

## General Comments on Article 4 of OPCAT

Dear Subcommittee of the Prevention of Torture,

In response to your request, we accept the universally adopted places of detention under article 4 of OPCAT. However, we make the observation that two places of detention have not been included; aged care and disability group homes.

We feel these are significant 'primary' places of detention. These are people who are particularly vulnerable and can often not speak for themselves. It is necessary to use the protection of OPCAT to maintain standards in these places of detention. Please include us in any further discussions regarding article 4 and OPCAT.

Kind Regards,

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