

23 January 2020

Royal Australian College of General Practitioners
100 Wellington Parade
EAST MELBOURNE VIC 3002

By email to: standards@racgp.org.au

Dear Royal Australian College of General Practitioners

Re: Standards for health services in Australian immigration detention centres (2nd edition)

Thank you for inviting the Royal Australian and New Zealand College of Psychiatrists (RANZCP) with the opportunity to contribute to the consultation in relation to the draft *Standards for health services in Australian immigration detention centres* (2nd edition) (the Draft Standards).

The RANZCP commends the work that the Royal Australian College of General Practitioners (RACGP) has undertaken in preparing these Draft Standards. The RANZCP recognises the complexity of providing health care to individuals in immigration detention, and has published both a [professional practice guideline](#) and [position statement](#) in relation to providing mental health services for asylum seekers and refugees to assist psychiatrists in navigating this complexity.

The RANZCP emphasises the importance of ensuring that all health care, including mental health care, is provided in a culturally safe and trauma-informed way, and commends the weight that the RACGP has given these issues has been given in the Draft Standards. The RANZCP also notes that the Draft Standards address patient experience issues, such as continuity of care and the patient-practitioner relationship, which is positive especially in the immigration detention context where patients are particularly vulnerable. We also commend the inclusion of training and workplace health and safety for health professionals. The RANZCP considers that this training should include training in relation to de-escalation of mental health crises and the management of self-harm behaviours to prevent suicide and other self-harm behaviours.

The RANZCP notes that the Draft Standards address the use of seclusion and restraint of patients and would emphasise the importance of medical professionals moving towards eliminating restrictive practices. This is a particularly challenging issue in the context of acute mental health care, which individuals in immigration detention may require, given the high incidence of mental illness in immigration detention. The RANZCP would be willing to offer further support or information to the RACGP in relation to this issue.

The RANZCP also notes that individuals in immigration detention face substantial mental health challenges. Robust referral pathways should be established to allow individuals to access mental health care and, specifically psychiatrists, where appropriate. We wish to emphasise that the immigration detention environment is not an appropriate environment in which to provide mental health care and therefore these pathways should provide for transfers to acute psychiatric treatment facilities. Medical professionals, including general practitioners, should be aware of these pathways and of mental health professionals who specialise in mental health care for asylum seekers. Such professional networks and referrals are, in the RANZCP's view, crucial to ensuring that individuals in immigration detention have access to both physical and mental health care.

The RANZCP looks forward to seeing the progress of the Draft Standards and working with the RACGP where appropriate to ensure that individuals in immigration detention can access quality health care.

Should you wish to discuss further, please contact Ms Rosie Forster, Executive Manager of Practice, Policy and Partnerships, on (03) 9601 4942 or at rosie.forster@ranzcp.org.

Yours sincerely



Associate Professor John Allan
President

Ref: 1662