

NOTICE OF FILING

Details of Filing

Document Lodged:	Particulars (including Further and Better Particulars)
Court of Filing	FEDERAL COURT OF AUSTRALIA (FCA)
Date of Lodgment:	21/11/2025 4:05:11 PM AWST
Date Accepted for Filing:	21/11/2025 4:05:16 PM AWST
File Number:	WAD251/2022
File Title:	ALEXANDRA WALTERS & ANOR v STATE OF WESTERN AUSTRALIA
Registry:	WESTERN AUSTRALIA REGISTRY - FEDERAL COURT OF AUSTRALIA



Sia Lagos

Registrar

Important Information

This Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

The date of the filing of the document is determined pursuant to the Court's Rules.



No. WAD251 of 2022

Federal Court of Australia

District Registry: Western Australia

Division: General

ALEXANDRA WALTERS

First Applicant

JOEL VIDA

Second Applicant

STATE OF WESTERN AUSTRALIA

Respondent

The Respondent's Schedule of Particulars for Ms Walters

PART 1

1. In relation to 23 and 24 May 2018:

- (1) Ms Walters was placed in a holding cell in reception from approximately 3.47am to 4.44am on 23 May 2018;
- (2) Ms Walters was allocated a cell in Cue (a unit located within the Yeeda Unit) from approximately 4.44am on 23 May 2018 to 6.41pm on 24 May 2018, when she was allocated a cell in the Yeeda Unit;
- (3) Ms Walters was out of her cell in Cue from 7.30am to 3.30pm to attend Court and 5pm to 5.30pm for meals on 23 May 2018;
- (4) Ms Walters was out of her cell at least during the following periods on 24 May 2018:
 - (a) for at least one hour in the afternoon to attend school;

- (b) in the afternoon at approximately 3.00pm and 5.00pm for at least a total of one hour spending recreational time with other young persons;
 - (c) for a social visit by her family from approximately 3.45pm to 4.45pm;
 - (d) to eat dinner and participate in evening tasks with other young persons from approximately 5.30pm to 6.45pm;
- (5) detainees in the Yeeda Unit were subject to a lockdown to their respective cells during the following periods of time on 24 May 2018:
- (a) at approximately 12.00pm to 1.00pm due to staff breaks; and
 - (b) at approximately 3.55pm to 5.00pm following an incident in the Unit concerning missing scissors, however, Ms Walters was at her social visit during this time.

2. In relation to 25 and 26 May 2018:

- (1) Ms Walters was out of her cell at least during the following periods on 25 May 2018:
- (a) when she participated in education and recreation for approximately 5 hours;
 - (b) for a social visit by her family from approximately 3.45pm to 4.45pm;
 - (c) to make a phone call to her mother at 6.11pm which lasted for 577 seconds;
 - (d) to eat dinner and participate in evening tasks with other young persons from approximately 4.55pm to 6.35pm;
- (2) detainees in the Yeeda Unit were subject to a lockdown to their respective cells during the following periods of time on 25 May 2018:
- (a) at approximately 12.15pm to 1.00pm due to staff breaks; and
 - (b) at approximately 4.10pm to 4.55pm due to staff breaks, however, Ms Walters was at her social visit;
- (3) Youth Justice Officers attended the Yeeda Unit to visit Ms Walters at approximately 10.55am on 26 May 2018;

- (4) Ms Walters was out of her cell at least during the following periods on 26 May 2018:
 - (a) at approximately 12.55pm, in C wing where Ms Walters was allocated a cell, she was let out of her cell for a cooking activity;
 - (b) for a social visit from her family from approximately 3.45pm to 4.45pm;
 - (c) to make a phone call to her father at 5.33pm which lasted for 531 seconds;
 - (5) detainees in the C wing of the Yeeda Unit were subject to the following on 26 May 2018:
 - (a) a rolling lockdown in their respective cells from approximately 12.10pm to 12.55pm due to staff shortages; and
 - (b) a lockdown in their respective cells following their evening meal at approximately 5.50pm due to staff shortages.
3. In relation to 31 May and 1 June 2018:
- (1) On 31 May 2018:
 - (a) at approximately 6.00pm, all detainees were secured in the Yeeda Unit and Ms Walters requested to be locked down;
 - (b) at approximately 6.15pm, the C wing of the Yeeda Unit was locked down due to threats being made by Ms Walters;
 - (c) at approximately 6.50pm, Ms Walters was moved from her cell in the Yeeda Unit and placed in an observation cell in Cue following an incident that occurred at approximately 6.00pm;
 - (2) the incident (incident ID I48559629) included the following events:
 - (a) another young person was playing with the light switch of Ms Walters' cell while Ms Walters showered in her cell in the Yeeda Unit;
 - (b) Ms Walters was then let out of her cell and shortly afterward walked to the laundry area asking another young person who was turning off her light;

- (c) Ms Walters stated that she would "choke and stab whoever did it, what they were doing wasn't very nice";
 - (d) following Ms Walters' threat, all young persons were placed in their cells;
 - (e) the other young person made oral threats to Ms Walters;
 - (f) Ms Walters was allocated a cell in Cue for her safety and the safety of other detainees;
 - (g) Ms Walters' cell in the Yeeda Unit was unlocked and she was escorted to Cue and placed in an observation cell and assisted with making her bed;
 - (h) Ms Walters told the officer that she had scratched her legs and that the louder the yelling got the more she scratched, with the scratches being visible on Ms Walters' upper and lower legs;
 - (i) the officer informed the unit manager about Ms Walters' self-harm;
 - (j) Ms Walters was secured in a cell in Cue overnight during from approximately 7.15pm to 7.45am (**Overnight Lockdown**);
- (3) on 1 June 2018 at approximately 8.50am, Ms Walters was returned to the Yeeda Unit from Cue to shower and participate in the daily program; and
- (4) Ms Walters was in Cue from approximately 6.50pm on 31 May 2018 until approximately 8.50am on 1 June 2018 (being, approximately 14 hours overnight and about 1 hour in excess of the Overnight Lockdown).
4. On 8 June 2018, there was an incident (incident ID I48857335) which included the following events:
- (1) at approximately 7.45am, an officer observed that Ms Walters had fresh scratches on her ankles when that officer was undertaking a welfare check;
 - (2) the officer immediately reported this to the unit manager who then entered Ms Walters' cell and asked her to show her ankles;

- (3) Ms Walters was initially reluctant but pulled down her socks to show the unit manager approximately 20 scratches to the lower parts of her leg, above her ankles;
 - (4) the unit manager reported that the scratches looked to be superficial with a couple of the scratches looking as if they may have drawn a small amount of blood, and she asked Ms Walters what she had scratched herself with;
 - (5) Ms Walters stated she scratched herself with different things in her cell;
 - (6) the unit manager saw that there was a takeout container with a plastic knife enclosed in it and a broken pen in the bin in Ms Walters' cell, and asked Ms Walters if it was the pen, which she indicated yes by nodding her head;
 - (7) Ms Walters with her 1:1 officer's assistance cleaned out her cell and threw the broken pen out as instructed;
 - (8) at approximately 1.30pm, Ms Walters was examined by a clinical nurse who assessed that hospital was not required;
 - (9) Ms Walters was also visited by a psychologist at approximately 10.05am where she described her self-harm behaviour as a maladaptive coping strategy in response to various personal stressors such as difficulties tolerating feelings of shame when being reprimanded in front of peers or when she perceives she made a mistake;
 - (10) Ms Walters further identified peer difficulties/bullying as another trigger for risk-to-self behaviour in custody; and
 - (11) between approximately 4.15pm and 4.57pm, a meeting was conducted between Ms Walters' family and staff at Banksia Hill in relation to her wellbeing and an ARMS Detainee Risk Assessment Group (**ARAG**) Meeting was also convened in relation to her wellbeing.
5. On 16 June 2018, there was an incident (incident ID I49198535) which included the following events:
- (1) an officer recorded that Ms Walters had been awake most of the night and she had been abusive because the officer did not let her have the television on all night;

- (2) the officer suspected that Ms Walters' cell contained notes with threats towards him;
 - (3) at approximately 7.30am, the unit manager along with another officer conducted a search of Ms Walters' cell (along with two officers in attendance and supervising Ms Walters);
 - (4) during the search, multiple pages of drawings and notes were located depicting, among other things, acts of self-harm, harm to others, suicide ideation, as well as insults, threats and other derogatory comments to specific, named staff;
 - (5) the roaming recovery team then attended Ms Walters' cell and took photographs of the drawings before removing the drawings from Ms Walters' cell.
6. On 19 June 2018, there was an incident (incident ID I49339590) which included the following events:
- (1) at approximately 3.30pm, an officer was supervising young persons, including Ms Walters on the oval during recreation time;
 - (2) Ms Walters made the following statements during a conversation with the officer: "I wish I was as tough as the other girls in here, I am weak miss", "I just look weak", and "I really just want to assault one of the officers";
 - (3) Ms Walters continually picked up large branches off the ground making statements about stabbing people;
 - (4) the officer counselled Ms Walters in relation to her comments and actions and informed the unit manager; and
 - (5) Ms Walters was cautioned and counselled.
7. In relation to 20 and 21 June 2018:
- (1) there was an incident (incident ID I49384591) on 20 June 2018 which included the following events:
 - (a) at approximately 5.30pm, the unit manager was alerted by gatehouse officers that the mother of another young person had called Banksia Hill to advise that

her daughter was being bullied by Ms Walters and that Ms Walters was trying to obtain items to self-harm with;

- (b) the unit manager listened to the recorded telephone call between this young person and her mother (which took place at approximately 5.16pm) during which the young person told her mother that:
 - (i) Ms Walters was trying to convince her to sneak a knife into her cell so she could cut herself;
 - (ii) Ms Walters was getting angry at the young person because she wouldn't obtain the knife;
 - (iii) Ms Walters scared the young person; and
 - (iv) other young persons told her to give Ms Walters scissors;
- (c) after listening to the recording, the unit manager attempted to counsel Ms Walters and Ms Walters asked "who snitched on her";
- (d) the unit manager convened a meeting of all young persons detained in Cue and counselled and cautioned them about obtaining items on behalf of another young person to self-harm and the seriousness of it;
- (e) Cue was locked down so that an investigation could commence and incident reports prepared by officers;
- (f) an officer brought it to the unit manager's attention that earlier in the day, he had stopped scissors being passed by another detainee to Ms Walters during class;
- (g) Ms Walters was monitored by officers in the Yeeda Unit until she was moved to Cue;
- (h) at approximately 6.35pm, officers handcuffed Ms Walters and escorted her to Cue where the handcuffs were removed at approximately 6.39pm;

- (i) this use of handcuffs incident was authorised by a senior officer, psychology was notified and Ms Walters' parents were informed;
 - (j) Ms Walters was then strip searched and allocated a cell in Cue at approximately 7.00pm;
 - (k) no use of force was required as Ms Walters was compliant during the escort from the Yeeda Unit to Cue;
- (2) Ms Walters:
- (a) was in her cell in the Cue Unit from 7.00pm on 20 June 2018 including for the Overnight Lockdown;
 - (b) woke at 8.15am on 21 June 2018 and was given breakfast at 8.45am;
 - (c) refused a shower;
 - (d) at 9.35am, was let out of her cell to meet with the psychologist in the yard until 10.00am;
 - (e) was then returned to her cell with some books to read and was given lunch at 12.00pm;
 - (f) at 1.15pm, was returned to the Yeeda Unit with all other Cue detainees for recreational programs and education;
 - (g) participated in some drumming but then opted to stay in a wing of the Yeeda Unit during afternoon recreation time; and
 - (h) was allocated a cell in the Yeeda Unit at approximately 4.09pm on 21 June 2018.

8. In relation to 22 to 25 June 2018:

- (1) there was an incident (incident ID I49473400) on 22 June 2018 which included the following events:
 - (a) at approximately 6.45pm, an officer observed Ms Walters scratching the top of her legs in her cell in the Yeeda Unit;
 - (b) two officers entered Ms Walters' cell to speak with her, at which time Ms Walters initially denied self-harming but revealed multiple superficial cuts on her thighs to the officers;
 - (c) the officers located a staple on the floor which Ms Walters admitted using to cut her legs;
 - (d) the officers immediately informed the unit manager that Ms Walters had self-harmed;
 - (e) the unit manager attended Ms Walters' cell to speak with her;
 - (f) Ms Walters was visibly upset and angry at the mistreatment of the bird that was given to the C wing in the Yeeda Unit for detainees to look after and said to the unit manager:
 - (i) "its just the bird all the other girls have taken over";
 - (ii) "I'm the one that's meant to be looking after the bird, all day they have been grabbing at it and being mean, it's just a poor little bird. I hate when people are cruel to animals it's not right"; and
 - (iii) "all of them girls have taken over and even given it an aboriginal name, Muhammed Ali – I had named him Clause";
 - (g) Ms Walters was informed that due to concerns for her welfare, she would be relocated to Cue for the duration of the night;
 - (h) the unit manager told Ms Walters to just relax in her cell in the Yeeda Unit;

- (i) at approximately 6.55pm, two recovery officers attended Ms Walters' cell in the Yeeda Unit to escort her to Cue;
 - (j) one of the recovery officers handcuffed Ms Walters;
 - (k) this use of handcuffs incident was authorised by a senior officer, the nurse was notified, and Ms Walters' father was informed;
 - (l) when Ms Walters arrived in Cue, she was pat searched by an officer and the handcuffs were then removed by one of the recovery officers; and
 - (m) Ms Walters was medically assessed by a clinical nurse in her cell in Cue at approximately 7.55pm who observed self-harm scratches on Ms Walters' thighs and determined that no ongoing treatment was required.
- (2) Ms Walters was in her cell in Cue from 7.01pm on 22 June 2018 overnight, including during the Overnight Lockdown;
- (3) on 23 June 2018:
- (a) Ms Walters had a shower at approximately 10.05am;
 - (b) Ms Walters then cleaned her cell in Cue and the corridor before re-entering her cell at approximately 10.30am to watch TV;
 - (c) Ms Walters ate her lunch in her cell at approximately 11.30am;
 - (d) Ms Walters was out of her cell at approximately 12.00pm but did not want to participate in any activities or make any phone calls, saying that "people are dumb and a waste of time";
 - (e) Ms Walters went to visit the bird in the Yeeda Unit and sat outside;
 - (f) Ms Walters returned to her cell in Cue at approximately 1.00pm with chalk and paper and then fell asleep;
 - (g) Ms Walters was given cake by other young persons in the Yeeda Unit at approximately 3.20pm;

- (h) Ms Walters came out of her cell at approximately 5.00pm and went to the Yeeda Unit for dinner;
 - (i) Ms Walters appeared calm and happy to go back to Cue when requested to do so;
 - (j) Ms Walters was given some of her canteen in a cup to take back to Cue;
 - (k) Ms Walters was settled watching TV in her cell at approximately 6.00pm (being about an hour before the commencement of the Overnight Lockdown);
- (4) on 24 June 2018:
- (a) Ms Walters had breakfast and showered before spending time with the bird in the courtyard at approximately 9.30am;
 - (b) at approximately 10.15am, Ms Walters opted to go back into her cell in Cue;
 - (c) at approximately 11.40am, Ms Walters sat in the sun outside Cue with a senior officer;
 - (d) at approximately 12.10pm, Ms Walters went back into her cell with a cup of Coca-Cola;
 - (e) at approximately 1.10pm, Ms Walters went to the yard in the Yeeda Unit and interacted with other young persons and officers and walked around;
 - (f) at approximately 2.30pm, Ms Walters went back to her cell in Cue;
 - (g) Ms Walters was visited by her father and two sisters at approximately 3.45pm to 4.45pm;
 - (h) at approximately 5.30pm, Ms Walters ate a meal, watched TV in her cell in Cue;

- (5) on 25 June 2018:
 - (a) Ms Walters was visited by a case manager in Cue;
 - (b) Ms Walters was visited by her mother and stepfather from approximately 12.45pm to 1.45pm;
 - (c) a video conference was conducted between Ms Walters, her mother and stepfather and a staff member at Banksia Hill from approximately 3.00pm to 4.00pm; and
 - (d) Ms Walters was allocated a cell in the Yeeda Unit at approximately 5.31pm.
9. On 26 June 2018, there was an incident (incident ID I49644979) which included the following events:
 - (1) at approximately 6.00pm, an Officer observed that Ms Walters and another young person were conversing secretly;
 - (2) that young person informed the Officer that Ms Walters had been given a sharp piece of glass/Perspex by another young person to stab an Officer with;
 - (3) the Officer informed the unit manager and the roaming recovery team were called to conduct a search of Ms Walters' cell;
 - (4) all young persons were secured in their cells and Ms Walters was seated in the C wing lounge of the Yeeda Unit so that the search could be conducted;
 - (5) at approximately 6.15pm, a search of Ms Walters' cell was conducted by two officers who found a piece of plastic (approximately 8cm long and 2cm wide) which was concealed in the right-hand window frame (where the window slides up and down);
 - (6) the piece of plastic was handed to the unit manager by the officers;
 - (7) while the search was being conducted, Ms Walters informed the officer supervising her in the C wing lounge that:
 - (a) "but then my plan would not work out. It can't cut well but it is only good for stabbing";

- (b) "I just want to get [Officer X], I only hate him"; and
 - (c) it was hidden in a good spot and that the officers would never find it;
- (8) Ms Walters was cautioned and counselled by the unit manager about having sharp items in her cell, and she stated that she wanted to stab an officer and stated several times that the relevant officer is a "snitch";
- (9) the unit manager told Ms Walters that staff threats are not tolerated and that the officer was just doing their job to look after her as we have a duty of care to keep her safe;
- (10) once the search was complete, Ms Walters was secured back in her cell; and
- (11) it was recommended that the relevant officer be transferred to another unit due to Ms Walters' intent to cause injury to them.
10. On 27 June 2018:
- (1) there was an incident (incident ID I49650472) which included the following events:
 - (a) shortly after approximately 6.00am, Ms Walters was observed by an officer using a piece of Perspex to cut her legs and subsequently her wrists in her cell in the Yeeda Unit;
 - (b) Ms Walters was counselled by an officer through her cell grill;
 - (c) Ms Walters told officers through her cell grill several times that she wanted to stab an officer due to a cell search that they conducted the previous day removing posters from the walls of her cell wall and plastic being confiscated;
 - (d) a cell extraction team of six officers was assembled, briefed and placed on standby along with a nurse;
 - (e) at approximately 7.50am, Ms Walters requested toast but the request was refused given the threat to staff if they were to enter her cell;
 - (f) at approximately 8.05am, Ms Walters was observed by an officer pulling apart her radio and causing damage to her cell;

- (g) the power to Ms Walters' cell was isolated and turned off;
- (h) officers continued to counsel Ms Walters through the cell grill;
- (i) Ms Walters was observed by an officer tying both power cords from her radio and her television together with an antenna to fashion a noose which she attempted to secure to a light fitting several times before she was successful in doing so;
- (j) at approximately 8.44am, Ms Walters handed over to officers the piece of Perspex and demanded toast in exchange;
- (k) the officers denied the request for toast;
- (l) Ms Walters returned to her bed and refused to communicate with the officers counselling her;
- (m) Ms Walters then moved behind the privacy screen of her cell continuing to refuse to communicate with officers other than by grunting;
- (n) Ms Walters returned to her bed and covered herself with the doona continuing to refuse to communicate with officers;
- (o) at approximately 9.44am, Ms Walters was warned by an officer that if she did not remove the doona and start talking using her words, officers would enter her cell;
- (p) at approximately 9.47am, approval was obtained from the assistant superintendent for the cell extraction team to enter Ms Walters' cell as the risk of self-harm was high;
- (q) at approximately 9.50am, a use of force warning was given by the team leader to Ms Walters with time provided for Ms Walters to comply, which she did not;
- (r) shortly thereafter, the cell extraction team entered Ms Walters' cell:
 - (i) after entry, Ms Walters was seated on her bed;

- (ii) two officers then secured her upper body, whilst another two officers secured her left and right leg, respectively;
 - (iii) under instruction from the team leader, Ms Walters was carefully manoeuvred so that she was placed face down on her mattress;
 - (iv) an officer took over restraint from another whilst one applied handcuffs and performed a pat search of Ms Walters;
 - (v) Ms Walters was assisted to her feet and moved out of the cell;
- (s) as Ms Walters was moved out of C wing in the Yeeda Unit she said, "this is like the coolest thing that has ever happened to me" whilst smiling;
- (t) Ms Walters was escorted to Cue by two officers, followed by the other officers present during the incident;
- (u) Ms Walters was placed in a cell in Cue and a secondary pat search was performed before the handcuffs were removed;
- (v) all male officers were then replaced by female officers whilst a strip search was undertaken to ensure that Ms Walters did not have any items on her person that could pose a threat to her safety;
- (w) this use of force and strip search incident was reported to a senior officer and the assisting superintendent, the nurse was notified, psychology was notified and Ms Walters' mother was informed;
- (x) at approximately 9.55am, Ms Walters was medically assessed by a clinical nurse; the nurse observed that Ms Walters had fresh scratches on her legs below the knee, including cuts that read "DIE"; Ms Walters was not aggressive and was compliant. Ms Walters did mention to the nurse that "it was cool" what happened; the nurse noted that superficial self-harm was observed and Ms Walters was moving freely;
- (2) from approximately 10.00am, detainees remained in their cells for at least approximately 2 hours and 45 minutes for incident management purposes; there was

a centre wide lockdown due to staff shortages and which prevented detainees from being unlocked from their cells and accessing psychology services;

- (3) at approximately 10.30am, two officers conducted a search of Ms Walters' cell in the Yeeda Unit and found the following items: 1x broken TV, 1x broken radio, noose made from 2x TV power cords, 1 TV aerial and wires, 2x threatening hate letters towards officers, and multiple sharp plastic objects;
 - (4) at approximately 10.53am, case planning spoke with Ms Walters' father about Ms Walters' self-harm;
 - (5) at approximately 10.35am, photographs of Ms Walters' self-harm were taken;
 - (6) at approximately 1.00pm, Ms Walters was observed lying down looking out the window of her cell;
 - (7) at approximately 5.00pm, Ms Walters was given dinner;
 - (8) at approximately 6.36pm, Ms Walters was offered a phone call by the unit manager and senior officer but she declined; and
 - (9) Ms Walters remained in her cell including for the Overnight Lockdown.
11. On 1 July 2018, there was an incident (incident ID I49832257) which included the following events:
- (1) at approximately 11.20am, an officer observed Ms Walters in C wing of the Yeeda Unit pick up a book that was situated on the bench called, "The knife that killed me", which had a drawing of a knife with blood on it;
 - (2) the book was immediately confiscated from Ms Walters by the officer and placed in the unit manager's office;
 - (3) Ms Walters was subject to a lockdown in her cell for staff breaks at approximately 11.55am;
 - (4) prior to this:
 - (a) Ms Walters was given breakfast at approximately 10.15am;

- (b) at approximately 11.00am, the unit manager attended Cue to let Ms Walters out of her cell to shower and clean out her cell;
 - (c) at approximately 11.15am, Ms Walters made statements to an officer indicating that she would do a code red and made a threat of violence (with reference to a pair of scissors) against a teacher;
- (5) following the incident, Ms Walters was let out of her cell at approximately 12.40pm to attend a visit with her mother and sister from approximately 12.45pm to 1.45pm;
 - (6) at approximately 2.30pm, Ms Walters was placed back in her cell in Cue after attempting to pick up sharp sticks notwithstanding being instructed by officers several times not to do so;
 - (7) at approximately 5.20pm, Ms Walters was let out of her cell in Cue and taken to C wing in the Yeeda Unit for dinner; and
 - (8) at approximately 5.55pm, Ms Walters was placed back in her cell for attempting to snap pencils in half that were in the Yeeda Unit and ignoring the officer's instructions not to do so.
12. On 9 July 2018, there was an incident (incident ID I50191883) which included the following events:
- (1) earlier in the day, Ms Walters was observed by an officer making multiple attempts to gather sharp objects, including staples and scissors, and Ms Walters also made continuous efforts to evade her 1:1 officer in doing so; as a consequence, the officer was concerned about the risk of Ms Walters self-harming;
 - (2) following dinner in the C wing of the Yeeda Unit, at approximately 6.05pm, an officer was assisting Ms Walters with her washing in the laundry and noticed some scratches and blood on her right arm;
 - (3) the officer asked Ms Walters to show her arm but Ms Walters initially hid her arm from the officer;
 - (4) after being counselled by the officer, Ms Walters showed her arm which had a few superficial cuts;

- (5) Ms Walters informed the officer that she had hidden a staple that she had obtained from a classroom in the Yeeda Unit a few days ago and, while initially, Ms Walters would not disclose where the staple was hidden, after further counselling from the officer, Ms Walters told the officer that it was in the laundry;
- (6) Ms Walters and the officer then spoke with the unit manager about the incident, at which time the unit manager explained to Ms Walters that she would need to go back to her cell in Cue for the nurse to look at her arm;
- (7) the unit manager and the officer continued to counsel Ms Walters (who was pacing and trying to get past the unit manager) to attend her cell in Cue;
- (8) Ms Walters did not move and kept asking why she had to go to Cue;
- (9) the unit manager called the roaming recovery team on a code green;
- (10) after 10 minutes of counselling from the unit manager and the officer, Ms Walters refused to walk to Cue and kept repeating that she refused to go to Cue;
- (11) roaming recovery attended and informed Ms Walters that they will have to escort her to Cue and began to guide her; Ms Walters was compliant and began to walk;
- (12) after a few steps, Ms Walters stopped walking and refused to move;
- (13) the roaming recovery team took hold Ms Walters' arms in an "escort hold" and began walking her to Cue;
- (14) Ms Walters was placed in her cell in Cue and a pat search was conducted by an officer;
- (15) this use of force incident was authorised by the superintendent, reported to the senior officer and shift manager and a nurse was notified and requested to attend Cue, Ms Walters was referred to psychology and her mother was informed;
- (16) at approximately 6.20pm, Ms Walters was medically assessed by a clinical nurse and appropriate medical treatment was provided;
- (17) the roaming recovery team took a photograph of Ms Walters' arm;

- (18) Ms Walters cell was then secured in her cell for the Overnight Lockdown;
 - (19) Ms Walters was given a pie to eat at 6.30pm;
 - (20) at approximately 7.30pm, Ms Walters requested that her TV be turned off and her blinds be drawn down; and
 - (21) Ms Walters fell asleep from approximately 7.45pm.
13. On 10 July 2018, there was an incident (incident ID I50237183) which included the following events:
- (1) at approximately 6.00pm, following dinner in C wing of the Yeeda Unit, Ms Walters kept going into the laundry and hiding around the corner near the broom cupboard;
 - (2) Ms Walters' 1:1 officer followed her and told her to stay within sight;
 - (3) Ms Walters was getting angry and asked her officer to stop following her and "stalking" her, and the officer told Ms Walters that she would give her more space if she stayed within sight to which Ms Walters said she did not want to;
 - (4) this conversation between Ms Walters and her officer occurred multiple times;
 - (5) her 1:1 officer called the unit manager and the recovery team who then attended C wing of the Yeeda Unit;
 - (6) the unit manager became concerned for Ms Walters' welfare when they attended the laundry area where they found Ms Walters hiding around the corner towards the cleaning cupboard;
 - (7) the unit manager counselled Ms Walters and told her that her conduct was unacceptable;
 - (8) Ms Walters refused to comply with the unit manager's direction to go to her cell in Cue which was delivered a number of times;
 - (9) the unit manager issued Ms Walters with a use of force warning informing her that if she did not follow instructions, she would be escorted to Cue;

- (10) Ms Walters exited C wing and then refused to walk any further and as a consequence, the recovery team used an “escort hold” to escort Ms Walters to her cell in Cue;
 - (11) during this time, Ms Walters began to resist and attempted to break free of the escort hold multiple times;
 - (12) once outside her cell in Cue, Ms Walters’ 1:1 officer conducted a pat search of Ms Walters and then secured her in her cell;
 - (13) this use of force incident was authorised by the assistant superintendent;
 - (14) at approximately 6.30pm, Ms Walters was medically assessed by a clinical nurse following the use of force earlier that evening, with no injuries identified (or claimed);
 - (15) Ms Walters fell asleep early and slept soundly from 12am onwards on 11 July 2018; and
 - (16) at approximately 9.00am on 11 June 2018, Ms Walters was out of cell to have a shower and attend a visit with the mental health nurse until approximately 11.15am.
14. On 11 July 2018, there was an incident (incident ID I50263516) which included the following events:
- (1) at approximately 10.30am, Ms Walters was directed by the unit manager to return to her cell in Cue following an incident involving another young person in the Yeeda Unit but she refused to comply with the direction despite numerous requests;
 - (2) Ms Walters immediately became argumentative stating that, “I don’t want to get locked down” and “I’m not going there”;
 - (3) the unit manager instructed the recovery team to assist with escorting Ms Walters to her cell in Cue if she did not comply with the direction to do so;
 - (4) Ms Walters’ 1:1 officer continued to counsel Ms Walters to voluntarily go back to her cell in Cue but Ms Walters would not comply;
 - (5) the recovery team also counselled Ms Walters to go back to her cell but she would not comply;

- (6) after approximately 10 minutes of counselling, Ms Walters continued to not comply with the direction;
- (7) a member of the recovery team gave Ms Walters a use of force warning and ensured that she understood;
- (8) Ms Walters remained non-compliant;
- (9) two members of the recovery team took hold of Ms Walters' arms in an "escort hold" and escorted her to her cell in Cue;
- (10) throughout the escort, Ms Walters continued to resist resulting in one of the recovery team members transitioning to a "wrist weave manoeuvre" to aid in the escort of Ms Walters;
- (11) Ms Walters was placed in her cell in Cue and removed her shoes and socks upon request;
- (12) Ms Walters' 1:1 officer conducted a pat search and the cell was secured;
- (13) at approximately 10.45am, Ms Walters was medically assessed by the clinical nurse where no injuries were claimed and no indication for treatment was noted;
- (14) Ms Walters was advised to seek further nurse review if concerns or issues arose;
- (15) from approximately 11.00am, Ms Walters was in her cell settled, watching TV or laying on her bed for the remainder of the day; she was also given her lunch and dinner in cell;
- (16) Ms Walters was given loss of programme placement and was settled in her cell in Cue watching TV for the remainder of the day;
- (17) this use of force incident was authorised by a senior officer, a nurse was notified and Ms Walters was cleared of all injury;
- (18) this was the third incident in three days where Ms Walters refused to comply with the direction to return to her cell; and

- (19) following the Overnight Lockdown, at approximately 9.30am on 12 July 2018, Ms Walters was out of her cell to attend to chores, shower, attend school, spend time on the oval, visit the psychologist and attend a visit with her family during the hours of 9.30am to 12.15pm, 1.30pm to 3.45pm and 5.45pm to 6.45pm.
15. On 12 July 2018, there was an incident (incident ID I50335063) which included the following events:
- (1) at approximately 6.10pm, an officer observed Ms Walters sitting with other young persons in C wing of the Yeeda Unit watching television and noticed her hand moving whilst she was covering her hand with her legs;
 - (2) the officer approached Ms Walters and asked her to hand over what she had in her hands;
 - (3) Ms Walters refused to comply with the direction and instead was scratching herself with what the officer discovered was a staple;
 - (4) due to the officer's concern for Ms Walters' welfare and her recent self-harm incidents, the officer obtained the staple from Ms Walters, notified the unit manager and counselled Ms Walters;
 - (5) Ms Walters was then observed with a second staple and superficial self-harm marks were visible on her right forearm;
 - (6) Ms Walters moved into the laundry area;
 - (7) due to her unsettled behaviour, it was decided that Ms Walters should be moved back to Cue to stop her from self-harming behind the dryer in the laundry;
 - (8) Ms Walters was instructed by officers to go to Cue.
 - (9) the unit manager gave Ms Walters a number of opportunities to voluntarily go to Cue but she continued to ignore directions;
 - (10) the unit manager gave Ms Walters a use of force warning and explained what was going to happen to her if she didn't voluntarily go to Cue, to which she responded "this is dumb";

- (11) at approximately 6.30pm, two recovery officers attempted to escort Ms Walters using an “escort hold” but during the escort, Ms Walters became resistant and attempted to break free and an officer called a Code Amber;
- (12) the two recovery officers placed Ms Walters in a “wrist weave” but Ms Walters continued to resist;
- (13) the unit manager placed their hand on Ms Walters’ back ushering her out as they became concerned that she might hurt herself in actively resisting the escort;
- (14) Ms Walters was placed in her cell in Cue, asked to take off her shoes (which she did), a pat search was conducted by an officer and the cell was secured;
- (15) the unit manager sought approval from the senior officer for force to be used on Ms Walters during this incident;
- (16) medical staff were notified and Ms Walters’ mother was informed of the incident;
- (17) photographs were not taken following the incident as Ms Walters appeared distressed;
- (18) prior to the incident:
 - (a) from approximately 9.30am to 12.15pm, Ms Walters was out of her cell and either in the Yeeda Unit or at education;
 - (b) from approximately 1.30pm to 3.45pm, Ms Walters was out of her cell and either in the Yeeda Unit or at education;
 - (c) between approximately 3.45pm and 4.45pm, Ms Walters was visited by her family and a doctor;
 - (d) from approximately 5.45pm to 6.30pm, Ms Walters attended the Yeeda Unit for dinner when the incident occurred;
- (19) once Ms Walters was placed in her cell in Cue, she remained there overnight during Overnight Lockdown;
- (20) the next morning on 13 July 2018, Ms Walters attended education and attended a meeting with her mother and case planning; and

- (21) this was the fourth incident in four days where Ms Walters refused to comply with the direction to return to her cell.
16. On 13 July 2018, there was an incident (incident ID I50376090) which included the following events:
- (1) after dinner, Ms Walters was standing outside her cell window near the laundry area in the Yeeda Unit and an officer asked Ms Walters what she was doing, to which Ms Walters said “I’m going to give up staples tomorrow”;
 - (2) the officer noticed superficial cuts on Ms Walters’ left arm but no cuts on her hands;
 - (3) the officer, who was not familiar with Ms Walters, asked a second officer whether the cuts on Ms Walters were new cuts and not from the day before;
 - (4) the second officer observed Ms Walters scratching her leg;
 - (5) at approximately 5.20pm, the officer informed the unit manager of Ms Walters’ self-harm;
 - (6) the unit manager and two recovery officers attended the laundry area and engaged in conversation with Ms Walters;
 - (7) Ms Walters consistently answered all questions with “I don’t know”;
 - (8) Ms Walters told the unit manager that she would “stop cutting and scratching tomorrow”;
 - (9) the unit manager attempted a number of times to counsel Ms Walters to walk to Cue by herself, failing which force would be used against her;
 - (10) Ms Walters refused to do so and as consequence, force was used by the two recovery officers grabbing hold of Ms Walters’ arms and wrists;
 - (11) Ms Walters resisted the escort as she was being walked to Cue by the officers;
 - (12) when they arrived at Cue, Ms Walters took her shoes off and was told that she would need to see the nurse;

- (13) in the cell, Ms Walters sat on the bed with the recovery officers as they waited for the other officers;
- (14) Ms Walters said to the recovery officers “I cut myself pretty bad”;
- (15) Ms Walters asked if a pat search could be conducted instead of a strip search;
- (16) Ms Walters was pat searched, counselled and photographs of her arms and legs were taken;
- (17) the officers asked Ms Walters if she was all right and if she had dinner, before leaving the cell and locking the door;
- (18) prior to the incident:
 - (a) Ms Walters attended school in the morning and was observed by an officer removing a staple from a magazine;
 - (b) the officer removed the staple from Ms Walters and handed it to the unit manager;
- (19) the use of force incident described in sub-paragraph (10) above was authorised by the superintendent and nursing were also notified;
- (20) following the incident, the unit manager unsuccessfully attempted to contact Ms Walters’ primary care giver to inform them of the incident;
- (21) at approximately 6.30pm, the clinical nurse attended Ms Walters’ cell and medically assessed her and no injuries were identified from the incident;
- (22) Ms Walters remained in her cell for the Overnight Lockdown;
- (23) on 14 July 2024:
 - (a) at approximately 10.00am, Ms Walters’ cell was unlocked for her to shower, clean and eat breakfast;
 - (b) at approximately 10.55am, Ms Walters requested to be resecured in her cell to watch TV;

- (c) at 12.50pm, Ms Walters was let out of her cell to attend a visit with her mother; and
 - (d) at approximately 1.45pm, Ms Walters attended the Yeeda Unit and the gymnasium to participate in sports and recreation time with other young persons.
17. On 18 July 2018, there was an incident (incident ID I50569966) which included the following events:
- (1) at approximately 9.45am, Ms Walters was attending education activities in the C wing of the Yeeda Unit, where she was provided with work and offered help by teachers and officers but refused to complete the work;
 - (2) instead, Ms Walters was drawing an inappropriate picture which said 'DIE Officers' with the 'I' drawn as a bloodied knife;
 - (3) officers confiscated the drawing from Ms Walters;
 - (4) at about the same time, other young persons were completing a task which required them to remove a large amount of staples from the pin boards – as Ms Walters had a history of self-harm using staples, her 1:1 officer decided to remove Ms Walters from the area for her own safety;
 - (5) during the morning tea break, Ms Walters was asked to stay within sight of officers on a number of occasions given her tendency to pick up sharp sticks and other objects in the yard but she repeatedly hid from officers, calling them 'stupid', 'mean' and 'dumb' and accusing them of 'stalking' her;
 - (6) the unit manager and the officer decided to move Ms Walters to Cue as she was not following instructions and refused to stay within sight of the officers; and
 - (7) later that day:
 - (a) at approximately 10.35am, Ms Walters was escorted to her cell by the unit manager;

- (b) at approximately 1.00pm, Ms Walters was out of cell to attend a visit with her mother, stepfather and case planning;
 - (c) at approximately 2.15pm, Ms Walters was out of cell to attend Court via video-link;
 - (d) at approximately 3.45pm, Ms Walters returned to her cell in Cue;
 - (e) at approximately 5.45pm, Ms Walters was given her dinner in her cell; and
 - (f) at approximately 7.50pm, she requested to have her TV turned off and slept throughout the remainder of the Overnight Lockdown;
18. On 19 July 2018, there was an incident (incident ID I50620774) which included the following events:
- (1) at approximately 10.30am, an officer conducted a routine search of Ms Walters' cell in Cue;
 - (2) during the search, papers were confiscated which contained handwritten notes and drawings including a song about slashing the throat of an officer and a list of "Kids/Officers I will kill"; and
 - (3) a recovery officer attended Ms Walters' cell and took photographs of the handwritten notes and drawings.
19. On 29 August 2018, there was an incident (incident ID I52501869) which included the following events:
- (1) at approximately 6.10pm, Ms Walters asked an officer "if you strangle someone, do they die if you strangle them at the bottom of the neck or the top";
 - (2) Ms Walters told the officer that when she gets out of Banksia Hill, she is going to kill herself and that not getting out "is messing up her plans";
 - (3) earlier that day, Ms Walters was remanded for a further two weeks;

- (4) the Officer counselled Ms Walters and asked her repeatedly if she felt like hurting herself to which Ms Walters said, “No, because you officers won’t let me” and “I’m just asking questions and you officers won’t let me anyway”;
 - (5) the officer informed the unit manager of the incident;
 - (6) the unit manager visited Ms Walters in the laundry area as she was concerned about Ms Walters’ state of mind and it was explained to Ms Walters that the night shift staff would continue to monitor her for her safety as a precaution;
 - (7) Ms Walters was accepting of this;
 - (8) at approximately the time of the Overnight Lockdown, the officer noticed that Ms Walters, who was in her cell, had a long piece of tape rolled up around the back of her neck and was holding it with both hands, and the tape was long enough to fit around Ms Walters’ neck;
 - (9) the officer unlocked Ms Walters’ cell and instructed her to give the officer the tape; and
 - (10) following a short period of counselling by the officer, Ms Walters handed over the tape.
20. On 30 August 2018, there was an incident (incident ID I52559190) which included the following events:
- (1) at approximately 9.15pm, an officer was completing a welfare on Ms Walters in her cell in the Yeeda Unit and observed that she had a sock placed around her neck, holding both ends of the sock at the front of her neck;
 - (2) the officer extensively counselled Ms Walters;
 - (3) Ms Walters said “I wasn’t going to do anything miss”;
 - (4) the officer told Ms Walters that if the behaviour continued, she may need to be moved to Cue for her own welfare;
 - (5) the officer informed the unit manager of the incident;

- (6) in addition to performing the welfare checks applicable to Ms Walters, the unit manager instructed the officer to also perform random welfare checks on Ms Walters; and
 - (7) it was decided by the unit manager and senior officers to keep Ms Walters in her cell to prevent escalation of the incident with extra welfare checks put in place.
21. On 3 September 2018, there was an incident (incident ID I52695076) which included the following events:
- (1) at approximately 9.35am, an officer observed Ms Walters writing in her schoolbook in the classroom;
 - (2) the officer observed the name of another officer written in the book along with written threats;
 - (3) as the officer moved closer to Ms Walters, she shut the book;
 - (4) the officer informed the unit manager of the incident;
 - (5) at approximately 9.40am, the unit manager attended the classroom and inspected the workbook; the workbook contained drawings of knives, depictions of scenes relating to hangings as well as threatening phrases referencing officers.
 - (6) earlier that morning, an officer (with the same name as the officer referred to in Ms Walters' workbook) had instructed Ms Walters to put her hair up as this was a standard practice in the Yeeda unit for all girls attending education and the instruction had annoyed Ms Walters.
22. On 10 September 2018, there was an incident (incident ID I53048373) which included the following events:
- (1) at approximately 6.15pm, Ms Walters refused to comply with a directive to return to her cell after time working in the laundry;
 - (2) attending officers attempted to counsel Ms Walters for at least 15 minutes before a use of force warning was issued;

- (3) Ms Walters was non-compliant with instruction and counselling;
 - (4) Ms Walters was then issued a use of force warning;
 - (5) Ms Walters continued not to comply with instruction;
 - (6) officers escorted Ms Walters to her cell using the wrist weave hold;
 - (7) Ms Walters attempted to resist escort;
 - (8) this use of force incident was authorised by the superintendent, psychology was notified and Ms Walters' mother was informed;
 - (9) Ms Walters was pat searched on arrival at her cell and placed in her cell from 6.51pm for the Overnight Lockdown until 8.00am the following morning on 11 September 2018 when she rejoined the program;
 - (10) Ms Walters was assessed for physical injuries by the clinical nurse at approximately 8.00pm who recorded, "nil medical treatment required"; and
 - (11) as a result of the incident, Ms Walters was punished by loss of program placement.
23. On 11 September 2018, there was an incident (incident ID I53098169) which included the following events:
- (1) at approximately 6.10pm, Ms Walters was informed by an officer that she was to transition to Cue for lockdown but she refused to do so;
 - (2) the officer continued to counsel Ms Walters about the reasons why she was being housed in Cue and it was reinforced to her that the decision to reside in Cue was not punishment but a concern for her wellbeing and safety;
 - (3) Ms Walters continued to refuse to comply with instructions to move to Cue;
 - (4) Ms Walters was in the laundry area and had in her possession a broom, which following some counselling, was taken off her by the unit manager;
 - (5) Ms Walters then picked up two spray bottles and was threatening to spray the officers with them;

- (6) the recovery team attended the laundry area and asked Ms Walters to walk unassisted to Cue but she remained unwilling to do so;
- (7) the recovery team issued a use of force warning but Ms Walters remained non-compliant with the instructions to walk to Cue;
- (8) a use of force warning was issued a second time to Ms Walters who continued to remain non-complaint;
- (9) the unit manager grabbed the spray bottle out of Ms Walters' hands and took hold of her left arm;
- (10) two recovery officers then stepped in and took hold of Ms Walters in an escort hold and escorted her to Cue;
- (11) during the escort, Ms Walters kicked at one of the recovery officer's legs multiple times and resisted the escort the whole way to Cue;
- (12) a pat search of Ms Walters was conducted upon entry into her cell in Cue;
- (13) at approximately 8.15pm, the duty nurse conducted an injury assessment and welfare check on Ms Walters, where no injuries were indicated and no indication for treatment was noted;
- (14) the nurse advised Ms Walters to seek further nurse review if there were any concerns or any issues arise;
- (15) prior to the incident at approximately 4.52pm, case planning spoke with both of Ms Walters' parents about her placement in Cue and both parents were understanding of the situation;
- (16) as a consequence of the incident, Ms Walters was given a loss of television privileges for two days;
- (17) Ms Walters' mother was informed of the incident; and

- (18) Ms Walters was out of her cell in Cue on 12 September 2018 from 9.15am to shower and then participated in a combination of programs, education, and psychology visits in Yeeda from 9.45am to 12.15pm.
24. On 12 September 2018, there was an incident (incident ID I53122436) which included the following events:
- (1) at approximately 12.00pm, Ms Walters was instructed to return to her cell in Cue for a lockdown due to staff breaks;
 - (2) Ms Walters ignored instructions to return to her cell despite being encouraged by officers for 10 – 15 minutes to do so voluntarily;
 - (3) Ms Walters said words to the effect that she was not going to hurt herself until next week;
 - (4) numerous use of force warnings were then issued to Ms Walters by the officer;
 - (5) the unit manager instructed the recovery officers to escort Ms Walters to her cell in Cue;
 - (6) the recovery officers took hold of Ms Walters' arms in an escort hold;
 - (7) Ms Walters attempted to strike one of the recovery officers as he attempted to maintain control of her right arm;
 - (8) Ms Walters also attempted to kick the legs of both recovery officers;
 - (9) the recovery officers transferred from an escort hold to a wrist weave;
 - (10) Ms Walters was escorted to her cell in Cue where she removed her shoes and a pat search was conducted;
 - (11) this use of force was authorised by a senior officer, Ms Walters' care giver was informed;
 - (12) at approximately 1.15pm, Ms Walters was medically assessed by the clinical nurse after the incident and provided appropriate medical treatment with no injuries reported;

- (13) following the incident, Ms Walters was given a loss of TV privileges for the remainder of the day; and
 - (14) Ms Walters was out of cell from approximately 3.45pm to 6.00pm during which she received a visit from her sister and father from 3.45pm to 4.45pm and then placed a number of telephone calls to her mother between approximately 4.54pm and 5.42pm.
25. On 12 September 2018, there was another incident (incident ID I53145348) which included the following events:
- (1) at approximately 5.50pm, the unit manager instructed Ms Walters multiple times that she needed to prepare herself to make her way to Cue from the Yeeda Unit but Ms Walters was not complying with instructions;
 - (2) the unit manager encouraged Ms Walters to go to Cue to sweep her cell before the Overnight Lockdown but Ms Walters refused to go;
 - (3) other officers present in the lounge of the Yeeda Unit attempted to counsel Ms Walters to walk to Cue and encouraged her to do so on her own;
 - (4) Ms Walters repeatedly said “I don’t want to go to Cue”, “I don’t deserve to go there” and that she doesn’t want to because she cannot control the TV in Cue;
 - (5) the unit manager reinforced to Ms Walters that the decision for her to go to Cue was not punishment but a concern for her wellbeing and safety and that it is “the best place for her tonight”;
 - (6) an officer told Ms Walters that she has to go to Cue and the alternative is that the recovery team have to take her up there if she doesn’t walk up there nicely and it’s her choice;
 - (7) the unit manager called in the recovery team to escort Ms Walters to Cue if she did not follow instructions;
 - (8) at approximately 6.00pm, the unit manager issued a use of force warning to Ms Walters and asked her if she understands to which she responded “but I want you to use force” and appeared to have physically tensed her body;

- (9) the unit manager told Ms Walters to “make a good decision” and another officer urged her again to walk to Cue herself but she refused to do so;
- (10) the unit manager told Ms Walters that this was her last chance but she did not comply, and the unit manager then instructed the recovery officers to escort Ms Walters;
- (11) the officers used an “arm drag” technique on Ms Walters as she was sitting in the lounge of the Yeeda Unit on a chair;
- (12) Ms Walters kicked the officers multiple times;
- (13) the officers then placed Ms Walters in an escort hold to escort her to Cue;
- (14) Ms Walters resisted the escort, kicking the officers multiple times and saying “but I don’t want to go to Cue”;
- (15) Ms Walters was placed in her cell in Cue and was pat searched;
- (16) Ms Walters was instructed to sit on the bed so that the officers could exit the cell;
- (17) Ms Walters did not follow this instruction and was placed on the mattress by the officers with her hands behind her back before a hot exit was made by the officers before the door was secured; a hot exit is a technique used by officers to safely exit a cell by placing the detainee on a mattress in the cell; once the team leader has confirmed that control of the detainee has been achieved and that the officers are correctly positioned, the team leader notifies the detainee that any restraints will be removed; one officer will take control of the detainee’s wrists; the team leader will position themselves behind that officer’s feet and hold onto their belt; the team leader will then direct the other officers in cell to exit; once they have exited and tapped the team leader on the shoulder on their way out of the cell safely, the team leader will assist the officer controlling the detainee’s wrists safely out of the cell by stabilising them, pulling them backwards on the belt and shoulder;
- (18) a hot exit was executed as Ms Walters resisted the escort and was highly agitated and unsettled;
- (19) this use of force incident was authorised by a senior officer and Ms Walters’ mother was informed;

- (20) at approximately 6.15pm, a nurse attended Ms Walters' cell and medically assessed her with no injuries identified;
 - (21) as a consequence of the incident, Ms Walters was given loss of program placement;
 - (22) notwithstanding the loss of program placement, Ms Walters was settled in her cell for the Overnight Lockdown and rejoined the program first thing in the morning of 13 September 2018;
 - (23) Ms Walters was out of her cell on 13 September 2024 from 9.00am until 6.15pm:
 - (a) she placed a call to her mother at 9.34am;
 - (b) she was visited in the Yeeda Unit by an Aboriginal welfare officer and a case planning manager; and
 - (c) she participated in education and other unit activities.
26. On 13 September 2018, there was an incident (incident ID I53196695) which included the following events:
- (1) at approximately 6.00pm, Ms Walters was in the laundry area of the Yeeda Unit with her 1:1 officer who was urging her to go back to Cue to make a phone call and a cup of tea prior to the Overnight Lockdown;
 - (2) Ms Walters refused to do so and instead said words to the effect that "she didn't want to go" and that "she had a plan";
 - (3) the unit manager asked Ms Walters what her plan was to which she said words to the effect that "the plan was in her hand" – Ms Walters was holding, in her right hand, a stick that was approximately 5 inches long with what looked like thorns sticking out of it;
 - (4) the unit manager asked the officer to move away from Ms Walters and the recovery team were called into the laundry area;
 - (5) the unit manager and the recovery team repeatedly instructed Ms Walters to hand over the stick or put it down;

- (6) during the officers' counselling of Ms Walters to walk to Cue on her own, they told her that:
 - (a) it's not good to threaten people;
 - (b) Ms Walters has had a good day and that out of all the girls, she has been locked down the least;
 - (c) they would love to walk up to Cue as a team without recovery helping her;
 - (d) it's not a game and it's not fun, to which Ms Walters responded by saying that it is fun for her and smiled;
- (7) the unit manager issued a use of force warning, to the effect that if Ms Walters did not follow the instruction issued above, force would need to be used;
- (8) Ms Walters said words to the effect that:
 - (a) she was disappointed that two of the officers had glasses on because the glasses would protect their eyes;
 - (b) Ms Walters was going to stab the officer (without glasses on) in the eye; and
 - (c) she will start being good from tomorrow;
- (9) Ms Walters refused to put the stick down or hand it over to the officers;
- (10) one of the recovery officers repeated the use of force warning;
- (11) the recovery officers grabbed hold of Ms Walters' arms in order to secure the stick;
- (12) the recovery officers then held Ms Walters in an escort hold as they attempted to escort her over to Cue;
- (13) Ms Walters started resisting and kicking the recovery officers causing them to change to a wrist weave hold;
- (14) upon entry into her cell in Cue, Ms Walters was pat searched;

- (15) Ms Walters was instructed to move to the bed and lay on her torso so that the officers could safely exit the cell but refused to do so;
- (16) as a consequence, Ms Walters was placed into the “prone” position with her arms behind her back in the handcuffing position and instructed to remain on the bed until she heard the door close;
- (17) the Officers then made a hot exit from the cell;
- (18) this use of force incident was authorised by a senior officer and one of Ms Walters’ caregivers was informed;
- (19) at approximately 6.25pm, Ms Walters was medically assessed by a clinical nurse with no injuries identified or claimed;
- (20) prior to the incident, during the day, Ms Walters:
 - (a) had made concerning remarks to the unit manager such as “I don’t deserve to go [to Cue], I won’t be hurting myself until next week” and to another detainee such as “It would be good to see [Officer X] in the next couple of days before I kill myself”; and
 - (b) refused to see her psychologist;
- (21) following the Overnight Lockdown, Ms Walters was out of her cell on 14 September 2024 from 9.30am until 5.45pm – in particular, she:
 - (a) showered and undertook chores;
 - (b) attended education;
 - (c) spent time outside in the grounds of the Yeeda Unit;
 - (d) purchased a portable CD player and a radio from the canteen; and
 - (e) placed a number of phone calls at 10.33am to her mother, 10.34am to her father and 5.36pm to her mother.

27. On 16 September 2018, there was an incident (incident ID I53293168) which included the following events:

- (1) at approximately 9.50am, Ms Walters made a phone call to her mother and sister during which she indicated that she was going to commit suicide and stated that she wrote a card to her family and hid it in her schoolwork folder;
- (2) at approximately 11.20am, officers were tasked with recovering Ms Walters' schoolwork folder;
- (3) officers found a purple card and drawings of Ms Walters, including a drawing of her on top of a building (resembling the Yeeda Unit building) ready to jump along with other images of her in a pool of blood and hanging at the parameter fence;
- (4) officers confiscated the schoolbook which was photographed and taken into evidence, with copies provided to psychology for assessment;
- (5) as a precaution, Ms Walters was to remain in Cue during the day and supervised by two staff at all unlock periods, in which she had spent approximately an hour outside;
- (6) Ms Walters' mother was informed of what had occurred and of the images, and that Ms Walters would be kept in Cue for the day as a safety precaution;
- (7) at approximately 12.40pm, Ms Walters was visited in Cue by her family for approximately an hour; and
- (8) Ms Walters had dinner outside her cell in Cue.

28. On 16 September 2018, there was another incident (incident ID I53307953) which included the following events:

- (1) at approximately 6.05pm, Ms Walters was asked to return to her cell in Cue but she refused to do so;
- (2) Ms Walters was then counselled by the unit manager to return to her cell and was informed that if she did not comply, force would be used to return her to her cell;
- (3) Ms Walters said words to the effect that "she did not care and was not going in";

- (4) Ms Walters was again warned a number of times that force would be used if she did not return to her cell voluntarily;
 - (5) Ms Walters continued to refuse to return to her cell voluntarily;
 - (6) Ms Walters' continued non-compliance with instructions led to recovery officers physically restraining her (one officer on each arm), before using force (an escort hold and wrist weave) to escort her to Cue;
 - (7) as the officers took hold of Ms Walters' arms, Ms Walters kicked out at one of the officers and struck him in the knee;
 - (8) Ms Walters was pat searched on return to her cell;
 - (9) this use of force incident was authorised by a senior officer;
 - (10) a clinical nurse was notified of the incident at approximately 6.15pm;
 - (11) Ms Walters confirmed that she was not injured during the incident; and
 - (12) Ms Walters was released from her cell at approximately 9.30am the following morning on 17 September 2018.
29. On 17 September 2018, there was an incident (incident ID I53368696) which included the following events:
- (1) at approximately 6.15pm, Ms Walters was in the laundry room completing laundry chores;
 - (2) Ms Walters was informed that she would be heading to Cue for Overnight Lockdown but she refused and instead threatened the officer making the request;
 - (3) Ms Walters appeared highly agitated, crossing her arms and raising her voice;
 - (4) Ms Walters was counselled for approximately 20 minutes but still refused to move to her cell and a use of force warning was provided;
 - (5) officers moved to restrain Ms Walters in an attempt to guide her back to her cell but she began lashing out with her arms at officers, striking one officer in the chest;

- (6) for the safety of Ms Walters and officers, the officers restrained Ms Walters' arms and placed them behind her back and the unit manager then placed handcuffs on Ms Walters;
 - (7) Ms Walters was escorted to Cue by officers using a controlled escort hold during whilst she continued to resist;
 - (8) this use of force incident was authorised by a senior officer;
 - (9) this use of handcuffs incident was authorised by the unit manager;
 - (10) one of Ms Walters' caregivers was informed and nursing were notified; and
 - (11) Ms Walters remained in her cell during the Overnight Lockdown, until approximately 8.50am the following morning on 18 September 2018, when she was released for breakfast and she left her cell at approximately 9.15am and remained out of her cell until approximately 12.00pm when she returned for the lunchtime lockdown.
30. On 18 September 2018, there was an incident (incident ID I53424021) which included the following events:
- (1) at approximately 4.15pm, Ms Walters was in the yard of the Yeeda Unit;
 - (2) when asked by the officers to return to her cell in Cue for the staff afternoon break, Ms Walters refused to do so;
 - (3) during her interaction with the officers, Ms Walters was holding a stick in her hand and appeared to be sharpening it for a short period against the wall;
 - (4) a code green was called and the recovery officers attended the Unit;
 - (5) the officers continued to ask Ms Walters to voluntarily return to her cell in Cue;
 - (6) Ms Walters did not comply with their directions;
 - (7) the officers warned Ms Walters that if she refused to comply, they would need to handcuff her and use force to move her;
 - (8) a code amber was called;

- (9) at this time, Ms Walters began to hold the stick with her fist wrapped around the top part of the stick and the bottom pointing down;
- (10) the officers asked Ms Walters to drop the stick and warned Ms Walters that they would have to collect the shields if Ms Walters did not drop the stick as it could be considered a weapon and the officers did not know how Ms Walters may use the stick;
- (11) despite the officers' repeated directions for Ms Walters to drop the stick, Ms Walters refused or failed to do so;
- (12) as the recovery officers moved towards Ms Walters to take the stick from her and restrain her, Ms Walters lunged at them with the stick;
- (13) the officers took the stick from Ms Walters, put Ms Walters on the ground in a figure four restraint and handcuffed her;
- (14) the officers then escorted Ms Walters to her cell in Cue;
- (15) Ms Walters continued to struggle against the officers from time to time during the escort and the recovery officers used an "under hook and pike" hold to escort Ms Walters to Cue;
- (16) on arrival at the cell in Cue, Ms Walters was held in a prone position on the mattress, and her handcuffs were removed;
- (17) the officers then performed a hot exit;
- (18) this use of force incident was authorised by the unit manager;
- (19) this use of handcuffs incident was authorised by a senior officer;
- (20) Ms Walters' mother was informed;
- (21) a nurse was notified and attended to Ms Walters, who was assessed with nil medical treatment required; and
- (22) Ms Walters remained in her cell, including for the Overnight Lockdown and until approximately 2.20pm on the following day, 19 September 2018; a psychologist attended Cue at approximately 9.45am to visit Ms Walters who declined to be seen

three times; at approximately 10.30am, Ms Walters also declined to clean her cell or exit her cell to shower; Ms Walters was counselled by the unit manager and a senior officer at approximately 12.35pm; Ms Walters cleaned her cell at approximately 12.50pm.

31. On 19 September 2018:

- (1) at approximately 3.15pm, Ms Walters was in a case planning interview room to meet with a senior case planning manager and her parents following a Court appearance;
- (2) officers instructed Ms Walters that she needed to be handcuffed to be escorted back to her cell in Cue;
- (3) Ms Walters did not follow the officers' instructions;
- (4) the officers attempted multiple times to persuade Ms Walters to allow them to handcuff her and escort her to her cell in Cue and provided Ms Walters with a use of force warning;
- (5) Ms Walters continued to refuse to comply;
- (6) the officers then attempted to help Ms Walters up from her chair at which time Ms Walters kicked out and resisted the officers;
- (7) the officers handcuffed Ms Walters and escorted her back to her cell in Cue;
- (8) Ms Walters remained non-compliant throughout the escort and kicked out at the officers during the escort from the case planning interview room to her cell in Cue;
- (9) on arrival at her cell in Cue, Ms Walters was placed on a mattress on the floor in the prone position and her legs placed in the figure four position for her and the officers' safety as she continued to struggle against the officers while she was pat searched and her handcuffs were being removed; the officers then performed a hot exit;
- (10) this use of force incident and use of handcuffs incident was authorised by a senior officer;

- (11) the duty nurse was notified and assessed Ms Walters for any injury; Ms Walters was cleared;
 - (12) Ms Walters' mother was informed of the incident;
 - (13) Ms Walters was given a loss of program placement; and
 - (14) Ms Walters was in her cell from approximately 3.45pm on 19 September 2018 including for the Overnight Lockdown until 8.15am on the following day, 20 September 2018 when Ms Walters attended activities, ate her meals and showered.
32. On 20 September 2018, there was an incident (incident ID I53545897) which included the following events:
- (1) at approximately 6.00pm, Ms Walters was in the exercise yard in Cue;
 - (2) officers directed that Ms Walters allow them to escort her to her cell in Cue for Overnight Lockdown;
 - (3) Ms Walters refused notwithstanding being provided with ample time to comply in accordance with the directions provided to officers in Ms Walters' personal support plan (**PSP**);
 - (4) recovery officers were called and repeated the request for Ms Walters to enable them to escort her to her cell in Cue and issued use of force warning if Ms Walters did not comply;
 - (5) Ms Walters did not comply;
 - (6) recovery officers took hold of Ms Walters' arms and escorted her to her cell in Cue using an escort arm hold;
 - (7) Ms Walters continued to resist the officers during the escort;
 - (8) on arrival at her cell, Ms Walters was pat searched;
 - (9) at approximately 6.20pm, Ms Walters was seen by a nurse who assessed her and cleared Ms Walters;

- (10) both Ms Walters' mother and father were informed of the incident;
 - (11) this use of force incident was authorised by a senior officer;
 - (12) Ms Walters was given a loss of program placement; and
 - (13) Ms Walters remained in her cell for the Overnight Lockdown and until approximately 8.30am on 21 September 2018 when she was out of cell for breakfast and a shower; the Unit was then visited by a baby kangaroo and Ms Walters saw a psychologist at approximately 11.30am before having lunch and returning to her cell to read a book; Ms Walters attended to chores after lunch, made some telephone calls and attended the gymnasium at approximately 3.00pm.
33. On 22 September 2018, there was an incident (incident ID I53614220) which included the following events:
- (1) at approximately 3.00pm, Ms Walters was in the gymnasium when she was asked by officers to leave the gym and move to Cue to continue recreation there until the 4pm lockdown;
 - (2) officers informed Ms Walters that handcuffs would be used for her escort back to Cue as per her PSP;
 - (3) Ms Walters did not comply with the officers' directions and was counselled as per her PSP for a number of minutes after which she was given a use of force warning (in line with her PSP) and allowed time to consider it and willingly comply with the officers' directions;
 - (4) subsequently, recovery officers approached Ms Walters and told her they would assist her to move away from the wall so handcuffs could be applied for her escort back to Cue;
 - (5) Ms Walters kicked out and attempted to punch the officers as they sought to take hold of her;
 - (6) officers took hold of Ms Walters by her arms and began to walk her away from the corner across the gym;

- (7) Ms Walters continued to resist and kick out at the officers and for her own safety and that of the officers, Ms Walters was then lowered to the ground in the prone position so that handcuffs could be applied;
 - (8) Ms Walters was handcuffed, lifted to her feet and escorted back to Cue;
 - (9) during the escort, Ms Walters continued to kick out at the officers;
 - (10) on arrival at her cell, Ms Walters was placed on a mattress on the floor in a prone position, where she was held in a figure four restraint;
 - (11) Ms Walters was pat searched before her handcuffs were removed and officers performed a hot exit from the cell;
 - (12) at approximately 3.20pm, Ms Walters was medically assessed by a nurse and was cleared;
 - (13) one of Ms Walters' care givers was informed of the incident by the unit manager;
 - (14) this use of force incident and use of handcuffs incident were authorised by a senior officer;
 - (15) prior to this incident, officers reported that Ms Walters disclosed suicidal intentions; and
 - (16) Ms Walters remained in her cell until approximately 10.15am on the following morning, 23 September 2018 when she was let out of her cell to attend to her chores; Ms Walters then had a social visit from her family at approximately 12.45pm in Cue.
34. On 23 September 2018, there was an incident (incident ID I53646413) which included the following events:
- (1) at approximately 6.00pm, Ms Walters was in the recreation yard of Cue when officers observed Ms Walters isolating herself in the corner of the yard, and recorded that this was "the same behaviour she exhibited yesterday before she refused to return to her cell";

- (2) officers asked Ms Walters to move inside to the common area of Cue but Ms Walters became distressed and demanded that she return outside to resume her recreation;
- (3) once inside, as it was past 6.00pm, the officers told Ms Walters that she would be remaining in the common area of Cue for the evening;
- (4) Ms Walters kept pulling at the door handle and demanded that she be let back outside;
- (5) Ms Walters then moved towards a window and stated that she wanted fresh air;
- (6) the officers told Ms Walters she was welcome to sit by the open window until the Overnight Lockdown;
- (7) Ms Walters began pulling at the window to try and force it open, partly pulling it out of its tracks;
- (8) Ms Walters became agitated and the officer instructed Ms Walters to stop what she was doing, move away from the window if she wanted to continue her recreational time;
- (9) Ms Walters ignored the officer and continued to pull at the window;
- (10) the officer then instructed Ms Walters to go to her cell as she was not following instructions and was causing damage to the unit;
- (11) Ms Walters refused to comply;
- (12) the officer called a code green and the unit manager attended;
- (13) the unit manager gave Ms Walters instructions to return to her cell with which Ms Walters did not comply;
- (14) recovery officers were called as well as the senior officer; despite Ms Walters being provided with ample time to comply with the officers' instructions as per her PSP, she refused; a use of force warning was given;
- (15) the recovery officers approached Ms Walters to escort her to her cell as per the supervising officer's direction;

- (16) Ms Walters struggled against the officers kicking one of them;
 - (17) the recovery officers grabbed hold of Ms Walters' left and right arms and escorted her to her cell and as Ms Walters was being escorted by recovery officers from the common area of Cue to her cell Ms Walters resisted and was restrained by her arms;
 - (18) on arrival at her cell, for her own safety and that of the officers, Ms Walters was placed in the prone position on a mattress on the floor and subsequently placed in a figure four restraint; the officers performed a hot exit;
 - (19) a nurse assessed Ms Walters with no injuries identified;
 - (20) this use of force incident was authorised by a senior officer;
 - (21) the caregivers for Ms Walters were subsequently informed of the incident by the unit manager; and
 - (22) Ms Walters remained in her cell for the Overnight Lockdown and until approximately 8.45am the following morning, 24 September 2018 when she attended to chores.
35. On 24 September 2018, there was an incident (incident ID I53685785) which included the following events:
- (1) at approximately 6.00pm, Ms Walters was in the recreation yard of Cue when officers asked Ms Walters to return to her cell for Overnight Lockdown;
 - (2) in accordance with Ms Walters' PSP, Ms Walters was instructed to return to her cell for Overnight Lockdown but she refused;
 - (3) the unit manager was called, who then gave Ms Walters a minute by minute countdown to return to her cell, but Ms Walters refused;
 - (4) the unit manager then, attempted to counsel and coach Ms Walters to her cell but Ms Walters continued to refuse to comply;
 - (5) the unit manager issued a use of force warning by advising Ms Walters that she would be moved to her cell if she did not walk there herself but Ms Walters did not comply;

- (6) the unit manager called recovery officers for assistance and instructed them to ask Ms Walters to go to her cell and if she did not comply to use force to assist her with doing so;
 - (7) as the recovery officers moved towards Ms Walters to assist her move to her cell, she kicked one officer in the leg and punched him in the face;
 - (8) the recovery officers grabbed hold of Ms Walters' left and right arms and used a controlled escort hold to escort Ms Walters to Cue;
 - (9) on arrival at her cell in Cue, Ms Walters was placed in a prone position on the mattress and placed in a figure four restraint; officers then performed a hot exit;
 - (10) a nurse assessed Ms Walters through the window of her cell; Ms Walters was asked whether she had any injuries to which she replied "no";
 - (11) this use of force incident was authorised by the superintendent;
 - (12) Ms Walters' parents were informed of the incident;
 - (13) prior to the incident, Ms Walters showered in the afternoon, handed over glass shards to an officer which were found near the heater control unit and Ms Walters' mother visited her in Cue; and
 - (14) Ms Walters remained in her cell for the Overnight Lockdown and appeared to be sleeping until she came out of her cell to shower at approximately 10.30am the following day, 25 September 2025.
36. On 25 September 2018, there was an incident (incident ID I53740357) which included the following events:
- (1) at approximately 3.30pm, Ms Walters told officers that she did not want to be alive for her next birthday, which was in 13 days;
 - (2) Ms Walters asked the officers about electricity voltage and what effect 240 volts would have on a person;

- (3) Ms Walters was observed by officers playing with or looking at a heating unit while holding a cup of water; the officers formed the view that Ms Walters may attempt to harm herself by electrocution, using the water in her cup and the heater;
- (4) one officer distracted Ms Walters while another officer removed the cup of water from Ms Walters;
- (5) Ms Walters became agitated that the water had been taken from her;
- (6) an officer called a code green;
- (7) Ms Walters became aggressive; she walked towards the heating unit and proceeded to remove the front panel from the unit and to pull at the wires in what the officers believed was an attempt to electrocute herself;
- (8) one of the officers placed himself between Ms Walters and the heating unit and attempted to direct her to her cell;
- (9) in response, Ms Walters attempted to punch the officer in the face;
- (10) the punches did not connect with the officer's face, but were deflected by the officer to his upper body;
- (11) an officer called a code amber;
- (12) for safety reasons, Ms Walters was restrained by the officers in a wrist weave;
- (13) an officer then called a code red for Cue as Ms Walters was attempting to break away from the hold as she was being escorted to her cell;
- (14) the officers placed Ms Walters on a mattress in her cell in a prone position which Ms Walters was resisting; Ms Walters was placed in a figure four position and the officers performed a hot exit before securing the cell;
- (15) a senior officer was informed of this use of force incident;
- (16) Ms Walters was medically assessed by a nurse following the incident and was cleared of any injuries;

- (17) Ms Walters' parents were informed of the incident; and
 - (18) Ms Walters remained in her cell for the Overnight Lockdown and until she saw a psychologist at approximately 9.45am the next morning, 26 September 2025; prior to this, Ms Walters was offered breakfast and a shower, both of which she refused.
37. On 26 September 2018, there was an incident (incident ID I53772374) which included the following events:
- (1) at approximately 12.00pm, Ms Walters was in the common area of Cue talking with the medical escort officer and representative from case planning;
 - (2) Ms Walters was told that shortly she would need to return to her cell in Cue for the afternoon lockdown;
 - (3) Ms Walters was given a five minute warning as required by her PSP;
 - (4) at the end of the five minute period, the officers asked Ms Walters to move to her cell; Ms Walters refused;
 - (5) Ms Walters was counselled for about ten minutes to return to her cell; she refused to comply;
 - (6) while Ms Walters was being counselled, she stated that she does not like being in her cell, and that she was bored and frustrated at the long lockdown;
 - (7) she was told that an officer would get her lunch and attempt to get the DVD feed working in her cell once she was in her cell;
 - (8) Ms Walters continued to refuse to comply;
 - (9) Ms Walters was told that if she refused to comply, the officers would follow the plan to move her to her cell; the officers then explained the plan to her but Ms Walters continued to refuse to comply; the unit manager was called by the officers;
 - (10) after approximately 2 – 3 minutes of counselling by the unit manager, Ms Walters was given a use of force warning and continued not to comply;

- (11) after several minutes, the unit manager instructed the recovery officers to escort Ms Walters to her cell;
 - (12) the recovery officers took hold of Ms Walters' arms and guided her to an observation cell via a controlled escort hold; during the escort, Ms Walters actively and continually attempted to kick the officers' legs;
 - (13) once in cell, officers attempted a pat search but Ms Walters kicked at them so was placed on a mattress on the ground in a figure four; she was pat searched and the officers then performed a hot exit;
 - (14) Ms Walters was medically assessed by a clinical nurse at approximately 1.40pm with no injuries identified or claimed;
 - (15) this use of force incident was authorised by the superintendent;
 - (16) one of Ms Walters' care givers was subsequently contacted; and
 - (17) Ms Walters was in her cell from this time until approximately 4.55pm when her parents attended Cue to visit her; Ms Walters was offered lunch which she refused; following the visit, Ms Walters had dinner outside of her cell; Ms Walters walked into her cell at approximately 6.13pm for the Overnight Lockdown.
38. On 27 September 2018, there was an incident (incident ID I53851165) which included the following events:
- (1) Ms Walters ate her evening meal in the common area of Cue;
 - (2) Ms Walters asked officers who would be working the next day, she named a specific officer and stated words to the effect; "I hate him, I don't want him to work here tomorrow";
 - (3) at approximately 5.40pm, the officers provided Ms Walters with a five minute warning that she would be returning to her cell at approximately 5.45pm for the Overnight Lockdown;

- (4) notwithstanding the officers counselling Ms Walters to follow their instructions to return to her cell, Ms Walters refused and moved from the common area to the shower area;
- (5) the officers called the unit manager to assist;
- (6) the unit manager counselled Ms Walters for a number of minutes to return to her cell and explained to Ms Walters that recovery officers would be called to assist and would use force if she remained non-compliant;
- (7) Ms Walters refused to move;
- (8) the unit manager stated that he would give Ms Walters a further 30 seconds to comply before asking the recovery officers to step in;
- (9) after about 30 seconds, the unit manager asked the recovery officers to step in;
- (10) the recovery officers counselled Ms Walters for a number of minutes reiterating that if Ms Walters did not move to the cell voluntarily, force would be used and their preference was for Ms Walters to walk to her cell voluntarily; Ms Walters continued to refuse;
- (11) the unit manager then motioned to the recovery officers to use force to move Ms Walters to her cell;
- (12) the recovery officers grabbed Ms Walters by her arms and as they did so, Ms Walters kicked one of the recovery officers in the groin;
- (13) due to Ms Walters resisting against the recovery officers and due to the confined area that Ms Walters was in, the recovery officers placed Ms Walters in a wrist weave hold to have better control of Ms Walters as they escorted her to her cell;
- (14) Ms Walters was put in a prone position on a mattress; she was placed in a figure four restraint; a pat search and a hot exit were conducted before her cell was secured;
- (15) this use of force incident was approved by a senior officer;
- (16) Ms Walters' parents were informed of the incident;

- (17) a nurse assessed Ms Walters through the window of her cell and no injuries were noted; and
 - (18) Ms Walters was in her cell for the Overnight Lockdown and until approximately 9.45am on the following day, 28 September 2018, when Ms Walters left her cell to shower.
39. On 28 September 2018, there was an incident (incident ID I53869817) which included the following events:
- (1) at approximately 10.00am, Ms Walters was accompanied by officers to have a shower;
 - (2) once Ms Walters finished her shower, she was provided with clothing to wear;
 - (3) the officers swapped a couple of items of clothing for Ms Walters that Ms Walters was unhappy with;
 - (4) once dressed, Ms Walters expressed concern that the collared t-shirt she had been provided with showed her bra and she wanted a different t-shirt;
 - (5) Ms Walters made a statement to the effect that she would not wear the shirt because she was “not a slut”;
 - (6) the officers reassured Ms Walters that her bra was not visible but stated that if Ms Walters was uncomfortable wearing the t-shirt provided, they could provide another non-collared shirt; the officers informed Ms Walters that in order for one of the officers to be able to go and obtain another t-shirt for her, Ms Walters would need to return to her cell;
 - (7) the officers asked Ms Walters to finish up in the bathroom and return to her cell so that her request could be fulfilled;
 - (8) Ms Walters refused, saying that she wanted to change into the non-collared t-shirt in the bathroom;
 - (9) the officers instructed Ms Walters multiple times to walk to her cell and she refused;

- (10) the unit manager, two recovery officers and a senior officer arrived to assist; the unit manager first counselled Ms Walters to return to her cell for a few minutes; Ms Walters refused;
 - (11) the senior officer then counselled Ms Walters; he said to Ms Walters that she had one minute to move to her cell on her own and if she did not do so, he would instruct the recovery officers to move her; a use of force warning was issued;
 - (12) Ms Walters complied with the directions from the officers; no force was used;
 - (13) Ms Walters' mother was informed of the incident; and
 - (14) Ms Walters was in her cell from 10.20am until approximately 11.20am when she attended an art lesson.
40. On 5 October 2018, there was an incident (incident ID I54221803) which included the following events:
- (1) at approximately 1.00pm, Ms Walters was briefed about acceptable behaviour while in the classroom;
 - (2) at approximately 1.30pm, Ms Walters was observed by the unit manager and officers using drawing implements in the classroom to draw inappropriate drawings of knives and blood;
 - (3) officers confiscated Ms Walters drawing implements for approximately 10 minutes;
 - (4) Ms Walters was counselled by the unit manager;
 - (5) Ms Walters was not responsive to counselling; she commenced ripping books and pulling at computer cords in the classroom;
 - (6) Ms Walters called an officer a "bitch";
 - (7) at approximately 2.15pm, Ms Walters' 1:1 officer called the unit manager and requested she be returned to her cell;

- (8) Ms Walters was informed by the unit manager that she could go to the lounge area for some more time there and not to her cell provided that she followed the officers' instructions;
- (9) in accordance with her PSP, Ms Walters was handcuffed for the escort;
- (10) during the escort, Ms Walters:
 - (a) attempted to tamper with the handcuffs;
 - (b) scratched at the officers' hands; and
 - (c) ignored the officers' instructions to cease the resisting behaviour;
- (11) the officers decided to take Ms Walters to her cell rather than the common area given her non-compliance during the escort;
- (12) on arrival at her cell, Ms Walters kicked out at the officers;
- (13) Ms Walters was placed into a prone position on her mattress and pat searched by an officer;
- (14) the officers performed a hot exit from Ms Walters' cell, and Ms Walters lunged at the door as they did;
- (15) at approximately 4.30pm, Ms Walters was attended to by a nurse after the use of force incident but refused treatment;
- (16) this use of force incident and use of handcuffs incident were approved by a senior officer;
- (17) senior officers were notified of the incident;
- (18) Ms Walters' mother was informed of the incident;
- (19) the nurse was informed of the incident; Ms Walters declined to see the nurse; and
- (20) Ms Walters was in her cell until approximately 9.20am the following morning on 6 October 2018 when she exited her cell to shower.

41. On 7 October 2018, there was an incident (incident ID I54282873) which included the following events:
- (1) at approximately 10.50am, Ms Walters was taking nearly an hour to have a shower; Ms Walters refused to get dressed after her shower, and was verbally abusive to staff;
 - (2) at approximately 11.20am, Ms Walters attended a social visit with other detainees in A wing of the Yeeda Unit;
 - (3) Ms Walters requested that an officer “put my radio on now”;
 - (4) officers instructed Ms Walters to use her manners;
 - (5) Ms Walters verbally abused the officers using profanity;
 - (6) Ms Walters was counselled by the officers, and instructed to control her swearing;
 - (7) Ms Walters continued to verbally abuse the officers;
 - (8) Ms Walters was instructed by the officers to return to her cell, which she refused;
 - (9) the unit manager and recovery officers were called to attend and assist with escorting Ms Walters to her cell;
 - (10) Ms Walters obstructed the officers’ entry into the Unit by holding the door handle; Ms Walters was counselled by the unit manager to move away from the door and sit down;
 - (11) officers entered the Unit through a side entrance, and the unit manager entered through the front door;
 - (12) when the door to the Unit was opened, Ms Walters ran towards it but was intercepted by the officers, who used a controlled hold escort technique to remove Ms Walters to her cell;
 - (13) Ms Walters continued to resist the escort, kicking out at the officers;
 - (14) Ms Walters was placed into a prone position on her mattress;

- (15) Ms Walters scratched at the officers hands and wrists;
 - (16) Ms Walters was instructed several times to stop scratching staff, to stop resisting, and to take a few deep breaths to assist her to calm down;
 - (17) the officers then performed a hot exit from the cell;
 - (18) at approximately 5.15pm, Ms Walters was offered dinner through her cell door hatch;
 - (19) Ms Walters pushed her arm through the hatch and refused to remove it again;
 - (20) the officers used force to remove her arm;
 - (21) at approximately 6.00pm, Ms Walters was attended to by a nurse;
 - (22) this use of force incident was authorised by a senior officer;
 - (23) a nurse was notified but Ms Walters refused to be seen; there were no obvious injuries;
 - (24) Ms Walters' mother was subsequently informed of the incident; and
 - (25) Ms Walters was in her cell from this time until 11.15am as she was non-receptive to counselling and was abusive towards an officer via the call system; Ms Walters attended an out of cell visit from two other young persons.
42. On 8 October 2018, there was an incident (incident ID I54347191) which included the following events:
- (1) at approximately 2.50pm, officers responded to a code green in Cue, where Ms Walters was seen standing with her back to the wall and holding a blue pencil in her hand was angled downwards with the sharp end pointing towards the ground and Ms Walters hand at the top closed into a fist;
 - (2) on the table in front of Ms Walters was a picture drawn in blue pencil depicting among other things a knife, the words "kill yourself" and the words "die officers":
 - (3) for approximately 5 minutes, officers counselled Ms Walters to place the pencil back down onto the table several times;

- (4) a code amber was called by one of the recovery officers;
- (5) the officers spent several minutes counselling Ms Walters, including wishing her a happy birthday and informing her that the use of force may impact her ability to attend her birthday visit with her family which was scheduled to take place that afternoon;
- (6) Ms Walters informed the officers that she had “wanted to kill herself for months” and as today was her birthday this is what had to come about;
- (7) Ms Walters was given a use of force warning;
- (8) a short time after the use of force warning was delivered, Ms Walters was disarmed by the officers;
- (9) a soft shield was utilised in disarming Ms Walters;
- (10) once disarmed, Ms Walters was carried by the officers, with one of the officers holding each of her arms and legs, back into her cell;
- (11) once returned to her cell, Ms Walters was placed in a prone position on her mattress on the floor and an officer performed a pat search and the officers performed a hot exit;
- (12) Ms Walters attempted to scratch the hands and wrists of the officers while she was being searched;
- (13) this use of force incident was authorised by a unit manager;
- (14) Ms Walters’ care giver was informed of the incident before her afternoon visit;
- (15) Ms Walters was in her cell until approximately 4.55pm, when she attended a visit with her family in the lounge of Cue and enjoyed birthday cake;
- (16) at approximately 6.12pm Ms Walters was medically examined by a nurse and nil injury was recorded; and
- (17) Ms Walters then had her evening meal in her cell.

43. On 11 October 2018, there was an incident (incident ID I54523757) which included the following events:
- (1) at approximately 2.50pm, Ms Walters was in the Yeeda Unit participating in an art program when officers attended the Yeeda programs room to escort her back to Cue at the end of the program;
 - (2) Ms Walters discussed with officer as to when she would be able to return to the Yeeda Unit on a more permanent basis;
 - (3) consistent with her PSP, Ms Walters was handcuffed for the escort;
 - (4) during the escort, Ms Walters was observed by the officers fiddling with her handcuffs, and trying to push them off her wrists despite requests by the officers to stop doing so;
 - (5) once in Cue, Ms Walters returned to her cell without further incident;
 - (6) this use of handcuffs incident was authorised by a senior officer; and
 - (7) Ms Walters remained in her cell until approximately 3.45pm, at which time she attended a visit with her sister which went for approximately an hour.
44. On 25 October 2018, there was an incident (incident ID I55200614) which included the following events:
- (1) Ms Walters attended education for at least two hours over the course of the morning;
 - (2) Ms Walters also attended a visit with another detainee during morning tea;
 - (3) at approximately 12.00pm, Ms Walters ate her lunch in cell and spent some time in the sun in the yard;
 - (4) at approximately 1.45pm, Ms Walters attended a visit with her mother and stepfather and for her appearance in the Perth Children's Court;
 - (5) Ms Walters also attended a further visit with the other detainee and Ms Walters ate afternoon tea before returning to her cell at approximately 3.55pm;

- (6) at approximately 5.00pm, Ms Walters was in the Cue common area for dinner;
 - (7) at approximately 6.15pm, officers attended the Yeeda Unit to escort Ms Walters back to her cell for the evening following her dinner;
 - (8) Walters was placed in handcuffs during the escort consistent with her PSP;
 - (9) the officers observed Ms Walters twisting her wrists and moving her hands in an attempt to remove her handcuffs;
 - (10) the officers instructed Ms Walters to stop moving her hands, and lightly took hold of her hands to ensure her compliance with instructions;
 - (11) Ms Walters was returned to her cell in Cue without further incident;
 - (12) once inside her cell, the handcuffs were removed from Ms Walters, and a pat search was conducted;
 - (13) this use of handcuffs incident was authorised by the unit manager; and
 - (14) Ms Walters was in her cell for the Overnight Lockdown and was given a cup of tea and her canteen in cell at approximately 6.50pm; she was in her cell until approximately 8.30am on the next morning, 26 October 2018, when she attended to chores and had a shower.
45. On 26 October 2018, there was an incident (incident ID I55245250) which included the following events:
- (1) at approximately 3.50pm, officers attended the gymnasium to escort Ms Walters to Cue for the evening;
 - (2) Ms Walters was placed in handcuffs during the escort consistent with her PSP;
 - (3) the officers observed Ms Walters twisting her wrists and moving her hands in an attempt to remove her handcuffs;
 - (4) the officers instructed Ms Walters to stop moving her hands;

- (5) once inside her cell, the handcuffs were removed from Ms Walters and a pat search was conducted;
 - (6) this use of handcuffs incident was authorised by a senior officer; and
 - (7) Ms Walters was in her cell until approximately 5.30pm when she ate her evening meal outside of her cell in Cue and attempted to make three phone calls to her mother at approximately 6.00pm.
46. On 27 October 2018, there was an incident (incident ID I55279524) which included the following events:
- (1) at approximately 4.40pm, officers observed Ms Walters becoming agitated, and pulling posters off the wall gymnasium as she was unable to use the cross-trainer (which was in use by another detainee);
 - (2) Ms Walters was heard saying “you fucking prick”, directed at an officer;
 - (3) Ms Walters was instructed to cease the behaviour otherwise she would be returned to Cue;
 - (4) Ms Walters ignored that instruction and continued acting in a disruptive manner;
 - (5) Ms Walters was counselled about her behaviour and the consequence of her actions;
 - (6) a code green was called by an officer and recovery officers were called to attend the gym;
 - (7) Ms Walters was handcuffed and escorted back to Cue;
 - (8) while being placed in handcuffs, Ms Walters stated “if I wasn’t trying to be good, I’d punch that old fucking officer cunt”;
 - (9) during the escort, Ms Walters said “I didn’t punch him, but I wanted to”;
 - (10) Ms Walters was escorted back to her cell where she was pat searched and her handcuffs were removed; and

- (11) Ms Walters was in her cell until approximately 6.00pm when she was counselled by the unit manager, and ate her dinner outside of her cell; Ms Walters was returned to her cell at approximately 6.10pm including for the Overnight Lockdown until approximately 9.15am the following morning, 28 October 2018, to attend to chores and shower.
47. On 30 October 2018, there was an incident (incident ID I55397882) which included the following events:
- (1) at approximately 8.00am, officers found graffiti in the gym which included the word "DIE" on the leg extension machine twice, into the seat of the seated leg press machine once, into the moving parts of the seated leg press machine twice and the word "LEXIE" into the moving parts of the seated leg press machine once;
 - (2) Ms Walters was interviewed by two officers; she admitted that she had vandalised the exercise equipment while using the gym on 27 October 2018;
 - (3) the officers counselled Ms Walters who appeared non-responsive to their counsel and did not present any remorse; and
 - (4) Ms Walters was given a loss of privileges of spends/canteen and of using the fitness room for one week.
48. On 31 October 2018, there was an incident (incident ID I55468174) which included the following events:
- (1) Ms Walters was given school work to proceed with her future transition into education in the Yeeda Unit;
 - (2) at approximately 11.25pm, Ms Walters raised her voice at officers while attending education;
 - (3) Ms Walters said words to the effect: "I don't want to waste my Wednesday! I'm already getting nothing! I don't want to do school work and waste my time!";
 - (4) Ms Walters was counselled by an officer and the teacher, and encouraged to complete her schoolwork;

- (5) Ms Walters was not receptive to counselling, and commenced ripping her art book apart;
- (6) Ms Walters was instructed that education would conclude and she was to return to her cell;
- (7) the officers gave Ms Walters time to comply with the instruction as per her PSP;
- (8) Ms Walters refused to move to her cell; an officer issued a final warning to move to cell prior to requesting the unit manager's assistance but Ms Walters continued to refuse to move to her cell;
- (9) the unit manager was called for assistance;
- (10) Ms Walters lunged at the officer and attempted to kick him in the groin area;
- (11) Ms Walters attempted to strike the same officer in the head with a closed fist;
- (12) the unit manager called a code amber;
- (13) the officers placed Ms Walters into a prone position on the floor to prevent any injuries and in order to apply handcuffs;
- (14) the officers attempted to counsel Ms Walters who was resisting the application of handcuffs, including by saying "take a few deep breaths Lexie";
- (15) once handcuffed, the officers assisted Ms Walters into a standing position;
- (16) the officers escorted Ms Walters to her cell;
- (17) once returned to her cell, Ms Walters was placed on a mattress in a prone position and pat searched by an officer with nil objects found on her person;
- (18) the handcuffs were removed from Ms Walters and the officers performed a hot exit from her cell;
- (19) this use of force incident and use of handcuffs incident were authorised by the superintendent;

- (20) Ms Walters was referred to psychology following the incident;
 - (21) a nurse was notified of the incident and assessed Ms Walters with no issues identified at approximately 2.40pm;
 - (22) Ms Walters was given lunch in her cell at approximately 1.15pm and had the radio turned on from approximately 2.00pm; she was otherwise asleep in her cell until it was unlocked at approximately 4.40pm when Ms Walters was then counselled by the unit manager, spent some time in the yard and made a phone call to her father; Ms Walters also had her dinner out in the common area of Cue until being returned to her cell at approximately 6.30pm for the Overnight Lockdown; and
 - (23) because of her behaviour, Ms Walters:
 - (a) lost her television privilege from 31 October 2018 until 1 November 2018 inclusive; and
 - (b) lost her canteen spend privilege from 31 October 2018 until 5 November 2018 inclusive.
49. On 30 October 2018, there were another two incidents (incident ID I55425578 and I55434377) which included the following events:
- (1) at approximately 3.30pm, officers witnessed Ms Walters, who was in the common area of Cue, causing damage to newly issued shoes by tearing material off the tongue of the shoe as a means of avoiding wearing them;
 - (2) Ms Walters was counselled by an officer but was belligerent;
 - (3) Ms Walters was immediately placed in cell for damage to centre property;
 - (4) a restitution of \$20 was charged for the damaged shoe;
 - (5) at approximately 5.35pm, Ms Walters was out of cell and counselled by the unit manager about this incident but Ms Walters was not receptive to his counsel;
 - (6) at approximately 5.40pm, Ms Walters attended B wing of the Yeeda Unit to have dinner;

- (7) at approximately 6.00pm, Ms Walters was observed by an officer causing damage to another pair of newly issued centre shoes, by ripping the inside lining and pulling the soles out of the shoes;
- (8) Ms Walters was instructed by the officers to stop destroying the shoes;
- (9) Ms Walters verbally abused the officer;
- (10) recovery officers were called to assist with Ms Walters;
- (11) at approximately 6.10pm, the officers attempted to counsel Ms Walters;
- (12) Ms Walters threw her shoe with force at an officer;
- (13) the unit manager deflected the shoe from hitting the officer, making contact with his left palm;
- (14) an officer called a code amber;
- (15) Ms Walters was then escorted back to her cell, with officers taking hold of each of her arms and walking her to her cell;
- (16) handcuffs were not applied to Ms Walters for the escort;
- (17) Ms Walters was not compliant during the escort and continued to resist;
- (18) Ms Walters was placed face down on her mattress on the floor in a prone position;
- (19) Ms Walters was pat searched by an officer;
- (20) the one shoe that Ms Walters was wearing was removed from her person;
- (21) the officers then performed a hot exit from Ms Walters' cell;
- (22) this use of force incident was authorised by a senior officer;
- (23) Ms Walters was examined by a nurse and nil injuries were identified; and
- (24) Ms Walters was in her cell including for the Overnight Lockdown; she was given fruit in cell at approximately 6.15pm and the nurse attended at approximately 6.30pm;

Ms Walters was in cell until approximately 8.45am on the following day, 31 October 2018, to attend to chores and shower, to attend a visit with a psychologist and then to attend education.

50. On 7 November 2018, there was an incident (incident ID I55794918) which included the following events:

- (1) at approximately 8.50am, officers inspected chalk drawings made by Ms Walters in the yard of Cue, which the officers suspected were made a day or two earlier;
- (2) there were eleven drawings in total, each made with coloured chalk on the windows/walls of Cue, depicting images of knives and acts of harm to others or self-harm, along with profanity and insulting or threatening words;
- (3) three of the images depicted specific officers, alongside similar images and words;
- (4) the ARMS chair and psychology were informed; and
- (5) Ms Walters was counselled.

51. On 7 November 2018, there was another incident (incident ID I55820709) which included the following events:

- (1) at approximately 4.45pm, Ms Walters attended a visit with her father and sister in the Peel Unit;
- (2) at approximately 5.30pm, Ms Walters ended the visit with her family, saying she was to have dinner with the girls in B wing of the Yeeda Unit that evening;
- (3) Ms Walters was instructed by the officers that she would not be able to have dinner in B wing, as the girls in the wing were particularly unsettled;
- (4) Ms Walters was instructed that she would instead be returning to the lounge area of Cue for her evening recreation and dinner;
- (5) the officers followed the five-step plan process outlined in Ms Walters PSP, namely:
 - (a) the officers provided Ms Walters with approximately five minutes' warning that she would need to return to the lounge in Cue for dinner;

- (b) Ms Walters refused to comply with the officers instructions and remained seated on a sofa;
 - (c) the officers called the unit manager to assist;
 - (d) the unit manager counselled Ms Walters for several minutes to return to the lounge in Cue, and that the officers would use force if she remained non-complaint; Ms Walters refused to move; and
 - (e) the unit manager then indicated to the recovery officers to use force to move Ms Walters to her cell;
- (6) the recovery officers grabbed Ms Walters by her arms and as they did so, Ms Walters kicked one of the recover officers in the leg, and hit another in the mouth with a closed fist punch;
 - (7) the recovery officers restrained Ms Walters arms and assisted her into a prone position on the floor; handcuffs were applied to Ms Walters which she was resisting throughout their application;
 - (8) Ms Walters was assisted to her feet;
 - (9) Ms Walters scratched at the recovery officers hands and wrists during the escort; Ms Walters also attempted to kick the recovery officers with her legs; Ms Walters continued to resist against recovery officers during the escort;
 - (10) once inside her cell, Ms Walters was assisted on to the mattress on the floor in a prone position by recovery officers;
 - (11) an officer conducted a pat search of Ms Walters, and nil objects were found;
 - (12) the recovery officers then removed her handcuffs and performed a hot exit from the cell;
 - (13) Ms Walters scratched five officers in the process of being placed in her cell, Ms Walters also caused a slightly swollen lip and sore knee to an officer;

- (14) at approximately 6.00pm, Ms Walters was assessed by a nurse with nil injuries noted and no treatment required;
 - (15) this use of force incident and use of restraint incident were authorised by a senior officer;
 - (16) Ms Walters' mother was notified; and
 - (17) Ms Walters was in her cell, including for the Overnight Lockdown and until the following morning at approximately 7.50am on the following day, 8 November 2018 when she showered and ate her breakfast in the yard in Cue.
52. On 11 November 2018, there was an incident (incident ID I55975544) which included the following events:
- (1) in the morning at approximately 8.50am, an officer found ripped up pieces of paper containing threatening phrases about another detainee and stuck them on the inside of Ms Walters' cell door; and
 - (2) Ms Walters was cautioned and counselled about threatening behaviour towards other detainees; Ms Walters continued her behaviour and the officer informed the unit manager;
 - (3) Ms Walters refused to shower;
 - (4) Ms Walters then drew a picture on the window in the yard of Cue; the picture on the window contained images depicting vulgar images of the detainee and which contained insulting language;
 - (5) Ms Walters was reminded of the behavioural expectations in her PSP;
 - (6) Ms Walters showed no remorse and stood by her actions;
 - (7) the incident was referred to psychology;
 - (8) Ms Walters' caregivers were informed of the incident; and
 - (9) Ms Walters was given a loss of television and radio privileges for the remainder of the day.

53. On 11 November 2018, there was another incident (incident ID I55994468) which included the following events:

- (1) at approximately 5.35pm, Ms Walters was having dinner in the lounge area of Cue;
- (2) another young person, with whom Ms Walters was not to interact due to an active risk alert (to and from) being listed on TOMS for the other young person and Ms Walters, needed to enter the lounge area to make a telephone call;
- (3) Ms Walters was instructed by the unit manager to return to cell to allow this to occur;
- (4) Ms Walters was offered a telephone call prior to returning to her cell, to which Ms Walters responded by saying that, she didn't have to go to her cell because she had rights and that she would "think about [making a phone call]";
- (5) consistent with her PSP, Ms Walters was counselled by the unit manager about returning to her cell and given multiple warnings;
- (6) Ms Walters was afforded extra time by the unit manager to process the instructions and consider her behaviour;
- (7) Ms Walters began questioning whether the consequences of her not going to her cell were worth it and said "you can't take my TV for more than three days and I've had no TV before so that is ok"; Ms Walters remained in her chair;
- (8) the unit manager issued a final warning to Ms Walters, saying words to the effect "Lexie move to cell now or we will have to use force";
- (9) the officers then took hold of each of Ms Walters' arms;
- (10) Ms Walters immediately attempted to strike and kick the officers;
- (11) Ms Walters was placed into a wrist weave hold;
- (12) a code amber was called;
- (13) Ms Walters was escorted to her cell by the officers;

- (14) once in her cell, Ms Walters was assisted into a prone position on her mattress; Ms Walters repeatedly kicked out at the officers with force, making contact with at least one officer; Ms Walters also attempted to scratch the officers; the officers performed a hot exit from the cell;
 - (15) once secured in her cell, Ms Walters proceeded to pull chunks of hair out of her head; Ms Walters placed the hair in a pile at the end of her bed; this conduct continued for approximately three minutes;
 - (16) Ms Walters proceeded to throw cups of water around her cell; as a result of her behaviour, the water to Ms Walters' cell was shut off for a period of time;
 - (17) at approximately 6.20pm, Ms Walters was assessed by a clinical nurse with nil injuries observed, and nil injuries reported as Ms Walters refused to engage with the medical assessment;
 - (18) psychology were notified of the incident;
 - (19) Ms Walters' mother was informed of the incident;
 - (20) sometime after being secured in her cell for the Overnight Lockdown, Ms Walters ripped up pieces of paper and arranged them to read the word "Die" and an officer's name on her cell window; the pieces of paper were arranged in a way so that they could be read by Officers from the outside her cell;
 - (21) at approximately 6.58pm, Ms Walters was observed by the officers pretending to be a dog in her cell; and
 - (22) Ms Walters was unlocked from her cell at 8.20am the following morning, 12 November 2018, to shower and have breakfast in the lounge area of Cue before being taken to education.
54. On 13 November 2018, there was an incident (incident ID I56097151) which included the following events:
- (1) prior to this incident, there was another incident (incident ID I 56075047), which included the following events:

- (a) at approximately 8.15am, a scratch card was found in Ms Walters' cell which had been scratched with a sharp object to depict a drawing of various stick figures standing on top of a tall building; the stick figures were holding guns and shooting at one another; the scratch card also depicted a helicopter, marked "NYPD";
 - (b) there was also a list of approximately 30 names, under the title "death list" scratched into the scratch card; some of the names included names of officers and staff; and
 - (c) Ms Walters was counselled and cautioned about her behaviour; she stated that she wrote the list because she hates the people on it;
- (2) at approximately 2.00pm, Ms Walters was approached by officers and asked if she had any sharp objects on her person;
 - (3) Ms Walters admitted to having a small piece of wire in her cell;
 - (4) Ms Walters retrieved the piece of wire;
 - (5) the officers asked Ms Walters to produce the piece of wire to them to be confiscated;
 - (6) Ms Walters refused to produce the piece of wire to the officers;
 - (7) Ms Walters was counselled by the officers for approximately 20 minutes about why she needed to produce the piece of wire;
 - (8) Ms Walters was not receptive to counselling;
 - (9) Ms Walters produced the piece of wire to the officers only after recovery officers had arrived to escort her to her cell;
 - (10) Ms Walters was instructed by the unit manager to return to her cell to think about her conduct;
 - (11) consistent with her PSP, Ms Walters was allowed several minutes to consider the instruction;
 - (12) Ms Walters was encouraged by the officers to walk by herself to her cell;

- (13) Ms Walters was not receptive to counselling;
- (14) Ms Walters was then issued a use of force warning;
- (15) Ms Walters continued to refuse to move to her cell independently;
- (16) the recovery officers then utilised soft shields to assist Ms Walters to the floor;
- (17) Ms Walters was then placed in a prone position on the floor;
- (18) an officer took control of Ms Walters' legs;
- (19) handcuffs were applied to Ms Walters;
- (20) Ms Walters resisted the application of handcuffs;
- (21) the officers then assisted Ms Walters to her feet and she was escorted back to her cell utilising a hook and pike hold;
- (22) Ms Walters continued to resist the escort;
- (23) on arrival in her cell, Ms Walters was placed in the prone position on her mattress on the floor and Ms Walters' legs were placed into a figure four restraint;
- (24) the handcuffs were removed from Ms Walters, and the officers performed a hot exit; an officer suffered a scratch to the left forearm;
- (25) this use of force incident and use of handcuffs incident were approved by a senior officer;
- (26) Ms Walters was observed in her cell pulling hair out for a short period of time;
- (27) at approximately 2.55pm, Ms Walters was attended to by a clinical nurse; Ms Walters was unable to be visually assessed by the nurse, as she was hiding behind her cell mattress but verbally confirmed that she was fine and that she did not want to be assessed by the nurse; no medical treatment was required and Ms Walters was encouraged to seek medical attention later if it was required;

- (28) from approximately 3.00pm until approximately 3.55pm, Ms Walters hid behind the mattress in her cell and refused to respond to the officers who were checking on her;
 - (29) officers continued to perform routine checks on Ms Walters through her outside window in 15-minute intervals; Ms Walters appeared fine;
 - (30) at approximately 3.55pm, the officers lost sight of Ms Walters and contacted the unit manager to attend;
 - (31) at approximately 4.05pm, the unit manager entered Ms Walters cell to confirm her wellbeing; Ms Walters confirmed that she was fine;
 - (32) Ms Walters refused to extract herself from behind her mattress;
 - (33) at approximately 5.00pm, recovery officers attended to assist in routine checks on Ms Walters;
 - (34) at approximately 6.00pm, officers entered Ms Walters' cell to remove unnecessary items due to continued loss of visual (namely extra blankets and soft toys);
 - (35) Ms Walters' caregivers were notified a number of times in relation to the above events; and
 - (36) Ms Walters was in her cell during the Overnight Lockdown and until approximately 8.45am the next day, 14 November 2018 when she attended to her chores, had a shower and ate her breakfast outside in the exercise yard.
55. On 15 November 2018, there was an incident (incident ID I56213607) which included the following events:
- (1) Ms Walters appeared in Perth Children's Court in the morning;
 - (2) at approximately 1.20pm, Ms Walters returned to Banksia Hill;
 - (3) Ms Walters was instructed that she would need to submit to a routine strip search prior to returning to her cell;
 - (4) Ms Walters refused to submit to the strip search;

- (5) Ms Walters was directed to enter a holding cell, and she did;
 - (6) a pat search and wand search were agreed to by Ms Walters and were performed on her; and
 - (7) at approximately 1.40pm, Ms Walters was released from the holding cell and it was explained to her that she would be escorted back to the Yeeda Unit.
56. The following additional events took place on 15 November 2018 as part of the above incident (incident ID I56213607):
- (1) consistent with her PSP, officers instructed Ms Walters to move against the wall to be handcuffed for the escort back to the Yeeda Unit;
 - (2) Ms Walters refused to comply with the officers' instructions and started walking around the admissions area;
 - (3) Ms Walters was issued with a use of force warning by a senior officer; Ms Walters' did not comply;
 - (4) instead, when the officers moved in to restrain Ms Walters, she kicked out twice, striking an officer in the groin and upper leg;
 - (5) an officer then called a code amber to the admissions area;
 - (6) Ms Walters was assisted into a prone position by the officers so that handcuffs could be applied;
 - (7) the officers attempted to counsel Ms Walters while she was in the prone position;
 - (8) Ms Walters was not receptive to counselling and continued to resist the application of the handcuffs;
 - (9) once the handcuffs were applied, Ms Walters was assisted to her feet by the officers;
 - (10) the officers provided Ms Walters with shoes to prevent her feet from burning in the sun during her escort back to cell, but Ms Walters refused to wear them;

- (11) Ms Walters attempted to resist the escort multiple times, either by dropping her weight to the ground or by attempting to kick the officers;
 - (12) on arrival at her cell, Ms Walters was placed in the prone position and her handcuffs were removed and the officers performed a hot exit from the cell;
 - (13) this use of force incident and use of handcuffs incident were approved by the superintendent;
 - (14) a caregiver of Ms Walters was notified of the events of this incident;
 - (15) at approximately 2.15pm, Ms Walters was attended to by a clinical nurse; Ms Walters did not open her cell door and no medical assessment was completed;
 - (16) Ms Walters proceeded to hide behind her mattress in her cell for a period of several hours;
 - (17) at approximately 5.15pm, Ms Walters was provided her evening meal, but threw it onto the floor of her cell;
 - (18) Ms Walters refused to comply with the unit manager's counselling and the directions given to clean up the food mess; instead she chose to remain hiding behind her mattress; and
 - (19) Ms Walters remained in her cell for the Overnight Lockdown and until 9.00am the following day, 16 November 2018 to complete her chores, shower and visit the mental health nurse.
57. On 21 November 2018, there was an incident (incident ID I56528799) which included the following events:
- (1) at approximately 11.50am, Ms Walters was instructed to return to her cell for the lunchtime lockdown;
 - (2) Ms Walters was counselled for several minutes about why she needed to move to cell, but she was non-compliant;

- (3) officers offered to carry a spider that, Ms Walters was keeping in a cup, to her cell for her;
- (4) Ms Walters was issued a use of force warning prior to force being used;
- (5) Ms Walters kicked the officers when they attempted to escort her to cell;
- (6) Ms Walters attempted to strike an officer;
- (7) Ms Walters was placed into the prone position with a figure four restraint and handcuffs were applied;
- (8) the officers were required to carry her to her cell;
- (9) Ms Walters was counselled by the officers during the escort;
- (10) Ms Walters attempted to scratch the officers whilst they removed her handcuffs;
- (11) at approximately 12.10pm, a clinical nurse attempted to assess Ms Walters who refused to engage with the nurse and remained hiding behind her mattress;
- (12) this use of force incident and use of handcuffs incident were approved by the superintendent;
- (13) Ms Walters' caregiver was informed of the incident;
- (14) Ms Walters was given a loss of television privileges for the remainder of the day and was given a work time order which she served in Cue that evening;
- (15) at approximately 1.50pm, Ms Walters was counselled by staff about pulling her hair out and scratching the top of her foot;
- (16) at approximately 2.35pm, Ms the clinical nurse was able to assess Ms Walters and nil injury was identified or claimed by Ms Walters;
- (17) at approximately 4.00pm, Ms Walters was released from her cell to attend a visit with her family in the Peel Unit;

- (18) at approximately 4.45pm, Ms Walters was counselled regarding the loss of her television privileges, and Ms Walters was receptive to counselling; and
 - (19) Ms Walters was returned to her cell for the Overnight Lockdown at approximately 5.00pm; Ms Walters was given animal books to read and the unit manager counselled Ms Walters about the loss of privileges. Ms Walters remained in her cell until 8.15am the following morning, 22 November 2018 when she had a shower, attended to chores, was counselled by the Assisting Superintendent and was escorted to education.
58. On 23 November 2018, there were two incidents (incident IDs I56664642 and I56672540) which included the following events:
- (1) from approximately 9.00am to 3.15pm, Ms Walters was out of her cell other than to have her lunch;
 - (2) at approximately 2.00pm, an ARMS meeting was conducted where it was discussed that Ms Walters had been observed as displaying ongoing poor behaviour towards staff, including:
 - (a) making inappropriate comments;
 - (b) drawing pictures that resemble staff being killed or already dead;
 - (c) making noticeable efforts to use intimidation tactics such as moving into staff personal space and having prolonged eye contact to get staff to do as Ms Walters instructs them to do;
 - (d) making comments to the effect that she is the alpha and has more rights than any other detainee who stays in Cue; and
 - (e) the recommendation was made for Ms Walters to remain on ARMS;
 - (3) at approximately 3.20pm, when Ms Walters was being escorted back to her cell in Cue by officers for the afternoon staff break, Ms Walters made a passing comment to staff, with words to the effect that if she doesn't get let out after the break, she will hurt them;

- (4) an officer instructed Ms Walters to cease those comments and to move directly to cell;
- (5) Ms Walters complied with the direction and the cell door was then secured;
- (6) at approximately 5.30pm, two officers attended Ms Walters' cell in Cue to counsel her about her behaviour earlier that afternoon (incident ID I56672542) when she threatened to hurt staff if she did not get let out after the break;
- (7) an officer told Ms Walters that due to her threats towards another officer, she would not be leaving her cell for the evening;
- (8) Ms Walters blamed her behaviour on staff and said words to the effect that if they did what she told them, they would not get hurt;
- (9) Ms Walters became agitated and was observed to be clenching her fist;
- (10) Ms Walters did not appear to be receptive to counselling;
- (11) an officer told Ms Walters that due to her threatening behaviour to another officer, that she would not be leaving her cell for the evening and would remain in her cell for the afternoon unlock period;
- (12) as the officers backed out of the cell, Ms Walters lunged out in an aggressive manner, however the officers had left the cell and managed to secure the cell;
- (13) Ms Walters was observed yelling abusive comments towards an officer, including words to the effect of "just go kill yourself";
- (14) Ms Walters' caregiver was notified;
- (15) the incident was also referred to psychology;
- (16) as a result of the incidents on this day, Ms Walters was punished with a loss of television privileges from 23 November 2018 to 24 November 2018 inclusive and a loss of program placement; and
- (17) Ms Walters remained in her cell for the balance of the afternoon and the Overnight Lockdown; her cell was unlocked the following morning, 24 November 2018 at

approximately 10.45am when Ms Walters attended to chores and had a shower before going into the yard.

59. On 24 November 2018, there was an incident (incident ID I56692562) which included the following events:

- (1) at approximately 7.00am, officers observed Ms Walters hiding behind a mattress in her cell and were unable to perform a welfare check as they could not see Ms Walters;
- (2) the officers then entered Ms Walters' cell to remove the mattress and observed strips of ripped doona cover around Ms Walters' wrists and ankles;
- (3) the officers removed the mattress from Ms Walters' cell;
- (4) the officers attempted to counsel Ms Walters who declined and the officers then said words to the effect that they would come back "in a bit";
- (5) the officers subsequently counselled Ms Walters to remove the strips of doona cloth around her wrists and ankles, which she said were her bracelets;
- (6) the officers exited the cell and secured the cell door without incident;
- (7) the officers told Ms Walters that she would need to remove the torn items from her wrists and ankles prior to unlock; Ms Walters began complying with the direction;
- (8) Ms Walters' caregiver was informed; and
- (9) the incident was referred to psychology.

60. On 26 November 2018, there was an incident (incident ID I56796051) which included the following events:

- (1) at approximately 4.00pm, Ms Walters was in the yard in Cue and refused to comply with requests to exit the yard to return to her cell for the afternoon lockdown;
- (2) Ms Walters was observed as smiling and making no verbal response when asked to exit the yard to return to her cell;

- (3) an officer instructed Ms Walters again to move to her cell to which she responded "I'll think about it";
- (4) in accordance with her PSP, Ms Walters was given further time to process the instruction which she ignored;
- (5) a code green was called by the officer;
- (6) recovery officers and the unit manager attempted to counsel Ms Walters to return to her cell without the use of restraints; another officer was standing nearby with a soft shield in case it was required; a use of force warning was issued;
- (7) the officers were positioned in the yard and Ms Walters started walking forward, when she suddenly ran towards the unit manager, knocking her into the yard fence; Ms Walters started striking the unit manager's head and face;
- (8) the other officers then pulled Ms Walters off the unit manager, restrained Ms Walters to the ground using the prone position and applied handcuffs to Ms Walters with her hands behind her back;
- (9) Ms Walters then stated that she would walk and was helped by her feet by the officers before being escorted back to her cell;
- (10) in the cell, Ms Walters was asked to kneel before the handcuffs would be removed but she did not comply; Ms Walters instead kicked out at one of the officers;
- (11) the officers then placed Ms Walters on the ground in the prone position and a pat search was conducted;
- (12) the officers removed the handcuffs from Ms Walters and told her to remain on the ground while a pat search was performed and the officers performed a hot exit from the cell;
- (13) the officers then secured the cell;
- (14) at approximately 7.00pm, a clinical nurse assessed Ms Walters from the cell window and was informed by Ms Walters that she had no injuries; the clinical nurse also

observed that Ms Walters had no obvious injuries and accordingly, noted that nil was treatment required;

- (15) this use of force incident and use of handcuffs incident were authorised by a senior officer;
- (16) Ms Walters' caregiver was informed the following day; and
- (17) Ms Walters was then confined to her cell for the remainder of the Overnight Lockdown until approximately 9.45am when she attended to her chores and showered before attending to yard activities.

61. On 28 November 2018, there was an incident (incident ID I56879825) which included the following events:

- (1) at approximately 11.25am, Ms Walters was in the yard area of Cue and was instructed by two officers to return to her cell in accordance with her PSP;
- (2) Ms Walters did not respond and the officers gave Ms Walters a second direction to return to her cell and a use of force warning was issued;
- (3) Ms Walters said words to the effect of, "what, you two are going to take me to my cell, where's recovery?";
- (4) in accordance with Ms Walters' PSP, the officers then issued another use of force warning and called a code green;
- (5) Ms Walters then said words to the effect of "you had better remove your glasses" to one of the officers;
- (6) Ms Walters lunged forward and began throwing punches towards the officer's right ear and right cheek and she got a hold of the officer's glasses;
- (7) another officer took hold of Ms Walters' right arm and applied a wrist weave in order to restrain Ms Walters;
- (8) one of the officer secured Ms Walters' left arm and a third officer entered the yard to assist with restraining Ms Walters;

- (9) Ms Walters then kicked the third officer and made contact with his left thigh;
 - (10) Ms Walters was then secured and escorted to her cell where she was placed in a prone position;
 - (11) the officers conducted a pat search and performed a hot exit;
 - (12) at approximately 11.30am, a clinical nurse attended Ms Walters cell to medically assess her after a use of force incident; however the clinical nurse was unable to medically clear Ms Walters as she was under her duvet and would not speak through the glass; and the nurse returned at approximately 1.54pm to assess Ms Walters who again declined to speak with the nurse;
 - (13) Ms Walters' mother was informed of the incident; and
 - (14) Ms Walters remained in her cell for the remainder of the day, either sleeping or laying on her bed quietly and looking out the window, and including for the Overnight Lockdown; Ms Walters came out of her cell at 11.15am the following day, 29 November 2018, after significant counselling from the officers and the Assisting Superintendent.
62. On 29 November 2018, there was an incident (incident ID I56955032) which included the following events:
- (1) at approximately 3.55pm, Ms Walters was in the yard area of Cue and was informed by officers to return to her cell for a staff break and Ms Walters did not respond;
 - (2) at approximately 4.00pm, Ms Walters was again informed by two officers to return to her cell;
 - (3) Ms Walters replied that she will "think about it", and the officers repeated the instruction and issued a use of force warning;
 - (4) Ms Walters still did not comply with the instruction and the officers called a code green and approached Ms Walters when she started throwing punches towards the officers with a closed fist;

- (5) the officers restrained Ms Walters' arms and put her right arm in a wrist weave, before escorting her to an observation cell;
- (6) the officers then placed Ms Walters into a prone position on a mattress that was placed on the floor and another officer took control of Ms Walters' legs;
- (7) a pat search was conducted and the officers conducted a hot exit from the cell; Ms Walters dug her fingernails into an officer's right wrist, breaking the skin;
- (8) at approximately 4.15pm, a clinical nurse attended Ms Walters' cell to medically assess her after the use of force incident; however the clinical nurse could not see Ms Walters as she was hiding behind a mattress and refused to engage with the nurse;
- (9) Ms Walters hid behind her mattress out of sight from staff;
- (10) the officers obtained permission from a senior officer to enter Ms Walters cell to remove the mattress due to concerns for her welfare (given her recent self-harm behind a mattress) and the inability of staff to maintain a visual of Ms Walters;
- (11) the officers gave instructions to Ms Walters to come out from behind the mattress but those instructions were ignored;
- (12) the officers then entered Ms Walters' cell including with a soft shield and attempted to remove the mattress;
- (13) when the officers tried to remove the mattress, Ms Walters grabbed the soft shield and attempted to punch the officers;
- (14) the officers ultimately removed the mattress so that staff could establish continuous observation as per Ms Walters' ARMS risk management plan;
- (15) the officers then exited Ms Walters' cell without further incident;
- (16) the clinical nurse attended Ms Walters' cell again and reported that Ms Walters still refused to engage with the nurse and instead hid behind the toilet, but observed that there were no obvious signs of injury to Ms Walters;

- (17) Ms Walters' caregiver was informed of the incident; and
 - (18) this use of force incident was authorised by the superintendent.
63. On 30 November 2018, there was an incident (incident ID I56999351) which included the following events:
- (1) at approximately 3.45pm, Ms Walters was in the yard area of Cue and was informed by officers to return to her cell for a staff break and Ms Walters did not respond;
 - (2) the officers issued a second instruction to Ms Walters to return to her cell which Ms Walters did not respond to;
 - (3) the officers issued a use of force warning and called a code green at approximately 3.50pm;
 - (4) Ms Walters then took a fighting stance and lunged at an officer, punching an officer in the head and made contact with the officer's right temple;
 - (5) the officers then restrained Ms Walters using a wrist weave to reduce the opportunity for further assault;
 - (6) Ms Walters was secured against the brick wall in the yard before being escorted back to her cell;
 - (7) the officers then placed Ms Walters into a prone position on a mattress that was placed on the floor and another officer took control of Ms Walters' legs;
 - (8) the officers then put Ms Walters into a figure four position before conducting a pat search of Ms Walters and nil was found;
 - (9) the officers then conducted a hot exit of Ms Walters' cell and secured the cell door and informed the clinical nurse of the use of force;
 - (10) this use of force incident was authorised by the superintendent;
 - (11) Ms Walters' caregiver was informed of the incident;

- (12) at approximately 4.15pm, a clinical nurse attended Ms Walters' cell to medically assess her after the use of force incident; however the clinical nurse could not see Ms Walters as she was covered with a doona and refused to engage with the nurse;
 - (13) Ms Walters stood against the window and then moved back to the bench to sit down; the nurse could not assess Ms Walters;
 - (14) Ms Walters then started to tear apart her mattress;
 - (15) at approximately 5.05pm, Ms Walters was observed continuing to rip up the mattress;
 - (16) at approximately 5.45pm, Ms Walters was observed as ripping up the mattress cover;
 - (17) at approximately 5.50pm, Ms Walters could be seen eating the fluff from the mattress and she had a piece of material over 1 metre long wrapped around her neck like a scarf;
 - (18) at approximately 5.55pm, the ripped-up mattress was ultimately removed from Ms Walters' cell when Ms Walters passed the ripped-up mattress through the hatch in exchange for bananas; and
 - (19) Ms Walters remained in her cell including for the Overnight Lockdown and refused to leave her cell the next morning, 1 December 2018.
64. On 15 December 2018, there was an incident (incident ID I57735465) which included the following events:
- (1) at approximately 10.30am, Ms Walters was participating in her assigned chores in the Cue bathroom but became abusive and physically threatening towards an officer;
 - (2) Ms Walters was given a 5-minute warning to complete her chores and return to her cell to cool off but during these 5 minutes, Ms Walters continued to display defiant behaviour and was speaking rudely to an officer;
 - (3) when the 5-minute warning was up, Ms Walters was instructed to move to her cell but she did not comply with that instruction;

- (4) earlier in the morning at approximately 9.00am, Ms Walters had asked for a Texta pen or a radio earlier that morning but was not granted one, and was told that she was not getting a Texta as she had not followed earlier instructions to change into a clean set of clothes after showering;
- (5) Ms Walters received counselling from an officer who explained she could spend some time in cell due to her ongoing abuse towards staff and for not following instructions;
- (6) Ms Walters said words to the effect of “if you don’t stop talking, it sounds like you want to be punched, just like [another officer]”;
- (7) Ms Walters was instructed by an officer again to return to her cell, that cleaning time was over and was issued a use of force warning;
- (8) Ms Walters moved out of the bathroom area and walked slowly down the hall and stopped outside her cell door;
- (9) at approximately 10.38am, Ms Walters, standing outside her cell door, had an exchange with an officer, asking if she would be getting out, how long she had to be well-behaved before she could get a Texta to draw with while in her cell;
- (10) the officer responded that she could if she “does the right thing”;
- (11) Ms Walters started complaining about the pillows and the officer said that she would get another pillow for her;
- (12) Ms Walters complained again about not getting a Texta pen and when asked if she was going into her cell or not, she said she was “thinking about it”;
- (13) the officers eventually attempted to move Ms Walters into her cell but Ms Walters lunged at an officer and attempted to punch her, striking the officer on her forehead with a closed fist;
- (14) an officer restrained Ms Walters’ right arm and another officer lifted Ms Walters slightly off the ground in a vertical upright position, carrying her into the cell before placing her on her feet and conducting a hot exit;

- (15) once the officers exited the cell, Ms Walters charged towards the door but the officers managed to secure the door before Ms Walters could reach the door;
 - (16) the officers did not conduct a pat search as Ms Walters was very agitated and due to the nature of her entry into the cell;
 - (17) at approximately 11.45am, a clinical nurse attended Ms Walters' cell to see her after the use of force; however, Ms Walters remained face down on the mattress and laying on her arms, refusing all attempts by the nurse to assess her; Ms Walters said words to the effect of "there's nothing wrong with me"; no medical treatment was provided;
 - (18) Ms Walters' mother was informed of the incident; and
 - (19) Ms Walters remained in her cell for the remainder of the day either sleeping or laying on her bed until the Overnight Lockdown; earlier in the day she was offered on a number of occasions to use the gym equipment and the fitness room but she refused.
65. On 28 December 2018, there was an incident (incident ID I58327659) which included the following events:
- (1) officers searched Ms Walters cell while she was in the shower and confiscated a piece of paper from her journal;
 - (2) the officers attended Cue to take photographs of graffiti found in Ms Walters' cell at approximately 8.30am;
 - (3) Ms Walters was informed that her cell would be searched as part of the centre's routine;
 - (4) at approximately 8.45am, Ms Walters became upset when she noticed that the officers had gloves on to search her cell, saying words to the effect of "I don't want them going through my personal things. It's private";
 - (5) Ms Walters completed her cell clean and walked towards the shower area with her private journal;

- (6) an officer searched Ms Walters' cell and found:
 - (a) 1 x plastic 3D picture that was removed from a puzzle box – the item was removed and placed in an evidence bag and given to security; and
 - (b) graffiti and threatening language towards an individual; the graffiti was photographed;
 - (7) the officers then searched Ms Walters' journal and found a piece of paper with a drawing and writing on it;
 - (8) the drawing was of a tall fence, a small fence, a pole and stairs all labelled and mapped out with the words "jump off" at the top and "Plan E"; there were written remarks by Ms Walters as to "why life for me sucks" – a picture of that note was taken and the note was placed in an evidence bag that was passed to security;
 - (9) Ms Walters finished her shower and went to the yard area where she was counselled by an officer;
 - (10) Ms Walters appeared to understand and acknowledge the counselling offered by the officer and the officer informed her that she could speak to a psychologist or an officer from the unit who she trusted; and
 - (11) at approximately 11.00am, Ms Walters had morning tea in the Peel Unit; she was returned to her cell for staff breaks for approximately an hour at 11.35am; she then attended recreation in the fitness room; Ms Walters then spent the rest of her afternoon in the Peel Unit with the bird until approximately 4.00pm when she was returned to her cell for staff breaks for approximately an hour, during which she was given her canteen order and coffee in her cell; Ms Walters had her dinner in the Cue area with another detainee for approximately an hour and was then returned to her cell at approximately 6.30pm for the Overnight Lockdown.
66. On 30 December 2018, there was an incident (incident ID I58425407) which included the following events:
- (1) at approximately 2.45pm, Ms Walters was waiting to be moved from the Peel Unit to the fitness room;

- (2) Ms Walters was visibly upset and crying about the death of her pet bird; Ms Walters was counselled by the officers who encouraged her to use the fitness room in the Peel Unit as a positive outlet for her emotions;
 - (3) Ms Walters agreed to use the fitness room and did so, however on her return to Cue from the fitness room, she attempted to slip off the handcuffs which had been applied to her in accordance with her PSP;
 - (4) Ms Walters was instructed by officers to stop slipping out of her handcuffs and she complied with the instruction when asked to do so;
 - (5) the incident was referred to psychology; and
 - (6) the conditions of Ms Walters' PSP were to be reviewed the following day, 31 December 2018.
67. On 6 January 2019, there was an incident (incident ID I58775878) which included the following events:
- (1) at approximately 4.45pm, Ms Walters was in the Peel Unit when she was getting ready to be escorted back to Cue for staff breaks; Ms Walters was instructed to walk back to Cue;
 - (2) Ms Walters told officers, words to the effect of, "I don't wanna go to Cue" and started walking slowly towards Cue in the garden, close to the perimeter of the Peel building;
 - (3) the officers instructed Ms Walters to stop walking in the garden and to walk faster; however, Ms Walters stood next to a bush or small tree adjacent to the bench outside of Cue, did not move and picked leaves off the bush/tree;
 - (4) the officers then instructed Ms Walters to walk to Cue but she ignored the instruction and the officers called a code green;
 - (5) Ms Walters then started sprinting towards the storage shed to the left of Cue and the officers called a code red for the Yeeda Unit;

- (6) while sprinting away, Ms Walters tripped between the path and the storage shed but she managed to stand up and change direction towards the shed before stumbling and falling again;
 - (7) the officers restrained Ms Walters, with one officer taking control of her arms and putting them behind her back, and another officer taking control of her legs, before handcuffs were applied to Ms Walters;
 - (8) Ms Walters was then escorted by officers to her cell in Cue where she was placed on a mattress in a prone position until another officer took control of her legs and held her in a figure four hold;
 - (9) Ms Walters was pat searched, her handcuffs were removed and the officers then performed a hot exit out of her cell;
 - (10) the use of handcuffs was authorised by a senior officer;
 - (11) whilst in her cell, from approximately 5.25pm, Ms Walters was observed talking to another detainee about how much she dislikes the unit manager, coming up with plans to assault the unit manager and saying that if she sees the unit manager outside, "I will bash her"; Ms Walters was observed ripping up her shoes and smearing her dinner throughout her cell from approximately 6.00pm;
 - (12) at approximately 6.10pm, Ms Walters was seen by the nurse who reported that there was no serious injury sighted and no treatment was needed;
 - (13) as a result of the incident, Ms Walters lost television privileges for three days (from 6 to 8 January 2019 inclusive), her PSP was to be reviewed (and appropriate changes made) on 7 January 2025; and
 - (14) Ms Walters' caregiver was informed of the incident.
68. On 6 January 2019, there was another incident (incident number I58781696) which included the following events:
- (1) at approximately 7.15pm, when Ms Walters was being counselled by officers about an earlier incident (incident number I58775878), the officers noticed ripped up pieces of paper on the floor of Ms Walters' cell;

- (2) the ripped up pieces of paper read “someone’s gonna get punched tomorrow”;
 - (3) an officer asked Ms Walters what she had meant by the words on the paper and she shrugged and asked for fruit;
 - (4) the officer also asked what Ms Walters did to her dinner and she pointed to a huge mess on the floor and wall of her cell;
 - (5) Ms Walters was counselled about not throwing food around, demanding alternative food to be delivered to her and the threatening words on the floor; and
 - (6) Ms Walters was observed to have not engaged with the officer, who instructed staff to be aware of Ms Walters’ deteriorating mood.
69. On 8 January 2019, there was an incident (incident ID I58864248) which included the following events:
- (1) at approximately 10.15am, Ms Walters was placed in the shower where she was provided with clean clothing;
 - (2) Ms Walters refused to wear her new clothes and complained that they were dirty, “fucked up” or “stained”;
 - (3) officers offered Ms Walters a different set of clothes but she had refused and started to verbally abuse officers using vulgar words;
 - (4) the officers then asked Ms Walters to return to her cell to get dressed but Ms Walters threatened to punch an officer in the face, saying words to the effect of “a well-deserved punch in the head”, and she proceeded to throw three bottles of shampoo/body wash, two bottles of conditioner and one large bar of soap at the officers, which all hit the wall and bounced into the corridor;
 - (5) the officers called a code green;
 - (6) one of the officers continued to attempt to get Ms Walters to put her top on and sought to enter the shower area asking “if I come in to give you your top, will you hit me”, to which Ms Walters said “no I’m only going to punch that other slut”; the officer handed

Ms Walters her top and she eventually agreed to wear her old shirt before recovery officers entered the shower once she was dressed;

- (7) Ms Walters was then instructed to move to her cell and given a use of force warning and she eventually exited the shower and made her way back to her cell;
- (8) Ms Walters hesitated at the door before she was firmly instructed by the officers to enter her cell, which she complied with, before her cell door was secured;
- (9) shortly after Ms Walters entered her cell, she retrieved a staple hidden in her cell and the officers observed that she was self-harming her right leg and right forearm with the staple;
- (10) the officers requested that Ms Walters return the staple which she agreed to by slipping it through the cell hatch;
- (11) a clinical nurse was immediately notified and Ms Walters was assessed at approximately 11.55am for physical injuries; Ms Walters declined treatment and did not voice any concerns; she was cleared of any serious injuries;
- (12) Ms Walters' caregivers were notified of the incident;
- (13) Ms Walters was given a loss of canteen/spends privileges for four days (from 8 to 11 January 2019 inclusive) and loss of program placement;
- (14) Ms Walters' PSP was to be revised and Teachers and psychology services were consulted following the incident; and
- (15) Ms Walters was in her cell from approximately 11.15am to 3.30pm including due to staff training; Ms Walters attended a visit from her family from approximately 3.45pm to 4.45pm; Ms Walters then returned to her cell for dinner whilst watching TV and for the Overnight Lockdown; Ms Walters came out of her cell at approximately 9.15am the following day, 9 January 2019; she spoke with the unit manager and attended education.

70. On 11 January 2019, there was an incident (incident ID I59051286) which included the following events:
- (1) at approximately 4.50pm, Ms Walters was attending a family visit in the Peel Unit when the discussion between Ms Walters and her family had become argumentative and she said that she would “bash” officers;
 - (2) an officer interjected twice and asked Ms Walters to be more respectful in the way that she spoke;
 - (3) after Ms Walters’ family left, Ms Walters was instructed to stand up to be restrained and escorted to her cell in Cue; however, she refused to comply and remained standing with her back against the wall in the Peel Unit;
 - (4) Ms Walters was given two use of force warnings by the officers;
 - (5) Ms Walters then approached the officers and said words to the effect of “I’ll show you use of force” and lunged forward at one officer, striking the officer’s left cheek with a closed right fist;
 - (6) the officers called a code amber and another officer restrained Ms Walters’ right arm before she kicked a second officer, striking that officer’s right inner thigh;
 - (7) Ms Walters was then restrained by the officers to the ground in a prone position; she was handcuffed and escorted to her cell in Cue;
 - (8) Ms Walters was then placed on a mattress and put in a figure four position; a pat search was conducted and the handcuffs were removed from Ms Walters; the officers performed a hot exit from her cell;
 - (9) this use of force incident and use of handcuffs incident were authorised by the superintendent;
 - (10) Ms Walters’ caregiver was notified of the incident;
 - (11) at approximately 5.05pm, another officer observed Ms Walters self-harming through the window to her cell, where she had found a staple and used it to scratch herself;

- (12) Ms Walters continued to scratch her arms and legs with the staple until 5.15pm before the officers contacted a clinical nurse at approximately 5.25pm to inform the nurse that a use of force incident had occurred and that Ms Walters had self-harmed with a staple;
 - (13) in the meantime, the officers asked Ms Walters to slide the staple under the cell door but she refused;
 - (14) at approximately 5.30pm, Ms Walters rang the cell call system and asked what she would receive for handing over the staple and she asked if recovery were going to come back to get the staple;
 - (15) at approximately 6.15pm, Ms Walters handed over the staple through the cell hatch door in exchange for her meal and bedding;
 - (16) at approximately 6.45pm, a nurse assessed Ms Walters through the Perspex window and noted her superficial scratches to both arms and legs; no treatment was required and Ms Walters was content to self-monitor for infection control; and
 - (17) Ms Walters remained in her cell for the Overnight Lockdown and until approximately 9.40am the following day, 12 January 2019, when Ms Walters attended to her chores and showered.
71. On 15 January 2019, there was an incident (incident ID I59237153) which included the following events:
- (1) at approximately 3.45pm, Ms Walters was standing in the back right corner of the gymnasium and would not comply with officers' requests to be handcuffed to be escorted back to her cell, as required under her PSP;
 - (2) at approximately 3.50pm, recovery officers were called to assist to escort Ms Walters out of the gym;
 - (3) an officer engaged with Ms Walters at length, to encourage her to allow the officers to apply handcuffs as required under her PSP and she was given time to comply with the instructions;

- (4) officers called a code green for the gym as Ms Walters' body language and demeanour suggested that she would not follow instructions;
- (5) Ms Walters was told to place her hands behind her back for handcuffs to be safely applied; Ms Walters did not comply and a use of force warning was issued by the officers;
- (6) Ms Walters said words to the effect of, "I won't put my hands behind my back but I might put them out front" and put up her fists to take a fighting stance towards the officers;
- (7) the officers then attempted to restrain Ms Walters with handcuffs but she lunged at one officer with a closed fist and attempted to strike that officer in the head, who deflected the strike;
- (8) Ms Walters was then restrained to the ground and the officers took control of her legs and applied handcuffs before she was escorted to Cue unit and placed in her cell;
- (9) the officers then conducted a pat search and as an officer removed Ms Walters' right handcuff, Ms Walters immediately stuck out with her arm in an attempt to assault the officer;
- (10) the officers restrained Ms Walters again by placing her on a mattress using a figure four hold and removed her handcuffs from her left hand before performing a hot exit from her cell;
- (11) this use of force incident and use of handcuffs incident were authorised by the superintendent;
- (12) Ms Walters' mother was informed of the incident;
- (13) an officer later observed that Ms Walters was scratching her legs with an unknown item;
- (14) a clinical nurse attempted to assess Ms Walters at approximately 4.30pm but was unable to do so; however, from the nurse's viewing of Ms Walters through the vandalised window to her cell, there appeared to be no injuries to Ms Walters;

- (15) Ms Walters was given a loss of her canteen and gym privileges for 1 week and television privileges for 3 days;
 - (16) the unit manager, in consultation with a senior officer decided that Ms Walters would remain in Cue, with visits to the Peel Unit, until she modified her behaviour and followed instructions; and
 - (17) Ms Walters remained in her cell for the rest of the afternoon and for the Overnight Lockdown; Ms Walters came out of her cell the following day, 16 January 2019 when the unit manager attended to counsel Ms Walters and she met with case planning in the common area of Cue.
72. On 19 January 2019, there was an incident (incident ID I59420259) which included the following events:
- (1) at approximately 8.30am, officers observed that Ms Walters had some writing on her cell floor by ripping up paper to form words;
 - (2) specifically, Ms Walters had ripped up paper to form the words on the floor of a vulgar and threatening nature;
 - (3) at approximately 9.15am, an officer entered Ms Walters' cell to counsel her but she was not receptive to counselling and showed the officer her middle finger;
 - (4) the officer instructed Ms Walters to clean up the mess on her floor but she did not comply and instead, pushed the mess to one side of the floor at approximately 10.55am;
 - (5) at approximately 11.18am, Ms Walters cleaned up her cell and disposed of the rubbish, including by sweeping and mopping her cell; and
 - (6) Ms Walters continued to be unresponsive to counselling and was given a loss off television privileges for two days.

73. On 29 January 2019, there was an incident (incident ID I59920491) which included the following events:
- (1) at approximately 11.25am, Ms Walters returned from Court in the rear pod of a police vehicle and upon arriving at Banksia Hill's admissions sally-port, Ms Walters refused to exit the vehicle despite being given instructions to do so by officers;
 - (2) another officer counselled Ms Walters, reminding her of her good behaviour and asking her to exit the vehicle but Ms Walters did not follow instructions and made no attempt to exit the vehicle;
 - (3) after time was given to Ms Walters to comply with the officers' directions to exit the vehicle, a use of force warning was given;
 - (4) under the instruction of a senior officer, an officer then entered the vehicle to remove Ms Walters but Ms Walters struck the officer to the side of his head with a closed fist and kicked him in the stomach area;
 - (5) another officer then entered the vehicle to assist with restraining Ms Walters and both officers held her arms and moved her out of the vehicle with the assistance of another two officers who secured Ms Walters' legs;
 - (6) Ms Walters continued to struggle with the officers while being moved out of the vehicle and once she was out of the vehicle, she was placed in the prone position on the ground and her legs moved into a figure four position before she was handcuffed and moved to her cell in Cue;
 - (7) while Ms Walters was moved to her cell, she continued to attempt to get her hands out of the handcuffs; she was instructed to stop doing so but she didn't and instead continued to do so;
 - (8) Ms Walters was then placed on a mattress in her cell in the prone position and her legs moved into a figure four position while a pat and wand search was conducted;
 - (9) the officers then removed the handcuffs from Ms Walters (whilst she was scratching them) and performed a hot exit;

- (10) this use of force incident and use of handcuffs incident were approved by a senior officer;
 - (11) a clinical nurse attempted to assess Ms Walters at approximately 1.30pm; Ms Walters' declined that she had any injuries following the incident;
 - (12) Ms Walters' mother was informed of the incident; and
 - (13) following the above incident, at approximately 11.30am, it was observed that Ms Walters had extensive cuts to her arms and legs using a piece of glass that she secreted in her mouth during the day; Ms Walters refused medical treatment (incident ID I59948989).
74. In addition to the above events, the following additional events occurred as part of the same incident:
- (1) Ms Walters was also observed moving her mattress against a side wall and hiding behind the mattress such that the officers could not see Ms Walters from her cell window or via the cell camera;
 - (2) due to concerns held by a senior officer about Ms Walters self-harming (given her history of self-harming behind her mattress), the officers re-entered Ms Walters' cell with a soft shield and attempted to remove her mattress and bedding;
 - (3) Ms Walters resisted the officers and attempted to punch an officer with closed fists behind the soft shield;
 - (4) other officers removed Ms Walters' mattress, bedding and other items from her cell;
 - (5) Ms Walters was then restrained on the ground in a prone position and was moved into a figure four position before the officers performed a hot exit;
 - (6) at approximately 9.30pm, a clinical nurse assessed Ms Walters who was happy to engage; she had extensive superficial self-harm linear cuts to all limbs; no urgent treatment was required and Ms Walters declined to clean the dried blood off;
 - (7) an email was sent to the day shift unit manager to contact the caregivers of Ms Walters, which they did the following day; and

- (8) following the incidents on 29 January 2019, Ms Walters was in her cell for the remainder of the day and the Overnight Lockdown either sleeping or watching TV (with the exception of the further incident detailed in sub-paragraphs (1) to (5) above) until approximately 9.15am on the next day, 30 January 2019 when she attended to chores and had a shower.
75. On 26 February 2019, there was an incident (incident ID I61332612) which included the following events:
- (1) at approximately 5.35pm, Ms Walters was being escorted from Cue to the Yeeda Unit for dinner with the other detainees when she attempted to run away;
 - (2) an officer held onto Ms Walters' shirt; Ms Walters then turned around and kicked the officer's upper left leg and said words to the effect of "get the fuck off me you fucking bitch";
 - (3) Ms Walters continued to struggle against the officer's hold and then turned to swing her fist against the officer's face, who had turned her face away and Ms Walters' fist struck with force on the officer's right ear; a code amber was called;
 - (4) Ms Walters then managed to wriggle free of the officer's grip and ran away to the back of the Cue building and climbed the Cue fence from the recreation yard and onto the fenced roof; a code red was called;
 - (5) Ms Walters ignored all instructions from the officers to come down from the roof despite being counselled by several officers to do so;
 - (6) Ms Walters remained on the roof for approximately four hours, during which, she had continuously moved back and forth along the area above the exercise yard to the Cue roof, and also tore branches off a small tree that was close to the roof to make what appeared to be a shelter; the Special Operations Group attended the centre;
 - (7) there were several officers on the scene who were told not to engage with Ms Walters;
 - (8) an officer eventually told Ms Walters that due to her behaviour, she would be placed in rip-proof clothing if she stayed on the roof much longer and be subject to a strip search if she was forcibly removed;

- (9) Ms Walters eventually descended the roof on her own accord by climbing down the fence of the recreation area at approximately 9.30pm;
- (10) during the time that Ms Walters was on the roof, the entire centre was locked down and several members of staff maintained a cordon;
- (11) once off the roof, the officers immediately took hold of Ms Walters' arms and applied handcuffs which she resisted, and she was then placed in the prone position on the grass;
- (12) Ms Walters was then escorted to her cell in Cue;
- (13) once Ms Walters arrived at her cell, officers removed the handcuffs from Ms Walters and conducted a half-half strip search of Ms Walters;
- (14) Ms Walters was then provided with a mattress and dinner and secured in her cell;
- (15) at approximately 10.05pm, Ms Walters requested bedding and an officer counselled Ms Walters, asking why she got on the roof;
- (16) Ms Walters said that she was sick of being locked up in Cue and eventually started to cry;
- (17) officers delivered bedding to Ms Walters at approximately 10.22pm;
- (18) a clinical nurse attempted to assess Ms Walters at approximately 11.30pm but Ms Walters refused to engage and the nurse assessed that her injuries were unknown and none were disclosed;
- (19) Ms Walters asked for her lights to be turned off at approximately 11.47pm and soon settled to sleep and remained in her cell for the remainder of the Overnight Lockdown; she came out of her cell the next day, 27 February 2019 at approximately 9.45am to attend to chores and shower; and
- (20) Ms Walters was given a loss of her television privileges for one day, and the senior officer of security recommended that Ms Walters remain in Cue for observation for a minimum period of 28 days with the necessary support and guidance to monitor her

behaviour and that her PSP be amended to ensure that all her movements are undertaken with restraints.

76. On 27 February 2019, there was an incident (incident ID I61384426) which included the following events:

- (1) at approximately 1.55pm, Ms Walters was in her cell (being a multi-purpose cell) and told officers that she wanted to return to her original observation cell (01) in Cue;
- (2) Ms Walters said words to the effect of “I own that cell, it’s my fucking cell”;
- (3) the officers informed Ms Walters that she would be moving into another observation cell (02) based on a management decision;
- (4) Ms Walters then became abusive towards the officers, saying words to the effect that she would punch officers in the face when she is out of her cell and continued to shout and appeared agitated; and
- (5) as a result of the incident, Ms Walters lost her privileges for canteen/spends for three days (from 27 February 2019 to 1 March 2019) and lost television privileges for the day until lockdown that evening.

77. On 27 February 2019, there was another incident (incident ID I61397298) which included the following events:

- (1) at approximately 4.25pm, Ms Walters refused to move to observation cell 02 after her shower and stated that observation cell 02 was contaminated with “cunt blood”;
- (2) Ms Walters was instructed to move to her cell and needed to comply with the instruction;
- (3) Ms Walters was counselled by officers for several minutes but continued to refuse to relocate to her cell on her own, sitting in a chair in the lounge, refusing, and a use of force warning was given;
- (4) the officers then took hold of Ms Walters’ arms to lift her from a chair to her feet;

- (5) the officers used the wrist weave hold while escorting Ms Walters to the cell and when she was in her cell, the officers put Ms Walters face down in the prone position on a mattress on the cell floor and used a figure four restraint; the officers then performed a hot exit from the cell;
 - (6) Ms Walters was give a loss of television privileges for 2 days;
 - (7) Ms Walters' caregiver was notified; and
 - (8) Ms Walters was in her cell including for the Overnight Lockdown.
78. On 27 February 2019, there was a third incident (incident ID I61405449) which included the following events:
- (1) at approximately 6.45pm, Ms Walters was not visible in her cell from the viewing windows; an officer went outside to see if they could see anything through the outside window but couldn't see anything other than Ms Walters' t-shirt; the officer notified a senior officer of the situation;
 - (2) Ms Walters was not responding to the officer's counsel nor did she move from behind the mattress when counselled; the officer continued to counsel Ms Walters on numerous occasions to no avail;
 - (3) at approximately 7.45pm, the unit manager attended to counsel Ms Walters; she came out from behind the mattress and began complaining about her cell placement, demanding to be moved; the unit manager counselled Ms Walters at length; the unit manager notified Ms Walters that she would not be moved during a night shift and would remain in that cell for the evening;
 - (4) at approximately 8.00pm, Ms Walters self-harmed by wrapping a piece of fabric around her neck and pulling it tight, such that the piece of fabric eventually broke;
 - (5) the unit manager attended again and counselled Ms Walters; during this conversation, Ms Walters complained about the cleanliness of the cell using vulgar and derogatory language, querying why she had to move cells; the cell appeared to be of a clean standard;

- (6) a nurse attended and examined Ms Walters; she observed red marks on or around Ms Walters' neck; and
 - (7) Ms Walters refused all meals offered to her on this day but at approximately 8.35pm, Ms Walters requested her television be turned on and appeared settled for the remainder of the evening.
79. On 28 February 2019, there was an incident (incident ID I61456765) which included the following events:
- (1) at approximately 2.35pm, Ms Walters tied material from her t-shirt around her neck;
 - (2) the officers and the unit manager counselled Ms Walters, who then ceased tying the material around her neck; and
 - (3) the officers noted Ms Walters "seems still very upset and angry" after her prior roof ascent.
80. On 1 March 2019, there was an incident (incident ID I61505084) which included the following events:
- (1) at approximately 4.45pm, Ms Walters was observed by officers holding a stick in the yard of the Yeeda Unit in a threatening manner; a code amber was called;
 - (2) Ms Walters was counselled by the officers and agreed to drop the stick;
 - (3) Ms Walters was instructed to return to her cell, and the officers told her that force would be used if she did not comply;
 - (4) Ms Walters complied and walked back to her cell without any use of force or further incident; once returned to her cell, Ms Walters was pat searched, and nil items were found;
 - (5) once Ms Walters was in her cell, she used her mattress to obscure the cell camera;
 - (6) the unit manager went to the outside window and could see that Ms Walters was using a piece of glass to self-harm causing cuts and scratches to her leg and there was blood in the cell; a code amber was called;

- (7) a recovery officer was able to engage with Ms Walters and gave her a direction to sit on the bed; Ms Walters followed this direction and for her safety the officers entered the cell to assess her injuries and remove the obstructions from camera and viewing window;
 - (8) an officer counselled Ms Walters briefly and the cell door was re-secured; Ms Walters produced to the officers an additional 4 pieces of glass that she was hiding in her mouth;
 - (9) the nurse was informed of the incident and attended Cue; the nurse observed Ms Walters through the cell window; Ms Walters declined all medical treatment;
 - (10) Ms Walters complied with the officer's instruction to clean the blood from her cell; she was moved to multi-purpose cell 3 as there was an issue with the camera in her current cell (multi-purpose cell 4); and
 - (11) Ms Walters was in her cell including for the Overnight Lockdown until approximately 9.45am on the following day, 2 March 2019, when she attended to chores and showered.
81. On 18 March 2019, there was an incident (incident ID I62301949) which included the following events:
- (1) at approximately. 8.57am, Ms Walters was out of cell (her cell was unlocked) and attended to cleaning her cell;
 - (2) at approximately 9.07am, Ms Walters was wandering in Cue asking for a hair tie; officers assured her that hair tie will be provided but she was unsettled and not following instruction; the officers continued to reassure Ms Walters that all required items will be provided; Ms Walters showered and continued to be abusive towards officers;
 - (3) at approximately 9.16am, Ms Walters was secured in her cell;
 - (4) at approximately 9.50am, Ms Walters' cell was unlocked and she was counselled by the unit manager about verbally abusing staff;

- (5) after the unit manager left, Ms Walters yelled words to the effect of “if I had a knife, I would stab you all” and used other profane language;
 - (6) Ms Walters hid behind her mattress and was counselled at length by the officers and the unit manager before complying with their instructions; Ms Walters tore up a book and refused to eat lunch; she continued to abuse officers; Ms Walters then agreed to eat some food;
 - (7) Ms Walters was in her cell following the above events until approximately 3.01pm, when the Chaplain met with Ms Walters in the Cue lounge; Ms Walters was back in cell watching television from approximately 3.45pm until she attended a visit with her family at approximately 5.00pm; and
 - (8) Ms Walters was given loss of recreation privileges for 1 hour because of her behaviour.
82. On 23 March 2019, there was an incident (incident ID I62599251) which included the following events:
- (1) at approximately 9.30am, Ms Walters reported to officers that she had self-harmed by swallowing a piece of glass overnight;
 - (2) Ms Walters reported being bullied and threatened by another young person;
 - (3) Ms Walters reported that she had found a piece of glass and attempted to self-harm with it, but was unable to, and she then reported she swallowed the piece of glass; and
 - (4) the officers counselled Ms Walters; a nurse was notified and a welfare check was conducted.
83. On 23 March 2019, there was another incident (incident ID I62598571) which included the following events:
- (1) at approximately 2.15pm, Ms Walters was observed in the Cue lounge area drawing in her journal in a manner which aroused suspicion;

- (2) officers asked Ms Walters to show them her journal but she refused and commenced verbally abusing the officers;
 - (3) Ms Walters said words to the effect of “I don’t have to show you shit” and “you’re just causing shit”; a code amber was called;
 - (4) Ms Walters initially resisted instructions to return to her cell, but eventually complied by walking to her cell accompanied by the officers;
 - (5) once secured in her cell, Ms Walters covered her camera and used the cell intercom to verbally abuse staff with profane language words;
 - (6) Ms Walters was counselled by the unit manager; she was given a loss of recreation privilege for 1 day and appeared accepting of her loss of recreation time; and
 - (7) Ms Walters was in her cell for the remainder of the afternoon given the further incident detailed in paragraph 84 below.
84. On 23 March 2019, there was an incident (incident ID I62605259) which included the following events:
- (1) at approximately 3.40pm, Ms Walters rang the intercom system and spoke with an officer who requested that she uncover her camera;
 - (2) Ms Walters was observed to have superficial scratches to her arms and legs;
 - (3) the officer asked why she did that and Ms Walters replied words to the effect of “why not, nothing else to do”;
 - (4) a senior officer counselled Ms Walters about the self-harming and she surrendered the staple she used to self-harm with;
 - (5) at approximately 4.00pm, Ms Walters was attended to by a nurse and provided appropriate medical treatment and a referral to psychology was completed; and
 - (6) Ms Walters’ father was informed of the incident.

85. On 17 April 2019, there were two incidents:

- (1) there was an incident (incident ID I63736209) which included the following events:
 - (a) at approximately 11.55am, whilst attending schooling in the common area of Cue, Ms Walters was instructed to return to her cell; Ms Walters had been counselled and cautioned regarding her participation in education; she was asked on two separate occasions to engage and complete the tasks set by the teacher;
 - (b) Ms Walters did not comply with the officers' instructions, who then counselled Ms Walters for several minutes before calling recovery officers to assist with the escort by calling a code amber;
 - (c) the officer asked the teacher to pack up all education items and exit the unit; Ms Walters still had a pencil in her hand and was refusing to return the pencil to the teacher;
 - (d) Ms Walters continued not to comply with instructions and the officers then took control of Ms Walters' arms and walked her back to her cell, but she resisted the escort by kicking out at staff and insulting the officers with profanity;
 - (e) Ms Walters was then returned to her cell and a pat search and wand search were conducted before the officers left her cell;
 - (f) this use of force incident was authorised by the superintendent;
 - (g) attempts were made to contact Ms Walters' caregivers in relation to the incident;
 - (h) Ms Walters was given a loss of canteen/spends privileges from 17 to 24 April 2019 inclusive; and
 - (i) Ms Walters was assessed by the nurse at approximately 1.20pm:
 - (i) Ms Walters was sitting on the bed with arms held behind her back and legs tucked beneath her;

- (ii) the nurse was unable to open the cell and a visual was obtained through the viewing window and open hatch;
 - (iii) the nurse spoke with Ms Walters through the hatch; she denied any injury;
 - (iv) there were obvious signs of injury seen with blood spills visible on the bedding; Ms Walters denied the spills were blood and stated it was paint;
 - (v) Ms Walters declined to expose her arms or legs to sight; the nurse was therefore unable to complete an injury assessment; and
 - (vi) a visual of Ms Walters was obtained via the cell camera; she was applying some sort of instrument to her forearms; extraction of the instrument was recommended to reduce further harm;
- (2) there was a second incident (incident ID I63743254) which included the following events:
- (a) at approximately 12.12pm, officers witnessed Ms Walters ripping at her mattress and noted a small sharp twig like object next to a hole in the mattress she had made;
 - (b) Ms Walters was cautioned about damage to property and self-harm;
 - (c) Ms Walters was then observed self-harming by tying material from the mattress around her hand to bring a vein to surface, using a sharp object to pierce the vein and wiping blood from her hand;
 - (d) at approximately 1.20pm, Ms Walters was attended to by a nurse, who was unable to complete a full injury assessment as she was non-compliant, and refusing to be medically assessed (as detailed in sub-paragraph (1) above);
 - (e) at approximately 3.00pm, Ms Walters was attended to by the nurse for a second time, who recorded small superficial cuts to Ms Walters' right arm/wrist;
 - (f) Ms Walters stated that two of the cuts were new and two cuts were wounds from last week which were reopened, and she refused medical treatment and for the wounds to be cleaned or covered;

- (g) Ms Walters was encouraged to seek further nurse review if the wounds showed signs of infection;
- (h) attempts were made to contact Ms Walters' mother in relation to this incident;
- (i) at approximately 3.30pm, Ms Walters was counselled by the unit manager;
- (j) at approximately 4.00pm, Ms Walters was moved from the multi-purpose cell she was in to an observation cell (01);
- (k) at approximately 6.00pm, Ms Walters was released from her cell for her evening meal; Ms Walters returned to her cell at approximately 6.31pm for the Overnight Lockdown; and
- (l) Ms Walters had to pay \$100 restitution for the price of the mattress as it was unusable and unsafe for use.

86. On 24 April 2019, there was an incident (incident ID I64036031) which included the following events:

- (1) at approximately 3.00pm, Ms Walters was in the lounge of the Peel Unit when she became argumentative and aggressive with an officer;
- (2) officers attempted to counsel Ms Walters about her language and Ms Walters stated words to the effect "if you don't shut your mouth, you'll be sorry" in a threatening way directed at the officer;
- (3) when the officers attempted to call a code green, Ms Walters stated words to the effect "if you call a code, I will punch you in the face";
- (4) Ms Walters then ran at one of the officer and attempted to strike the officer with a closed fist;
- (5) after Ms Walters ran at an officer, the officers took control of her arms and assisted Ms Walters to the floor;
- (6) the officers secured Ms Walters' arms and legs while she was facing up on the floor and called a code amber;

- (7) when additional officers arrived to assist, Ms Walters was rolled into a prone position so that handcuffs could be applied and Ms Walters was then assisted to her feet for the escort back to her cell;
- (8) Ms Walters walked with her escort back to her cell;
- (9) on arrival at her cell, Ms Walters was put in a figure four restraint;
- (10) recovery officers then pat searched Ms Walters, conducted a wand search and removed her handcuffs;
- (11) Ms Walters attempted to scratch at the officers' hands while they removed her handcuffs and attempted to interfere with an officer's wristwatch;
- (12) this use of force incident and use of handcuffs incident were authorised by the unit manager;
- (13) Ms Walters' caregiver was notified of the incident;
- (14) at approximately 4.23pm, Ms Walters was attended to by the nurse who assessed her and provided appropriate medical treatment;
- (15) at approximately 5.10pm, Ms Walters was counselled by the unit manager; and
- (16) Ms Walters was confined to her cell and released from her cell at approximately 10.00am on the next day, 25 April 2019.

PART 2

87. During the time Ms Walters was detained in Banksia Hill, she was subject to a lockdown or a rolling lockdown as follows:

- (1) on 24 May 2018, Ms Walters was confined to her cell for a total of 90 minutes;
- (2) on 26 May 2018, Ms Walters was confined to her cell for a total of 60 minutes;
- (3) on 27 May 2018, Ms Walters was confined to her cell for a total of 105 minutes;
- (4) on 2 June 2018, Ms Walters was confined to her cell for a total of 200 minutes, and additionally opted to be in her cell for 60 minutes;
- (5) on 3 June 2018, Ms Walters was confined to her cell for a total of 115 minutes, and additionally opted to be in her cell for 130 minutes;
- (6) on 8 June 2018, Ms Walters was confined to her cell for a total of 115 minutes;
- (7) on 9 June 2018, Ms Walters was confined to her cell for a total of 395 minutes;
- (8) on 10 June 2018, Ms Walters was confined to her cell for a total of 255 minutes, and additionally opted to be in her cell for 120 minutes;
- (9) on 11 June 2018, Ms Walters was confined to her cell in a lockdown for a total of 45 minutes;
- (10) on 13 June 2018, Ms Walters was confined to her cell for a total of 60 minutes;
- (11) on 14 June 2018, Ms Walters was confined to her cell for a total of 150 minutes;
- (12) on 16 June 2018, Ms Walters was confined to her cell for a total of 15 minutes;
- (13) on 17 June 2018, Ms Walters was confined to her cell for a total of 15 minutes and additionally opted to remain in her cell for 120 minutes;
- (14) on 20 June 2018, Ms Walters was confined to her cell for a total of 125 minutes;
- (15) on 21 June 2018, Ms Walters was confined to her cell for a total of 110 minutes;

- (16) on 2 July 2018, Ms Walters was confined to her cell for a total of 315 minutes;
- (17) on 6 July 2018, Ms Walters was confined to her cell for a total of 15 minutes;
- (18) on 17 July 2018, Ms Walters was confined to her cell for a total of 50 minutes;
- (19) on 24 July 2018, Ms Walters was confined to her cell for a total of 60 minutes;
- (20) on 27 July 2018, Ms Walters was confined to her cell for a total of 45 minutes;
- (21) on 29 July 2018, Ms Walters was confined to her cell for a total of 30 minutes;
- (22) on 30 July 2018, Ms Walters was confined to her for a total of 50 minutes;
- (23) on 2 August 2018, Ms Walters was confined to her cell for a total of 90 minutes;
- (24) on 9 August 2018, Ms Walters was confined to her cell for a total of 165 minutes;
- (25) on 15 August 2018, Ms Walters was confined to her cell for a total of 45 minutes;
- (26) on 17 August 2018, Ms Walters was confined to her cell for a total of 375 minutes;
- (27) on 26 August 2018, Ms Walters was confined to her cell for a total of 45 minutes;
- (28) on 9 September 2018, Ms Walters was confined to her cell for a total of 125 minutes;
- (29) on 15 September 2018, Ms Walters was confined to her cell for a total of 300 minutes;
- (30) on 29 September 2018, Ms Walters was confined to her cell for a total of 220 minutes;
- (31) on 12 October 2018, Ms Walters was confined to her cell for a total of 70 minutes;
- (32) on 19 November 2018, Ms Walters was confined in her cell for a total of 120 minutes;
- (33) on 20 November 2018, Ms Walters was confined to her cell for a total of 300 minutes;
- (34) on 4 December 2018, Ms Walters was confined to her cell for a total of 75 minutes;
- (35) on 22 December 2018, Ms Walters was confined to her cell for a total of 55 minutes;
- (36) on 29 December 2018, Ms Walters was confined to her cell for a total of 300 minutes;

- (37) on 30 December 2018, Ms Walters was confined to her cell for a total of 315 minutes;
- (38) on 13 January 2019, Ms Walters was confined to her cell for a total of 300 minutes;
- (39) on 18 January 2019, Ms Walters was confined to her cell for a total of 95 minutes;
- (40) on 27 January 2019, Ms Walters was confined to her cell for a total of 510 minutes;
- (41) on 30 January 2019, Ms Walters was confined to her cell for a total of 185 minutes;
- (42) on 30 March 2019, Ms Walters was confined to her cell for a total of 520 minutes;
- (43) on 3 April 2019, Ms Walters was confined to her cell for a total of 570 minutes;
- (44) on 4 April 2019, Ms Walters was confined to her cell for a total of 315 minutes;
- (45) on 14 April 2019, Ms Walters was confined to her cell for a total of 18 minutes;
- (46) on 28 April 2019, Ms Walters was confined to her cell for a total of 133 minutes; and
- (47) on 4 December 2019, Ms Walters was confined to her cell for a total of 255 minutes.