



Australian
Human Rights
Commission

HG v

Commonwealth of

Australia (DIBP)

[2015] AusHRC 95

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**HG v Commonwealth of Australia
(Department of Immigration
and Border Protection)**

[2015] AusHRC 95

Report into arbitrary detention

Australian Human Rights Commission 2015



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Commission**

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**Australian
Human Rights
Commission**

June 2015

Senator the Hon. George Brandis QC
Attorney-General
Parliament House
Canberra ACT 2600

Dear Attorney,

I have completed my report pursuant to s 11(1)(f)(ii) of the *Australian Human Rights Commission Act 1986* (Cth) into the complaint made by Mr HG against the Commonwealth of Australia – Department of Immigration and Border Protection.

I have found that Mr HG's detention at North West Point Immigration Detention Centre, Perth Immigration Detention Centre and Maribyrnong Immigration Detention Centre from 26 June 2010 until 21 May 2012 was arbitrary within the meaning of article 9(1) of the *International Covenant on Civil and Political Rights* (ICCPR).

In light of my findings, I recommend that the Commonwealth pay compensation and apologise to Mr HG.

By letter dated 15 May 2015 the Department provided a response to my findings and recommendations. I have outlined the Department's response in part 7 of this report.

I enclose a copy of my report.

Yours sincerely,

A handwritten signature in black ink, reading "Gillian Triggs".

Gillian Triggs
President
Australian Human Rights Commission

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1 Introduction

1. This is a report setting out the findings of the Australian Human Rights Commission (the Commission) and the reasons for those findings following an inquiry by the Commission into the complaint lodged by Mr HG.
2. Mr HG has asked that he not be referred to by name in this report. I consider that the preservation of the anonymity of Mr HG is necessary to protect his privacy. Accordingly, I have given a direction pursuant to s 14(2) of the *Australian Human Rights Commission Act 1986* (Cth) (AHRC Act) and have referred to him throughout as Mr HG.
3. Mr HG alleges that his treatment by the Commonwealth of Australia – Department of Immigration and Citizenship (subsequently redesignated as the Department of Immigration and Border Protection (the department)), involved an act or practice inconsistent with or contrary to his human rights under the *International Covenant on Civil and Political Rights* (ICCPR).

2 Summary of findings and recommendations

2.1 Relevant act under the AHRC Act

4. I have found that the Commonwealth's failure to detain Mr HG in the least restrictive manner possible during the 23 months that he was detained in closed detention facilities was an 'act' for the purposes of the AHRC Act. The Minister could have placed Mr HG in community detention or in a place other than an immigration detention centre during this time but did not do so.

2.2 Inconsistent with Article 9, ICCPR

5. I have found that Mr HG's detention for 23 months in immigration detention facilities was not necessary in the circumstances or proportionate to the Commonwealth's legitimate aim of managing its migration system.
6. For this reason, I have found that the failure to place Mr HG in community detention or some other less restrictive form of detention was inconsistent with the prohibition of arbitrary detention in Article 9 of the ICCPR.

2.3 Recommendations

7. I have recommended that the Commonwealth:
 - (a) pay Mr HG an appropriate sum of compensation; and
 - (b) issue an apology to Mr HG.

3 Background

8. Mr HG is a national of Iran who arrived on Christmas Island as an undocumented maritime arrival aboard suspected illegal entry vessel 'Horsely' on 26 June 2010. He was detained on Christmas Island at the North West Point Immigration Detention Centre (NWPIDC) for the first 14 months that he was in Australia. On 30 March 2011 he was assessed by the department as not being a refugee.
9. On 1 September 2011 Mr HG was transferred to Perth Immigration Detention Centre (PIDC). On 20 September 2011 an Independent Merits Review affirmed the decision that Mr HG was not a refugee. On 9 December 2011 he was transferred to Maribyrnong Immigration Detention Centre (MIDC).
10. On 8 May 2012 the Minister agreed to exercise his public interest powers under s 197AB of the *Migration Act 1958* (Cth) and made a residence determination for Mr HG to reside in community detention.
11. On 18 May 2012 the department finalised a post-protection review check which found that Mr HG's case for making a successful Protection Visa application was not enhanced by the information before the department.
12. On 21 May 2012, Mr HG was placed in community detention in Western Australia.
13. On 25 March 2013, Mr HG was granted a Temporary Humanitarian Stay visa and a Bridging visa E.
14. Mr HG claims that his detention during the period 26 June 2010 to 21 May 2012 by the Commonwealth was arbitrary within the meaning of article 9 of the ICCPR.

4 Legislative framework

4.1 Functions of the Commission

15. Section 11(1)(f) of the AHRC Act provides that the Commission has a function to inquire into any act or practice that may be inconsistent with or contrary to any human right.¹
16. Section 3(1) of the AHRC Act defines 'act' to include an act done by or on behalf of the Commonwealth. Section 3(3) provides that the reference to, or the doing of, an act includes the reference to the refusal or failure to do an act.
17. The functions of the Commission identified in section 11(1)(f) of the AHRC Act are only engaged where an act complained of is not one required by law to be taken.²

5 Assessment

5.1 Act or practice of the Commonwealth

18. I find that the Commonwealth's failure to detain Mr HG in the least restrictive manner possible during the 23 months that he was detained in closed detention facilities in NWPIDC, PIDC and MIDC constitutes an act under the AHRC Act.
19. Whilst on Christmas Island, Mr HG was detained under s 189(3) of the Migration Act. At the time Mr HG was detained, s 189(3) of the Migration Act stated that 'if an officer knows or reasonably suspects that a person in an excised offshore place is an unlawful non-citizen, the officer may detain the person'. There was no requirement for the Commonwealth to detain Mr HG while he was on Christmas Island.
20. When Mr HG was transferred from Christmas Island to the mainland he was detained under s 189(1) of the Migration Act. While s 189(1) of the Migration Act requires the detention of unlawful non-citizens, it does not require that unlawful non-citizens are detained in an immigration detention facility.
21. Section 197AB of the Migration Act states:

If the Minister thinks that it is in the public interest to do so, the Minister may make a determination (a residence determination) to the effect that one or more specified persons to whom this subdivision applies are to reside at a specified place, instead of being detained at a place covered by the definition of immigration detention in subsection 5(1).
22. Further, under s 5 of the Migration Act the definition of 'immigration detention' includes 'being held by, or on behalf of, an officer in another place approved by the Minister in writing'.
23. Accordingly, Mr HG could have been placed in community detention or the Minister could have approved a place in the community as a place of detention.

5.2 Inconsistent with or contrary to human rights

24. Mr HG was detained in immigration detention centres from 26 June 2010 until 21 May 2012 when he was placed in community detention.
25. Under international law, to avoid being arbitrary, detention must be necessary and proportionate to a legitimate aim of the Commonwealth.³

26. A draft General Comment published by the United Nations Human Rights Committee on 10 April 2014 in relation to article 9 makes the following comments about immigration detention based on previous decisions by the Committee:

Detention in the course of proceedings for the control of immigration is not *per se* arbitrary, but the detention must be justified as reasonable, necessary and proportionate in light of the circumstances, and reassessed as it extends in time. Asylum-seekers who unlawfully enter a State party's territory may be detained for a brief initial period in order to document their entry, record their claims, and determine their identity if it is in doubt. To detain them further while their claims are being resolved would be arbitrary absent particular reasons specific to the individual, such as an individualized likelihood of absconding, danger of crimes against others, or risk of acts against national security. The decision must consider relevant factors case-by-case, and not be based on a mandatory rule for a broad category; must take into account less invasive means of achieving the same ends, such as reporting obligations, sureties, or other conditions to prevent absconding; and must be subject to periodic re-evaluation and judicial review. Children may be deprived of liberty only as a measure of last resort and for the shortest appropriate period of time, taking into account their best interest as a primary consideration with regard to the duration and conditions of detention. Decisions of the detention of adult migrants must also take into account the effect of the detention on their mental health. The inability of a State party to carry out the expulsion of an individual does not justify indefinite detention.⁴

27. In Mr HG's case, it is necessary to consider whether his prolonged detention in closed detention facilities could be justified as reasonable, necessary and proportionate on the basis of particular reasons specific to him, and in light of the available alternatives to closed detention.
28. The information before me suggests that the department first considered placing Mr HG in a less restrictive form of detention when he was referred for consideration for a community detention placement on 12 September 2011, nearly 15 months after he was first detained.
29. Departmental records during this time indicate that Mr HG claims to have a history of torture and trauma, was involved in six incidents of actual and threatened self-harm, was transferred from Christmas Island to PIDC to obtain specialist medical treatment and was admitted as an in-patient at Graylands Psychiatric Hospital in Perth from 1 September 2011 to 7 September 2011.
30. On 8 December 2011, Mr HG's case manager noted that the International Health and Medical Services (IHMS) mental health team requested that Mr HG be removed from an immigration detention centre environment and placed in a community environment. The department's records also indicate that Mr HG made two further threats of self-harm and engaged in one act of self-harm on 2 February 2012.
31. Despite this history, it took the department a further six months after the initial community detention referral and 21 months after Mr HG was first detained, to refer his case to the Minister to consider a community detention placement on 23 March 2012. The department's submission to the Minister indicates the reason for the referral was on the basis of Mr HG's mental health and noted:

Clinical evidence suggests there has been deterioration in Mr HG's mental health since being in detention. It also supports the assumption that these symptoms will persist if his detention in a restrictive environment continues. The International Health and Medical Services recommend Mr HG be transferred from his current place of detention to a less restrictive environment with appropriate services as soon as possible.

32. The department's submission to the Minister in March 2012 also states that 'there is no information before the department that suggests this client would pose a threat to the Australian community if placed in community detention'.
33. On 8 May 2012 the Minister agreed to exercise his public interest powers under section 197AB and made a residence determination for Mr HG to reside in community detention and he was placed in community detention on 21 May 2012.
34. By 21 May 2012, Mr HG had spent 23 months in closed immigration detention during which time he exhibited negative mental health outcomes. The department has not sufficiently explained why it was necessary to detain Mr HG in closed immigration detention facilities during this time and its delay in considering less restrictive detention options for Mr HG.
35. In response to my preliminary view, the department advised that its community detention program was expanded in October 2010 for the purpose of prioritising the transfer of children into the community and that single adult men, such as Mr HG, were not eligible to be placed in the community unless they were assessed as particularly vulnerable.
36. This submission from the department does not address the reasons Mr HG was not assessed against the community detention guidelines until September 2011, some 15 months after he was first detained. Additionally, the submission does not address the reason it took the department a further 6 months after the initial community detention referral to refer Mr HG's case to the Minister in circumstances where there was clear evidence of Mr HG's vulnerabilities.
37. The department also stated in its response to my preliminary view that due to the number of referrals for community detention at this time, the time taken to finalise Mr HG's release into community detention was not unusual.
38. I do not consider that this submission justifies the ongoing and prolonged detention of Mr HG in circumstances where evidence of Mr HG's mental health vulnerabilities was before the department from at least September 2011.
39. It is my view that Mr HG's detention in closed immigration detention facilities has not been justified as either necessary in the circumstances or proportionate to the Commonwealth's legitimate aim of managing its migration system.
40. Based on the information before me, I find that the failure to place Mr HG in community detention or a less restrictive form of detention than in an immigration detention centre during the 23 months that he was detained was arbitrary and inconsistent with his right to liberty under article 9(1) of the ICCPR.

6 Recommendations

6.1 Power to make recommendations

41. Where, after conducting an inquiry, the Commission finds that an act or practice engaged in by a respondent is inconsistent with or contrary to any human right, the Commission is required to serve notice on the respondent setting out its findings and reasons for those findings.⁵ The Commission may include in the notice any recommendation for preventing a repetition of the act or a continuation of the practice.⁶
42. The Commission may also recommend:
- (a) the payment of compensation to, or in respect of, a person who has suffered loss or damage; and
 - (b) the taking of other action to remedy or reduce the loss or damage suffered by a person.⁷

6.2 Mr HG's submissions

43. Mr HG submitted that his time in immigration detention has had ongoing adverse impacts on his physical and mental health. He is currently in Yongah Hill Immigration Detention Centre having been re-detained in August 2013.
44. Mr HG has asked that the Commonwealth release him from closed detention and also compensate him for the pain and suffering of being detained in closed immigration detention. Mr HG did not specify the amount of financial compensation that he is seeking.

6.3 Consideration of compensation

45. There is no judicial guidance dealing with the assessment of recommendations for financial compensation for breaches of human rights under the AHRC Act.
46. However, in considering the assessment of a recommendation for compensation under section 35 of the AHRC Act (relating to discrimination matters under Part II, Division 4 of the AHRC Act), the Federal Court has indicated that tort principles for the assessment of damages should be applied.⁸
47. I am of the view that this is the appropriate approach to take to the present matter. For this reason, so far as is possible in the case of a recommendation for compensation, the object should be to place the injured party in the same position as if the wrong had not occurred.⁹
48. The tort of false imprisonment is a more limited action than an action for breach of article 9(1). This is because an action for false imprisonment cannot succeed where there is lawful justification for the detention, whereas a breach of article 9(1) will be made out where it can be established that the detention was arbitrary, irrespective of legality.

49. Notwithstanding this important distinction, the damages awarded in false imprisonment provide an appropriate guide for the award of compensation for a breach of article 9(1). This is because the damages that are available in false imprisonment matters provide an indication of how the courts have considered it appropriate to compensate for loss of liberty.
50. The principal heads of damage for a tort of this nature are injury to liberty (the loss of freedom considered primarily from a non-pecuniary standpoint) and injury to feelings (the indignity, mental suffering, disgrace and humiliation, with any attendant loss of social status).¹⁰
51. In the case of *Fernando v Commonwealth of Australia (No 5)*,¹¹ Siopis J considered the judicial guidance available on the quantum of damages for loss of liberty for a long period arising from wrongful imprisonment. Siopis J referred to the case of *Nye v State of New South Wales*:¹²
- ...the *Nye* case is useful in one respect, namely, that the court was required to consider the quantum of damages to be awarded to Mr Nye in respect of his loss of liberty for a period of some 16 months which he spent in Long Bay Gaol. In doing so, consistently with the approach recognized by Spigelman CJ in *Ruddock* (NSWCA), the Court did not assess damages by application of a daily rate, but awarded Mr Nye the sum of \$100,000 in general damages. It is also relevant to observe that in *Nye*, the court referred to the fact that for a period of time during his detention in Long Bay Gaol, Mr Nye feared for his life at the hands of other inmates of that gaol.¹³
52. Siopis J noted that further guidance on the quantum of damages for loss of liberty for a long period arising from wrongful imprisonment can be obtained from the case of *Ruddock* (NSWCA).¹⁴ In that case at first instance,¹⁵ the New South Wales District Court awarded the plaintiff, Mr Taylor, the sum of \$116,000 in damages in respect of wrongful imprisonment, consequent upon his detention following the cancellation of his permanent residency visa on character grounds.
53. Mr Taylor was detained for two separate periods. The first was for 161 days and the second was for 155 days. In that case, because Mr Taylor's convictions were in relation to sexual offences against children, Mr Taylor was detained in a state prison under a 'strict protection' regime and not in an immigration detention centre. The detention regime to which Mr Taylor was subjected was described as a 'particularly harsh one'.
54. The Court also took into account the fact that Mr Taylor had a long criminal record and that this was not his first experience of a loss of liberty. He was also considered to be a person of low repute who would not have felt the disgrace and humiliation experienced by a person of good character in similar circumstances.¹⁶
55. On appeal, in the New South Wales Court of Appeal, Spigelman CJ considered the adequacy of the damages awarded to Mr Taylor and observed that the quantum of damages was low, but not so low as to amount to appellable error.¹⁷ Spigelman CJ also observed that:
- Damages for false imprisonment cannot be computed on the basis that there is some kind of applicable daily rate. A substantial proportion of the ultimate award must be given for what has been described as "the initial shock of being arrested". (*Thompson; Hsu v Commissioner of Police of the Metropolis* [1998] QB 498 at 515.) As the term of imprisonment extends the effect upon the person falsely imprisoned does progressively diminish.¹⁸

56. Although in *Fernando v Commonwealth of Australia (No 5)*, Siopis J ultimately accepted the Commonwealth's argument that Mr Fernando was only entitled to nominal damages,¹⁹ his Honour considered the sum of general damages he would have awarded in respect of Mr Fernando's claim if his findings in respect of the Commonwealth's argument on nominal damages were wrong. Mr Fernando was wrongfully imprisoned for 1,203 days in an immigration detention centre. Siopis J accepted Mr Fernando's evidence that he suffered anxiety and stress during his detention and, also, that he was treated for depression during and after his detention and took these factors into account in assessing the quantum of damages. His Honour also noted that Mr Fernando's evidence did not suggest that in immigration detention he was subjected to the harsh 'strict protection' regime to which Mr Taylor was subjected in a state prison, nor that Mr Fernando feared for his life at the hands of inmates in the same way that Mr Nye did whilst he was detained at Long Bay Gaol. Taking all of these factors into account, Siopis J stated that he would have awarded Mr Fernando in respect of his 1,203 days in detention the sum of \$265,000.²⁰

6.4 Recommendation that compensation be paid

57. I have found that Mr HG's detention in immigration detention facilities for a period of 23 months was arbitrary for the purposes of article 9(1) of the ICCPR.
58. I consider that the Commonwealth should pay to Mr HG an appropriate amount of compensation to reflect the loss of liberty caused by his detention in line with the principles set out above.
59. The information before me indicates that immigration detention had an adverse impact on the mental health of Mr HG. This factor should be taken into account in the quantum of compensation.

6.5 Apology

60. In addition to compensation, I consider that it is appropriate that the Commonwealth provide a formal written apology to Mr HG for the breaches of his human rights. Apologies are important remedies for breaches of human rights. They, at least to some extent, alleviate the suffering of those who have been wronged.²¹

6.6 Other considerations

61. Mr HG has another complaint before the Commission in relation to his detention in an immigration detention centre from August 2013 to date. I consider that it is more appropriate for me to consider his request regarding release from immigration detention as part of any findings and recommendations that I may make in relation to that complaint.

7 Department's response

62. By letter dated 15 May 2015, the Department provided a response to my findings and recommendations. In relation to my first recommendation, the Department disagreed that compensation should be paid to Mr HG. The Department stated:

Any monetary claim for compensation against the Commonwealth can only be considered where it is consistent with the *Legal Services Directions 2005*. The *Legal Services Directions 2005* provide that a matter may only be settled where there is at least a meaningful prospect of liability being established against the Commonwealth. Furthermore, the amount of compensation that is offered must be in accordance with legal principle and practice.

The Department considers that Mr HG's detention in closed immigration detention facilities for 23 months was lawful and that the decisions and processes were appropriate having regard to the circumstances of his case. The Department therefore considers that there is no meaningful prospect of liability being established against the Commonwealth under Australian domestic law and as such no proper legal basis to consider a payment of compensation to Mr HG. The Department is therefore unable to pay compensation to Mr HG.

Although there are limited circumstances in which the Commonwealth may pay compensation on a discretionary basis, *Resource Management No. 409* and *No. 401* generally limit such payments to situations where a person has suffered some form of financial detriment or injury arising out of a defective administration on the part of the Commonwealth, or otherwise experienced an anomalous, inequitable or unintended outcome as a result of the application of Commonwealth legislation or policy. On the basis of the current information the Department is not satisfied that there is a proper basis for payment of discretionary compensation at this time.

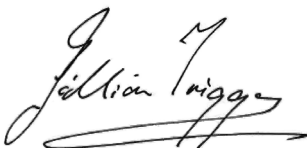
The Department therefore holds the view that there is no basis for payment of compensation to Mr HG and advises that it will not be taking any further action in relation to this recommendation.

63. In relation to my second recommendation that the Department issue Mr HG with an apology, the Department disagreed, submitting:

With respect to the view that the Commonwealth acted inconsistently with the prohibition of arbitrary detention in Article 9 of the ICCPR, the Department continues to rely on its previous submissions that Mr HG's immigration detention was lawful and not arbitrary, that it was in accordance with the relevant provisions of the Act, to the legitimate goal of mitigating risk to the Australian community and maintaining the integrity of Australia's immigration framework.

Therefore, the Department holds the view that there is no basis for a formal apology and advises that it will not be taking any further action in relation to this recommendation.

64. I report accordingly to the Attorney-General.



Gillian Triggs
President
Australian Human Rights Commission

June 2015

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- 1 Section 3(1) of the AHRC Act defines human rights to include the rights recognised by the ICCPR.
 - 2 See *Secretary, Department of Defence v HREOC, Burgess & Ors* ('Burgess') (1997) 78 FCR 208.
 - 3 *Van Alphen v Netherlands* Communication No. 305/1988 UN Doc CCPR/C/39/D/305/1988, *A v Australia* Communication No. 560/1993 UN Doc CCPR/C/59/D/560/1993, *C v Australia* Communication No. 900/1999 UN Doc CCPR/C/76/D/900/1999.
 - 4 United Nations Human Rights Committee, Draft General Comment 35 (2014) *Article 9: Liberty and security of person*, UN Doc CCPR/C/GC/R.35/Rev.3, [18].
 - 5 AHRC Act s 29(2)(a).
 - 6 AHRC Act s 29(2)(b).
 - 7 AHRC Act s 29(2)(c).
 - 8 *Peacock v The Commonwealth* (2000) 104 FCR 464, 483 (Wilcox J).
 - 9 See *Hall v A & A Sheiban Pty Limited* (1989) 20 FCR 217, 239 (Lockhart J).
 - 10 *Cassell & Co Ltd v Broome* (1972) AC 1027, 1124; *Spautz v Butterworth & Anor* (1996) 41 NSWLR 1 (Clarke JA); *Vignoll v Sydney Harbour Casino* [1999] NSWSC 1113 (22 November 1999), [87].
 - 11 [2013] FCA 901.
 - 12 [2003] NSWSC 1212.
 - 13 [2013] FCA 901, [121].
 - 14 *Ruddock v Taylor* (2003) 58 NSWLR 269.
 - 15 *Taylor v Ruddock* (unreported, 18 December 2002, NSW District Court (Murrell DCJ)).
 - 16 *Taylor v Ruddock* (unreported, 18 December 2002, NSW District Court (Murrell DCJ)), [140].
 - 17 *Ruddock v Taylor* [2003] 58 NSWLR 269, 279.
 - 18 *Ruddock v Taylor* [2003] 58 NSWLR 269, 279.
 - 19 The court awarded nominal damages of one dollar for the unlawful detention of Mr Fernando because as a non-citizen, once he committed a serious crime, he was always liable to have his visa cancelled: *Fernando v Commonwealth of Australia (No 5)* [2013] FCA 901, [98]-[99].
 - 20 *Fernando v Commonwealth of Australia (No 5)* [2013] FCA 901, [139].
 - 21 D Shelton, *Remedies in International Human Rights Law* (2000), 151.

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