

OBERSTOWN CHILDREN DETENTION CAMPUS
RESPONSE OF THE BOARD OF MANAGEMENT TO THE
RECOMMENDATIONS OF THE OPERATIONAL REVIEW
JULY 2017



CARE EDUCATION HEALTH & WELLBEING

Foreword

Oberstown Children Detention Campus provides young people referred by the courts with care and education in a safe and secure environment, helping them to address offending behaviour and prepare for a positive return to their families and communities.

The requirement that detention must be a measure of last resort and the accompanying implementation of the various diversionary measures under the legislative framework – the Children Act 2001 as amended – means that only those young people for whom no alternative sanction would be appropriate are referred to detention.

The Campus is an amalgamation of three schools in a new custom-built premises. The legislation bringing the single Campus into effect came into force on 1 June 2016 along with the appointment of the new Board of Management. Together with this change process, Oberstown has, in fulfilment of national law and policy, taken responsibility for all young people under 18 years, enabling Ireland to end the practice of detaining children in adult prisons.

The result of these changes is that the number of young people in detention (and thus in Oberstown) has been falling to an average of 40 young people—approximately 30 on detention orders and 10 on remand orders - Oberstown Campus is currently licensed to accommodate 48 boys and six girls. It also means that young people detained in Oberstown can have significant, complex unmet needs and may at times display very challenging behaviour.

The complexities of bringing together three separate entities under one means that Oberstown has experienced serious challenges in the last year. Working through these issues with staff via the Workplace Relations Commission, it was agreed by Oberstown management that three main areas of concern— Health and Safety, Security and Behaviour Management - would be reviewed by external parties.

These were completed as follows:

- A review on Security was completed in December 2016,
- Two reviews on Health and Safety were completed in January 2017,
- A review of Behaviour Management was completed in July 2017.

In September 2016, in consultation with the Minister for Children and Youth Affairs, the Board requested an additional review of the overall operation of the Campus, in line with agreed terms of reference, in a stated supportive and developmental process designed to assist ongoing developments and continuing reform. The review was undertaken by Professor Barry Goldson and Professor Nick Hardwick, and they completed preparatory and fieldwork visits over a period of three/four days during October/November 2016. The final report was received in February 2017.

The Board of Management sought independent legal advice to clarify any legal risks associated with publishing the body of the report. The advice received by the Board was that the risks were too great and so the Board decided, very regrettably, that the body of the report could not be published.

A sub-committee was given responsibility by the Board to examine the report's recommendations in detail and consult with management in relation to each and every recommendation in order that the Board could be advised as to their implementation. This document is the result of this considered process; it sets out the recommendations made by the reviewers and highlights the current position in Oberstown and details the measures that the Board understands have been taken or are due to be taken in the areas identified. It was approved by the Board on 18 July 2017.

The final development to note is that in March 2017, the Minister for Children and Youth Affairs, Dr Katherine Zappone, TD, established the Review Implementation Group and tasked it with the analysis and tracking of the recommendations of all the reviews undertaken at Oberstown. The group is chaired by Professor Ursula Kilkelly, Chair of the Board of Management at Oberstown, with representation from Oberstown management, staff, trade unions, the Irish Youth Justice Service and an external person. Work processing all of the recommendations from the reviews is almost complete and an action plan, providing for their implementation, is being finalised.



Professor Ursula Kilkelly
Chair, Board of Management
Oberstown Children Detention Campus

Operational Review: Recommendations and Comments

	RECOMMENDATION	COMMENTS
1	Accurate national data should be regularly collated, published and disseminated by the Youth Justice, Adoption Policy and Legal Division, Department of Children and Youth Affairs.	This recommendation falls under the remit of the Department of Children and Youth Affairs to address under the Youth Justice Action Plan. It has been referred to the Department for its consideration by the Review Implementation Group. However, it is noteworthy that in 2017, Oberstown initiated a plan to publish data relevant to the admission and discharge of young people on the Campus. Recent trends are being analysed and the Board understands that this data will be published on the Oberstown website on a regular basis.
2	Such data should be used for the purposes of strategic planning.	From the Board's perspective, it intends using this information for planning purposes. In particular, the Board is advised that this information will assist in the management of young people on Campus and the development of specific services to meet their needs.
3	Action should be taken as set out in the Youth Justice Action Plan 2014-2018 to develop effective means of increasing independent quantitative and qualitative research capacity to enhance the effectiveness of strategic planning.	The Board considers that this matter falls under the remit of the Department of Children and Youth Affairs under the Youth Justice Action Plan. It has been referred to the Department for its consideration by the Review Implementation Group.
4	Girls should no longer be placed at Oberstown.	The Board is not in a position to address this matter, which falls under the remit of the Department of Children and Youth Affairs to consider as a matter of national law and policy. It has been referred to the Department for its consideration by the Review Implementation Group.
5	Targeted bail supervision programmes (including intensive programmes when the circumstances require), robust remand management strategies and intensive community-based 'alternative to custody' programmes, should be systematically developed and/or developed across Ireland as an integral part of a national strategy to further 'manage-down' the numbers of young people detained in penal custody.	The Board notes that this is a matter of national policy which falls within the remit of the Department of Children and Youth Affairs to address. For information, it notes that a range of community-based sanctions are in place under the Children Act 2001 and a pilot Bail Supervision Scheme has been in place since October 2016.

6	The Youth Justice Service should develop the use of video-conferencing across Ireland to reduce the necessity of young people having to appear in person at remand hearings, but only ever in accordance with best practice principles and international standards.	Oberstown has comprehensive video-conference facilities on site and in July 2017 facilitated the first video-link to court proceedings. However, not all courts have video-link facilities. As a number of legislative and policy considerations have yet to be addressed by the relevant external parties, this falls within the remit of the Department of Children and Youth Affairs, not Oberstown, to address.
7	Family visits should be encouraged by the active promotion of the practical and financial assistance available.	The Board understands that family visits are encouraged and form a key element of Oberstown placement planning from the onset of the young person's arrival on Campus. Financial support can be accessed by families via their local Community Welfare Officers. In addition, Oberstown provides transport to enable families and others to visit. This is provided free of charge where it is considered necessary.
8	Visits should only ever be screened in cases where it is demonstrably necessary following a robust individual risk assessment.	The Board is advised that risk assessments are part of the process in place on the Campus to determine whether a visit should be screened, monitored closely or not. Work undertaken with Health and Safety staff has supported this development. Furthermore, the Board understands that visits are only ever screened in cases where it is found to be necessary following a robust individual risk assessment.
9	In accordance with the Oberstown policy, visits should never be stopped as a punishment.	The Board is clear that it is Oberstown policy that visits should never be stopped as a punishment. However, visits may sometimes not occur due to factors of safety and risk.
10	A greater range of visitors should be allowed.	The Board is advised that decisions as to who can visit young people are based on information provided at Placement Planning Meetings. Young people can request the addition of names of people who they would like to have visit and have telephone contact. These requests are considered in light of professional evaluation and risk assessment.
11	The visits location should be relaxed and comfortable.	The Board considers that visits take place in a comfortable, appropriate, purpose built environment. Some additional furniture has been added to the waiting area.

12	Smaller regional secure facilities should be provided in the medium- to longer-term in proportion to, and in tandem with, scaling back capacity at the Oberstown Campus.	This is a matter of national law and policy, falling within the remit of the Department of Children and Youth Affairs, not Oberstown, to address.. It has been referred to the Department for its consideration by the Review Implementation Group.
13	Until such time as smaller regional secure facilities might be available (see para. 65 and 66.7) , all 17-year-old boys subject to penal remands and committals in Ireland should be detained at Oberstown.	The Board can advise that this is a matter of national policy and within the remit of the Department of Children and Youth Affairs, not Oberstown, to address. It has been referred to the Department for its consideration by the Review Implementation Group. For information, since March 31st 2017, all 17 year olds are detained and remanded in Oberstown Children Detention Campus.
14	The practice of placing 17-year-old boys at Wheatfield Place of Detention is contrary to both best practice principles and international standards and, as such, it should be terminated at the earliest opportunity once Oberstown is judged by management to have sufficiently settled and stabilised.	From March 31st 2017, all young people up to 18 years detained by the courts either on remand or detention orders are sent to Oberstown. This decision was taken by the Minister for Children and Youth Affairs following a recommendation from the Director of Oberstown Children Detention Campus.
15	All staff should be both supported, and held to account, for accepting and adopting individual responsibility, for conducting themselves professionally and for working in accordance with best practice principles and international standards.	The Board understands that it is current Oberstown policy that staff are both supported and held to account with regard to their professional responsibility. Revised policies and procedures, approved by the Board, have supported consistency in practice across the Campus and work has been undertaken to support Unit Managers in their supervision of staff. Campus management began rolling out a Performance Management Development System (PMDS) to all senior and middle managers in April 2017 and this will be extended to all staff across the Campus in 2018.
16	Expert external facilitators should continue to be used to help move Oberstown forward.	The Board is aware that expert external facilitators and other professionals have been engaged in supporting the Campus for the past 12 months. Work to support senior managers in the areas of role development and management functioning was completed in May 2017. Training in Group Supervision with middle managers was completed in June 2017. A coaching/mentoring professional has been working with the Director and the Senior Management Team since February 2017 addressing role responsibility and team awareness. A review of the ongoing supports is underway.

17	The staff training policies and practices at Oberstown should be reviewed and the training programme should be maintained and developed to ensure that every member of staff receives and engages with regular and appropriate up-to-date training in all aspects of their work.	As part of ongoing HR practice at Oberstown, a review of staff training, policies and practices began in June 2017, led by the Human Resources Manager.
18	Accurate records of staff training should be maintained and, where appropriate, be made available for external scrutiny.	The Board is advised that a new, specially developed IT system ('Softworks') has been in place since March 2017. This increases the accuracy of staff training records and also allows for information to be collated for external scrutiny.
19	Staff supervision policies and practices at Oberstown should continue to be reviewed to ensure that every member of staff receives regular and appropriate supervision.	Oberstown continues to review its supervision policy on an ongoing basis. Since September 2016, Oberstown has engaged professional expertise to ensure managers are supported to deliver effective supervision to all staff.
20	Accurate records of staff supervision should be maintained and, where appropriate, be made available for external scrutiny.	As part of this process, new forms were designed and are being implemented as part of the supervision process. This will improve the recording of staff supervision, allowing for information to be collated for external scrutiny.
21	The role of the Board of Management should be clarified and a distinction made between those members with an advisory or representative role and those responsible for the overall management of the Campus.	The Board of Management is established under section 167 of the Children Act 2001 and under the Act all members assume collective responsibility for management of the Campus. The Board values the varying perspectives brought to its work by different Board members. The operation of the Board, in light of the principles of good governance, is under active consideration by the Board and its sub-committees.
22	Urgent action should be taken to resolve, without any further delay, the dispute between management and the trade union at Oberstown.	The Board is aware that Oberstown has engaged on an ongoing basis with its Trade Unions both locally, regionally and nationally under the auspices of the Workplace Relations Commission (WRC), the established, statutory industrial relations mechanism. Regular local meetings take place and actively consider a range of matters relating to the Campus operation and staffing.
23	Independent arbitration and/or legal opinion should be employed to help settle the dispute.	In addition to active engagement with the WRC, both independent arbitration and legal opinion have been explored.

24	Senior managers should have a more visible and 'natural' day-to-day presence on the units.	The Board approved a new senior management structure in April 2017. In line with this, a Chief Operations Manager and three Deputy Directors have been in place since 1st May 2017, with the specific purpose of having a visible presence across the Campus. Work on this area has recently been intensified.
25	Systematic strategic action should be taken - in accordance with the recommendations made throughout this report - to close the rupture between senior managers and frontline operational staff and to offset the need for the former to intervene in crises on the units that might otherwise be avoided	The Board is advised that a process of joint working has been undertaken between all senior managers to understand the ongoing needs of the Campus and to address the anxieties of frontline staff. There has been a particular focus on training, communication and de-escalation practices as well as adherence to best practices, record keeping, programme work and solving problems. These matters were set out in the Action Plan adopted by the Board in January 2017 and these areas will also be integrated into the Campus Strategy 2017-2020, which is close to completion.
26	The Operational Review should be used by the Board of Management and senior managers to rearticulate the role of Oberstown and the plans for its future development to all Unit Managers.	The Board can confirm that work has been undertaken to re-articulate the role of Oberstown. In January 2017, the Board of Management adopted an interim Action Plan articulating key priorities. Consultation and planning towards the adoption of a new Strategic Plan for 2017-2020, informed by staff consultation, is underway and will be presented to the Board in September 2017. Once approved by the Board, the Strategic Plan will be disseminated to all staff across the Campus.
27	Unit Managers should be tasked with cascading information pertaining to the role of Oberstown and the plans for its future development to all operational staff within their Units and, more significantly, with ensuring the consistent implementation of the same in accordance with best practice principles and international standards.	Further to the above, the Board understands that Unit Managers will be tasked with cascading the Strategic Plan within their Units. Furthermore, in December 2016, a Deputy Director was allocated specific responsibility for the management of Unit Managers and he continues to support Unit Managers to communicate with staff on all issues of best practice.

28	A single Unit Manager should have overall responsibility for each unit supported by a designated deputy to provide cover when they are not available.	A single Unit Manager has overall responsibility for each residential unit, and approval has been granted for a new grade of 'residential social care worker with responsibility' to assist Unit Managers. Discussions are ongoing with the Trade Unions with regard to the introduction of this grade on Campus.
29	A single senior manager should have responsibility for managing and supervising all Unit Managers and for chairing a weekly meeting of Unit Managers.	The Board is aware that a Deputy Director has the responsibility to manage and supervise the Unit Managers and for chairing the weekly Unit Managers' meetings.
30	Attendance at weekly Unit Manager's meetings should be a priority. In addition to discussing individual young people where necessary, the meetings should be the principal forum for discussing the development of operational policies and procedures and both arranging and reviewing their effective implementation.	The Deputy Director prioritises the weekly Unit Managers' meetings and since January 2017, this is the principal forum for the discussion of young people and policy and procedural matters on Campus.
31	Unit Managers should have a clear professional obligation for ensuring the consistent application of Campus policies and practices on their units in accordance with best practice principles and international standards.	The Board is advised that it is the duty of Unit Managers to ensure the application of Campus policies and procedures in accordance with best practice. Since September 2016, external advisors have been engaged to strengthen the capacity of the Unit Managers to fully implement this requirement on a consistent basis.
32	The purpose and function of the units should be appropriately differentiated to meet the specific needs of different 'groups' of young people (for example remand, committed, long term, short term), within a strategic framework of agreed policies , practices and procedures.	The Board is aware that the purpose and function of the residential units is increasingly differentiated to meet the specific needs of different groups of young people. Since May 2017, remanded and committed young people have been accommodated in separate units, with the relevant policies and procedures. Young people in line with the relevant serving. longer sentences are also accommodated in a distinct setting with relevant support programmes and a strategic approach for engaging with them via restorative practice commenced in June 2017.
33	Unit Managers should be appropriately supported, and held responsible and accountable, for developing the ethos, identity and services within their designated units.	As already noted, work is ongoing to support Unit Managers to develop their capacity to manage units. In addition, the Deputy Director with responsibility for Care Services is working with Unit Managers to ensure the proper care regimes are in place for young people, including developing the ethos and identity of the residential units.

34	A strategy should be developed and implemented to ensure closer integration between the School and the Units.	The Board is aware that a draft education strategy and protocol for working together between School and Campus are being developed. This is being progressed between the Board of Management and the Dublin Dun Laoghaire Education Training Board, which has responsibility for the education provision on Campus.
35	Best practice principles and the young person-centred ethos that are evident in the School should be transferred to the Units.	Care of young people on the Campus is currently based on best practice and a young person-cantered ethos, in line with the Children Act 2001. New routines and engagements are being developed to assist in the sharing of ideas and approaches between the School and the residential units.
36	The policy and practice of never allowing young people to associate in groups of more than three – both in the School and across the wider Campus – should be reviewed with a view to allowing young people on the higher ratings levels to have greater freedom of movement and association	The Campus does not have a policy of never allowing young people to associate in groups of more than three, although this practice is sometimes evident. The Campus is putting in place a strategy to support the association of young people in groups and this will evolve further throughout 2017. The Board is advised that a working group between the School and the Campus will be established in September 2017 to progress these issues on this basis.
37	The education strategy that is currently underway should be completed and implemented at the earliest opportunity in conjunction with the findings and recommendations of this Review.	The Board understands that the review of the education strategy that is being undertaken by the School Board and the Education and Training Board (ETB) will be finalised in the coming months. It will be implemented in conjunction with the recommendations of this Review as deemed appropriate by the Board of the School and the ETB.
38	Consideration should be given by the relevant government departments to resourcing the School in a way that will allow it to operate throughout the year and to provide, in collaboration with Unit staff, a greater range of evening activities.	This falls within the remit of the Department of Children and Youth Affairs and the Department of Education and Skills to consider and action. This recommendation has been referred to the Department of Children and Youth Affairs by the Review Implementation Group.
39	Systematic strategic action should be taken - in accordance with the recommendations made throughout this report - to re-establish an underpinning ethos of care and the consistent application of CEHOP across Oberstown.	The consistent application of CEHOP (the Oberstown framework for providing care, education, health, work on offending behaviour and preparation for release) is a stated goal in the Action Plan adopted by the Board in January 2017 and is a clear priority. A Deputy Director with responsibility for Care Services has been tasked with its implementation.

40	The School Council should be extended to cover the entire Campus. Independent support should be obtained to support members of the Council and to develop its role.	The Council has already been extended to operate on a cross-Campus basis. More generally, an expert in children's rights and participation is supporting the Campus to develop a Strategy for the participation of young people in decision-making at Oberstown, in consultation with a young person's advisory group. This is in line with the National Policy on Children and Young Person's Participation in Decision-Making.
41	The Director and other key members of staff should meet regularly with the Council in an organised 'constituted' forum.	Meetings have taken place between the Chairperson of the Council and the Director. The Council has been invited to meet the Director on a monthly basis as part of routine communication. Furthermore, as noted above, a Strategy for the Participation of Young People in decision-making is being developed for the Campus in line with the National Policy for the Participation of Children and Young People in Decision-Making.
42	Greater consistency and rigour is required with regard to implementing Campus policy on individual care plans and the roles and responsibilities of designated key workers.	The Head of Care and the Deputy Director with responsibility for Care Services have developed a routine to meet keyworkers and ensure they are familiar with the responsibilities of the role. A programme of training began in March 2017 to further strengthen key workers' capability.
43	More rigorous and consistent operational mechanisms should be implemented in order to systematically review individual care plans and key worker relations. Every young person should be given the opportunity - and provided with encouragement and support to be active parties within all such mechanisms.	Since October 2016 the Head of Care has assumed responsibility to chair all Placement Plan Meetings under the management of the Deputy Director with responsibility for Care to ensure more rigorous and consistent review of individual care plans. Young people attend the meetings and their views are sought. The Board understands that every young person is actively encouraged and supported to play an active part in reviewing their individual placement plans and key worker relations. The Campus Senior Management Team reviews the compliance with the placement planning process weekly to ensure that placement plans and reviews have been undertaken as per the Campus policy. Young people on detention orders have reviews every six weeks and young people on remand have them more regularly subject to court order. Furthermore, as noted above, the Board is aware that the Campus is in the process of developing a strategy to promote the participation of young people in decision-making at Oberstown, in line with national strategy in this area.

44	Restrictions on young people’s mobility around the Campus and their ability to associate with others, should only be made on the basis of rigorous individual, dynamic risk assessments.	The Board is advised that the movement of young people across the Campus is undertaken through a risk assessment. A review of the current risk assessment is scheduled to occur in September 2017 and will incorporate teachers, care staff and the Health and Safety Officer.
45	A publication schedule should be established to make data publicly available about the performance of Oberstown Children Detention Campus, including safety, security and safeguarding issues.	The Board notes that this is a matter for the Department of Children and Youth Affairs. This recommendation has been referred to the Department for its consideration by the Review Implementation Group.
46	The Government of Ireland should strengthen inspection and monitoring arrangements by ratifying OPCAT and establishing a NPM that meets international standards.	The Board notes that ratification of the Optional Protocol to the United Nations Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT) is a matter for Government. This recommendation has been referred to the Department of Children and Youth Affairs in the first instance by the Review Implementation Group.
47	More rigorous and consistently applied recording of all safety and security incidents is vital.	A new Deputy Director with responsibility for Safety and Risk was appointed in May 2017 and has been tasked with improving compliance, reporting and monitoring progress in this area. The Board is advised that significant improvement has been made in the reporting of safety issues with the introduction of IAA reports and the use of the National Incident Management System.
48	Recording systems should be urgently improved in consultation with Unit Managers and, through them, staff.	The Board is aware that work has been underway for 18 months to develop a specifically designed case management system for Oberstown that will, among other things, improve staff record keeping. It is being implemented on a phased basis to support recording systems and is expected to be completed by the end of 2017. Staff working groups have been established to support its development and roll-out. In the interim, Deputy Directors have set out with Unit Managers and staff the requirement to complete reports and records.

49	The data gleaned from such improved recording should be collated and systematically analysed on an ongoing basis.	The data gleaned from the improved recording will be collated and systematically analysed on an ongoing basis by the Campus Senior Management Team. Reports will be available to determine trends and, through weekly and monthly reviews by the Unit Managers, Deputy Directors for Care and Residential Services, compliance with procedures and policies can be determined and actions taken to improve outcomes for young people.
50	Trends and risks that emerge from data analysis should be tabled for discussion, and action, at Campus Management and Unit Manager Meetings.	The Board is advised that such information is considered, systematically analysed and actioned at weekly Campus Senior Management Team meetings to determine trends, areas of concern and improvement.
51	Young people should be consulted regularly about how safety and security might be improved.	The Board understands that regular meetings take place between young people and the Director and a range of other mechanisms for consultation with young people are being developed, including the development of an Oberstown Strategy for the Participation of Young People in Decision-Making. As part of this process, an advisory group of young people has been set up and initial discussion with them has identified the five key areas on which they want to be consulted. They are 1. Complaints, 2. Education/training, 3. Routines 4. Activities, 5 Planning for Release. This will now be progressed in line with the emerging Oberstown Strategy in this area.
52	The recent review of security should be considered and acted on as a matter of urgency.	The Security Review was completed in December 2016 and its recommendations are under consideration, and are being actioned appropriately by Campus management, the Board and the Department of Children and Youth Affairs. Furthermore, the recommendations of the Security Review, along with the recommendations of all external reviews, are being analysed by the Review Implementation Group, established by the Minister for Children and Youth Affairs in March 2017, which is developing a timed, costed action plan.

53	Alongside the review of security, appropriate action should be taken to address staff training, the swipe card/lock system, tool storage and the creation of 'sterile areas' beside perimeter fences (so nothing is available to scale them).	The Board is aware that a series of measures have been undertaken since November 2016 to address these points, as referenced, in line with the recommendations of the Security Review. Since May 2017, this work is being led by the newly appointed Deputy Director with responsibility for Safety and Risk. Furthermore, all recommendations are being analysed and tracked by the Review Implementation Group.
54	Urgent action should be taken to upgrade all deficient furniture and fittings with alternatives that are suitable for purpose, and to ensure future repairs are completed immediately.	The Board is aware that significant work has been undertaken to upgrade all deficient furniture and fittings. Measures have been taken to ensure that maintenance and building services are available out of hours, to effect timely repairs where required. A facilities management company is also now in place to address issues as they arise, meaning that the capacity now exists on Campus to ensure that all buildings are effectively maintained.
55	The Garda should only be called to the Campus in the most exceptional circumstances. In such circumstances, the most senior manager on duty shall be the only person vested with authority to call the Garda.	A protocol is in place between the Campus and An Garda Síochána to ensure that Gardaí attend the Campus in exceptional circumstances only and on the authority of the most senior manager on Campus. The Board is advised that regular formal meetings takes place between the Director and An Garda Síochána to keep matters under review.
56	The necessary action should be taken to restore a culture and operational environment in which staff are responsible, and best placed, to both care for and, when necessary, control young people. Establishing dynamic security, building positive relationships with young people and intervening approach young people and intervening appropriately to de-escalate potential conflict situations, are necessarily vital strategies that also accord with best practice principles and international standards.	An extensive range of actions has been undertaken or is underway to address the various measures suggested here. These include revision of all Campus policies and procedures, enhanced training and taking steps to support better decision-making in the residential units. The Behaviour Management Review, completed in July 2017, addresses these issues directly and its recommendations are being actioned accordingly. More generally, the Strategic Plan 2017-2020, which is close to completion, will map out the key priorities for the Campus for the next three years across all areas, taking account of the work of the Review Implementation Group.
57	A siren is not an effective or appropriate means of communicating with the local community.	The Board is clear that a siren has never been used at the Campus and will not be used as it is deemed a security risk.

58	Urgent action should be taken to devise a consistently applied strategy for communicating with the local community in any case of emergency. By this we mean: a Grade I incident, any breach of the inner perimeter security barrier and/or on any other occasion when the Garda are required to make an emergency attendance on Campus.	The Board is aware that a Protocol is in place to support effective communication between Oberstown and the local community. Regular meetings are held with neighbours to address their concerns and an agreed text alert system is in place to notify neighbours in case of an emergency. Two neighbourhood representatives sit on the Board of Management.
59	All Units should be brought back into use as quickly as possible.	As noted above, from December 2016, a facilities management company was assigned responsibility on site to ensure that all repairs and refitting work is undertaken in a timely manner. Three units were refurbished in early 2017 and a programme of refitting the remaining six units is underway and is due to be completed by the end of 2017. As a result, only one unit remains out of operation.
60	A strategy should be implemented that will serve to separate remanded and committed young people and provide a distinct operational purpose and function for each Unit, ready for implementation as soon as all of the Units are operational.	The Board confirms that this action was implemented in May 2017 following an extensive process of planning, consultation and preparation.
61	A Working Party comprising nominated members Unit Managers and members of the Senior Management Team, should be tasked with developing draft proposals for a revised behaviour management ratings system. Members of the School Council should be consulted before the proposals are presented to the Oberstown Board of Management for approval.	The Board is aware that these matters have been considered by the review of Behaviour Management, which was completed in July 2017, following consultation with staff and young people. An action plan for the ten recommendations made by the review will be finalised in August 2017 and will address the need to revise the management ratings system through a process of consultation with staff, management and young people. The recommendations of the Behaviour Management Review have also been referred to the Review Implementation Group for analysis and tracking.
62	Once approved the revised behaviour management ratings system should be implemented without delay. Unit Managers should be tasked with monitoring the implementation of the revised system and ensuring that it is applied consistently and fairly	The action plan being developed will include steps to ensure that the new behaviour management ratings system is implemented fairly and consistently across Campus. The Deputy Director for Care Services will have responsibility for keeping this under review.

63	All staff should be provided with up-to-date behaviour management training and refresher training at regular intervals.	Behaviour management training is an ongoing key aspect of staff training and professional development on Campus. A comprehensive training management schedule has been undertaken in the last 18 months and this will be reconsidered in the context of the recommendations of the Behaviour Management Review.
64	Consistent case conferences and care planning meetings for young people, especially those with particularly complex needs, should include Unit staff (a minimum of Unit Manager and Keyworker), School staff, ACTS and the young person (accompanied by an advocate if appropriate). Such meetings should be recorded and agreed actions should be monitored and regularly reviewed.	The Board is aware that placement planning meetings are an ongoing part of the care provided to young people on Campus. The placement planning process was established as part of the so-called CEHOP framework in early 2016 so that these meetings address the care, education, health, offending behaviour and release (CEHOP) needs of each young person. Following a review of its implementation, and since December 2016, the Head of Care has responsibility for organising and chairing placement planning meetings. They are attended by young people, their families, keyworkers, and all professionals (teachers, health professionals and other stakeholders) are invited to attend. Young people on detention orders have a placement planning meeting every six weeks and those on remand orders have a placement planning meeting normally every week, in line with the length of their order. There is a standard format for recording the decisions made at these meetings and every week, the data on these meetings is reviewed by the Director.
65	A revised programme of training should be urgently implemented to ensure that there is an experienced cohort of staff who are able and confident to apply approved techniques to de-escalate incidents or, when absolutely necessary, to restrain young people safely.	Behaviour management training is an ongoing key aspect of staff training and professional development on Campus. A comprehensive training management schedule has been undertaken in the last 18 months and this will be updated in the context of the recommendations from the Behaviour Management Review. The 2017/ 2018 training programme will prioritise behaviour management training.
66	A review of restraint reporting and recording systems should be undertaken.	The Board is aware that there is a recording system in place for the reporting of restraints. Following review and as part of further improvements, restraint has been formally identified as a restrictive practice and from July 1st 2017 all restrictive practices must be reported, as they occur, through the line management system to the Chief Operations Officer. This information forms part of the monthly reports to the Board of Management from the Director.

67	Unit Managers should assume responsibility and accountability for ensuring that all restraint incidents on their respective Units are reported and recorded correctly.	Unit Managers have responsibility and accountability for ensuring that restraint is used in line with policy and that such practices are recorded and reported correctly. This will be enhanced by the new system for recording and reporting restrictive practices introduced on 1st July 2017.
68	Each restraint incident should be comprehensively reviewed - using CCTV where possible - as a learning exercise. The review should include the member(s) of staff concerned, the relevant Unit Manager(s), the MAPA trainers and a nominated member of the Senior Management Team.	The Board is advised that it is current practice to ensure that incidents are comprehensively reviewed for learning purposes using the After Incident Review (AIR) framework. However, current policy only permits the reviewing of CCTV for certain precise purposes - including investigations, child protection and security. Changing this policy, which is informed by the requirements of data protection, will require discussions with the Department of Children and Youth Affairs and the Trade Unions. A review of all staff policies is underway and this will allow for the policy on CCTV to be updated to consider this recommendation.
69	Young people should always be debriefed and appropriately supported after a restraint incident.	The Board is advised that a consistent process of problem-solving takes place between young people and care staff after all significant incidents involving young people, including restraint. Work is underway with Unit Managers to support consistent recording of these processes.
70	Medical staff should be advised of any restraint incident without delay, should make arrangements to examine the young person at the earliest opportunity and, if they deem it necessary, arrangements should be made to provide the young person with access to treatment and/or further medical assessment.	The Board has been advised that it is standard procedure for medical staff to be informed of every restraint. This is Campus policy and the Designated Liaison Person is also informed and both undertake a review of the matter as required under their respective remits. If risk assessment determines that for reasons relating to the safety of the young person, or for other reasons of security and health and safety, access to healthcare in the community is not immediately possible, the Chief Operations Officer or the Director are to be notified to determine what alternative options may be required. This may involve bringing additional medical support on Campus.

71	Handcuffs should only ever be used in strict accordance with specified policy and should be subject to rigorous recording and monitoring.	The Board notes that there is a Campus policy on the use of handcuffs, the revised version of which was approved by the Board in July 2017. This requires that handcuffs will only be used in exceptional circumstances following a risk assessment as this is a restrictive practice. Steps have been taken to improve the quality of the recording of their use.
72	Negotiations should be initiated with unions towards assisting staff who feel unable or unwilling to work at Oberstown to move on to alternative employment.	Oberstown management meet monthly with Trade Union representatives to discuss all staffing matters and these are addressed, in consultation with the Board and the Department of Children and Youth Affairs.
73	The Board of Management should commission an independent review of the senior management team to ensure that it is suitable to direct Oberstown through the next stage of its development.	The Board confirms that an external review of the Campus Senior Management team was undertaken early in 2017. Following on from this, a new management structure, with identified roles and responsibilities, was approved by the Board in March 2017 to meet the current and future needs of the Campus.
74	The Board of Management and the Senior Management Team should consider the merits of replacing MAPA, over a strategically phased period, with an alternative behaviour management system providing that it complies with best practice principles and international standards.	The Behaviour Management Review was specifically tasked with addressing the suitability of MAPA, among other aspects of behaviour management at Oberstown. This review, completed in July 2017, recommended that the full range of procedures available under MAPA be used to manage young people's behaviour. This will be progressed under the action plan currently being developed by management to implement this and the other recommendations of the Behaviour Management Review.
75	If the Minister for Children and Youth Affairs is minded to consider the need for PPE for the purposes of planned intervention in exceptionally rare and serious circumstances, it should only ever be implemented by specially trained staff drawn from an external agency.	The Board is aware that a review of the availability of limited Personal Protective Equipment (PPE) was completed in April 2017 under the auspices of the Department of Children and Youth Affairs, with the participation of Oberstown management and Trade Unions. The report made recommendations to the Director, which are currently under consideration and proposals are being developed to put measures in place to address exceptional and rare circumstances with specially trained staff drawn from an external agency. The recommendations of the Behaviour Management Review, completed in July 2017, will inform further actions to be taken in this area.

76	The review of single separation policy that is underway should be concluded urgently.	The Board notes that the review of the National Single Separation Policy has been completed and a new national policy was adopted by the Department of Children and Youth Affairs in January 2017. In light of this, the Oberstown policy was reviewed and a revised policy was approved by the Board of Management in April 2017.
77	The review should consider ending the use of 'Protection Rooms' on the Units and replacing them with a central high-care unit on Campus with appropriately trained staff able to offer professional care, therapeutic intervention and mental health support.	The use of a protection room is considered a restrictive practice under the Oberstown Single Separation Policy and is only used in exceptional circumstances and for the shortest appropriate period of time. The recording of the use of the protection rooms is now incorporated into the restrictive practice documentation requiring Deputy Director approval and monitoring. Young people with particularly acute needs will continue to have their needs met on an individual basis. The concept of introducing a central high-care unit on the Campus is something that will be considered in this context.
78	Single separation should not be used solely because a young person is deemed to be at risk of self-harm.	When a young person is deemed at risk of self-harm, a range of interventions and supports are put in place to assist him/her and single separation is not used solely to manage that risk of self-harm. As single separation is a restrictive practice, the monitoring of single separation now requires Deputy Director approval in line with the procedure.
79	The removal of a young person's clothing should be an exceptional measure authorised only by the Director and, in which cases, a dignified safe alternative should be provided in all cases.	It is only ever in exceptional cases, for the safety of the young person, that it may become necessary to take certain steps, including removal of their clothing, to protect them from self-harm. This is authorised by the Director and every effort is made to protect their right to dignity while protecting them from self-harm. The relevant support and therapeutic services are always made available as a matter of urgency in line with the Individual Crisis Management Plan held by each young person.

80	A named senior manager should be made responsible and accountable for ensuring that all episodes of single separation are appropriately authorised, managed, recorded and reviewed in accordance with the existing procedure.	The Board is advised that Unit Managers have responsibility and accountability for ensuring that single separation is used in line with policy and that such practices are recorded and reported correctly. This is being enhanced by the new system for recording and reporting restrictive practices introduced on 1st July 2017. The Deputy Director with responsibility for Care Services ensures each single separation is appropriately used and recorded.
81	In the short term, and in the light of relatively widespread recent availability of drugs at Oberstown, consideration should be given to reverting to the practices set out in the Unit Procedures. If, following a risk assessment, there are strong grounds for believing that young people returning to the Campus, or entering the Campus for the first time, are carrying drugs they should receive a full search. A full search should be conducted by two staff of the same gender as the young person. The young person's dignity should be protected as far as possible and they should be provided with a towel or dressing gown to ensure they are never completely naked. All their clothing including underwear should be removed and searched.	The Board is aware that the level of drug misuse by young people in Oberstown reflects that by vulnerable young people in the wider community. At the same time, it is a strategic priority at Oberstown to limit the introduction and use of drugs on Campus and a range of measures are being actioned towards the ultimate goal of ensuring that Oberstown is drug-free. Addiction counselling is also provided to young people as part of the ongoing support for their care. With respect to searches of young people, the Board is advised that the procedures set out in the Unit Procedures are being followed. Following a risk assessment, where there are grounds to believe that a young person is in possession of drugs, a search is undertaken in line with the Campus policy. This provides for all requirements associated with gender and the protection of dignity.
82	Internal body cavity searches should never be undertaken unless authorised by a doctor for medical reasons.	The Board confirms that in line with the Campus policy on searches, the latest version of which was adopted in 2015, internal body cavity searches are not undertaken in any circumstances.
83	All other searches of young people, with the exception of 'pat-downs' should be authorised by a senior manager.	In line with Campus policy, pat-down searches of young people are undertaken following a risk assessment, which considers security and safety issues, only where appropriate, and with the approval of a Unit Manager.
84	A senior manager should be responsible and accountable for ensuring that all searches are properly authorised and recorded.	The Deputy Director with responsibility for Care Services has responsibility to ensure that searches are appropriately used and recorded.

85	A full review of the searching policy should be undertaken as soon as possible. This should include personal, property and room searches. It should also consider whether an effective and proportionate drug testing system should be introduced.	In line with the strategic priority at Oberstown to limit the introduction and use of drugs on Campus, a comprehensive review of all risks associated with drug misuse is currently underway, including searches, transport arrangements and detection. This will consider whether a more effective drug testing system can be introduced.
86	The Garda should ensure that officers providing escorts for young people attending remand hearings take all reasonable steps to prevent drugs being transferred on to the Campus.	In 2016, formal communication took place between the Director and An Garda Síochána to ensure safe and best practices are used to prevent drugs being transferred on to the Campus, as a result of attendance at remand hearings. An awareness alert protocol is in place around the risks associated with drug misuse. This has led to the reduction of drugs introduced onto the Campus. The situation is kept under regular and close review.
87	As stated, wherever appropriate, video conferencing should be used to offset the need for transporting young people to and from courts for the purpose of attending routine remand hearings (see para. 66.1).	As noted above, Oberstown Children Detention Campus has comprehensive, video-conference facilities on site and in July 2017 facilitated the first video-link to court proceedings. However, not all courts have video-link facilities. As a number of legislative and policy considerations have yet to be addressed by the relevant external parties, this falls within the remit of the Department of Children and Youth Affairs, not Oberstown, to address.
88	Child protection policies should be reviewed to ensure that they are applicable to the new Campus, meet current best practice principles and accord with international standards.	Oberstown is fully compliant with the National Policy on Child Protection and Safeguarding and this matter is monitored by the Board and reviewed annually by HIQA. An updated Child Protection policy was approved by the Board in July 2017.
89	Consideration should be given towards developing mechanisms that might enable young people to resolve disputes and facilitate relaxing 'no mix' protocols and intensive modes of regulation.	The Board is advised that no-mix lists are currently used by staff to respond to risks associated with relationships between young people both off- and on-Campus. Restorative practice and the Student/Campus Council are being used to achieve a resolution of these issues which is less restrictive.

90	A comprehensive 'suicide' and 'self-harm' reduction policy should be developed and implemented as soon as possible with appropriate staff training.	The current suicide and self-harm policy for the Campus is currently set out in the Guidelines for Recognising Poor Practice, Abuse, Bullying and Mental Health Problems in Children Detention Schools (2010). This includes the risks that young people pose to themselves, including suicide and self-harm. Furthermore, the policy and training in this area are currently under review, including as part of the Behaviour Management review in order to ensure that a more comprehensive suicide and self-harm reduction policy is in place and that staff are trained accordingly. The Psychiatric Services on Campus will be consulted as part of this development.
91	Unit manager should be allocated a budget to improve and personalise the decoration and furnishings of their units in consultation with young people and staff.	Unit Managers have discretion to personalise and decorate their units and they can avail of funding for this purpose. This must comply with security, health and safety and financial requirements.
92	Consideration should be given to consulting with young people about the menu.	A process is in place for consultation with young people about menus, led by the Catering Manager who engages directly with young people on a monthly basis. The Campus Council will formalise this process and ensure wider participation of young people in decision-making takes place, is recorded and is effective in line with the emerging Campus Strategy on the Participation of Young People in Decision-Making.
93	The opportunities available for young people to prepare refreshments should be optimised paying due regard to security issues.	It is proposed to consult with young people via the Campus Council about how best to make available to them the opportunity to prepare refreshments while having due regard to security and safety considerations. This will take place within the context of the Campus Strategy on the Participation of Young People in Decision-Making, currently being developed.
94	That the role of healthcare staff in the management of restraint, separation and searches is clarified in accordance with principles of best practice international standards and medical ethics.	Healthcare staff have a defined role in the management of restraint. Consultation will be undertaken with healthcare staff about their role in the management of separation and search practices, led by the Deputy Director with responsibility for Care Services.

95	The services provided by ACTS should be maintained and, where appropriate, extended.	The ACTS service provides critical professional support to young people in Oberstown by way of psychology, drug counselling, speech and language therapy and social work services. Tusla, the Child and Family Agency, which has responsibility for ACTS and is conducting a review of the ACTS Service, has confirmed that the service provided to Oberstown will not be diminished. Engagement with Tusla to maintain the quality and level of the current service is ongoing.
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