



IPRT
Irish Penal Reform Trust

IPRT Submission to
Review Group on Thornton Hall

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The Irish Penal Reform Trust (IPRT) is Ireland's leading non-governmental organisation campaigning for the rights of everyone in the penal system, with prison as a last resort. IPRT is committed to reducing imprisonment and the progressive reform of the penal system based on evidence-led policies. IPRT works to achieve its goals through research, raising awareness, building alliances and growing our organisation.

Through its work, IPRT seeks to stimulate public debate on issues relating to the use of imprisonment, including on sentencing law and practice in Ireland. This is one in a series of Position Papers, which underpin the work of the IPRT.

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Introduction

The Irish Penal Reform Trust (IPRT) welcomes the present review process with regard to the proposed prison building project at Thornton Hall, Co. Dublin.

IPRT previously made a submission on the proposed prison project at Thornton to the Oireachtas Justice Committee in June 2008, and we subsequently published a Position Paper on the proposed project. Since then, we have also published additional Position Papers on the related issues of *Mandatory Sentencing* (May 2009), *Planning the Future of Irish Prisons* (July 2009), *Human Rights in Prison* (September 2009), and *Penal Policy with Imprisonment as a Last Resort* (September 2009); all available at <http://www.iprt.ie/position-papers>.

Here we set out those factors which we consider most relevant to allow an informed Government decision on this proposal. As a general principle, IPRT approaches the question of the costs and benefits of any discrete prison project in the context of the wider needs of the prison system and, crucially, in the context of the overall objectives of crime policy and wider social policy.

In re-examining the proposal at this point in time, we also recognise that the economic context for evaluating the prison building project has altered significantly and this is reflected in this submission. While IPRT is not qualified to address issues such as the question of construction costs or the original purchase of the site at Thornton, we have tried to reflect the need for value for money in our analysis of the various options available.

1. General Principles

1.1 Need for a Wider Crime Policy

The overarching goal of any criminal justice system is to reduce crime and to create and maintain a safe society. What is necessary to build safer communities is a coordinated criminal justice policy which is mindful of the relationship between crime and wider social policy; and which makes the most effective and efficient use of the various elements in the criminal justice system (police, courts, probation, prison etc.) Within the context of clearly defined policy objectives regarding crime reduction, Government and State agencies can make informed decisions to employ the resources and functions of the various criminal justice agencies in the most effective way possible while minimising the associated harms and costs of those measures.¹ **A key challenge in assessing current prison policy is the absence of a clearly stated Government Crime Policy which sets out a coherent vision regarding the appropriate balance to be drawn between crime prevention, diversion, punishment and rehabilitation. IPRT hopes that the current White Paper on Crime process will address this need.**

1.2 Penal Moderation

IPRT believes that Government should commit to limiting prisoner numbers and to reversing the accelerated penal expansion of recent years. Prison is the most expensive and socially disruptive of criminal sanctions. As set out in the Scottish Prison Commission review, “prison sometimes does good but it always does harm...” Rather than asking if we can afford to build more prison spaces, we should ask whether we can reduce the size of our prison population, and the social and economic costs associated with it, while maintaining or even improving public safety.² **The building of prisons cannot be a goal in itself. Rather, any proposal to construct new prisons should be assessed in terms of whether the same objectives of crime policy can be achieved in other more socially desirable and more cost-effective ways.**

1.3 Thornton in the Context of the Needs of the Prison System

IPRT believes that any appraisal of the capacity needs of the Irish prison system must be based on a comprehensive analysis of recent and future prison population trends. Beyond the question of the demand needs of the system, the question of the quality of detention facilities and the need for replacing and renovating prison buildings can be addressed separately. In this submission, we look at the needs of the prison system and the challenges for prison estate management, from the perspective of (i) the real capacity needs of the system and the strategies and measures available to reduce the prison population to optimum and affordable levels; (ii) the basic thresholds of prison accommodation and prison services that must be met; and (iii) the existing prison estate and the potential for its enhancement. **IPRT believes that the potential prison project at Thornton Hall must be viewed in the context of the wider need for a Prison Building Programme targeted at the identified needs and gaps within the current prison estate, and informed by best practice internationally in prison design and management. The priority must be improvement of conditions and not expansion.**

¹ IPRT’s position on the need for greater coordination between the various criminal justice agencies and for a more coherent crime policy is set out in the IPRT Position Paper *Planning the Future of Irish Prisons* (2009), available at <http://www.iprt.ie/contents/1407>.

² IPRT has already proposed that key concepts to underpin any such strategy might include the concept of Penal Moderation, which we have developed in the IPRT Position Paper *Penal Policy with Imprisonment as a Last Resort* (2009), available at <http://www.iprt.ie/contents/1406>.

1.4 The Economic Context for Prison Building

At an economic level, a general comparison can be made between the cost of imprisonment per prisoner and the equivalent cost of alternative forms of punishment. Ultimately prisons are an expensive means to achieve other policy objectives and should be used as sparingly as possible. This analysis has already informed recent Government initiatives to expand the use of community service orders in place of short prison sentences.³ IPRT also believes that a wider economic analysis can be undertaken of the financial and crime reduction benefits of investing resources in evidence-based crime prevention measures rather than in prison budgets.⁴ **In the fiscal position that Ireland currently finds itself and within the context of a chronically overcrowded prison system, IPRT believes that the choice facing the Government around the current levels of prison occupancy in Ireland is even more stark.**

It is now clear that maintaining or increasing the current level of prison population will result in either exposing staff and prisoners to unacceptably dangerous, and potentially illegal, levels of overcrowding; or incurring the additional and very significant costs of prison construction; or both. Our basic message is that these costs can be reduced if the government commits to a more enlightened, socially just crime policy which places increased focus on crime reduction and diversion programmes.

2. Questions of Capacity

2.1 Ending Overcrowding

The problem of overcrowding has been widely recognised as a central problem in the Irish prison system. As a starting point for any analysis of prison building and capacity, Government must ensure that the prison system operates within capacity. Safe custody limits should be set and enforced, and where necessary prisoners should be released to ensure the safety of staff and prisoners. Overcrowded prisons cannot function effectively and give rise to higher levels of violence and increased drug use. The relationship between overcrowding and the human rights obligations of the State to provide safe custody has been recognised by the European Court of Human Rights,⁵ the US District Court⁶ and the Irish High Court.⁷

In July 2010 the Inspector of Prisons analysed the occupancy level at the 14 prisons in the State with reference to the cell size and services available at each prison. His analysis disclosed an overcrowding

3 See The Probation Service, *Value for Money and Policy Review of the Community Service Scheme* (2009).

4 See Irish Penal Reform Trust, Barnardos, Irish Association of Young People in Care, *Shifting Focus: From Criminal Justice to Social Justice - Building Better and Safer Communities* (2010). A model for how all available crime reduction options can be assessed and evaluated in terms of costs and benefits can be seen from Washington State in the US, where detailed analysis of the comparative economic outcomes of all options has been used to reduce prison spending. See Steve Aos, Marna Miller, and Elizabeth Drake (2006), *Evidence-Based Public Policy Options to Reduce Future Prison Construction, Criminal Justice Costs, and Crime Rates*. Olympia: Washington State Institute for Public Policy, available at <http://www.wsipp.wa.gov/rptfiles/06-10-1201.pdf>. The type of analysis undertaken in Washington and the issue of a wider reallocation of resources within the criminal justice system is perhaps a matter for consideration in the context of the White Paper on Crime.

5 Two recent cases before the Court relating to overcrowding in Polish prisons have established that chronic overcrowding, combined with other factors, may constitute violations of Article 3 of the ECHR. Judgment in the two cases of *Orchowski v Poland* (Application No 17885/04) and *Norbert Sikorski v Poland* (Application No 17599/05) was delivered on 22nd October 2009.

6 See *Coleman and Plata et al., v Schwarzenegger, Governor of the State of California, et al.* (2:90-CV-0520 LKK JFM). Date of Delivery: 04/08/10 <http://www.caed.uscourts.gov/caed/Documents/90cv520o10804.pdf>

7 See *Mulligan v Governor of Portlaoise Prison* [2010] IEHC 269.

level of 15% above what can reasonably be considered a safe level of occupancy for prisoners and staff.⁸ Irish penal policy must endeavour to ensure that the prison system operates within its true design capacity by setting a realistic, truthful operational capacity and sticking to it rigorously. **We recognise that operating within its true design capacity may not be achievable overnight, but there must be a commitment that within a fixed period the Irish prison system will be brought within operational capacity as set out by the Inspector of Prisons.**

2.2 Reducing the Prison Population

There are two ways in which safe custody limits can be met: either by increasing capacity (supply of prison spaces) or by reducing prisoner numbers (demand). For the reasons set out in section 1 above, we believe that all efforts must be made to reduce demand wherever possible, before any proposals for expansion of stock should be considered. What is absolutely clear is that imprisonment rates are contingent on political decision and not a simple product of crime rates. While the number of persons in custody is determined by a complex series of factors, and most significantly by sentencing courts, IPRT notes that previous Governments have set targets to reduce the prison population.⁹ Once such targets are set, the task of Government is to identify those measures and policies that need to be implemented to achieve these ends, based on an analysis of the contributing role of the variables in the criminal justice system to overall numbers and while respecting the independence of the judiciary. Examples of jurisdictions where significant reductions in prison population have been achieved include Finland¹⁰ and more recently, some jurisdictions within the United States.¹¹ **IPRT believes that a realistic target would be to reduce prisoner population levels in the short term to as close as is possible to the design capacity of the current prison estate (estimated at 3,892 by the Inspector of Prisons in July 2010). Within the medium term, we believe that a reduction to 2005 prison population levels (average prisoner numbers in 2005 were 3,315) should be possible.**

2.3. Towards a Package of Measures to Reduce Prisoner Numbers

Any commitment to reducing the prison population will need to combine a series of short-term measures and long-term policies and actions. International experience shows that efforts to reduce prison demand are likely to be frustrated by simultaneously increasing stock – if new places are built, they will be filled as the justice system will adapt to meet supply with demand. If a combined package of measures is put in place, the current population level can be stabilised and a longer process of reduction begun. The key elements of this strategy must be to analyse the current composition of the prison population in order to: (1) identify which categories of prisoners can be immediately and safely reduced; (2) look at possible changes to release practices for existing prisoners; and (3) identify the

⁸ In July 2010 the Inspector recorded that safe capacity within the prison system was approximately 3,894, with 4,236 in custody at that time. This aggregate number does not reflect the much higher levels of overcrowding at some prisons. See Inspector of Prisons Report on *The Irish Prison Population – an examination of duties and obligations owed to Prisoners 2010*. This aggregate number also does not reflect the additional number of persons on temporary release (TR). While undoubtedly many prisoners on TR have been released due to pressures of overcrowding, it is not clear what proportion of those on temporary release can be considered to be “appropriately” on temporary release; i.e. for the stated functions of compassionate TR or TR for the purposes of preparation for release.

⁹ In its 1994 policy document *Management of Offenders*, the Department of Justice stated that an upper limit of between 2,200 and 2,300 should be set on the numbers in custody.

¹⁰ As a Government policy, Finland consistently reduced its prison population and rate of imprisonment from a rate of 200 per 100,000 in the 1950s to a current rate of less than 70 per 100,000. The measures put in place to achieve this reduction in Finland and in other jurisdictions were examined recently by the Scottish Parliament in a report commissioned by its Justice Committee in 2005.

¹¹ See the Sentencing Project *Downscaling Prisons Lessons from Four States 2010*, available at http://www.sentencingproject.org/doc/publications/publications/inc_DownscalingPrisons2010.pdf. See p.14, where it is stated that in 2000, 14 New York prisons were targeted for “bed take-downs”, whereby beds were removed from units that had been double-celled during the overcrowding crisis.

changes in sentencing law and practice that have been responsible for penal expansion and which can be safely reversed. **We believe Government should analyse the appropriate targets and the potential reductions which can be achieved in each area. IPRT does not have access to all the necessary data to prepare a comprehensive plan. However, we suggest here some of the areas where significant reductions might be achieved:**

2.3.1 Diversion - Who can be taken out of the prison system at present

Some segments of the prison population which have increased significantly in recent years, or where IPRT has identified potential for high levels of diversion include:

(i) Women Prisoners

Numbers of women prisoners have increased very significantly in recent years. There is a lack of residential or high-support services for low-risk women offenders with complex needs. Such options would be significantly cheaper than imprisonment.

Reduction in women prisoner numbers could bring the Dóchas Centre and Limerick back in line with design capacity, removing the need for extra dormitory accommodation at Dóchas. Current overcrowding in both prisons runs at approx. 60 prisoners or 40%.

(ii) Children

Fulfilling the Government's commitment to end the detention of children at St. Patrick's Institution will require the construction of an appropriate child detention facility (presumably at the main campus at Lusk). If St. Patrick's is to be retained as an institution, this move would open an additional capacity at St. Patrick's, which could be used for younger male prisoners in the category 18-21 and/or as a drug-free unit. The removal of children from the prison system will also free significant resources for a prison system ill-equipped to serve children.

St. Patrick's is not overcrowded at present. Potential increase in available stock 44-60, and the release of good education/workshop facilities.

(iii) Short sentence prisoners and fine defaulters

It is Government policy that imprisonment must be reserved as a sanction of last resort for less serious offences. Actions have already been taken to remove many of this category of offender from the prison system, including the enactment of the Fines Act (not yet implemented due to delays with Court Service ICT system) and the introduction of the Community Service Order Bill. IPRT believes that more aggressive diversion measures may also be needed, targeting categories such as road traffic offences.

In 2009, approximately 14% of daily sentenced prison population (12% total) was serving sentences of 12 months or less. The proportion serving 6 months or less was approximately 3.5% of the total daily prison population. On current figures,¹² this suggests that about 540 prisoners are serving less than 12 months and about 160 are serving less than 6 months. We can assume that a significant proportion of those on temporary release are in these categories also.

(iv) Mental Health and Drug Addiction

The Prison In-Reach and Court Liaison Service at Cloverhill Court has succeeded in diverting some mentally ill accused persons away from the prison system and into more appropriate

12 4,495 in custody on 4th May 2011.

community or forensic mental health services. The expansion of this system would achieve further diversion. It is probable that similar investment in diversion for chronic drug addicts could have similarly beneficial results. The shortage of drug treatment beds within the prison system is a serious challenge at present.

2.3.2 Remission and Parole – Who can be released earlier?

The swiftest and most immediately effective tactic to bring the prison population within safe custody limits is to release earlier some prisoners serving sentences. This can be done in a safe and structured way with some reform of the present parole process, which would be preferable to the current relatively unstructured over-use of the temporary release system. Temporary release should continue to play its intended and important role in assisting the re-entry of long-term prisoners into society; and in that regard, it should be made available for all categories of offender. Reform of parole and temporary release can have an immediate effect in terms of relieving current demand, but it can also have a longer impact by creating a more incentivised prison system for longer-term prisoners. Some measures which might be considered include:

(i) Remission

The Prison Act 2007 provides for 33% remission to be available to prisoners who engage with rehabilitation services. To date it seems that there is no practical mechanism for prisoners to access this enhanced remission regime. Options which might be considered include a general increase of remission levels from 25% to 33%; a targeted increase of remission for certain categories of offenders; or the establishment of a transparent administrative scheme to allow prisoners apply for enhanced remission where they can demonstrate constructive engagement with services.

(ii) Reform of Temporary Release and Parole

The Minister has already indicated his intention to review current parole law and procedures. Among the issues that might be reviewed with a view to allowing an increase in the release of longer term prisoners who have been assessed as no longer posing a risk, include:

- **Ensuring the incentive of temporary release is available to all categories of prisoners**
- **Broadening of the categories of prisoners who can apply for parole**
- **The establishment of an independent parole board, removing parole decisions from political control.**

2.3.3 Changes to Sentencing Practice

By identifying those categories of offending where the largest growth in numbers has occurred, it should be possible to examine the extent to which changing sentencing practice is responsible for expansion, and whether this can be changed. From the Department of Justice's own analysis, sentencing for drug crime, and specifically sections 15a of the Misuse of Drugs Act, 1977 would seem to have been a significant factor in the increase in prisoner numbers in recent years. Cost benefit analysis of mandatory sentencing regimes as a means of tackling specific crime problems, such as the trade in illegal drugs have been undertaken in other jurisdictions.¹³ **If it can be demonstrated that mandatory and presumptive sentencing has been an ineffective strategy to tackle the trade in illegal drugs, then IPRT believes repeal or amendment of this legislation could have a very significant impact on the penal expansion patterns of the last ten years.**¹⁴

¹³ For a U.S. analysis, see "Are mandatory minimum drug sentences cost effective?"; Rand Commission, 1997, available at http://www.rand.org/pubs/research_briefs/RB6003/index1.html (last accessed 13th May 2011).

¹⁴ The Law Reform Commission is currently reviewing the operation of mandatory sentencing legislation in general. Dublin Institute of

2.4 Planning Prison Projections for the Future

One justification for the original scale of the proposed prison at Thornton Hall was the need for “future-proofing” against an anticipated expansion of prisoner numbers. However, it is clear that this policy approach was adopted in the absence of accurate prison population projections. Central to any assessment of how prison capacity needs can be met is the need for an accurate assessment of the quantum of prisoners which the system should and will hold over the coming years. **There can be no proper planning without accurate population projections and an understanding of the interplay between the various factors which have led to the increase in prison population.** Models for effective prison projections are available from neighbouring jurisdictions which reflect the impact on prison population levels of political decisions, legislative change and other variables. One key element is the need to impose an obligation on the Oireachtas to conduct an analysis of the effect any proposed changes to penalties will have on the prison population.

3. Standards of Imprisonment and the Present Prison Estate

Having agreed an optimum level of the overall prison population in line with a commitment to safe custody limits, Government must then commit to the basic standards and needs which should apply to the quality of the prison system. Clear legal standards for the basic levels of prison conditions are set out in the European Prison Rules¹⁵ and in the Standards set by the Council of Europe Committee for the Prevention of Torture (CPT).¹⁶ It must be emphasised, though, that these are minimum standards. Broader considerations about best practice and evidence of prison conditions and regimes which are *most effective* in serving the combined goals of containment, punishment and rehabilitation must also be taken into account.

3.1 Basic Cell Conditions

The European Prison Rules and CPT standards set clear thresholds for the need for in-cell sanitation, cell size, access to heat and light, and access to basic prison service. These standards for prison conditions have been analysed by the Inspector of Prisons and applied to the Irish prison estate. While conditions in the modern prisons meet international standards, significant problems persist in Cork, Mountjoy, Limerick and Portlaoise prisons. Regardless of the decision regarding Thornton Hall, if these prisons are to continue to accommodate prisoners, proper sanitation facilities must be provided in all prison cells within a reasonable time frame. In this regard, an appraisal of the current work at C Wing in Mountjoy is needed at the earliest opportunity. In addition, an appraisal of the lifespan and potential for rebuild at all of these older facilities should also be undertaken immediately. Improvement works may mean temporary loss of prison capacity in some prisons, but if the necessary work is staggered appropriately, any disturbance should be minimised.

3.2 Safe Custody Limits and Occupancy

In line with the analysis of the Inspector of Prisons from 2010, all prisons must be brought within safe operational levels within the short term. This will mean significant reductions in the occupancy levels

Technology is engaged in a research project to analyse the profile of those persons convicted under sections 15a and 15b of the Misuse of Drugs Act 1977. See also *IPRT Position Paper on Mandatory Sentencing*.

¹⁵ European Prison Rules, Council of Europe Committee of Ministers *Recommendation 2* of 2006.

¹⁶ The “CPT Standards” are the collated substantive recommendations of the European Committee for the Prevention of Torture, first issued in 2002 and most recently revised in 2010.

at the existing prisons at Cork, Mountjoy, Dóchas, Limerick, Wheatfield and Midlands. Taking these prisons where overcrowding is combined with poor cell-conditions and lack of sanitation, immediate priorities to address overcrowding include:

- Mountjoy should be reduced by approximately 120
- Cork should be reduced by approximately 120
- Limerick (male) should be reduced by approximately 100

Wheatfield and Midlands, which both provide good cell conditions, are overcrowded by approximately 120 prisoners each. Dóchas is overcrowded by as many as 60 prisoners.

The Inspector of Prisons has made clear that the capacity and conditions in any given prison must be assessed with reference to the regimes and activities available in that prison. Overall, good facilities improve staff efficiency, morale and effectiveness. In the context of cutbacks across the public sector and the economies that must be achieved under the Croagh Park agreement, any assessment of what is affordable in terms of prison capacity must include a balanced and comprehensive assessment of the necessary levels of education and other services which should match each prison space.

3.3 Penal Moderation - Open Prisons, Smaller Prisons, Local Prisons

In line with the concept of Penal Moderation, and in the interests of minimising staff and other costs, a prison system should be based on the principle of providing the lowest level of security (or “depth” of imprisonment) necessary to achieve the goals of public protection, punishment and rehabilitation. At present, the Irish prison system houses less than 400 of its male prisoners in open or low-security facilities (8-9% from a total of over 4,500). In other jurisdictions, this figure can be as high as 35-40%. A cursory analysis of the profile of the Irish sentenced prison population shows that in 2009, 27.5% of sentenced prisoners were detained for offences against property without violence; 22% for drug offences; and 5% for road traffic offences.¹⁷ IPRT believes that a significant proportion of these categories of prisoners might benefit from an open or low-security regime.

Notable gaps in the Irish prison estate are the lack of any open facilities for women, for young male offenders, or for male offenders on short sentences. Open prisons are cheaper to run, primarily due to lower staff levels, and are particularly effective for low-risk offenders. Examples of low-cost and effective open facilities exist across many European prison systems, most notably in the Netherlands, Norway and Denmark. The entire system benefits through allowing greater segregation of prisoners according to risk, and creating more incentives for prisoners/ good behaviour will also have a profound effect. IPRT believes that a transfer of prisoners from overcrowded and expensive secure facilities to new or expanded open facilities can save significant financial resources. The IPS has already identified capacity to expand the open facility at Shelton Abbey and it is possible that Loughan House may also be suitable for expansion.

In its initial submission to the Oireachtas Justice Committee on the Thornton Hall Proposal, IPRT referred to the general shift across Europe away from large prisons to smaller more localised prisons. The House of Commons Justice Committee, when considering prison staffing and management, heard a number of submissions from senior police officers, HM Inspectorate of Prisons and leading prison academics that the maximum size for a standard prison should be 500 prisoners, with significantly lower levels for prisoners with higher or complex needs.¹⁸ A geographical breakdown of offenders and

¹⁷ IPS Annual Report 2009, see Table 2.2 at p14.

¹⁸ Justice Committee - Twelfth Report “Role of the Prison Officer”, October 2009, at section 6. Prof. Andrew Coyle of the International Centre for Prison Studies at Kings College London referred to an optimum prison size of 300 when addressing IPRT’s Open Forum on the Future of Irish Prisons in 2009.

prisoners should also be used to identify the areas of the country where prisons might most usefully be located, in line with the principle of more and smaller prisons rather than larger institutions (so called 'localism').¹⁹

4. Consequences for Thornton Hall and Prison Building Strategy

4.1 IPRT believes that if a package of measures to reduce the prison population is put in place (as set out in section 2 above), the prison population can be brought to a level close to the operational capacity of the current prison estate. This would require a reduction of 15% on current prisoner numbers (a reduction of approx. 470 prisoners).

4.2 Accurate and robust prison population projections must be put in place to facilitate proper prison planning. The Oireachtas should be obliged to review the potential impact on imprisonment levels of all new legislation.

4.3 IPRT believes that prison building should be based only on the improvement of conditions and not to increase the prison population. Based on a detailed analysis of the short-term and medium-term capacity and design needs of the prison system, any new build should be targeted at meeting identified needs, either on a geographical basis or for particular categories of prisoners.

4.4 In that regard, addressing the current overcrowding levels and poor cell conditions at Cork, Limerick and Mountjoy are the most urgent issues within the prison system, along with the specific overcrowding problem at Dóchas.

4.5 Any prison building programme should form a shift to a more diverse prison estate which would provide gradated security and regime settings, and move towards a more incentivised prison system. The need for open facilities for women and for young male offenders must be clear priorities.

4.6 We recognise that construction on existing sites may be preferable to new purchases. Therefore there is a need to analyse what space is available on existing sites to see if building can be done in a way that does not compromise space for exercise, facilities, etc. Actions such as the removal of children from St. Patrick's Institution will create some additional capacity at that institution.

4.7 It may be worth considering the wider range of sites and residential facilities in State ownership: both those previously and currently in the use of the Irish Prison Service and those in the use of other State agencies (such as Probation, HSE, etc.) Consideration might also be given to NAMA owned lands.

4.8 The suitability of Thornton Hall for an open facility is unclear. Isolation of the site from urban facilities such as employment or training facilities may militate against its use in this way. Development of open facilities at other existing prison sites may be preferable at the outset.

¹⁹ The concept of "localism" with regard to prison building is developed in detail by the Commission on the English Prison Today, Paper on Localism, see <http://www.prisoncommission.org.uk>.

