

Environmental Health and Hygiene Inspection Report

Inspection of Youth Custodial Services in
Tasmania, 2021



Produced by the Tasmanian Custodial Inspector

Address Level 6, 86 Collins Street, Hobart, Tasmania 7000
Telephone 1800 001 170 (Free call)
Facsimile 03 6173 0231
Email custodial.inspectorate@custodialinspector.tas.gov.au
Website www.custodialinspector.tas.gov.au

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From the Custodial Inspector

The purpose of the Custodial Inspector is to provide independent, proactive, preventative and systemic oversight of custodial centres. A custodial centre is defined as a prison within the meaning of the *Corrections Act 1997*, and a detention centre within the meaning of the *Youth Justice Act 1997*.

The *Custodial Inspector Act 2016* requires me to carry out a mandatory inspection of each custodial centre at least once every three years and to report on my findings and recommendations to the responsible Minister and to Parliament.

To meet my legislative obligations using the limited resources available, the Custodial Inspectorate undertakes themed inspections of custodial centres focusing on particular inspection standards. At the end of a three year cycle, all aspects of custodial centres will have been inspected against the entire set of standards.

I am required by section 15 of the *Custodial Inspector Act 2016* to prepare a report to the responsible Minister outlining my findings and recommendations in relation to each mandatory inspection. I report directly to the Minister responsible for the custodial centre and the Minister is required to table a copy of my report in each House of Parliament. In this way, inspection findings and recommendations become a public record. After tabling, all inspection reports are published on [my website](#).¹

In February 2021, an unannounced inspection against the Environmental Health and Hygiene standards (Appendix I) was undertaken at the Ashley Youth Detention Centre (AYDC). This is the second time this suite of inspection standards has been considered. The first inspection was undertaken in 2017, with findings and recommendations forming part of my *Inspection of Ashley Youth Detention Centre in Tasmania, 2017: Health and Wellbeing Inspection Report*.

The 2021 inspection considered the Environmental Health and Hygiene theme only, and I now present this report detailing the findings of and the recommendations resulting from the inspection.

Prior to publication of this report, the Department of Communities was consulted and invited to correct any factual inaccuracies in it and to provide a written response to the recommendations included in this report.

Richard Connock
Custodial Inspector

10 February 2022

¹ Office of the Custodial Inspector Tasmania, Office of the Custodial Inspector, Hobart, <https://www.custodialinspector.tas.gov.au>



Acknowledgements

I would like to acknowledge the contribution of Ms Helena Bobbi and Ms Durga Gopala-Krishnan, Environmental Health Officers from Public Health Services, Department of Health, who consulted on this inspection and were part of the inspection team. Ms Bobbi and Ms Gopala-Krishnan's consultant report is at Appendix 2.

I sincerely thank Ms Bobbi and Ms Gopala-Krishnan for their expert advice and assistance, which has added greatly to the work of my office.

Acknowledgment and appreciation is also extended to all staff at the Department of Communities Tasmania and AYDC who supported the inspection.

I would also like to thank the young people at AYDC who shared their experiences with the inspection team.



Executive summary

AYDC is managed by Child and Youth Services (CYS), an operational unit of the Department of Communities Tasmania. CYS is responsible for providing care and custody, at various levels of security, for young people detained and remanded in custody in Tasmania.²

A significant amount of time has elapsed between the inspection and the publication of this report. Reasons for this have included time delays due to COVID-19, which impacted on the receipt of the consultant's report, and turnover of staff at the Custodial Inspectorate. My inspection team recognises that in the 12 months since the inspection, AYDC may have already implemented some of the recommendations included in this report.

Relevant to the Environmental Health and Hygiene inspection, the inspection standards for youth custodial services cover themes such as:

- education concerning safe storage and preparation of food;
- the provision of safe food and clean water; and
- hygiene awareness training.

For the most part, compliance with the Inspection Standards for Youth Custodial Services in Tasmania (Youth Inspection Standards) was assessed by my inspection team during an onsite visit to AYDC on 25 February 2021.

During the inspection, a number of evidence sources were used to assess the detention centre against the inspection standards. These included:

- onsite visits;
- meetings with Centre management;
- individual interviews carried out with staff;
- conversations with young people in detention;
- review of documentation; and
- observation by my staff and the expert consultants.

² For the purposes of this report, a reference to the term 'detainee' and 'resident' means young people that are lawfully detained in custody at AYDC and includes both those that are remanded and those that are sentenced.



About Ashley Youth Detention Centre

AYDC is Tasmania's only youth detention facility³ and is located near Deloraine in northern Tasmania, approximately 230 kilometres from Hobart. The Centre is situated on approximately 36.5 hectares of land, some of which is run as a small farm.

At the time of the inspection, AYDC could accommodate up to 50 young offenders of all genders aged from ten to 18 years, spread across four accommodation units. During the consultation period prior to publication of this report, Department of Communities Tasmania stated that following recent refurbishment, AYDC now has bed capacity for up to 40 young offenders. The Centre is staffed 24 hours per day to cater for the number of young people in detention at any particular time.

The *Youth Justice Act 1997* (Tas) s. 4-5 requires AYDC to rehabilitate young people in conflict with the law, and to protect the community from illegal behaviour whilst providing secure care for young people detained or remanded by the courts. Rehabilitation outcomes may be improved through the provision of programs in accordance with the principles contained in the Act.

To meet the needs of the young people at AYDC, they are provided with education through the Ashley School (for which the Department of Education is responsible), and healthcare through the Correctional Primary Health Services (for which the Tasmanian Health Service is responsible). There are also a variety of recreational facilities for young people at AYDC including an indoor gym with basketball court and fitness area, an outdoor swimming pool, an outdoor basketball court, cricket nets and a barbeque area.

Young people at AYDC come from various backgrounds and generally face major social and developmental challenges. Young people involved in the youth justice system are at increased risk for developing serious and chronic mental illness; commonly demonstrate risky behaviour; have poorer health and increased mortality related to poor health and risk-taking behaviours; and lower intellectual and cognitive functioning.⁴

In Tasmania, the number of young people in youth detention is small compared to other Australian states and territories. The number of young people in youth detention in the June quarter 2021 was down slightly compared to the June quarter 2017 as seen in Table 1.⁵

³ The *Youth Justice Act 1997* provides that by notice published in the Gazette, the Minister may establish or abolish detention centres, or declare premises to be or not be detention centres. In addition to AYDC, the minister has declared the Hobart and Launceston Reception Prisons, Risdon Prison and the Ron Barwick Prison to be detention centres for young people. In practice, it would be extremely rare for a young person to be detained for any significant length of time in an adult custodial centre.

⁴ Australian Institute of Health and Welfare 2018, National data on the health of justice-involved young people: a feasibility study 2016-17, Cat. No. JUV 125, AIHW, Canberra, <https://aihw.gov.au/getmedia/4d24014b-dc78-4948-a9c4-6a80a91a3134/aihw-juv-125.pdf.aspx?inline=true>

⁵ Australian Institute of Health and Welfare 2021, Youth detention population in Australia 2021, Cat. No. JUV 136, AIHW, Canberra, <https://aihw.gov.au/getmedia/63a1f495-fbce-4571-bcea-aae07827afa0/aihw-juv-136.pdf.aspx?inline=true>



**Table 1. Young people in detention in Tasmania on an average night, June quarter
2017 and 2021**

	Sentenced ⁶ detention	Unsentenced ⁷ detention	Total detention
June quarter 2017	4.1	9.1	13.2
June quarter 2021	1.6	6.6	8.2

⁶Sentenced is when a young person has been found guilty in court and has received a legal order to serve a period of detention.

⁷Unsentenced is when a young person is awaiting the outcome of their court matter, or while awaiting sentencing after being found or pleading guilty.



Summary of recommendations

The following recommendations are made to the Department of Communities Tasmania:

- Recommendation 1:** That AYDC introduce routine microbiological testing of the pool.
- Recommendation 2:** That AYDC introduce templates for all food handling temperatures that require recording under the *Food Act 2003*.
- Recommendation 3:** That AYDC provide education to all young people at AYDC regarding the hygiene required when caring for chickens and collecting eggs.
- Recommendation 4:** That AYDC provide basic food handling training to all young people at AYDC.
- Recommendation 5:** That AYDC provide hygiene awareness training to all young people at AYDC.
- Recommendation 6:** That AYDC review the procedures in place for the transport of young people, to include scheduled stops for toilet breaks and access to food and water provisions.
- Recommendation 7:** That AYDC develop a sun protection policy for young people and staff, using the Department of Education's Sun Protection Policy as a guide.
- Recommendation 8:** That AYDC develop a procedure that reflects the current supervision by staff of residents' personal hygiene and housekeeping.



Inspection standards

The *Inspection Standards for Youth Custodial Centres in Tasmania* provide the structure for reviewing and assessing the performance of custodial centres in relation to the treatment of, and conditions for, young people in detention in Tasmania.

The standards were developed taking into account the range of relevant international treaties, covenants, the *Australasian Juvenile Justice Administrators Juvenile Justice Standard 2009*, and the Australian Children's Commissioners' and Guardians' *Statement on Conditions and Treatment of Youth Justice Detention November 2017*.

The standards are based on the *Inspection Standards for Juvenile Justice Custodial Services in New South Wales*. I consulted with the Department of Communities Tasmania and the (then) Interim Commissioner for Children and Young People and his staff to draft and finalise the inspection standards.

Independent monitoring and assessment is important to ensure custodial services are meeting standards. An independent perspective can identify issues – both shortcomings requiring improvement and strengths that can be better utilised – that may not be immediately apparent to the detention centre, thereby providing a continuous improvement framework.

The inspection standards are publicly available on the [Custodial Inspector's website](#).⁸ The inspection standards relevant to this report are set out in Appendix 1.

Inspection methodology

All inspections of AYDC are conducted against the Youth Inspection Standards.

Inspection provides independent, external evaluation including analysis of areas against the Youth Inspection Standards. It is based on gathering a range of evidence that is evaluated against an inspection framework. The inspection team ensures that evidence is first hand and based on direct observation of processes and conversations with young people and staff.⁹

After an inspection is completed, inspection reports are tabled in Parliament by the relevant portfolio Minister. Prior to tabling, the Department of Communities Tasmania is consulted, and invited to correct any factual inaccuracies in the report. The Department's response to recommendations made in this report are set out in Appendix 3.

⁸ Office of the Custodial Inspector Tasmania, *Standards and guidelines*, Office of the Custodial Inspector, Hobart, https://www.custodialinspector.tas.gov.au/standards_and_guidelines

⁹ First-hand wherever possible, and if not a direct observation, the information relied on will be fact checked and confirmed by another reliable source.



Environmental health and hygiene

Environmental health and hygiene definitions

Environmental health and hygiene are intertwined concepts.

Environmental health is defined by the World Health Organization (WHO) as all the physical, chemical and biological factors external to a person, and all the related factors impacting behaviour. It is targeted towards preventing disease and creating health-supportive environment.¹⁰ Environmental factors that can contribute to human mortality and morbidity include air quality, drinking water quality, food safety, use of chemicals, and soil and groundwater contamination.¹¹

Hygiene is the science which deals with the preservation of health.¹² Hygiene at a personal level includes food and water, sleep, and personal cleanliness; while at a public level it includes soil, arrangement of dwellings, heating and ventilation, and prevention of disease.¹³

Therefore, good human health requires a healthy surrounding environment, and recognising that hygiene involves many facets, not just personal cleanliness.

¹⁰ Environmental Health Standing Committee (enHealth) of the Australian Health Protection Principal Committee 2020, *Strategic Plan 2020-2023*, [https://www.health.gov.au/internet/main/publishing.nsf/Content/723987C5357A0ADECA257BF0001C68ED/\\$File/Strategic-Plan-2020-2023-enHealth.pdf](https://www.health.gov.au/internet/main/publishing.nsf/Content/723987C5357A0ADECA257BF0001C68ED/$File/Strategic-Plan-2020-2023-enHealth.pdf)

¹¹ Ibid.

¹² 'hygiene' 2022, in Macquarie Dictionary, Macmillan Publishers, Australia, https://www.macquariedictionary.com.au/features/word/search/?search_word_type=Dictionary&word=hygiene#

¹³ 'Hygiene', 2017, in Encyclopedia Britannica Online, <https://www.britannica.com/science/hygiene>



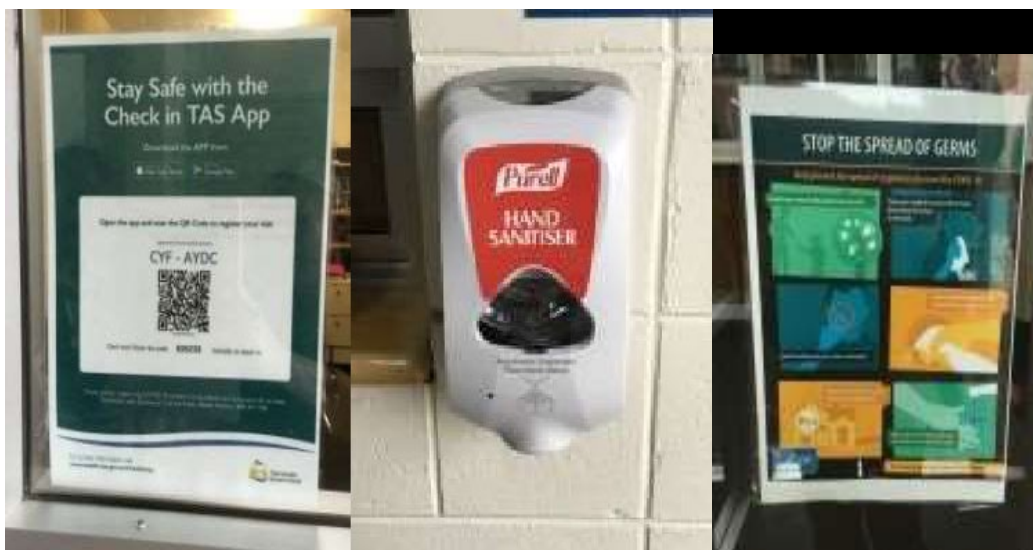
Environmental Health and Hygiene Inspection

COVID-19

SARS-CoV-2, the coronavirus that causes COVID-19, was first detected in late 2019¹⁴, and any consideration of environmental health encompasses a COVID-19 safe environment. Correctional and detention facilities, including juvenile detention centres, are likely to be at increased risk of significant transmission and infection with COVID-19.¹⁵

At the time of this inspection in February 2021, the consultants accompanying the inspection team noted the range of measures in place to assist in maintaining a COVID-19 safe environment in AYDC. These included the presence of Check in TAS QR codes, floor decals encouraging 1.5m separation, readily available hand sanitiser, and signage at entrances to remind all persons about not entering if unwell, physical distancing and hand and personal hygiene (Images 1-3). In addition to these preventative measures, the COVID-19 Outbreak Management Plan AYDC sighted by the inspection team outlines the response measures to be undertaken in the event of single or multiple cases of COVID-19 at AYDC.

Images 1-3 - COVID-19 safety measures at the AYDC entry



¹⁴ WebMD 2021, Coronavirus History, WebMD, <https://webmd.com/lung/coronavirus-history>

¹⁵ Communicable Diseases Network Australia (CDNA) 2020, CDNA national guidelines for the prevention, control and public health management of COVID-19 outbreaks in correctional and detention facilities in Australia, CDNA, Canberra, https://www.health.gov.au/sites/default/files/documents/2020/06/cdna-guidelines-for-the-prevention-control-and-public-health-management-of-covid-19-outbreaks-in-correctional-and-detention-facilities-in-australia_1.pdf



In addition to the above, there have been additional weekly cleaning measures introduced during COVID-19. These have been undertaken by an external cleaning service, and involve sanitising areas used by multiple people such as door handles, computers, phones, light switches and furniture (Figure 1). The inspection team sighted paperwork indicating that the additional cleaning was undertaken weekly during the inspection period.

Figure 1. Additional COVID-19 cleaning measures introduced at AYDC

Ashley Youth Detention Centre	
Specification of Work – COVID-19 Clean	
Cleaning Day: Wednesday	
Time Allocated: 7 hrs	
Public Holidays: No clean on a public holiday, clean alternate day	
Area	Tasks
Sanitize all areas in the centre due to COVID-19	All door handles, tables, computers, phones, windowsills, doors, walls/floors in frequently touched areas, TV's, remotes, light switches, dining rooms, tables chairs, recreation floors, common areas, windows and walk throughs in units, airlocks

My inspection team found that the AYDC complied with the Tasmanian Government's COVID-19 requirements at the time of the inspection.

Bedding

The AYDC 2017 *Health and Wellbeing Inspection Report* highlighted that mattresses and bedding at AYDC were in very good condition. This continues to generally be the case. One mattress in poor condition was sighted by the inspection team in an unoccupied room (Image 4). However, this issue was addressed by AYDC staff during the inspection.

Mattresses are made from fire retardant foam and have a removable cover; they are cleaned every three months and replaced when necessary. Clean bedding is provided weekly and sent off-site for laundering. Doonas are changed "whenever the young people want", and are washed when the young person leaves the centre or as needed.

At the time of the inspection, the AYDC policy document regarding bedding was sighted by the inspection team: Standard Operating Procedure (SOP) #11 Bedding, clothing and related items.

My Inspection Team found that AYDC continues to follow the procedure outlined in the Standard Operating Procedure, including replacing damaged mattresses.



Image 4 - Mattress in poor condition (ripped, stained cover) in unoccupied unit at AYDC



Requirements of relevant legislation

AYDC has a number of food preparation areas. The main kitchen prepares lunch and dinner daily for the young people at AYDC. Each AYDC residential unit has its own kitchenette where young people prepare their own breakfasts and snacks. The Daily Grind is a barista facility where young people receive training in hot beverage preparation and how to positively interact with their customers. The main kitchen is required to be registered as a food business in accordance with the *Food Act 2003*; it is registered by Meander Valley Council.¹⁶

Wastewater is disposed of through an onsite Blivet sewage treatment system and associated land application of the treated wastewater within the property boundaries. This system is serviced and checked by an external Service Provider at 12 week intervals in accordance with the provisions of the (Special) Plumbing Permit issued by Meander Valley Council.

At the time of the inspection, the AYDC swimming pool was available from the beginning of November to the end of April each year (Image 5). Chlorine and pH levels are monitored routinely; these results are documented and kept on site. An automated chlorinator had been ordered to replace the then current manual chlorine and pH checking, however, staff will continue daily visual checks and regular vacuuming. Microbiological testing of the pool is not performed. The consultant Environmental Health Officers in the inspection team recommended that, as this site is considered part of an educational facility, monitoring for microbiological compliance is not required by the *Recreational Water Quality Guidelines 2007*.¹⁷ While not mandatory, microbiological testing to check pool water quality is best practice.

¹⁶ *Food Act 2003* (State), <https://www.legislation.tas.gov.au/view/whole/html/inforce/current/act-2003-008>

¹⁷ Department of Health and Human Services, *Recreational Water Quality Guidelines 2007*, https://www.health.tas.gov.au/sites/default/files/2021-12/Recreational_Water_Quality_Guidelines_DoHTasmania2007.pdf



Microorganisms that are associated with contamination of swimming pools can be classified as faecally derived (e.g. from swimmers, animals or a contaminated water source) or non-faecally derived (e.g. shedding from human skin, or from animals, storm water runoff and windblown). As these microorganisms can still cause disease even if a pool is properly managed and adequately disinfected, microbiological testing ensures that optimum water treatment conditions are being maintained.¹⁸

Recommendation 1: That AYDC introduce routine microbiological testing of the pool.

Image 5. AYDC pool with AYDC kept chickens in the foreground



Food safety

The burden of food-borne disease in Australia is significant with an annual estimated 4.1 million people infected at an annual cost estimated at \$1.2 billion each year.¹⁹ Therefore food safety is an important part of environmental health and the prevention of illness.

The inspection team viewed the main kitchen, the residential units' kitchenettes, and the onsite barista facility The Daily Grind; all were appropriate for the current use and were very well maintained (Images 6-8).

¹⁸ Health Protection NSW 2013, Public swimming pool and spa pool advisory document, <https://www.health.nsw.gov.au/environment/Publications/Swimming-Pool-and-Spa-Advisory-doc.pdf>

¹⁹ OzFoodNet Working Group 2021, Monitoring the incidence and causes of disease potentially transmitted by food in Australia: Annual report of the OzFoodNet network, 2016, [https://www1.health.gov.au/internet/main/publishing.nsf/content/5c71fabf639650f6ca2586520081286b/\\$file/monitoring_the_incidence_and_causes_of_disease_potentially_transmitted_by_food_in_australia_annual_report_of_the_ozfoodnet_network_2016.pdf](https://www1.health.gov.au/internet/main/publishing.nsf/content/5c71fabf639650f6ca2586520081286b/$file/monitoring_the_incidence_and_causes_of_disease_potentially_transmitted_by_food_in_australia_annual_report_of_the_ozfoodnet_network_2016.pdf)



Images 6 and 7. AYDC main kitchen and residential unit kitchenette



Image 8. AYDC on-site barista facility – The Daily Grind





The AYDC 2017 Health and Wellbeing Inspection Report highlighted that the procedures in place for the preparation, delivery and service of meals to young people were considered compliant with the food safety requirements of the Australia New Zealand Food Standards Code.²⁰ This situation remained the case at this inspection; procedures in place for the preparation, delivery and service of meals to young people are considered compliant with the food safety requirements of the Code.

An up-to-date food safety program (FSP) is in place, where general processes and procedures are documented and recorded. These include details of approved suppliers, delivery of goods, cook-chill procedures, cleaning and sanitising, pest control, temperature checks and details of food handler training undertaken by all food handlers. Temperature checks are recorded manually – some using templates and some recorded without templates (Figures 2 and 3 respectively). Using templates reduces data recording time and ensures compliance with FSP. Young people are involved in food handling and service at The Daily Grind and they receive food handling training.

Recommendation 2: That AYDC introduce templates for all food handling temperatures that require recording under the Food Act 2003.

Figures 2 and 3. Temperature records for cold store and heated meals

Cold Store Temperature Record									
Month: March Year: 2021									
	Time (h:m)	Air Temp (°C)	Gauge Temp	Comment	Sign	Time (h:m)	Air Temp (°C)	Gauge Temp	Comment
1 st	7:10	2.5°C	3°C		CS	7:50	2°C	3°C	CS
2 nd	7:10	0.1°C	2°C		NH	7:50	2.5°C	3°C	CS
3 rd	7:00	0.5°C	2°C		NH	7:00	3°C	3°C	CS
4 th	7:00	2°C	2°C		NH	7:00	3°C	2°C	NH
5 th	7:30	2°C	2.1°C		NH	7:30	1°C	2°C	NH
6 th	7:00	0.5°C	2°C		NH	7:00	2.5°C	3°C	NH
7 th	8:00	1°C	2°C		NH	8:00	1.5°C	2°C	NH
8 th	9:15	1°C	2°C		CS	9:15	3.5°C	4°C	CS
9 th	7:50	1°C	3°C		CS	7:50	2.5°C	3°C	CS
10 th	7:30	1.5°C	2°C		CS	7:30	2°C	3°C	CS
11 th	7:05	1.5°C	2°C		NH	7:05	2.5°C	2°C	CS
12 th	7:00	0°C	2°C		NH	7:00	4°C	4°C	NH
13 th	9:00	1°C	2°C		NH	9:00	3°C	3°C	NH
14 th	8:00	0°C	2°C		CS	8:00	1.5°C	3°C	CS
15 th	7:10	1.0°C	2°C		NH	7:10	2°C	2.5°C	NH
16 th	7:05	1°C	2°C		CS	7:05	3°C	3.5°C	NH
17 th	7:20	3°C	4°C		NH	7:20	2°C	3°C	NH
18 th	7:00	2°C	2°C		NH	7:00	4°C	5°C	IR
19 th	7:00	1.5°C	2°C		NH	7:00	0.5°C	3°C	IR
20 th	9:05	2°C	3°C		IR	9:05	3°C	4°C	IR
21 st	8:05	0°C	2°C		CS	8:05	1.5°C	3°C	CS
22 nd	7:10	3°C	4°C		CS	7:10	1.5°C	2°C	CS
23 rd	6:50	1.5°C	2°C		NH	6:50	1.5°C	3°C	NH
24 th	7:00	1°C	2°C		CS	7:00	2°C	3°C	CS
25 th	6:45	2.5°C	2°C		NH	6:45	2°C	1°C	NH
26 th	7:30	2°C	1.5°C		NH	7:30	2°C	3°C	NH
27 th	7:50	0.5°C	2°C		NH	7:50	1.5°C	2°C	NH
28 th	8:15	0.5°C	2°C		CS	8:15	0.5°C	3°C	CS
29 th	7:00	2°C	2°C		NH	7:00	2.5°C	2°C	NH
30 th	6:50	0.5°C	2°C		NH	6:50	2°C	2°C	NH
31 st		°C	°C				°C	°C	
Supervisor's Signature					Date				

4/3 Bronte 75°C Franklin 74.5°C	14/3 Liffey 74°C Bronte 74°C Franklin 74°C
5/3 Franklin 75 Bronte 72	15/3 Liffey 77°C Bronte 75°C Franklin 75°C
6/3 Bronte 75 Franklin 72	16/3 Bronte 73 Franklin 75
7-8 Liffey 73 Bronte 72 Franklin 69	17-8 Bronte 76° FRANKLIN 77° LIFFEY 74°
8/3 Liffey 74°C Bronte 70°C Franklin 69°C	19-3-21 Bronte 69° FRANKLIN 70°
9/3 Liffey 75°C Bronte 75°C Franklin 75°C	20-7-21 Bronte 68° FRANKLIN 71°
10/3 Liffey 69°C Bronte 74°C Franklin 74°C	21/3/21 Bronte 72° FRANKLIN 75°
11/3 Liffey 80°C Bronte 81°C Franklin 80.5°C	22/3/21 Bronte 76° FRANKLIN 76°
12/3 FRANKLIN 72° BRONTE 74°	23-3-21 Bronte 73 Franklin 77
13/3 Liffey 78 Bronte 78 Franklin 75	24/3/21 Bronte 72° FRANKLIN 74°
	25/3/21 Bronte 70° FRANKLIN 69°

²⁰ Australia New Zealand Food Standards Code
<https://www.foodstandards.gov.au/code/Pages/default.aspx>



At the time of the inspection, four chickens were being kept at AYDC. The consultants with the inspection team advised that chickens and eggs carry the bacteria *Salmonella*, and that young people need to be washing their hands after picking up either the chickens or the eggs. *Salmonella* is found in chicken faeces which can contaminate the chickens' feathers, the environment they live in, and the surface of eggs. Therefore hand washing should be done after touching chickens, collecting eggs, handling of nesting material, or coming into contact with chicken manure or the environment in which the chickens live.²¹

Recommendation 3: That AYDC provide education to all young people at AYDC regarding the hygiene required when caring for chickens and collecting eggs.

Continuous access to clean drinking water

The AYDC 2017 *Health and Wellbeing Inspection Report* indicated that concentrations of nickel and lead in AYDC water samples exceeded the Australian Drinking Water Guidelines (ADWG). The response by the Department of Communities Tasmania to the unannounced inspection in February 2021 indicated that continued testing had been undertaken in September 2018, December 2018, February 2019 and July 2019. Further testing was recommended for July 2020 but did not occur due to COVID-19 restrictions. The testing in December 2018 identified the source of the contamination as the header tanks; testing in July 2019 indicated that cleaning of the header tanks had removed the contamination. The inspection team sighted a water testing monitoring report dated July 2019 from an external water testing consultancy showing these results. AYDC is implementing a yearly testing regime which was projected to commence in mid-April 2021.

AYDC has included the flushing of pipes in its routine maintenance schedule; toilets are flushed and taps are run each week. This flushing of pipes is also performed when a young person moves into a previously vacant room.

The Department of Education, which is responsible for the Ashley School indicated in its response to this inspection that all young people are supplied with drinking bottles in their unit. If a young person requests water while in class, their teacher assistant or teacher will get this for them.

My inspection team is satisfied that AYDC performs regular water testing as outlined in the Department of Communities Tasmania response to the unannounced inspection of February 2021 and will continue to monitor this issue in future inspections.

²¹ Department of Health and, Department of Health, Victoria,
<https://www.betterhealth.vic.gov.au/health/healthyliving/keeping-backyard-chickens#bhs-content>



Food safety awareness training

Food safety and hygiene encompass many aspects, however good hand hygiene is an important basis for both of these. The COVID-19 pandemic has also resulted in increased hand hygiene awareness. A recent study showed that among 354,422 adolescents aged between 13 and 17 years, only 30.3% were found to practice appropriate hand hygiene.²² This reinforces the importance of food safety and hygiene awareness training for young people.

Young people involved in The Daily Grind receive food handler training. As all young people at AYDC are provided with food which they can use to prepare snacks in their unit, such as toasted sandwiches or smoothies (Images 9 and 10), basic food handling would be beneficial to all young people.

Recommendation 4: That AYDC provide basic food handling training to all young people at AYDC.

Images 9 and 10. Food provided to young people in their units.



²² Jatrana, S, Hasan, MM, Mamun, AA & Fatima, Y 2021, "Global variation in hand hygiene practices among adolescents: the role of family and school-level factors", *International Journal of Environmental Research and Public Health*, vol. 18, DOI 10.3390/ijerph18094984



Personal hygiene awareness training

The Induction Program Checklist lists personal hygiene as one of the items to be assessed. The Toiletries Policy 2014 lists what each young person is given at admission and weekly thereafter; which includes items such as shampoo, toothpaste, toothbrush, soap, toilet roll, deodorant and a comb. In addition to these items, females are provided with a hair brush, hair bands and sanitary pads or tampons on admission, with sanitary pads or tampons provided weekly thereafter.

The inspection team did not find any information regarding what, if any, hygiene awareness training is provided to young people at AYDC.

Recommendation 5: That AYDC provide hygiene awareness training to all young people at AYDC.

Transport

Concerns regarding transport of young people to and from AYDC was highlighted by the consultants, including the travel distance required from other regions, food and water provision, and toilet breaks. The inspection team was told that young people can take toilet stops on their escort trips, and the options are public toilets or police stations, however stops are usually not needed.

Recommendation 6: That AYDC review the procedures in place for the transport of young people, to include scheduled stops for toilet breaks and access to food and water provisions.

Sun protection awareness training

Sun protection should be included in hygiene awareness, as Australia has one of the highest rates of skin cancer in the world. Each year almost 2,000 Australians die from this almost entirely preventable disease.²³ Protecting skin from the sun reduces the risk of skin cancer. Cancer Council recommend a combination of sun protection measures, including sunscreen and wearing a hat.²⁴

The Swimming Pool Usage Procedure provides that sunscreen is to be made available and used by young people whilst outdoors during summer months. A link to the SunSmart website is also included.²⁵ The Department of Education's Sun Protection Policy states that all sites must develop their own policy.

Recommendation 7: That AYDC develop a sun protection policy for young people and staff, using the Department of Education's Sun Protection Policy as a guide.

²³ Cancer Council nd, *Sun safety – reduce your skin cancer risk*, Cancer Council, <https://www.cancer.org.au/cancer-information/causes-and-prevention/sun-safety>

²⁴ Cancer Council nd, *Preventing skin cancer – how to protect your skin from the sun*, Cancer Council, <https://www.cancer.org.au/cancer-information/causes-and-prevention/sun-safety/preventing-skin-cancer>

²⁵ Cancer Council Victoria nd, *SunSmart - sports groups*, Cancer Council Victoria, <https://www.sunsmart.com.au/advice-for/sports-groups>



Personal hygiene and housekeeping is monitored

The consultant report indicated that staff provide appropriate supervision for residents' personal hygiene and housekeeping, and that a culture of self-management is encouraged by staff. Documentation of these procedures is valuable for new and returning staff, and ensures continuity across all staff.

Recommendation 8: That AYDC develop a procedure that reflects the current supervision by staff of residents' personal hygiene and housekeeping.



Appendix I – Inspection Standards

Hygiene and Environmental Health

- 6.38** Hygiene and sanitation must meet the requirements of all relevant legislation
- 9.6.5** Food is hygienically stored and prepared in accordance with Food Standards Australia and New Zealand guidelines.
- 9.6.7** There should be continuous access to clean drinking water.
- 9.6.9** All staff and young people involved in food preparation or food serving have undertaken food safety training.
- 9.6.10** All young people undertake basic food safety and hygiene awareness training.
- 9.6.11** Personal hygiene and housekeeping is monitored at unit level.



Appendix 2 – Consultant Report

Department of Health
PUBLIC HEALTH SERVICES

Level 3, 25 Argyle Street, Hobart,
Tasmania GPO Box 125, HOBART TAS
7001, Australia Ph: 1800 671 738
Web: www.dhhs.tas.gov.au



Contact: Helena Bobbi
Phone: (03) 6166 0621
E-mail: Helena.bobbi@dhhs.tas.gov.au
File: PPH02944

Mr Richard Connock
Custodial Inspectorate
GPO Box 960
HOBART TAS 7001

Dear Mr Connock

Findings from the planned inspection of Ashley Youth Detention Centre – hygiene and environmental health - 2021

As requested by the Office of the Custodial Inspectorate, an Environmental Health Officer, Mrs Helena Bobbi, has assisted you with the inspection of Tasmanian custodial centres.

The inspections have been carried out in conjunction with [REDACTED], Principal Officer Custodial Inspectorate, and in accordance with section 13 of the *Custodial Inspector Act 2016*.

The centres inspected included: Ron Barwick Minimum Security Prison, Risdon Prison Complex, Mary Hutchinson Women's Prison, Hobart Reception Centre, and Launceston Reception Centre. The final site inspected was the Ashley Youth Detention Centre (AYDC), 4260 Meander Valley Road, Deloraine on 24 February 2021 and is the subject of this report.

The inspection of AYDC was conducted by Helena Bobbi with the assistance of Durga Gopala Krishnan, also an Environmental Health Officer from this department. They focused on hygiene and environmental health, within the framework of the *Inspection Standards for Youth Custodial Centres in Tasmania* and the recommendations of the initial round of custodial inspections conducted in 2017.

The following are findings and subsequent recommendations with regard to the AYDC site.

Food safety

- The Ashley Youth Detention Centre is registered as a food business by Meander Valley Council in accordance with the Food Act 2003.



- An up-to date food safety program (FSP) is in place. General processes and procedures are documented and recorded. This includes details of approved suppliers, delivery of goods, cook-chill procedures, cleaning and sanitising, pest control and details of food handler training undertaken by all food handlers.
- The FSP also includes reference to the protocol for identifying/screening young people for food allergies when first taken into custody.
- The fit-out of the main AYDC kitchen and kitchenettes in the residential units are appropriate for the current use and are very well maintained.
- The procedures in place for the preparation, delivery and service of meals to residents are considered compliant with food safety requirements (as per the Australia New Zealand Food Standards Code). This includes food handler training for young people involved in food handling and service. Young people are involved in these activities at the onsite café.

Drinking water quality

- In response to our initial findings at AYDC in August 2017 of exceedances in the levels of nickel and lead in drinking water above those required by the Australian Drinking Water Guidelines (ADWG), a monitoring program was undertaken to enable a review of the water supply and distribution system.
- We note that [REDACTED] were engaged to conduct the review and monitoring of the drinking water supply in July 2019 and determined the source of the exceedances were the onsite header tanks. In turn, they were flushed/cleaned, and subsequent monitoring verified compliance with the ADWG.
- [REDACTED] recommended follow-up monitoring in July 2020 as part of a risk-based approach to ensuring compliance with the ADWG, but it is unclear if follow up monitoring has been undertaken. It is recommended that you review the advice from Environmental Service and Design and implement relevant recommendations.
- Additional preventative measures are in place to mitigate the risk of a build-up of metals in water in the distribution system in areas that have fairly low use, including routine flushing of taps for 2 minutes and when a young person moves into a previously vacant room/unit. Maintenance staff oversee these processes.

Other environmental health issues

- Wastewater is disposed of through an onsite Blivet sewage treatment system and associated land application of the treated wastewater within the property boundaries. The system is serviced and checked regularly in accordance with the provisions of the (Special) Plumbing Permit issued by Meander Valley Council.
- Residents have access to a swimming pool at the site from the beginning of November to the end of April each year. Chlorine and pH levels are monitored routinely with results of monitoring documented and kept on site. As this site is considered part of an educational facility, monitoring for microbiological compliance of the pool water with the *Tasmanian Recreational Water Quality Guidelines* is not prescribed. However, you may choose to do so to provide further verification of water quality of the pool and in turn the mitigation of risks to public health from water borne illness. Our officers are available to offer advice on implementing this measure.
- Staff provide appropriate supervision for residents' personal hygiene and housekeeping, with a culture of self-management encouraged.
- The Department of Education Infection Prevention and Control Guidelines are available and implemented.



- Care should be taken to note and address the presence of any rodent infestation as can commonly occur when housing poultry.
- Procedures in place around the transport of young persons were flagged as an issue that would benefit from review, with consideration given to the length of time taken to travel to ADYC from other regions, as well as food/water and toilet breaks.
- While outside the formal scope of this inspection, officers also noted the range of measures in place to assist in maintaining a COVID-19 safe environment. These included the presence of Check in Tas QR codes, floor decals encouraging 1.5m separation, signage to remind all persons arriving at the entrances to not enter if unwell, get tested and stay at home, physical distancing and hand and personal hygiene. Hand sanitisers were also readily available throughout the site.

I would like to thank your officers for their time and assistance in facilitating the Department's assessment of the site, as well as assistance from staff across all sites.

Please do not hesitate to contact me on 6166 0698 or Helena Bobbi on 0418 439 173 if you would like to discuss any of these details further.

Yours sincerely

Paul Hunt
State Manager, Environmental Health Services

19 October 2021



Appendix 3 - Department of Communities Tasmania response to Recommendations

Comments from the Department of Communities Tasmania regarding this inspection

Communities Tasmania including the Ashley Youth Detention Centre (AYDC) are pleased to note the report for the most part highlights, compliance of the AYDC with Inspection Standards for Youth Custodial Services in Tasmania regarding Environmental Health and Hygiene.

It is important to further note the Consultants accompanying the Inspection Team noted the range of measures in place to assist in maintaining a COVID-19 safe environment. AYDC continues to practice measures to maintain it as a COVID-19 safe environment.

A significant amount of time has elapsed between the inspection and the publication of the report / recommendations due to COVID-19 and a change of staff within the Custodial Inspectorates Office.

Communities Tasmania note that seven of the eight recommendations are fully supported and in most cases, completed. The one recommendation not supported by Communities Tasmania, is a request from the Custodial Team to implement as a best practice, microbiological testing of the swimming pool water. Since the inspection was conducted a new automated chlorinator has been installed in the pool at AYDC. This effectively is a chlorine system which is monitored externally. Given this new system and the low level of usage of the pool it is submitted monitoring for microbiological compliance is not required.

Communities Tasmania would also like to provide the following update to the information in the report:

- Page 8 of the report refers to AYDC being able to accommodate up to 50 young offenders. Following the recent refurbishment of the Centre the bed capacity is now up to 40 young offenders. Noting that on average around 15 young offenders are accommodated in the facility.



Responses to Recommendations

Recommendation	Response/Acceptance Level
I. That AYDC introduce routine microbiological testing of the pool.	Not Supported Since this inspection was conducted, a new automated chlorinator has been installed in the pool at AYDC. This effectively is a chlorine system which is monitored externally. This system provides 'live' chemical levels and notifies if chemical levels require adjusting. Daily reports are available. As per the Recreational Water Quality Guidelines 2007, the Consultant, Environmental Health Officer in the inspection team recommended that monitoring for microbiological compliance was not required. The pool is designated as part of an educational facility. It is small in size with low level use. Given the number of residents, low-level usage, installation of the new chlorinator and the standards required (as per the Recreational Water Quality Guidelines 2007) the recommendation for microbiological testing is not supported.
That AYDC introduce templates for all food handling temperatures that require recording under the <i>Food Act 2003</i>.	Supported A template will be developed and implemented for all food handling temperatures requiring recording. All Youth Workers and kitchen staff undertake the 'I am food alert' food handling training on THEO which steps out why and how food handling and temperature taking must be conducted.
3 That AYDC provide education to all young people at AYDC regarding the hygiene required when caring for chickens and collecting eggs.	Supported The Chickens are temporarily off site and will return in the future. The Kitchen staff have responsibility for the care of the chickens and egg collection. A Gardening and Chicken Care training program has been developed for residents who wish to care / engage with the chickens. This training will be implemented once the chicken's return to the Centre.



Recommendation	Response/Acceptance Level
4. That AYDC provide basic food handling training to all young people at AYDC.	Supported Basic food handling training is undertaken by residents as part of their curriculum with the Department of Education. This is run regularly and reflected in the Program activity sheets. All residents initially complete the 'I Am Alert Food' course. Residents who have completed the 'I Am Food Alert' training can undertake in addition 'Do Food Safe' training. Each Sunday a qualified Chef is on site to cook with the Residents. The Chef reinforces/ensures food handling safety in this program.
5. That AYDC provide hygiene awareness training to all young people at AYDC.	Supported Personal hygiene picture prompts are used to support young people to develop appropriate personal hygiene standards. Residents are encouraged / trained in expectations of showering, teeth care etc in their daily routine. This is reinforced in daily routines sheet and recorded in the Behavior Development Program (BDP) points which is to incentivize and reward positive behavior. This assists in highlighting areas of concern regarding hygiene which is discussed at Weekly Review Meeting and referrals are made to either Ashley Team Support or Health to work with the individual. Department of Education run a program on health. School holiday programs also run a personal care information session such as how to clean nails, hygiene, skin care. A hairdresser visits the Centre. Health will advise if a Residents needs to be taken to the Dentist (off site) for teeth care / checkups etc.
6. That AYDC review the procedures in place for the transport of young people, to include scheduled stops for toilet breaks and access to food and water provisions.	Supported The procedure for the transport of young people is to be updated to include pre identified suitable toilet facilities if required enroute. It is to be noted that a bathroom check for the young person is made prior to leaving the Centre. AYDC provide food and water packs for the young people before they travel. Hygiene packs (sanitary products) are available / provided for female residents requiring transport to court.

**Recommendation****Response/Acceptance Level**

7. That AYDC develop a sun protection policy for young people and staff, using the Department of Education's Sun Protection Policy as a guide.

Supported

A policy / procedure will be developed which will incorporate young people and staff in the use of all sun safe equipment and products. These are already provided to the young people (sunblock, sunglasses, sunhats, sun safe shirts) for onsite and approved offsite activities. Usage will be linked to the accrual of BDP points to encourage the use of sun protection items.

8. That AYDC develop a procedure that reflects the current supervision by staff of residents' personal hygiene and housekeeping.

Supported

The supervision by staff of resident's personal hygiene is already built into the BDP. The staff support and promote the daily hygiene routine. This is reinforced in the daily routines sheet and recorded in the Behavior Development Program (BDP) points which incentivizes and rewards positive behavior. This assists in highlighting areas of concern regarding hygiene which is discussed at Weekly Review Meeting and referrals are made to either Ashley Team Support or Health to work with the individual. This will be incorporated in the training package for Youth Worker role on daily routines.



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