



**ESTABLISHMENT OF A REGIONAL
CARE AND JUSTICE CAMPUS
- CONSULTATION RESPONSE -**

JANUARY 2021

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Voice of Young People in Care (VOYPIC) welcomes the opportunity to respond to this public consultation on the proposed establishment of a Regional Care and Justice Campus.

VOYPIC is the charity for children and young people with lived experience of care in Northern Ireland. Created in 1993 by a group of young people in care and the professionals that supported them, VOYPIC has almost 30 years of experience promoting the rights and voice of children in care and care leavers.

We want every child to have a safe, stable and positive experience of care, and to be involved in the decisions about their life.

Our work supporting young people with lived experience of care focuses on three main areas:

○ **Advocacy**

- We deliver a Regional Independent Advocacy Service to children in care and young people in receipt of leaving and after care services, on behalf of the Health and Social Care Board.
- In 2019-2020, our advocates supported 457 children and young people living in and leaving care across Northern Ireland.
- We provided advocacy support to 78 young people in Beechcroft Child and Adolescent Mental Health Unit.
- We provide independent advocacy support to young people in Lakewood Secure Care centre, with a dedicated Youth Rights Worker attached to the centre.

○ **Participation**

- We facilitate Participation Forums in each HSCT on behalf of the HSCB.
- We also deliver a range of programmes for young people with a shared experience of care to come together, explore their care identify and take part in social actions projects to affect change.
- Our Young Leaders programme provides training and support to young people to take on more responsibility within the organisation, working more closely with our team of Youth Rights Workers to support their peers.

- In 2019-2020:
 - 72 young people took part in Participation Forums;
 - we delivered 176 group work sessions, involving 381 young people;
 - we delivered 24 activity days;
 - 65 young people attended a summer camp; and
 - 36 young people took on a leadership role within the organisation.

○ Influencing Change

- We amplify the voices of children and young people with lived experience of care on issues related to care experience.
- We listen to the views and opinions of children in care and care leavers, and support them to have their voice heard at all levels.
- We work in partnership with young people to design campaigns and social actions, to bring about real and lasting change for the care experienced community in Northern Ireland.

VOYPIC is a member of Regional Facilities for Children and Young People Stakeholder Reference Group, co-chaired by the Departments of Health and Justice.

In preparing this consultation response we engaged with young people currently involved in our services.

We hosted two online consultation events, open to young people with experience of care. These events were held on Wednesday 2 December and Tuesday 8 December 2020. Across the two events, four young people engaged in the discussions.

We carried out two group discussions with young people in Woodlands Juvenile Justice Centre on Monday 14 December 2020. Six young people engaged in these discussions.

We carried out individual discussions with nine young people. Of these, most had direct experience of Lakewood Secure Care Centre or Woodlands Juvenile Justice Centre.

In total, 19 young people provided their views to inform this consultation response.

During the consultation period, we approached approximately 25 other young people to take part in the process. They declined the invitation. Most young people felt they were not

in a good place to take part in the consultation. For some, this was due to the pandemic as young people were prioritising managing their day to day lives. A number were in crisis during the consultation period, therefore engagement was not possible. The timing of the consultation, over the Christmas holidays, during the Covid-19 pandemic, meant some young people were unable or unwilling to take part.

We welcome the opportunity to take part in this consultation process. The decision to restrict a child's liberty must be for the right reason. It should be a measure of last resort, for the shortest time possible, with clear objectives and purpose of the placement set out within a comprehensive therapeutic care plan.

In 2016, the UNCRC Committee expressed concerns about the practice of children being placed in secure accommodation. It recommended that the NI Executive ensure that secure accommodation in Northern Ireland is only used as a measure of last resort and for the shortest possible period of time, address the reasons for repeated or lengthy stays in such accommodation and develop alternatives to secure accommodation. (UN CRC Committee Concluding Observations on the Fifth Periodic Report of the UK of Great Britain and NI', 12 July 2016)

We hope that the work being undertaken by the Departments will contribute to alleviating the concerns of the UNCRC committee and meet its recommendations.

We note that the consultation proposals do not extend to children who require to be compulsorily admitted and detained for treatment for their mental health. However, it must be highlighted that children and young people who do not meet the criteria for detention may be referred to the new centre. Consideration must be given as to how their needs may be best met within the new centre or through alternative provision and support.

The Secure Care Centre

Question 1 - Do you have any comments on the proposal that the Secure Care Centre will comprise the existing Lakewood and Woodlands sites?

1. While we are in broad agreement with the proposal to establish a Secure Care Centre, as set out in the consultation document, the proposal is limited by its consideration of making use of the existing estate at Bangor alone.
2. The two current facilities – Lakewood Secure Care Centre and Woodland Juvenile Justice Centre – have two separate identities, despite being located in close proximity. The culture and model of practice in each centre is different, and each has different amenities, processes and structures. Young people have questioned how these two different approaches or ‘regimes’ can be safely amalgamated into one new centre. For example, will a new model of practice be developed for the new centre or will one of the current models of practice be adapted by the new centre?
3. We believe that the proposed new facility should not be viewed as a merger of the two existing centres, but rather as a new facility to replace them. The new centre should have a new name, a clearly articulated ethos and vision, underpinned with agreed values and principles. The consultation document did not set out a statement of purpose for the new centre. We believe that an outcomes focused statement of purpose could help to shape the new model of practice and how it will best meet the needs of children and young people.
4. We recognise that, for value-for-money, use will be made of current buildings on the site in Bangor. We recommend that these buildings are reconfigured and redecorated, to create a new positive therapeutic environment. In this process, thought should be given to managing noise, providing access to natural light and outdoor spaces, opportunities for sensory experience, and installation of equipment for play, leisure and entertainment.
5. The new centre should provide a safe and therapeutic environment, whilst maintaining as homely an environment as possible. It is important that it is not clinical or institutional.

Question 2 - Do you have any comments on the proposed capacity of the Secure Care Centre?

6. We acknowledge that the number of children being admitted to Woodlands Juvenile Justice Centre has decreased in recent years. We support the proposal to create a centre for 46 children and young people. We also support the proposal to reduce the number of children entering secure accommodation from 46 to 34 in the medium to long term. We agree that each house should accommodate no more than four young people.
7. However, we are mindful that this aspiration relies on a number of external factors, for example, early interventions in the community to prevent young people being admitted, reduction in the number of children being admitted to the centre as a place of safety under PACE arrangements, including the disproportionate numbers of children from care being placed in the centre; and a reduction in the number of children in the facility who cannot perfect bail.

Question 3 - What are your views on the longer-term aim of reducing the overall capacity within the Secure Care Centre, so that no child will be placed in a house with any more than three other children?

8. VOYPIC supports the aim of reducing the numbers of young people being admitted to the Secure Care Centre.
9. We acknowledge the strategic intent to continue the reduction in numbers of young people coming into the centre, however this can only be maintained through the continuation of a wide range of existing preventative interventions already in place across the community.
10. The consultation document fails to address the issue of raising of the minimum age of criminal responsibility (MACR), as recommended by the Youth Justice Review, which would have a direct impact on the nature of the centre and the numbers of children placed in it.

11. The age of criminal responsibility remains at ten years old in NI, as in England and Wales. However, the Age of Criminal Responsibility (Scotland) Act 2019 raises the age of criminal responsibility in Scotland to twelve.
12. In 2011, a Department of Justice 'Review of the Youth Justice System in NI', concluded that "the minimum age should be increased to 12 forthwith and, following a period of review and preparation, perhaps to 14". VOYPIC supports this conclusion and would advocate that consideration should be given to raising the minimum age to 15 once the new facility is operational.

Question 4 - Do you agree that the admissions criteria for the Secure Care Centre should be based on existing criteria, clarifying that children will be admitted to the Campus in one of two ways:

- a. **where the criteria set out in Article 44 of the Children Order are satisfied;**
- b. **or where the child is remanded or sentenced by the authority of a court.**

Question 7 - Do you think any changes are required to the existing criteria for admissions to secure accommodation under Article 44 of the Children Order?

13. Admissions criteria for the Secure Care Centre should be based on a clear statement of purpose for the Centre, which describes the educative and therapeutic outcomes they strive to achieve for children and young people and the range of supports it can offer to meet the individual needs of children and young people.
14. The pathway and criteria for admission to the centre should be developed based on this statement of purpose to ensure that there is a clear rationale for a child being placed in the new Centre, as part of their overall care plan, and not 'just somewhere to put them'.
15. We are of the opinion that Article 44 of the Children (Northern Ireland) Order 1995 is not fit for purpose and recognise that there is an argument that it is not compliant with Article 5 of the European Convention on Human Rights.
16. Young people we spoke to noted that entry to either Lakewood Secure Care Centre or Woodlands Juvenile Justice Centre is often based on similar behaviours. Many

described both as being punished for something they had done. The new Centre must focus on support for young people, regardless of their route of entry. Young people must be supported to understand why they are being admitted to the Secure Care Centre, the purpose of the admission, the nature of the support they will receive, and when and how they will leave the Centre.

Question 5 - Do you agree that the Secure Care Centre should continue to be used as a place of safety for children following their arrest, if this is required?

Question 6 - Do you agree that the use of the Secure Care Centre as a place of safety should be kept to a minimum, and that alternative accommodation options should be developed?

Question 30 - Do you have any views on the use of alternatives to the Secure Care Centre for children being considered for bail, and the use of wrap-around services as part of a bail package?

17. VOYPIC does not agree that the Secure Care Centre should be used as a place of safety for children following their arrest, nor for children being considered for bail.
18. All of the young people we spoke to were of the opinion that alternative places of safety, within the young person's local area, should be provided.
19. One young person (21) shared their experience, saying: *'I do not agree with being held in the centre because of no bail address. This happened to me and I was held for weeks because I had no bail address. And I had no charges because they had all been withdrawn. I think the Trust and social workers need to get better at sorting out accommodation.'*
20. We recommend expanding the range of options available to support children who need a 'place of safety' or who are being considered for bail, making use of the proposed new satellite provision with comprehensive wrap-around support.

Question 8 - Are there any other comments you wish to make about the routes of admission to the Secure Care Centre?

21. Entry to the Secure Care Centre should be limited to those most in need of the intensive support offered. It should be seen as a measure of last resort, only to be considered when community based interventions have proven unsuccessful and the young person continues to require significant, intensive support for a limited period of time to safeguard them and/or others around them.
22. Young people argued strongly for the provision of more targeted and intensive early intervention in the community, to avoid the need for admission to the Secure Care Centre. This includes young people entering the Centre via both the care and justice routes.

Multi-Agency Panel

Question 9 - Do you agree with the proposal to establish a regional, independently-chaired multi-agency Panel with the roles and responsibilities as described?

Question 10 - Do you agree with the membership proposed?

23. VOYPIC supports the establishment of a regional, independently-chaired multi-agency Panel.
24. We recognise and acknowledge the pilot which has been ongoing since September 2019, with input from VOYPIC.
25. VOYPIC supports this proposal in order to facilitate a consistent application of admission criteria and a needs-based approach to decision-making.
26. Young people's views on the establishment of the Panel were mixed. Some argued that the Panel should be made up of people known to the individual young person, including their social worker, who are familiar with their individual circumstances. Others believed that having an independent body with decision making power would ensure that only those who needed the support of the Secure Care Centre would be admitted.

27. One young woman (19) noted, *'I do think the Panel is great because in the past social workers were taking advantage, if they could not deal with someone they just sent them up.'*

Question 11 - Do you think, in some cases, there may be scope for the courts to make reference to the Panel in determining the most appropriate disposal for a child who has been involved in offending behaviour?

28. VOYPIC supports the proposal that there may be scope for the Courts to make reference to the Panel in determining the most appropriate arrangements for a child involved in offending behaviour.

Question 12 - Thinking about the roles, responsibilities and make-up of the Panel as described, do you have any views on whether the Panel and its functions should be established in legislation?

29. To ensure that it has the required authority, and to put in place clear parameters for that authority, the Panel and its functions should be established in legislation.

Question 13 - Do you think the Panel should have any other roles and responsibilities within the Campus, other than what is described here?

30. The role of the Panel in monitoring trends and questioning practices is crucial.

31. The Panel should have the potential to deploy alternatives to admission to the Secure Care Centre, preventing inappropriate admissions, minimising unnecessary placement moves, monitoring care, exit planning and discharge, to ensure a consistent approach to the management of risk.

Question 14 - Do you have any other comments on the proposal to establish a regional, independently-chaired multi-agency Panel as described?

32. Young people have the right to have their say on the decisions about them (Art. 12, UNCRC).
33. Young people have the right to access information (Art. 17, UNCRC) and support to have those views heard.
34. The role of the VOYPIC Independent Advocacy Service is recognised in the consultation:
- *'Engagement of VOYPIC Advocacy service to ensure the voice of the child is represented as part of the Panel process has proved to be successful with more children also actively requesting to attend the Panel meetings as a result.'*
35. It is essential that this provision is maintained and strengthened. Young people on the outside edge of the process, whose support concerns flag a potential need for admission to the Secure Care Centre in the future, should be referred for advocacy support at the earliest opportunity.
36. We note further recent attempts to simplify the process and increase accessibility for young people to engage in the process. We welcome these developments, including the opportunity to meet with the Chair ahead of the Panel meeting. We believe these should be strengthened further, with a view to developing good practice standards, to ensure that as many young people as possible can engage fully in the process.
37. All the young people we consulted with agreed that advocacy support should be provided for young people being presented to the Panel for admission to the Secure Care Centre. They also agreed that opportunities to engage with the Panel should be varied, to allow them to participate in a way that makes them feel comfortable. One young man (16) commented, *'I'd want to be there to make my point myself, and to hear what's said.'*
38. A small number of young people highlighted their concerns about being presented to a local Restriction of Liberty Panel in the past without their knowledge. One young person described how they had been told they were going on a trip, was taken to

Lakewood Secure Care Centre and stayed there for a number of weeks without any prior knowledge. Across the organisation, VOYPIC has supported a number of young people who have had similar experiences. We are pleased to note the increased engagement of young people in the Panel process during the period of the pilot.

39. While we recognise the perceived risk associated with telling a young person about the intention to seek admission to the Secure Care Centre for them, we believe this risk can be managed and the young person informed of this intention. By failing to do so, we risk not upholding our duty to ensure that the young person can enjoy their right to be informed and have their views duly considered in this important decision about their life.

Services in the Campus

Question 15 - What are your views on the proposal to implement a new Framework for Integrated Therapeutic Care, to be applied across all looked after children settings, including within the regional Care and Justice Campus?

Question 16 - What are your views on the multi-disciplinary team in the Secure Care Centre – how should it be made up?

Question 17 - Have you any other comments or views on the range of services that should be provided in the secure care centre?

40. The Framework for Integrated Therapeutic Care should provide a framework to support the therapeutic needs of children and young people in care across all setting, including the Campus. This framework should allow for more coordination of intervention for the individual young person, on a regional basis.
41. All services should be available to young people in a planned and purposeful manner, ensuring that the right supports are in place at the right time. This includes during a stay in the Secure Care Centre, as well as in the community, through the provision of satellite services within the Campus.
42. Continuity of service is a key issue for young people involved in VOYPIC, with many highlighting the need for services to follow them into and beyond the Secure Care Centre. Relationships, based on trust, were identified by young people as the

primary motivating factor for engaging in therapeutic intervention- young people will not engage if they do not feel safe with the therapist or practitioner. Where an intervention is commenced in the community, and the young person is subsequently admitted to the Secure Care Centre, the intervention (including the therapist delivering the intervention) should follow the young person into the centre.

43. A neurodevelopmental assessment would provide a detailed understanding of the development of sensory motor skills. Unusual sensory-motor coordination is highly associated with diagnosis such as Sensory Attachment Disorders, Developmental Delay, Learning Disability, Autism, ADHD and Developmental Coordination Disorders. Young people with such difficulties frequently present with challenging behaviours, emotional dysregulation and withdrawal or lack of engagement.
44. A speech and language screening of all children and young people coming into the Centre would increase understanding of receptive and expressive language difficulties, as these can affect how a child and young person communicates. We are aware of recent work in the Western Trust that showed that the majority of young people living within its children's homes had significant and unidentified speech, language, and communications difficulties. Early screening at the point of admission would provide a more holistic assessment and appropriate identification of each child's needs.
45. VOYPIC strongly supports the need for coordinated, trauma informed, mental health, drug and alcohol services as part of the Regional Care and Justice Campus, aligned to a highly skilled community provision, where skill mix is effectively used to promote the best outcomes for children with such complex needs.
46. Most young people identified mental health concerns, self-harm, misuse of drugs and alcohol, issues with control of emotions (particularly anger) and relationship difficulties as key areas of support need. Many voiced frustration that these are often considered as separate issues, with some giving the example of not being able to access mental health support alongside support for drug and alcohol addiction.
47. Holistic approaches to supporting the needs of the young people in the Secure Care Centre are critical. Supports available within the Centre should be wide-ranging, and designed to best meet these individual needs. Each young person should have a plan

of intervention, as part of their wider Care Plan, with details of how, when, and by whom these interventions will be delivered.

48. Young people noted the importance of environmental factors, as well as alternative therapies and activities, to support their development. *'The supports that are needed to deal with mental health issues include alternative therapies such as acupuncture, aromatherapy, calming environment with attention given to aroma (such as lavender), gym, pool, massage and gaming room. Realise that CAMHS is not the only route to dealing with mental health and that multiple routes should be available, the way there is choice in the community.'* (Male, 16)
49. VOYPIC recommends a range of youth and community diversionary services and therapies, (for example, family therapy, art therapy, equine therapy, peer support) also form part of the available services, both within the Centre and the community satellite provision.
50. Given the range of needs of the children and young people within the new centre it is vital that the staff team has a broad range of complementary qualifications, skills, experience, and knowledge. For example, youth and community workers are skilled at managing interpersonal and group relationships, the development of a child's agency, life and social skills. A complementary skills mix within the residential child care team could include professionals with the following backgrounds and experience: social work, youth and community work, psychology, mental health practitioners, speech and languages specialists, counselling, coaches, family therapists.
51. Some young people suggested that there should be care experienced staff within the Centre, who share a common experience with the young people spending time there. Many young people noted that they are more likely to identify with, trust, and positively engage with someone who has personal knowledge and experience of the issues impacting on them.
52. VOYPIC currently provides advocacy support to young people in Lakewood Secure Care Centre, with a dedicated Youth Rights Worker attached to the Centre. Young people in Woodlands Juvenile Justice Centre also have access to VOYPIC advocacy support, with a named Youth Rights Worker for the Centre.

53. It is vital advocacy services continue to be provided in the new centre, and are adequately resourced to enable meaningful engagement with young people and their participation in decision making and care planning at the earliest point.

A Needs Based Approach

Question 18 - What are your views on the proposal that children within the Secure Care Centre will not be separated on the basis of their route of admission?

Question 19 - Do you agree that decisions about where a child will be placed within the Secure Care Centre should be based on an assessment of their individual needs, taking into account the factors described?

54. As noted in the consultation document, young people entering secure settings, whether on welfare or justice grounds, share similar needs, family characteristics and levels of adverse experiences.
55. Admission to the Secure Care Centre for a young person, and the decision about where they will be placed within the Secure Care Centre, should be informed by their individual needs.
56. Admission to the Centre must be part of the young person's individual Care Plan, with the plan for their time in the Centre clearly detailed within that Care Plan. This plan should identify the assessed needs of the young person, and detail the interventions being put in place to support these needs.
57. While some young people voiced concern at not separating young people admitted to the Centre via a care pathway from those admitted via a justice pathway, most were in agreement that the young people's stay in the Secure Care Centre should be tailored to best meet their individual needs regardless of their route of admission.
58. Some young people noted that entry via both routes often involves the same types of behaviour. One young woman (19) commented: *'All the young people who go to JJC or to Secure have the same type of behaviours but if they don't get help with mental health and emotional wellbeing then it does not matter where they are.'*

59. Before admission, the risks associated with each young person should be thoroughly identified and assessed, and the plan for their stay informed by this risk assessment.
60. This consultation does not address the issue of raising of the minimum age of criminal responsibility, as recommended by the Youth Justice Review, which would have a direct impact on the routes through which young people would be admitted to the Centre. The central ethos of the Centre should focus on providing a supporting, therapeutic and caring environment for all young people, regardless of their route of admission; no child aged 15 and under should be subject to criminal proceedings.

Question 20 - Do you have any other suggestions for how children should be managed within the Secure Care Centre?

61. Young people involved in VOYPIC's consultation what had direct experience of Lakewood Secure Care Centre and/or Woodlands Juvenile Justice Centre discussed practices across the two facilities which they think should be maintained in the new Centre.
62. The issue of 'Trust' was important for the young people, with many discussing the approach to promoting positive behaviour and consequences of negative behaviour. All agreed that an approach based on clear expectations with rewards and consequences, similar to that currently used in Woodlands Juvenile Justice Centre, was preferable.
63. For some, the issue of smoking was important. Young people with experience of Woodlands Juvenile Justice Centre noted how they were not allowed to smoke in the Centre, but believed the rules were different in Lakewood Secure Care Centre. Thought should be given to how this will be managed in the new Secure Care Centre.

Leaving the Secure Care Centre – Exit Planning

Question 21 - Do you agree that an exit plan, as part of the overall care planning process, should be developed for each child and young person on admission to the Secure Care Centre and will be subject to regular review?

Question 22 - Do you have any views or comments to share on the proposed care planning, discharge and exit planning process described in this section?

64. A continuum of support for young people must be in place before, during and after time spent in the Centre.
65. Admission to the Secure Care Centre should be an integral part of a young person's Care and Therapeutic Plan. The decision to present a young person to the Multi-Agency Panel should be informed by previous interventions, analysis of why these have not led to the desired outcomes, identification of the purpose of admission to Secure Care Centre and plans for ongoing support for the young person beyond a stay in the Secure Care Centre. Therefore, plans for an individual young person's exit from the Secure Care Centre should be part of the plan for their admission, to be reviewed during their stay in the Centre.
66. Upon admission, detailed assessment should be undertaken to establish a plan of intervention for the young person, detailing the support they will be offered during their stay, the length of such intervention and how the intervention will be continued upon exit from the Centre. This should inform the duration of the young person's stay in the Secure Care Centre.
67. Many young people we spoke to noted their reluctance to engage constructively with interventions, focusing more on 'passing the time' until they were discharged from the Centre. Extensions to the Orders keeping them in Lakewood Secure Care Centre were frustrating, with many only feeling safe to participate when they knew the timeframe of their stay. Therefore, having a detailed plan in place, covering the length of their stay, with a set end date, would provide a sense of clarity for many young people, allowing them to actively engage in therapies in a safe and supported way.

68. This plan should extend beyond the young person's time in the Secure Care Centre, with detailed plans in place, from an early stage, detailing community based interventions to support the young person on exit from the Centre. Satellite provision through the Campus structure is best placed to oversee and delivery of community interventions, ensuring a continuity of support beyond the Centre.

Satellite Provision

Question 23 - Do you agree that a step-down facility should be located within the Campus, on the same site as—but separate from—the Secure Care Centre?

Question 24 - Given the stated purpose and function of the step-down unit, do you have any views on how it should operate in practice? For example, do you think it should be an open setting (ie. not a locked facility)?

Question 25 - Do you have any comments on the function and role of the step-down unit, over and above what is described here?

69. While there is some value in having a step-down facility on the same site as the centre, exit planning and support would be greatly enhanced by providing intensive support in the young person's local community, where this is most needed. Recently established peripatetic teams have a crucial role to play in supporting young people from residential care in their return.

70. Robust planning and delivery of service in the young person's local area would have a greater impact, providing them with a higher level of support in a situation more familiar to them than at the Secure Care Centre.

71. For many young people in need of the intensive support offered by the Secure Care Centre, the risk factors associated with problematic behaviours are within their communities. For most, these risk factors are not in the Bangor area, therefore a single step-down facility located on the same site as the Centre would not meet the aim of providing support in a real-world setting.

72. Young people suggested that, instead of one single step-down facility in Bangor, there should be a network of facilities and support across Northern Ireland, where young people could be accommodated in a similar way to that suggested in the step-down facility. This would allow them to receive more intensive support, in their own area, near the risks they face.
73. One young woman (16) noted; *'it is really important for a young person to move to an area in the Community that they like and where they feel safe for example, beside friends or family or an area that they knew well and were familiar with.'*

Question 26 - Do you agree that the Secure Care Centre should be supported by a network of locally-based connected satellite services across each of the five HSC Trust areas?

Question 27 - Do you agree that the purpose and focus of this satellite provision should be twofold:

- a. To prevent children and young people from entering the Secure Care Centre, and
- b. To provide support to facilitate the transition of these children and young people back into the community.

Question 28 - Do you agree that a multi-agency approach to this satellite provision should be adopted?

Question 32 - Do you think that there are alternative options for the design and functionality of satellite provision? If so, please outline.

74. Development of a network of locally-based satellite services across the five Health and Social Care Trust areas will be crucial to reducing the number of young people requiring a period of intensive support in the Secure Care Centre, as well as reducing the number of re-admissions to the centre following exit. Young people with experience of Lakewood Secure Care Centre told us that early intervention and ongoing support from an earlier stage would have greatly reduced the likelihood of their admission to the centre. Similarly, many told us that they did not feel

adequately supported when they left the Centre, as services were not available to them on discharge.

75. When developing the network, it is essential that mechanisms are put in place to ensure the strategic and operational coordination of services, at a regional level, so no young person is left without the service they need. This consultation does not provide detail on the workings of this, nor any lines of accountability for the delivery of these services, beyond their connection to the Framework for Integrated Therapeutic Care and link to the Multi-Agency Panel.
76. Proper resourcing of these services, either centrally or in the individual Trusts, must be addressed. We know that there is already considerable pressure on key services, including CAMHS and DAMHS, which must be addressed before this system could be put in place. It is not acceptable for a young person to receive support while staying in the Secure Care Centre, only to have to wait to receive community based support on exit.
77. The consultation document lacks detail on the type of support to be offered through the satellite provision, who will provide the support, and how this will be resourced. We suggest that further scoping is undertaken to establish the key areas of support required by young people leaving the Secure Care Centre, such as mental health support, drug and alcohol rehabilitation intervention, behavioural therapy, and social support. A wide-ranging scoping exercise should then be carried out to identify organisations best placed to provide this support, identifying gaps in provision and developing proposals to fill those gaps. Based on this, a model should be developed, with appropriate resourcing, to establish a series of local multi-agency delivery partnerships, with robust delivery plans and accountability structures put in place.

Question 29 - Do you have any views on the use of alternatives to the Secure Care Centre for children who have been arrested and require a place of safety while awaiting a court appearance? Do you think that suitably resourced children's homes may be a suitable place of safety for some of these children, subject to an assessment of risk?

Question 30 - Do you have any views on the use of alternatives to the Secure Care Centre for children being considered for bail, and the use of wrap-around services as part of a bail package?

78. VOYPIC does not agree that the Secure Care Centre should be used as a place of safety for children following their arrest, nor for children being considered for bail.
79. All of the young people we spoke to were of the opinion that alternative places of safety, within the young person's local area, should be provided.
80. VOYPIC recognises the pressure currently on children's homes, and the difficulties of providing accommodation for children and young people requiring a place of safety or being considered for bail in these homes. We call for investment in new local facilities to ensure such young people can be safely accommodated in their local area.
81. We support a multi-agency approach which could provide alternative arrangements for the provision of suitable accommodation in community-based settings coordinated by a number of key agencies such as Health and Social Care Trusts, PSNI, Youth Justice Agency, Education and Youth Services, the Northern Ireland Housing Executive, and voluntary and community sector organisations.
82. All such alternative arrangements must be complemented by a range of services to meet the individual support needs of the young person, including those provided by the Campus satellites.

Question 31 - Do you agree that designated supported housing for 16 and 17 years olds should form part of the community-based satellite provision?

83. VOYPIC agrees with the need for a review of supported housing provision for 16 and 17 year olds, as part of a wider review of accommodation for young people leaving care.
84. We have concerns that the accommodation needs of young people are not being met in their best interests, and that there is not currently sufficient accommodation options for young people leaving care and care leavers across Northern Ireland.
85. It is important that the range of accommodation provision is sufficient to provide young people with suitable housing in a locality that best supports their individual needs.

Governance and Accountability Arrangements

Question 33 - Do you agree with the proposal to appoint a Head of Operations responsible for the operation of the Regional Facilities (Secure Care Centre and on-site Step Down Unit)? If yes, do you agree that the appointment should be required in law and that the role and responsibilities should also be specified in legislation?

86. VOYPIC agrees with the proposal to appoint a Head of Operations responsible for the operation of the Regional Facilities.
87. We believe the post-holder should be suitably qualified and have experience in line with the Centre's statement of purpose. The post should be of sufficient seniority within the existing public sector structures.
88. The role and responsibilities of the Head of Operations should be included in the legislation creating the new Secure Care Centre.

Question 34 - In terms of the options detailed in respect of accountability arrangements for the Regional Facilities, which do you consider to be the most appropriate? Please explain the reasons for your response.

Question 35 - Do you have any alternative options for the accountability arrangements for the Regional Facilities?

89. Robust governance and accountability arrangements for the Centre and the wider Campus are essential to ensuring it offers the correct support to young people in the long term. We are of the opinion that the focus of the Centre must be on providing a caring and supportive environment for all the young people resident there, irrespective of their route of admission.

90. We recommend that a version of the Multi-Agency Partnership Board (Option 2) be put in place to ensure that young people receive the support required, and delivery partners can be held to account. Suggested partners include

- i. The Department of Health
- ii. The Department of Justice
- iii. The Health and Social Care Board
- iv. The five Health and Social Care Trusts
- v. The Youth Justice Agency
- vi. The Education Authority (inc. Youth Service)
- vii. The Housing Executive
- viii. The Police Service of Northern Ireland
- ix. CAMHS
- x. DAMHS
- xi. Voluntary & Community Sector representation

91. It is important that the Department of Health has a lead role in overseeing the operations of the Campus, with accountability structures put in place to ensure such, supported by the other Executive departments, including the Departments of Justice, Education and Communities.

92. While the focus of the Campus should be on providing care for young people, given the cross-departmental nature of the Campus, beyond the Departments of Health and Justice, the Partnership Board should be accountable to an Interdepartmental

Oversight Board. This Board should be chaired by the Department of Health, and comprise of senior officials from all Executive departments. The Board should report annually.

Legislation

Question 36 - Do you have views on the classification of the Secure Care Centre?

Question 37 - Do you have any views on the classification of the Campus satellite provision?

Question 38 - Do you consider that legislation will be required to support and formalise multi-agency working as part of a new Care and Justice Campus, by, for example, designating specified agencies or statutory Campus partners

Question 39 - Do you have any views on whether the proposed multi-agency Panel would require a statutory basis?

93. Classification of the Secure Care Centre and the Campus satellite provision will require a new category of classification; it is neither a children's home nor a juvenile justice centre. We recommend that the Centre is classified as a Residential Therapeutic and Education Centre, with the wider Campus classified as a Regional Therapeutic Community. It is important that this legislation is brought forward by the Minister for Health, with the legislation covering the entirety of the Regional Care and Justice Campus and all young people involved, regardless of their status.

94. The proposals outlined in the consultation will require replacement legislation to enable their implementation, as opposed to amendments to existing legislation. We are concerned that incremental changes will lead to potential challenges in this process, and the creation of two facilities on the same estate; one justice and one care. This may further extend beyond the Secure Care Centre, to encompass the entire Regional Campus. This would represent a failure to deliver on the proposed campus, instead simply reducing the capacity and footprint of the existing facilities in Bangor.

95. Any replacement legislation must take account of:

- Mental Capacity Act (Northern Ireland) 2016
- United Nations Convention on the Rights of the Child (UNCRC)
- United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)
- European Convention on Human Rights (ECHR) / Human Rights Act 1998
- Section 75 of the Northern Ireland Act 1998

96. VOYPIC also recommends the development of a new set of standards of practice for the new Centre. These should be co-produced in partnership with young people. Young people should be routinely involved in all RQIA inspections against these standards.

Question 40 - Do you agree that only children who were looked after prior to admission to the Secure Care Centre should be looked after while in the Centre?

97. VOYPIC agrees that only children who were looked after prior to admission to the Secure Care Centre should be looked after while in the Centre.

98. Any decision to make a young person 'looked after' should be based on an assessment of their needs, not on the length of their stay in the Centre.

Question 41 - Do you agree that the Head of Operations within the Secure Care Centre should be given parental responsibility for children who are admitted to the Secure Care Centre by way of a juvenile justice disposal?

Question 42 - Do you think that parental responsibility for looked after children should:

- I. Lie with the placing HSC Trust only;
- II. Pass to the Head of Operations for the duration the child is in the Secure Care Centre; or
- III. Be shared between the placing HSC Trust and the Head of Operations.

99. VOYPIC is of the opinion that parental responsibility for young people who are admitted to the Secure Care Centre, regardless of their route of entry, should be shared between the Head of Operations and whoever has parental responsibility immediately prior to admission.

100. In the case of a young person in care, parental responsibility should be shared between the Head of Operation and the placing HSC Trust. It is essential that the HSC Trust is actively involved in the care of the young person during their time in the Secure Care Centre, and in the development and implementation of a comprehensive exit plan and support package.

Question 43 - Do you have any views on whether the Department of Health should make regulations to prescribe children subject to the provisions of [Article 39\(6\) of Police and Criminal Evidence \(NI\) Order 1989](#), so that they do not automatically become a looked after child if the duration of their stay within the Campus is longer than 24 hours?

101. Any decision to make a young person 'looked after' should be based on an assessment of their needs, not on the length of their stay in the Centre.

Equality and Human Rights

Question 44 - Are the proposals set out in this consultation document likely to have an adverse impact on any of the nine equality groups identified under [Section 75 of the Northern Ireland Act 1998](#)? If yes, please state the group or groups and provide comment on how these adverse impacts could be reduced or alleviated in the proposals

Question 45 - Are you aware of any indication or evidence—qualitative or quantitative—that the proposals set out in this consultation document may have an adverse impact on equality of opportunity or on good relations? If yes, please give details and comment on what you think should be added or removed to alleviate the adverse impact.

Question 46 - Is there an opportunity to better promote equality of opportunity or good relations? If yes, please give details as to how

102. VOYPIC notes that the population of Woodlands Juvenile Justice Centre is overwhelmingly male (90.6%), and that a majority of young people in Lakewood Secure Care Centre is also male (60%).
103. VOYPIC notes that the majority of population of Woodlands Juvenile Justice Centre is Catholic (63%), compared to just over a quarter (26%) reporting as Protestant.
104. A small number of young people with experience of Woodland Juvenile Justice Centre we spoke to raised concerns related to sectarianism in their community. They questioned the need to separated young people in the Centre based on religious background.
105. VOYPIC is of the opinion that individualised, needs-based support for all young people in the Secure Care Centre will have no adverse impact on any of the nine equality groups identified under Section 75 of the Northern Ireland Act 1998.
106. We believe that the Secure Care Centre, through the support it will provide to young people, can play in role in better promoting good relations among young people across Northern Ireland.

Question 47 - Are there any aspects of this consultation where potential human rights violations may occur?

107. The outworking of proposals set out in the consultation must be mindful of the statutory duty to uphold the Rights of the Child, for example:
 - The 'best interests' principle (Article 3, UN CRC);
 - right of the child to be heard and to participate in decision making (Article 12, UN CRC);
 - right to freedom of expression, including the right to seek, receive and impart information (Article 13, UN CRC; Article 19);
 - right to due process, as contained in the right to a fair trial (Article 6, ECHR);
 - right to private and family life (Article 8, ECHR; Article 9, UN CRC);

- right of a child in care to a periodic review of their treatment and placement (Article 25, UN CRC);
- right to protections against unlawful deprivation of liberty (Article 37, UN CRC).

Question 48 - Are the actions/proposals set out in this consultation document likely to have an adverse impact on rural areas?

108. While we are in broad agreement with the proposal to establish a Secure Care Centre, as set out in the consultation document, the proposal is limited by its consideration of making use of the existing estate at Bangor alone.
109. We recognise the value-for-money argument of making use of the existing estate.
110. We have concerns that the locating of the Centre in Bangor will have an adverse impact on rural communities, particularly those in the west, north and south of Northern Ireland.