

In the matter of the *Commissions of Inquiry Act 1950*
Commissions of Inquiry Order (No.4) 2015
Barrett Adolescent Centre Commission of Inquiry

AFFIDAVIT

Cristelle Mulvogue of [REDACTED] Senior Clinician states on oath:

1. I have been provided with a Requirement to Give Information in a Written Statement dated 18 November 2015. **Exhibit [CM.1]** to this affidavit is a copy of this notice. I respond as follows:

1 Professional Qualifications

2. I have a Bachelor of Social Work (First Class Honours) from the University of Queensland and a Master of Social Work from Monash University. I have been working as a social worker since 2006 in both the mental health, and disability and forensic disability fields. I started working for the Department of Communities, Child Safety and Disability Services ("the Department") in November 2007. I was appointed to my current position of Senior Clinician (PO4) based at the Oxley Service Centre, in September 2012. I have been on maternity leave from my position since 30 November 2015. **Exhibit [CM.2]** to this affidavit is a copy of my curriculum vitae.

Page 1

✓Deponent ✓

A J.P., C.Dee., Solicitor

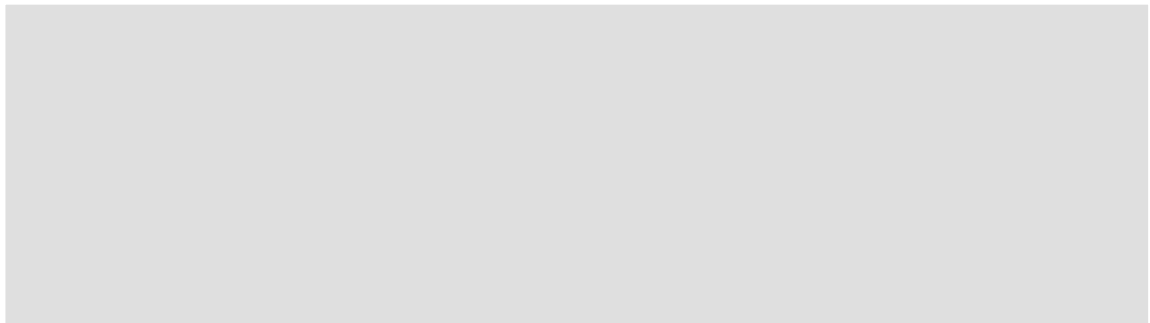
AFFIDAVIT

On behalf of Cristelle Mulvogue


TressCox Lawyers
 Level 4, 40 Creek Street
 BRISBANE QLD 4000

2 Contact with Patient 

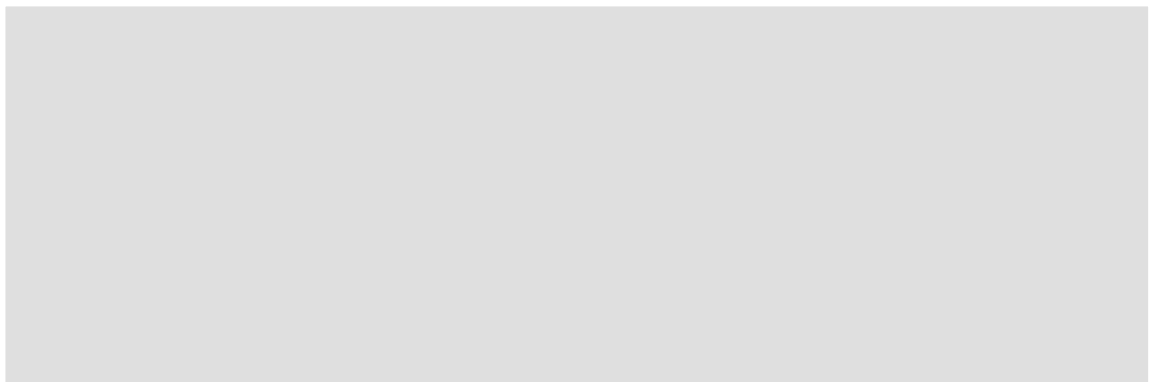
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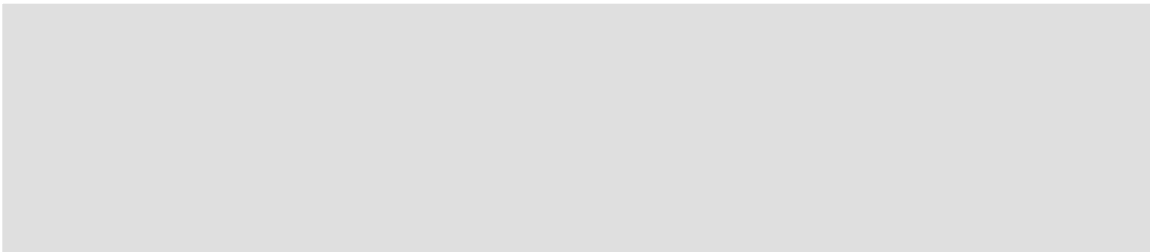
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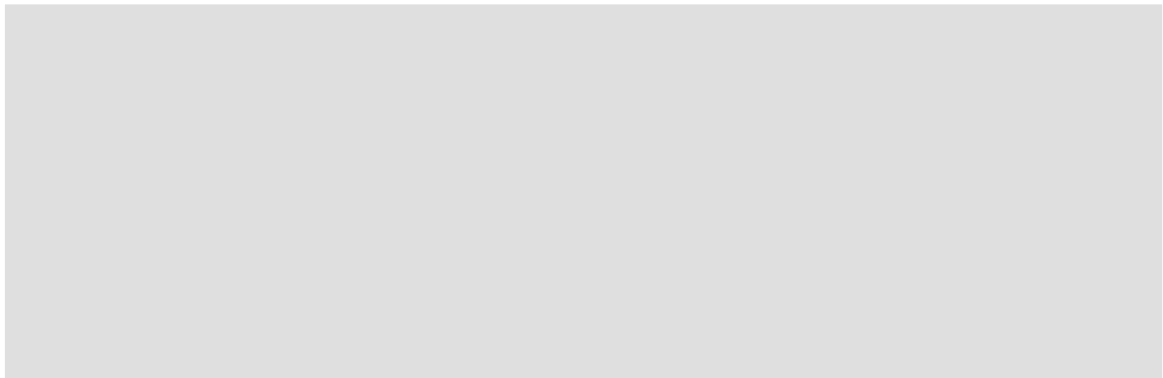
5.



6.



7.



3 Risk assessments conducted for Patient [REDACTED]

8.

[REDACTED]

9.

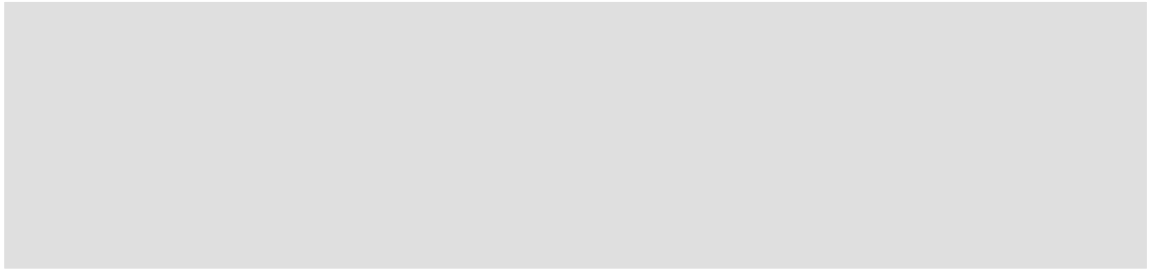
[REDACTED]

10. The tool used by me was a screening form developed approximately 5 to 6 years ago. The form screens for both the risk of aggression and suicide.

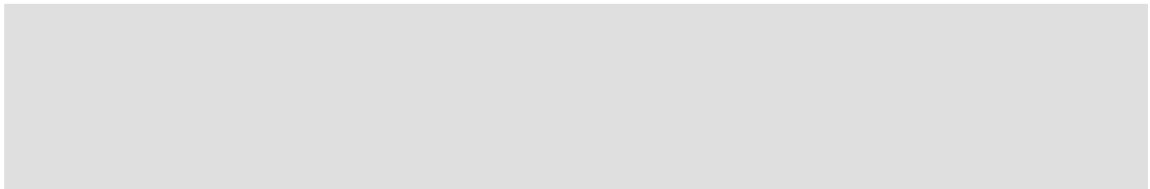
11.

[REDACTED]

12.

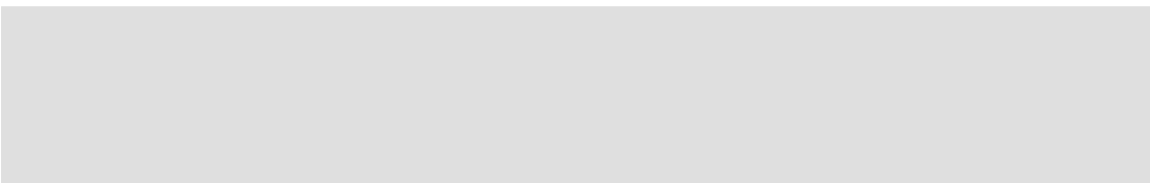


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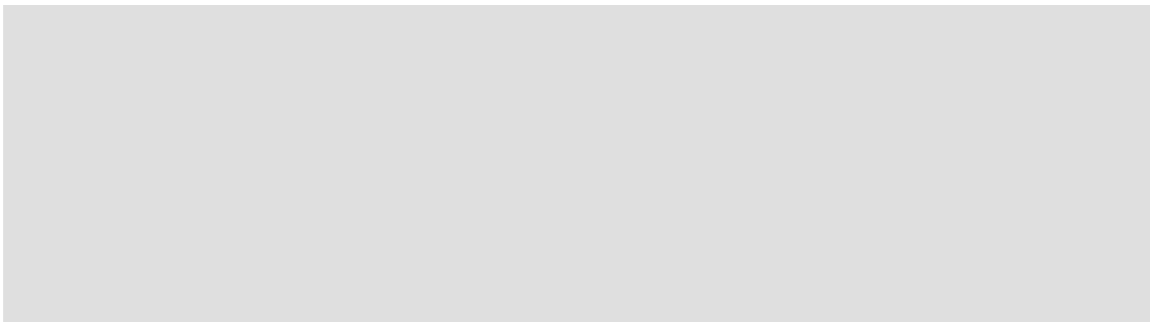


4 Communication of results of risk assessments for Patient

14.

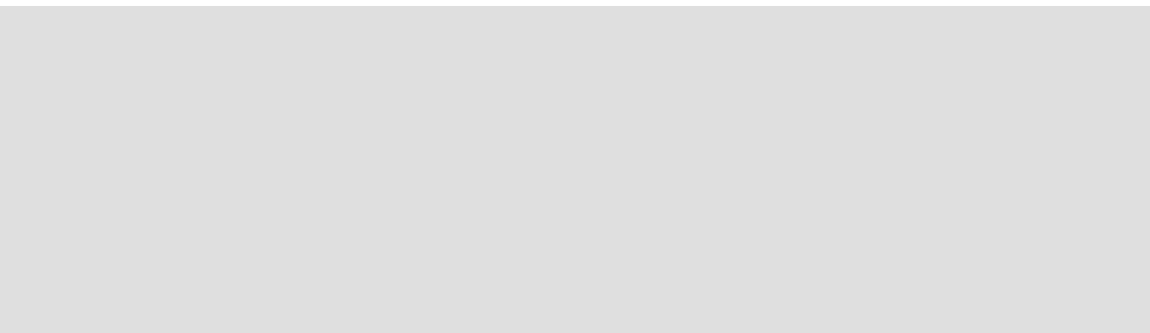


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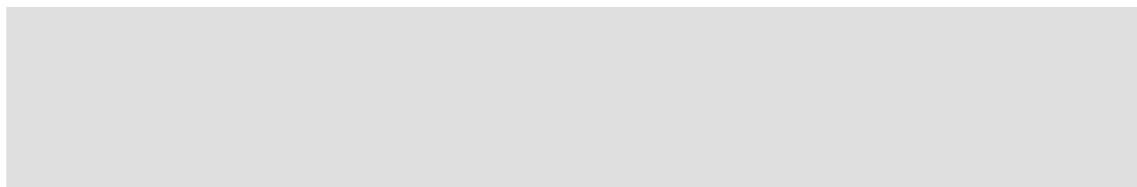


16. The referral was forwarded via email, high importance, on [REDACTED] **Exhibit [CM.7]** to this affidavit is a copy of the email enclosing the referral.

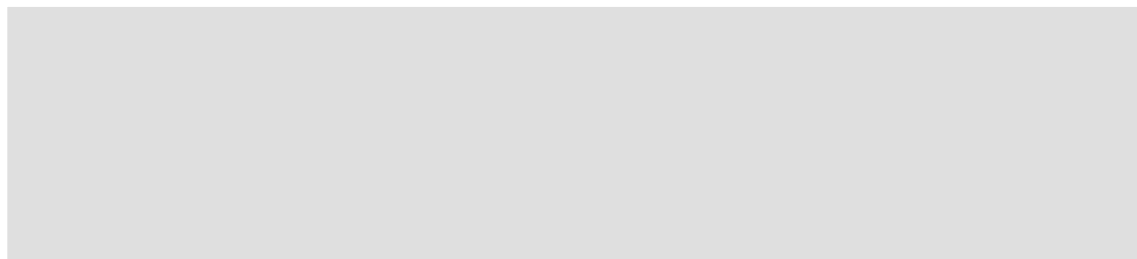
17.



18.



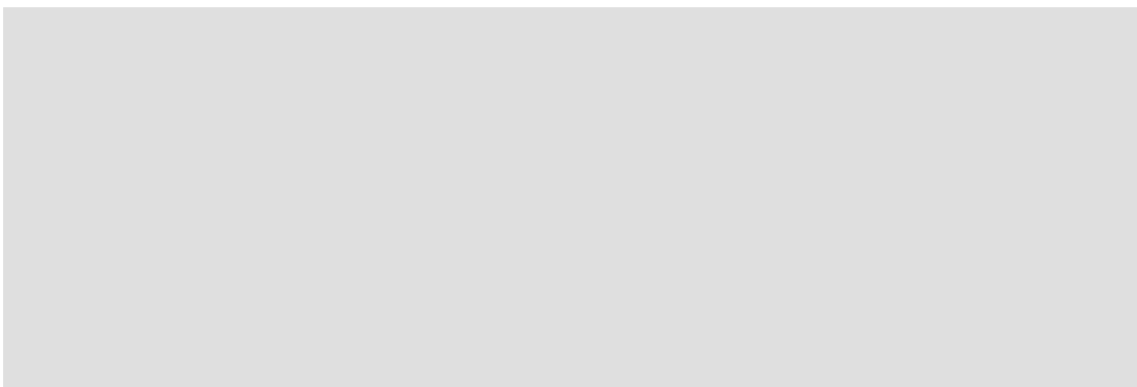
19.



20. A further meeting was organised with Dr Anne Brennan, Janette Young and myself to discuss the risk screen and our concerns that Patient [REDACTED] mental health needs, including [REDACTED] and management, could not be sufficiently managed by the [REDACTED] as we were not equipped to deal with mental health issues. **Exhibit [CM.10]** to this affidavit is a copy of my email exchange with Dr Anne Brennan dated 17 January 2014.

21. This meeting was arranged for 21 January 2014. **Exhibit [CM.11]** to this affidavit is a copy of the email meeting request.

22.

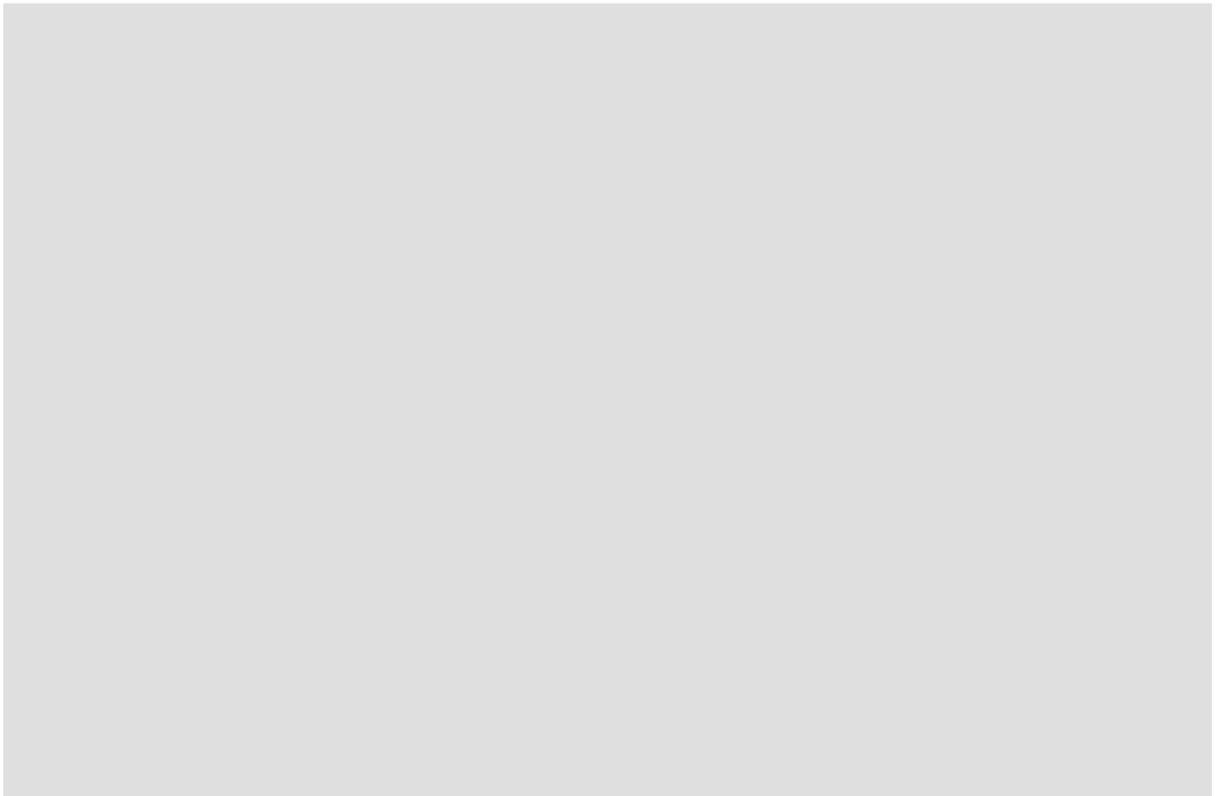


23. Janette Young and I meet with Dr Anne Brennan at the Oxley Centre as arranged on Monday 21 January 2014 to discuss Patient [REDACTED] **Exhibit [CM.14]** to this affidavit is a copy of my notes taken during the meeting of 21 January 2014.

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24. The meeting lasted approximately one hour. I spoke to my assessment that I had conducted on 13 January and Janette Young spoke to the concerns that we had that the [REDACTED] was not equipped to manage Patient [REDACTED] mental health issues. The [REDACTED] not mental health. Dr Brennan's response was that the Centre was closing and Patient [REDACTED] had to get out. She also questioned me quite a lot on why I had scored Patient [REDACTED] I stood my ground and did not resile from my assessment.

25.



26. We also discussed with Dr Brennan whether or not she could arrange for a referral to adult mental health services to provide support for Patient [REDACTED] and she suggested that we approach [REDACTED] We had already been looking at this option as well as a private psychiatrist, a GP mental health plan and private psychologists.

27. On 30 January 2014 a report was provided by Dr Steven Bower and Dr Annie Shek advising that they considered Patient [redacted] was suitable for placement in the community in supervised accommodation. **Exhibit [CM.15]** to this affidavit is a copy of report of Dr Steven Bower and Dr Annie Shek dated 30 January 2014.

5 Selection of [redacted]

28. I was not involved in the procurement or decision process related to [redacted] as this was not part of my role. [redacted]
[redacted]

6 Training for [redacted] support workers

29. [redacted]

30. [redacted]

[Redacted]

31.

[Redacted]

7 Further risk assessments or advice concerning patient [Redacted] following discharge from the Centre

32.

[Redacted]

33.

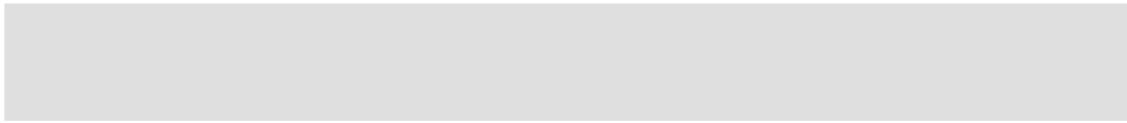
[Redacted]

34.

[Redacted]

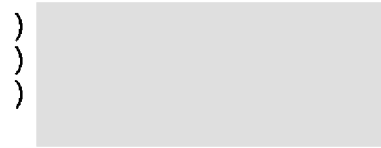
Miscellaneous

35.

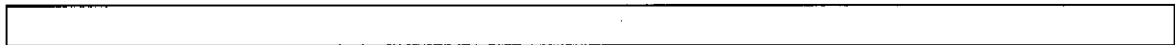


All the facts sworn to in this affidavit are true to my knowledge and belief except as stated otherwise.

Sworn by Cristelle Mulgrove on 18
January 2016 at Brisbane in the
presence of:



~~A Justice of the Peace, C.Dec.~~ Solicitor



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In the matter of the *Commissions of Inquiry Act 1950*

Commissions of Inquiry Order (No.4) 2015

Barrett Adolescent Centre Commission of Inquiry

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CM.5	Risk Assessment
CM.6	Referral
CM.7	Email enclosing the referral
CM.8	Email
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CM.15	Report of Dr Steven Bower and Dr Annie Shek
CM.16	Email

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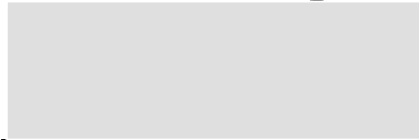
Barrett Adolescent Centre Commission of Inquiry

CERTIFICATE OF EXHIBIT

Exhibit **[CM.1]** to the Affidavit of Cristelle Mulgrove sworn on 18 January 2016.



Deponent



A.J.P., C.Déc., Solicitor

In reply please quote: CCS/20151118

Level 10, 179 North Quay
Brisbane Queensland 4000
PO Box 13016
George Street Post Shop
Brisbane Queensland 4003

Web www.barrettinquiry.qld.gov.au

Ms Louise Syme
Special Counsel
Crown Law

By email to: [REDACTED]

Dear Ms Syme

**REQUIREMENT TO GIVE INFORMATION IN A WRITTEN STATEMENT TO
THE BARRETT ADOLESCENT CENTRE COMMISSION OF INQUIRY**

Please find enclosed a notice requiring your client, Ms **Cristelle Mulvogue**, to give information in a written statement to the Barrett Adolescent Centre Commission of Inquiry ("the Commission") established pursuant to the Commissions of Inquiry Order (No. 4) 2015.

Ms Mulvogue's statement is to be provided to the Commission on or before **Friday 4 December 2015** at the place and in the manner specified in the notice. To this end, we refer you to paragraph 19 of the Commission's Practice Guideline 01/2015, which can be located on the Commission's website: www.barrettinquiry.qld.gov.au.

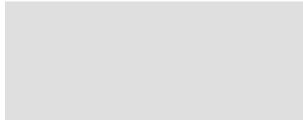
Where your client's statement refers to and identifies a BAC patient, a family member or carer of a BAC patient, we ask that you contact the writer to obtain an identification code so that the patient, family member or carer is otherwise not able to be identified. Generally, the Commission will not publish material or documents that identify or may lead to the identification of former patients, their family members or carers. Please refer to the Commission's Practice Guidelines, the Confidentiality Protocol dated 12/10/15 and the Order to Prohibit Publication of Evidence dated 15/10/15, all of which can be located on the Commission's website: www.barrettinquiry.qld.gov.au.

Documents annexed to witness statements should not be redacted in any way. These documents will be redacted by Commission staff before publication, in accordance with the Confidentiality Protocol.

If in addition your client wishes to apply for an order that the statement or any part of the statement should be confidential then they should apply to the Commissioner for an order under Part G of the Practice Guidelines.

If you require further information or clarification, please contact me on (07) 3239 6040.

Yours sincerely



Ashley Hill
Executive Director
Barrett Adolescent Centre Commission of Inquiry
18/11/2015

BARRETT ADOLESCENT CENTRE COMMISSION OF INQUIRY

Commissions of Inquiry Act 1950
Section 5(1)(d)

REQUIREMENT TO GIVE INFORMATION IN A WRITTEN STATEMENT

To: Cristelle Mulvogue

Of: c/- Louise Syme, Crown Law, by email to:
[REDACTED]

I, the Honourable MARGARET WILSON QC, Commissioner, appointed pursuant to Commissions of Inquiry Order (No. 4) 2015 to inquire into certain matters pertaining to the Barrett Adolescent Centre ("the Commission") require you to give a written statement to the Commission pursuant to sections 5(1)(d) of the *Commissions of Inquiry Act 1950* in regard to your knowledge of the matters set out in the Schedule annexed hereto.

YOU MUST COMPLY WITH THIS REQUIREMENT BY:

Giving a written statement prepared either in affidavit form or verified as a statutory declaration under the *Oaths Act 1867* to the Commission on or before **Friday 4 December 2015**, by delivering it to the Commission at Level 10, 179 North Quay, Brisbane.

A copy of the written statement must also be provided electronically either by: email at mail@barrettinquiry.qld.gov.au (In the subject line please include "Requirement for Written Statement"); or via the Commission's website at www.barrettinquiry.qld.gov.au (confidential information should be provided via the Commission's secure website).

If you believe that you have a reasonable excuse for not complying with this notice, for the purposes of section 5(2)(b) of the *Commissions of Inquiry Act 1950* you will need to provide evidence to the Commission in that regard by the due date specified above.

DATED this 18th day of November 2015

[REDACTED]
The Hon Margaret Wilson QC
Commissioner
Barrett Adolescent Centre Commission of Inquiry

SCHEDULE

1. Outline your professional qualifications and provide a copy of your current or most recent curriculum vitae.
2. Outline your contact with Patient [REDACTED]. Describe how you became involved in Patient [REDACTED] case management and care.
3. Outline any risk assessments you conducted for Patient [REDACTED] and detail how you formulated your conclusions for those risk assessments.
4. To whom did you convey the results of your risk assessments for Patient [REDACTED]. Detail any conversations you had with others regarding your risk assessments for Patient [REDACTED].
5. Were you involved in the selection of [REDACTED] as the support agency for Patient [REDACTED]. If so, how and why was [REDACTED] chosen? To your knowledge, were any other support agencies contacted to determine if they could provide support to Patient [REDACTED].
6. Did you, or to your knowledge, anyone else, offer or provide mental health training to the [REDACTED] support workers who were caring for Patient [REDACTED]. If so, outline the training that was provided.
7. Were you consulted or did you provide any further risks assessments or advice concerning the ongoing care of Patient [REDACTED] after Patient [REDACTED] discharge from the Barrett Adolescent Centre? If so, provide details of those assessments or advice.
8. Explain any other information or knowledge (and the source of that knowledge) that you have relevant to the Commission's Terms of Reference.
9. Identify and exhibit all documents in your custody or control that are referred to in your witness statement.

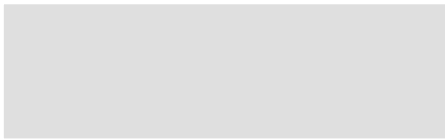
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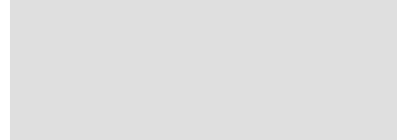
Barrett Adolescent Centre Commission of Inquiry

CERTIFICATE OF EXHIBIT

Exhibit **[CM.2]** to the Affidavit of Cristelle Mulgrove sworn on 18 January 2016.



Deponent



A.J.P., C.Dec., Solicitor

[REDACTED]
[REDACTED] or [REDACTED]

CRISTELLE MULVOGUE – Curriculum Vitae

PRACTICE FRAMEWORK

I locate my practice framework predominantly in systems theory. However, I often draw on other theoretical frameworks such as psychosocial theories, feminist theories, crisis intervention theories, behavioural theories, case management & strengths. My practice is primarily person-centred, which places the client firmly in the centre. Through this approach, the person within their networks & environments are reviewed in order to distinguish & interpret presenting concerns & the client is seen as the driver of an action or intervention. My framework is in a constant state of development as new experiences, new ways of thinking, & unique people & their experiences are encountered & taken on board. My practice develops as a result of my direct work environment, my continued professional education, the community resources & responses, service user & community needs, procedures & guidelines, & my own individual history & continuing life experience.

EDUCATION

- Bachelor of Social Work (First Class Hons), University of Queensland (2005)
- Master of Social Work, Monash University (2008) - Postgraduate Masters majoring in Forensic Social Work

WORK EXPERIENCE

Senior Clinician (PO4)

Brisbane Region, Department of Communities, Child Safety and Disability Services

September 2012 – Current

Key Responsibilities:

- **Consultation Liaison**
A key component of my role as Senior Clinician is to provide expert advice and assistance on forensic disability, dual disability and complex case matters to all clinicians, management and other stakeholders to ensure the coordination and delivery of appropriate services to clients. Through this role I manage and direct the development and implementation of necessary interventions, programmes, or services for clients with complex needs, working in collaboration with other clinical staff and management. I manage a short-term consultation liaison caseload, provide expert advice to courts, stakeholders and other relevant parties, prepare written reports on client matters, including Mental Health Court reports, conduct appropriate assessments, implement clinical interventions such as Positive Behaviour Support Plans and assist in the quality and assurance aspects of referrals from the Brisbane Region for the Specialist Disability Service Assessment and Outreach Team.
- **Dual Disability, Mental Health and Risk Assessment**
Through this role I provide mental health and risk assessment, including the authoring of reports such as HCR-20 Violence Risk Assessment Reports, mental health assessments, Mental Health Court Reports and provide advice to clinicians and other stakeholders regarding a person's mental health status, forensic and risk issues and ongoing management. I liaise and collaborate with Mental Health and other services to ensure coordinated client care and management.
- **Forensic Disability**
Through this role I am engaged in a consultation liaison and the provision of clinical advice regarding Forensic Disability matters and clients, including management of clients in the community, to clinicians, managers and the Director of Clinical Practice in Brisbane Region. Through this role I have worked in establishing clinical interventions for Forensic Disability clients in the Brisbane Region, including sourcing appropriate forensic clinical programs that can be delivered in a community arena and promoting the establishment and facilitation of these programs. I am engaged in the ongoing development and capacity building of staff in the Region in relation to Forensic Disability and have coordinated education and information sessions for Regional staff on this topic. Through this role I also have implemented and am coordinating the Social Problem Offence Related Thinking (SPORT) Program for Community Forensic Disability Clients.
- **Complex Stakeholder engagement, management and facilitation**
Through this role I have developed and managed effective working relationships with a diverse range of stakeholders including individuals with a disability, families, carers, Community organisations and Government and non-Government agencies. As part of this role I have set up and participated in the Dual Disability Collaborative Meetings held jointly with Queensland Health – Mental Health to facilitate better outcomes for clients who have a dual disability
- **Capacity building, education and professional development**
As the Senior Clinician, part of my role is to build the knowledge, skills and capacity of staff within the Brisbane Region in relation to working with clients who have a dual diagnosis or forensic concerns. I have done this through mentoring of staff, co-case management, clinical supervision and provision of training and education. As part of this role I have presented to such forums as the Dual Disability Network Meetings, Mental Health Grand Rounds, and provided presentations to Government and Non-Government agencies on identified education areas in Forensic Disability and Dual Disability.

.....

A/Team Leader (PO5)

June 2014; August - December 2014

Early Childhood Services, Oxley Service Centre, Department of Communities, Child Safety and Disability Services

Key Responsibilities:

- **Clinical Engagement**
Through this role I supported staff in the clinical management of their caseloads, including providing direct support and advice. I was also engaged in the referral review process for the Oxley Collaborative Practice Teams which involved reviewing all new referrals, looking at prioritisation and capacity and assigning in conjunction with the team the referral to clinicians.
- **Staff Management**
Through this role I was responsible for the direct line management of clinical staff within the Early Childhood Services Team. This incorporated aspects of line management such as provision of support and supervision, workload review, management of team leave, management of referrals, prioritisation and allocation of team referrals and clinical review of cases.
- **Complex Stakeholder engagement, management and facilitation**
Through this role I have engaged in effective working relationships with a diverse range of stakeholders including individuals with a disability, families, carers, Community organisations and Government and non-Government agencies. As part of this role I have attended stakeholder meetings with clinicians and provided information regarding funding, disability services processes, including the Register of Need and Prioritisation processes, as well as provided direct support to the clinicians in their roles.

.....

A/Principal Clinician (PO6) & Senior Practitioner

March 2012 – July 2012

Forensic Disability Service (FDS), Department of Communities, Child Safety and Disability Services

Key Responsibilities:

- **Senior Practitioner**
As a Senior Practitioner I was responsible for managing legislative powers under the Forensic Disability Act 2011 in relation to client management, seclusion and restrictive practices. Through this role I participated in the Senior Practitioner On-Call Roster and any clinical and critical risk reviews of Forensic Disability Clients including Limited Community Treatment reviews. I wrote Mental Health Review Tribunal Reports and Mental Health Court Reports for individual Forensic Disability Clients and attended these tribunals and courts to provide evidence and advice as requested. Through this role I liaised with various stakeholders, both internally at the FDS and externally (e.g. family, MHRT, Director of Forensic Disability).
- **Service Development & Quality Activities**
As the Principal Clinician I was engaged in quality and continuous improvement activities including monitoring & evaluation of service interventions, evaluation of programs & procedures, implementing good quality practices, promotion of professional development & education for self & staff. Examples of this include the development of the Achievement Planning and Capability Templates for all direct support, clinicians and Clinical Team Leaders within the FDS. Through this role I was engaged in the review and updating of policies, procedures and practice guidelines as required within the FDS. Part of my role was to maintain the clinical and reporting databases for the FDS including the Behaviour and Incident Database, Physical Intervention Database and Regulated Behaviour Control Database. I was responsible for data and service audits within the FDS to assist with maintaining compliance and ensuring good clinical practice. I was also engaged in the initial investigation and implementation of a peer support program for staff at the FDS.
- **Facilitation of Programs**
Through this role I facilitated and co-facilitated offence based and therapeutic programs for Forensic Disability clients detained at the FDS, in both a group and individual setting. These programs included Cognitive Behaviour Therapy (CBT) Group, Stepping Stones, Social Skills Group & Life Skills Group.
- **Staff Management and Staff Recruitment**
I was responsible for the direct line management of operation and clinical staff, including provision of Line Management supervision, Achievement Planning and coordination of service delivery for the FDS. Through my professional background I provided social work supervision to social workers within the FDS environment. Through this role I was also involved in the recruitment of staff for the FDS including chairing selection panels, preparing selection reports and participating in Open Evenings regarding the FDS.
- **Provision of professional education, training, & mentoring**
I was engaged in the training and mentoring of newer Clinical Team Leaders and backfill Clinical Team Leaders within the FDS. I developed and implemented the Authorised Practitioner Training for Clinical Staff and participated in the Induction of new staff in areas such as safety and security, risk management and achievement planning. I have also presented training in areas such as Vicarious Trauma, Mental Health and Disability and Forensic Disability to Disability Services and Mental Health staff. Through this role I provided mentoring to newer professional staff to assist to guide them in their professional lives within the FDS and the Department.

Clinical Team Leader (PO4)

(February 2011 – September 2012)

*Forensic Disability Service (FDS), Department of Communities, Child Safety and Disability Services***Key Responsibilities:**

- **Clinical Workload with Forensic Disability Clients**

Through this role I was engaged in intensive case management of Forensic Disability Clients detained in the FDS including preparation of reports for the MHRT and Mental Health Court, development of Individual Development Plans and Person Centred Plans; and liaison, education and assisted to family members and other stakeholders involved in the care and support of Forensic Disability Clients within the FDS. Through this role I was also part of the initial transition of clients to the FDS from Authorised Mental Health Facilities and I supported and engaged with that process. I was engaged in the ongoing risk assessment of clients utilising tools such as the HCR-20, SVR-20, ARMIDILO and DRAMS. Through this role I facilitated and co-facilitated offence based and therapeutic programs for Forensic Disability clients detained at the FDS, in both a group and individual setting. These programs included Cognitive Behaviour Therapy (CBT) Group, Stepping Stones, Social Skills Group & Life Skills Group.

- **Staff Management and Staff Recruitment**

I was responsible for the direct line management of operation and clinical staff, including provision of Line Management supervision, Achievement Planning and coordination of service delivery for the FDS. Through my professional background I provided social work supervision to social workers within the FDS environment. Through this role I was also involved in the recruitment of staff for the FDS including chairing selection panels, preparing selection reports and participating in Open Evenings regarding the FDS. Through this role I also had the opportunity to act in higher duties as the Senior Manager of the FDS.

- **Provision of professional education, training, & mentoring**

I was engaged in the training and mentoring of newer Clinical Team Leaders and backfill Clinical Team Leaders within the FDS. I developed and implemented the Authorised Practitioner Training for Clinical Staff and participated in the Induction of new staff in areas such as safety and security, risk management and achievement planning. I have also presented training in areas such as Vicarious Trauma, Mental Health and Disability and Forensic Disability to Disability Services and Mental Health staff. Through this role I provided mentoring to newer professional staff to assist to guide them in their professional lives within the FDS and the Department.

- **Quality and Service Improvement Activities**

Through this role I was engaged and participating in monitoring and evaluation of service interventions, programs, procedures, and professional development for the FDS. I was engaged in the review and updating of clinical and service procedures for the FDS and maintained the Behaviour and Incident database.

.....
Social Worker (PO3)

(November 2007 – February 2011)

Community Team, Adult Community Specialist Services (ACSS), Goodna Service Centre, Department of Communities, Child Safety and Disability Services

Through this role I was engaged in the intake, assessment and intensive case management of community clients with an intellectual disability. As part of this I provided case management services, social work assessments, needs assessments, mental health assessments, risk assessments, crisis interventions (e.g. arranging of emergency placements; organising emergency funding), and consultation liaison and engaged in collaborative practice with other agencies including government and non-government agencies. I was engaged through this role in delivering professional education in a variety of areas including social work, mental health, disability and staff support. I was engaged in social worker and social work student supervision within the Department and I was engaged in mentoring new staff through the New Graduate Program within the Department of Communities. I also assisting with the training and mentoring of new staff within the Community Team at the Service Centre. Through this role I was also engaged as a selection panel member for both Community Team staff and social work staff. Through this role I was engaged in facilitating community engagement with the Department through community activities for Disability Action Week (e.g. local art shows), local area Network meetings (including assisting to establish the South West Brisbane Disability Network) and being a representative of the Department at information sessions. I was also engaged in quality and continuous improvement activities such as the development and maintenance of the service user and case load registers for the Community Team; development of user friendly forms and 'cheat sheets' for continuous improvement, and development of induction packages for new staff to the Service Centre. I was a member of the Workload Review and Therapist Working Parties for the Department and I was part of the 2010 Internal Review of Disability Services as an auditor.

.....
Social Worker (PO3)

(2006 – 2007)

Queensland Forensic Mental Health Service (Southern & Central Areas), Royal Brisbane & Women's Hospital (RBWH), Queensland Health

Through this role I worked as a member of a multidisciplinary team & liaised with a diverse range of populations & services in the area of Forensic Mental Health (Mental Illness & Criminal Concerns). I gained experience, knowledge & skills in the forensic mental health area. I conducted mental health assessments, violence risk assessments and needs assessments. I was engaged in ongoing collaboration and liaison with government and non-government agencies in relation to the ongoing coordinated care of forensic mental health clients. Through this role I participated in research related to the number of violent offences committed by patients with a diagnosed mental illness since the inception of the Mental Health Act 2000; & compilation of the Planning Profile of Mental Health Services for Forensic Mental Health; & use of Queensland Mental Health data systems.

LICENCES & ACCREDITATIONS

- *Class C Open Drivers Licence* (Queensland) - # 76 900 076
- *Working With Children Blue Card* – 338214/3 (Expiry: 19/10/2017)
- *Applied First Aid Certificate* – 101618 (Provider 31423)
- Full Accredited Member of the Australian Association of Social Workers (AASW) – Membership # 207483
- Trained user of the *HCR-20 & SVR-20* Risk Assessment Tools
- Trained user of the *ARMIDILO (G & S)*
- Accredited user of the *PAS-ADD Checklist & Interview*
- Trained user of the *LS:RNR*
- *Trained facilitator for Stepping Stones – Emotional Regulation Program for offenders with an intellectual disability*
- *Trained facilitator for SPORT – Emotional Regulation Program for offenders with an intellectual disability*
- *Trained facilitator for Taylor and Novaco, Anger Management Program for people with a developmental disability*
- Accredited *Social Work supervisor*
- *REACH trained supervisor.*

REFEREES

Ms Janette Young

Manager Clinical Services, Oxley Service Centre, Department of Communities, Child Safety and Disability Services

Ph: [REDACTED]

Ema [REDACTED]

Janette is my current Manager for my position as Senior Clinician and I report to her as my line manager. Janette is familiar with my current role and performance and can attest to my clinical skills and leadership within my current role and the specifically in relation to my work in the field of Forensic Disability within the Brisbane Region.

Ms Janice Rushworth

Manager Clinical Services, Nundah Service Centre, Brisbane Region, Department of Communities, Child Safety and Disability Services

Phone: [REDACTED]

Email: [REDACTED]

Janice is my current clinical supervisor. I work closely with Janice in relation to my ongoing supervision and professional development. Janice can attest to my clinical and leadership skills.

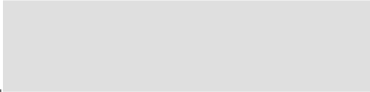
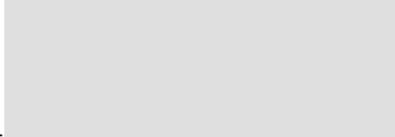
In the matter of the *Commissions of Inquiry Act 1950*

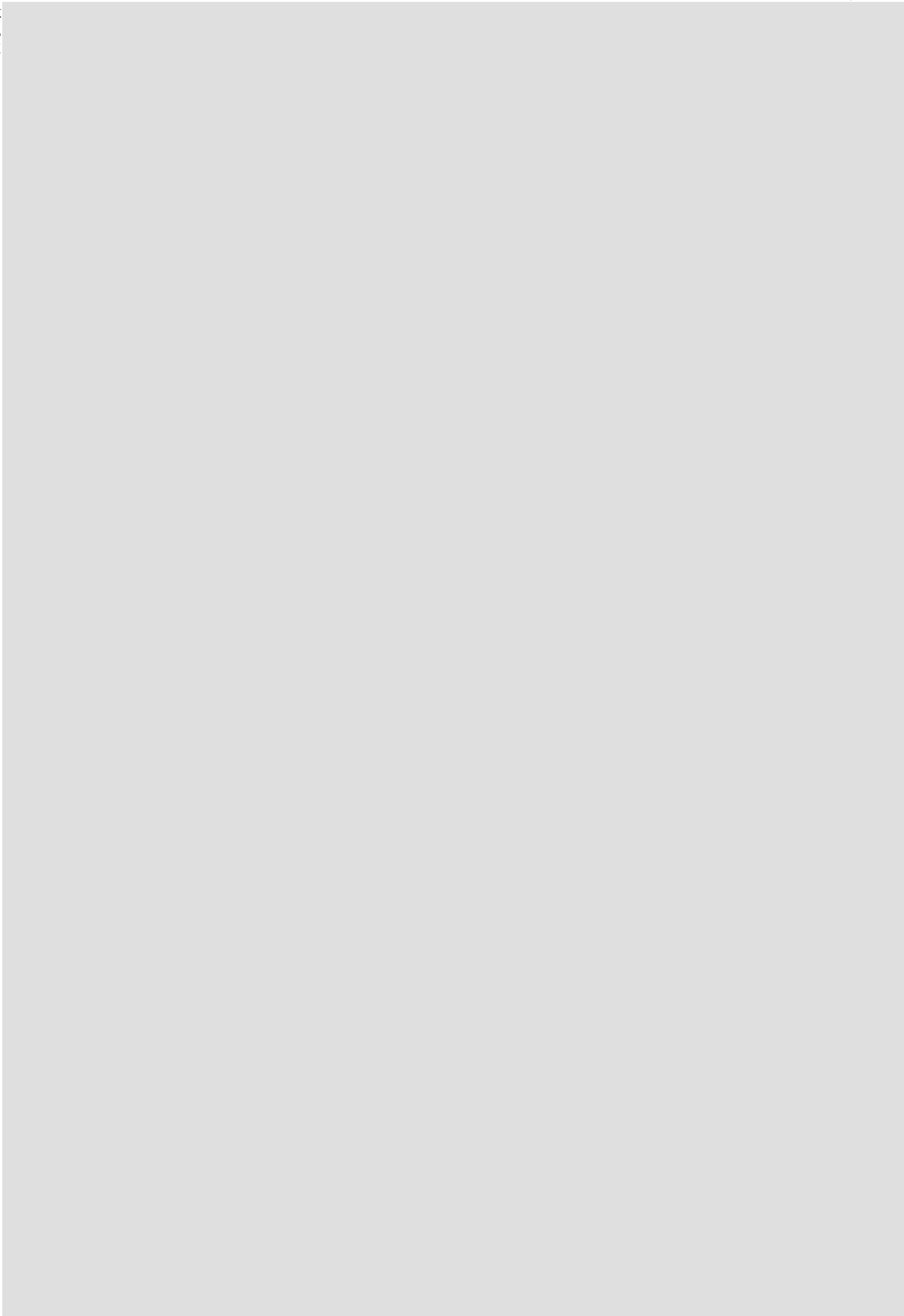
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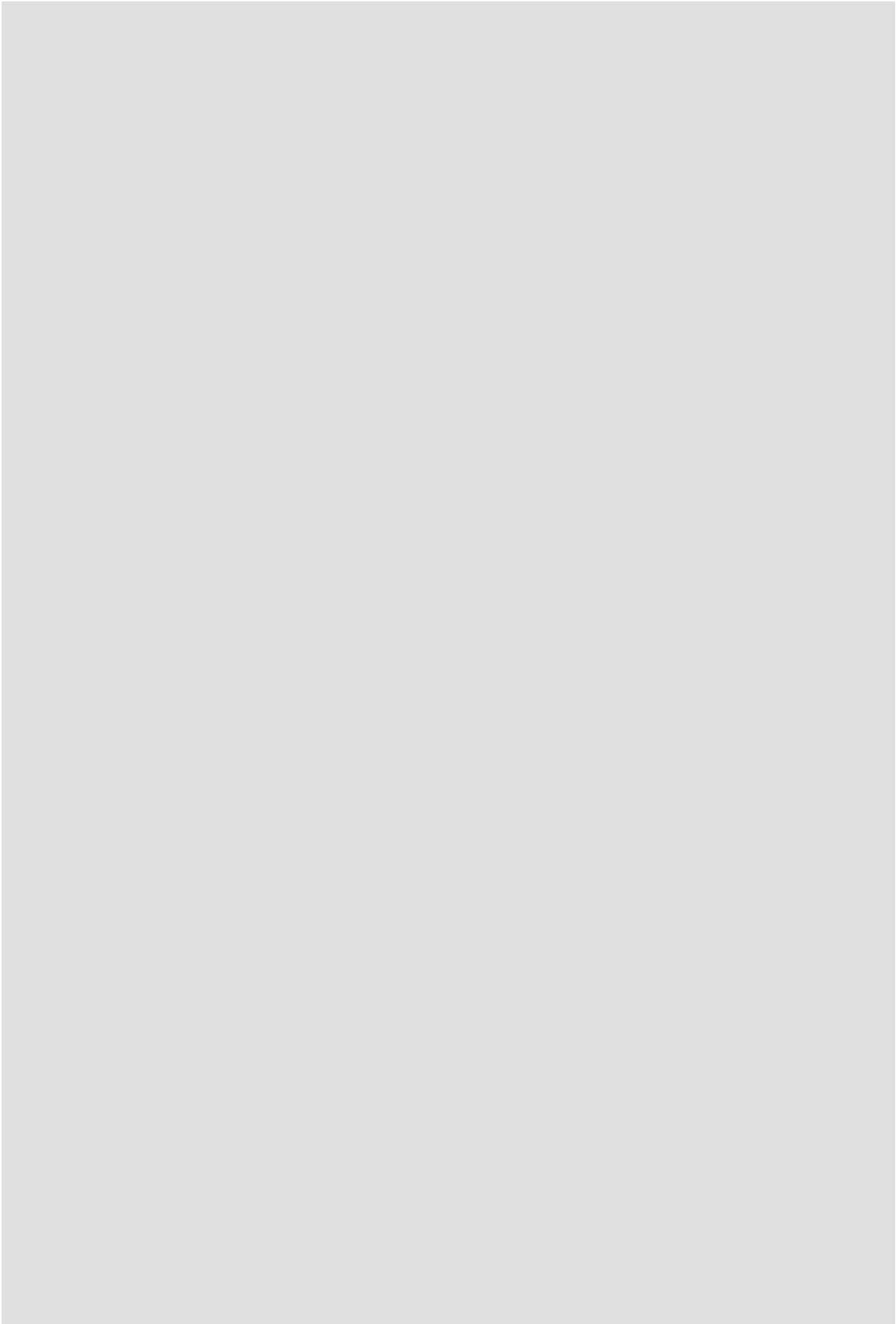
Barrett Adolescent Centre Commission of Inquiry

CERTIFICATE OF EXHIBIT

Exhibit [CM.3] to the Affidavit of Cristelle Mulgrove sworn on 18 January 2016.

 _____ Deponent	 _____ A J.P.; C.Dec., Solicitor
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In the matter of the *Commissions of Inquiry Act 1950*

Commissions of Inquiry Order (No.4) 2015

Barrett Adolescent Centre Commission of Inquiry

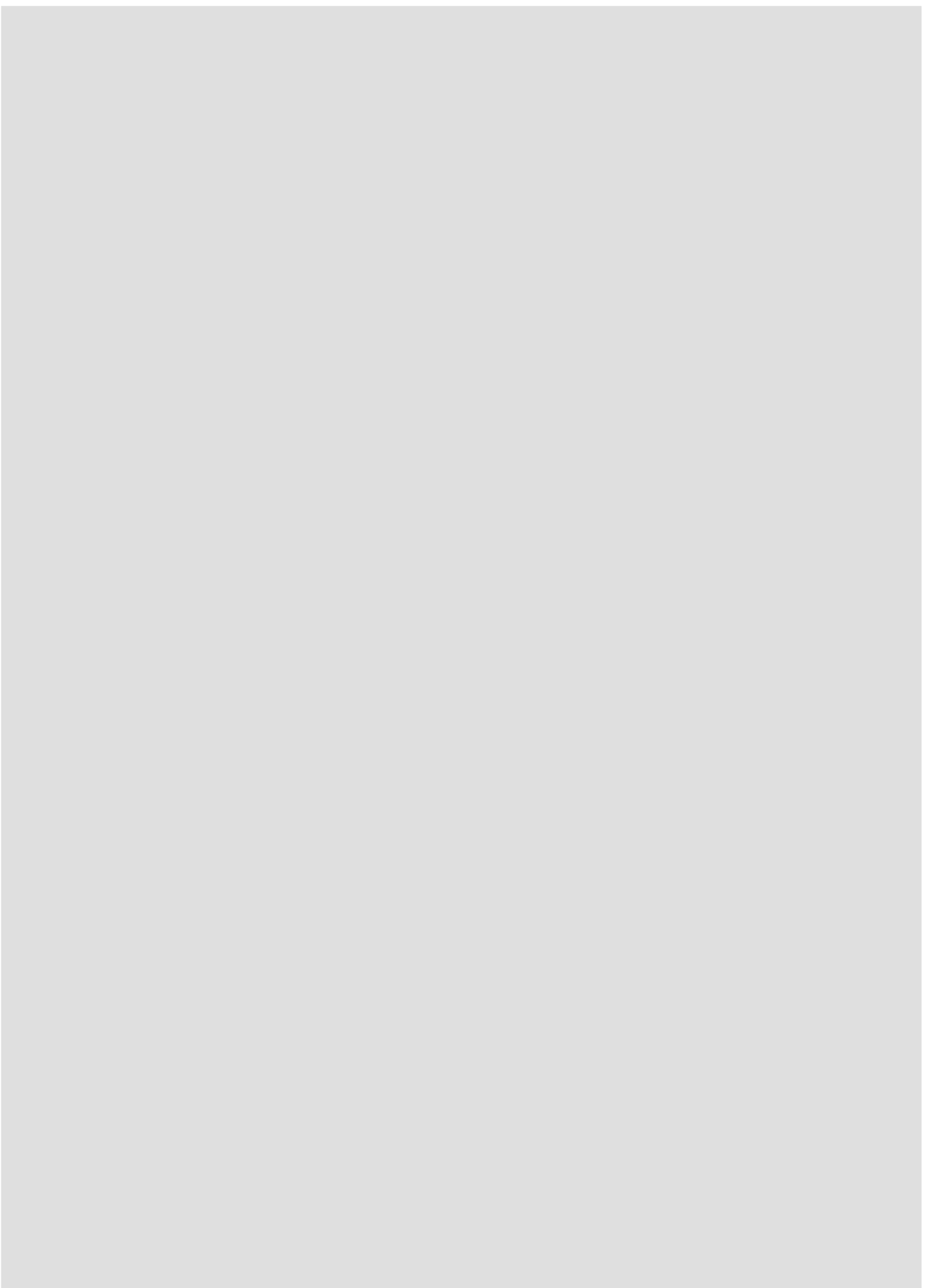
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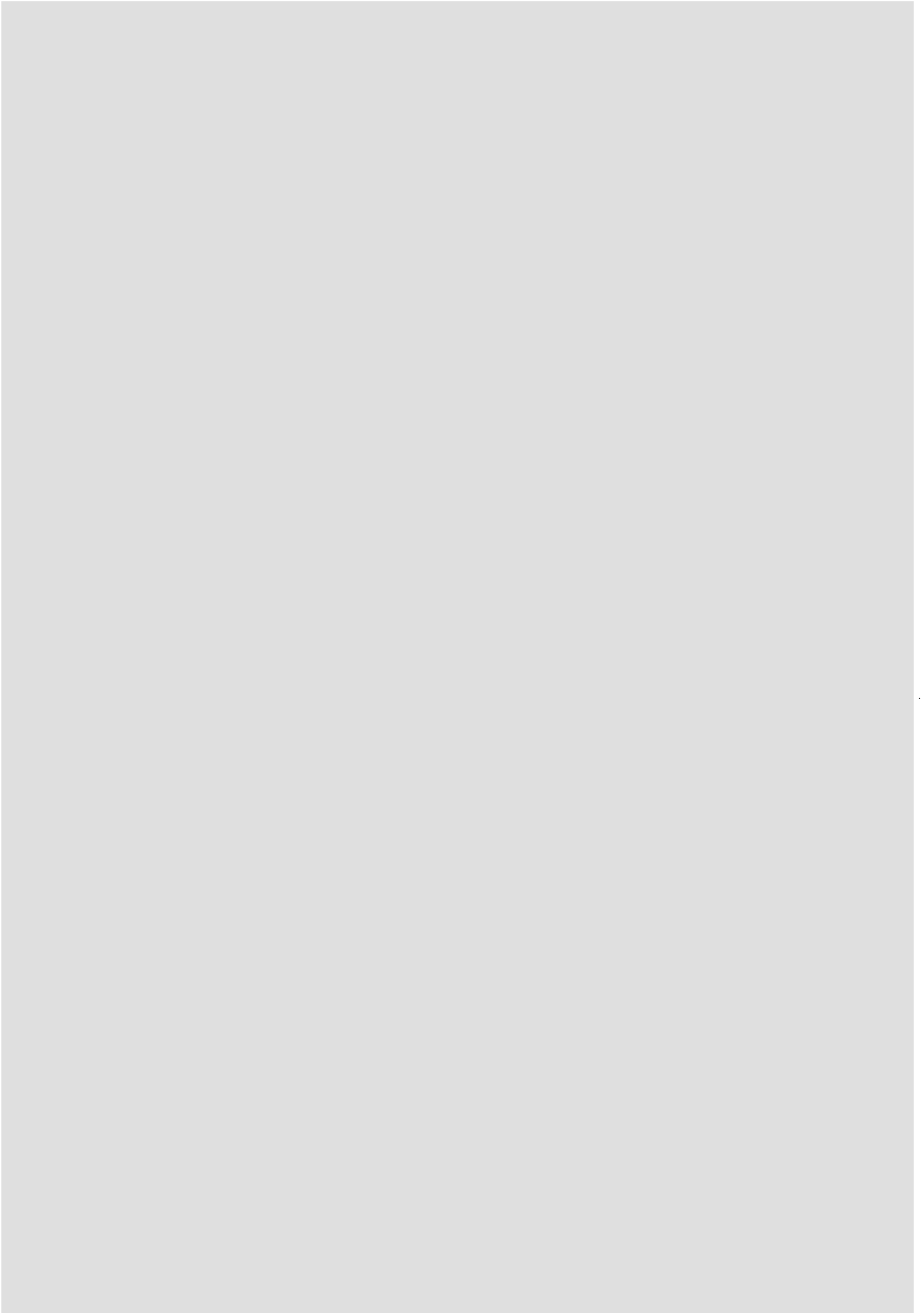
Exhibit **[CM.4]** to the Affidavit of Cristelle Mulgrove sworn on 18 January 2016.


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A.J.P., C.Dec., Solicitor

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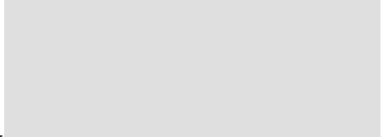
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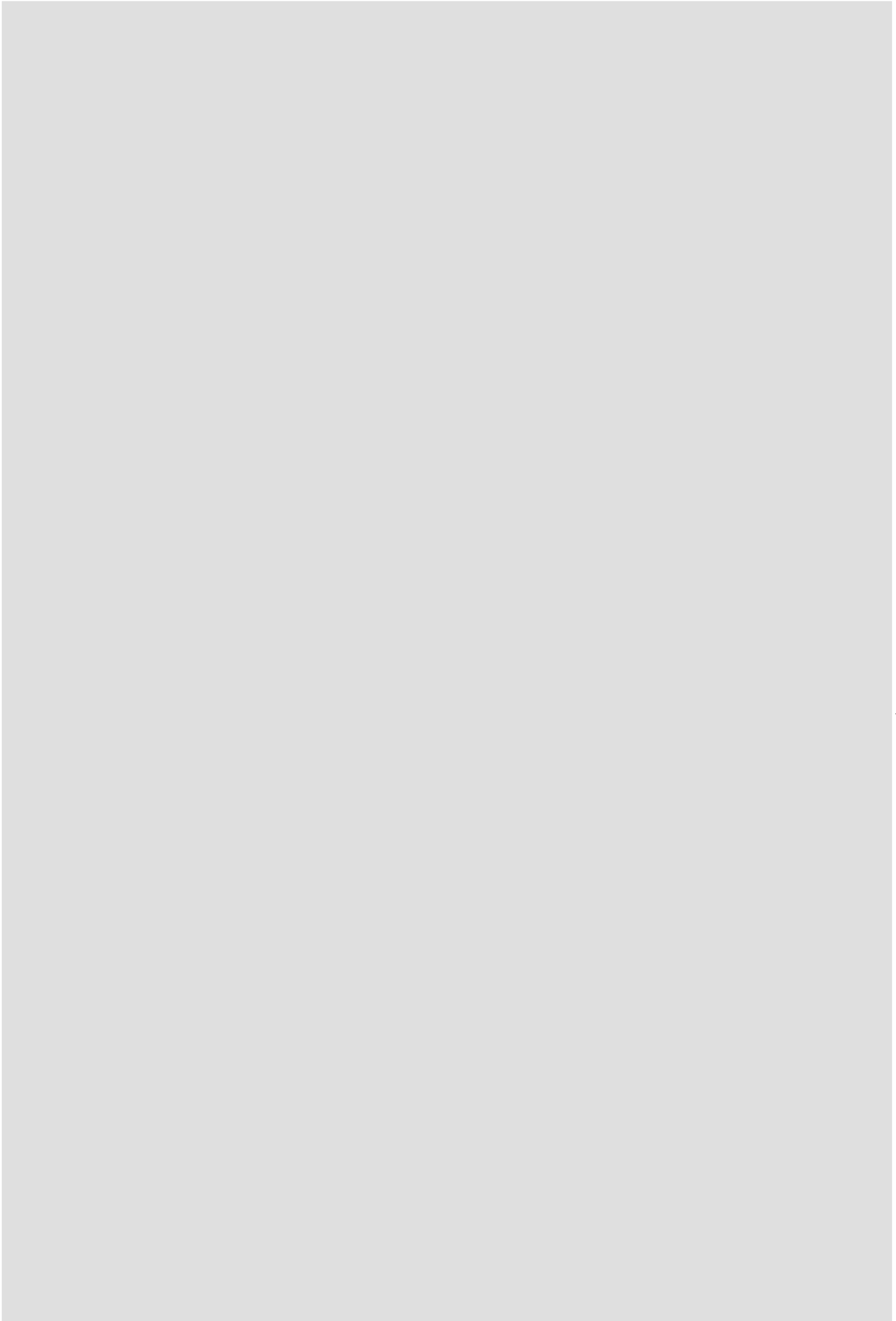
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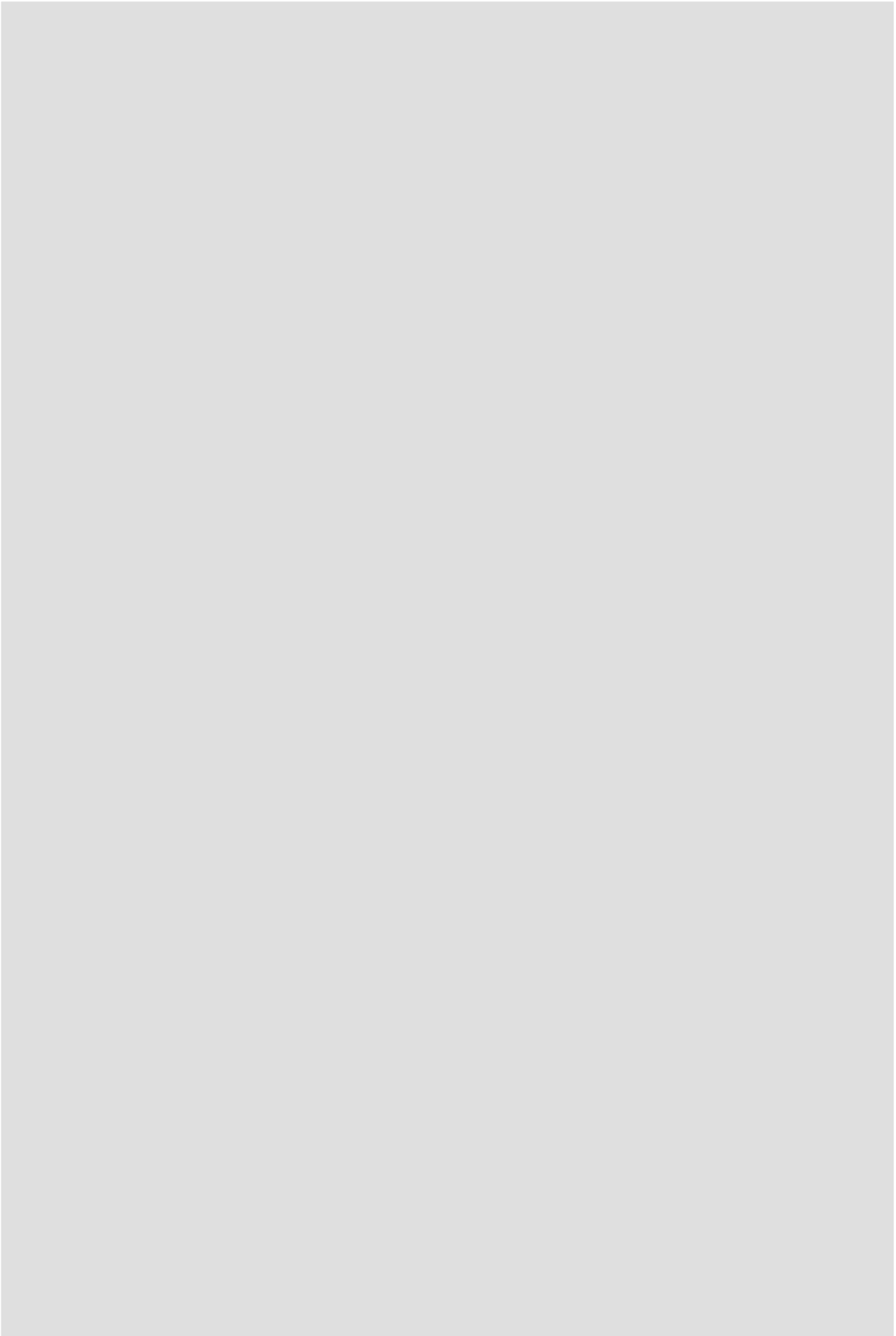
Barrett Adolescent Centre Commission of Inquiry

CERTIFICATE OF EXHIBIT

Exhibit **[CM.5]** to the Affidavit of Cristelle Mulgrove sworn on 18 January 2016.

 Deponent	 A.J.M., C. Leg., SOLICITOR
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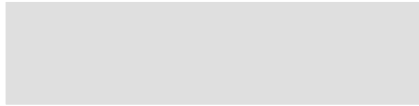
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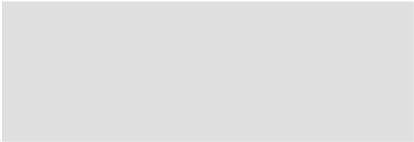
Barrett Adolescent Centre Commission of Inquiry

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Exhibit **[CM.6]** to the Affidavit of Cristelle Mulgrove sworn on 18 January 2016.



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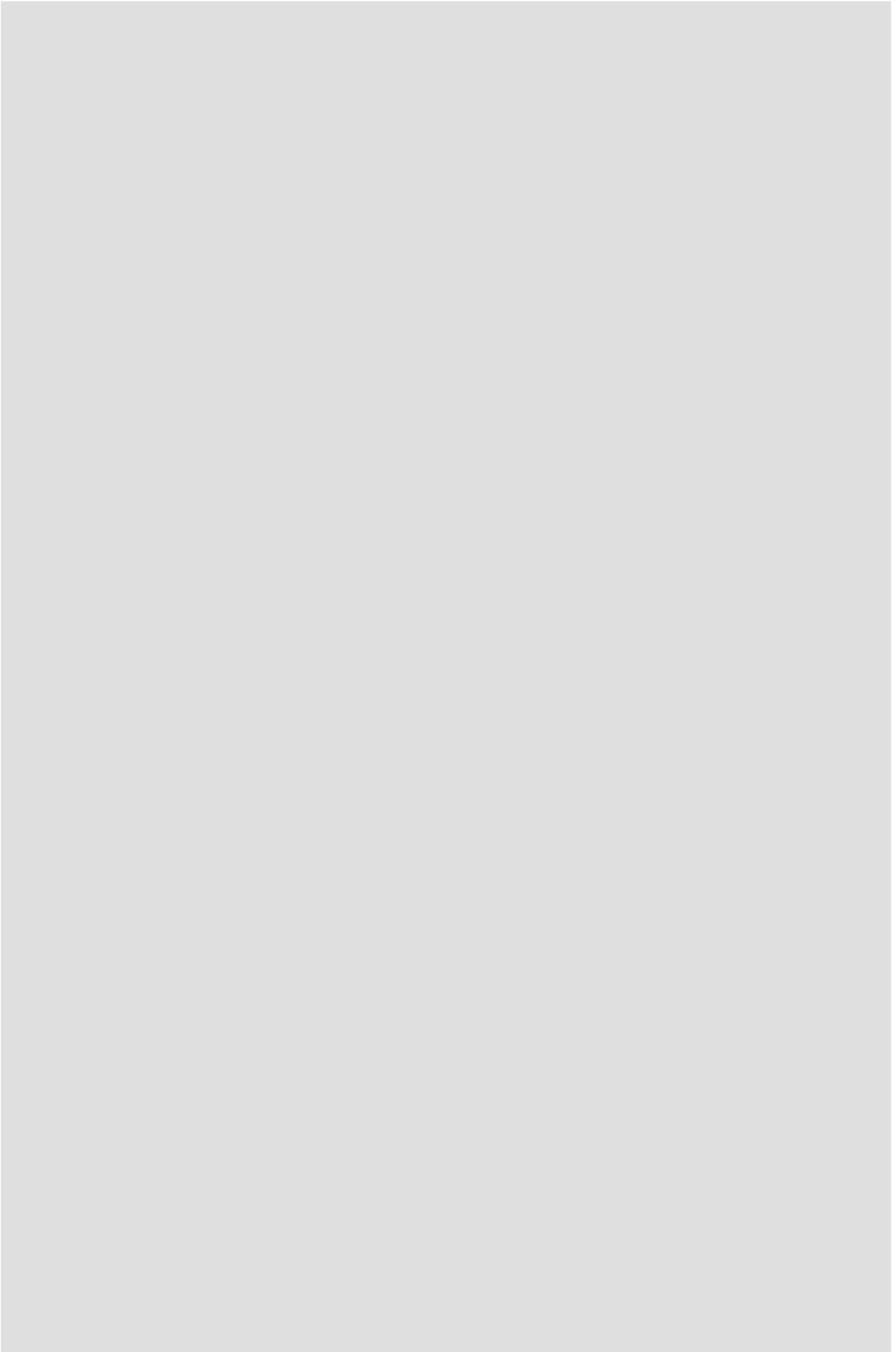


A J.P., C. Dec., Solicitor

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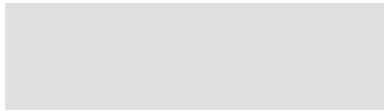
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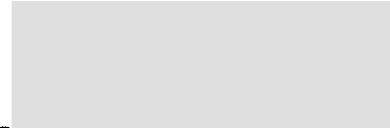
Barrett Adolescent Centre Commission of Inquiry

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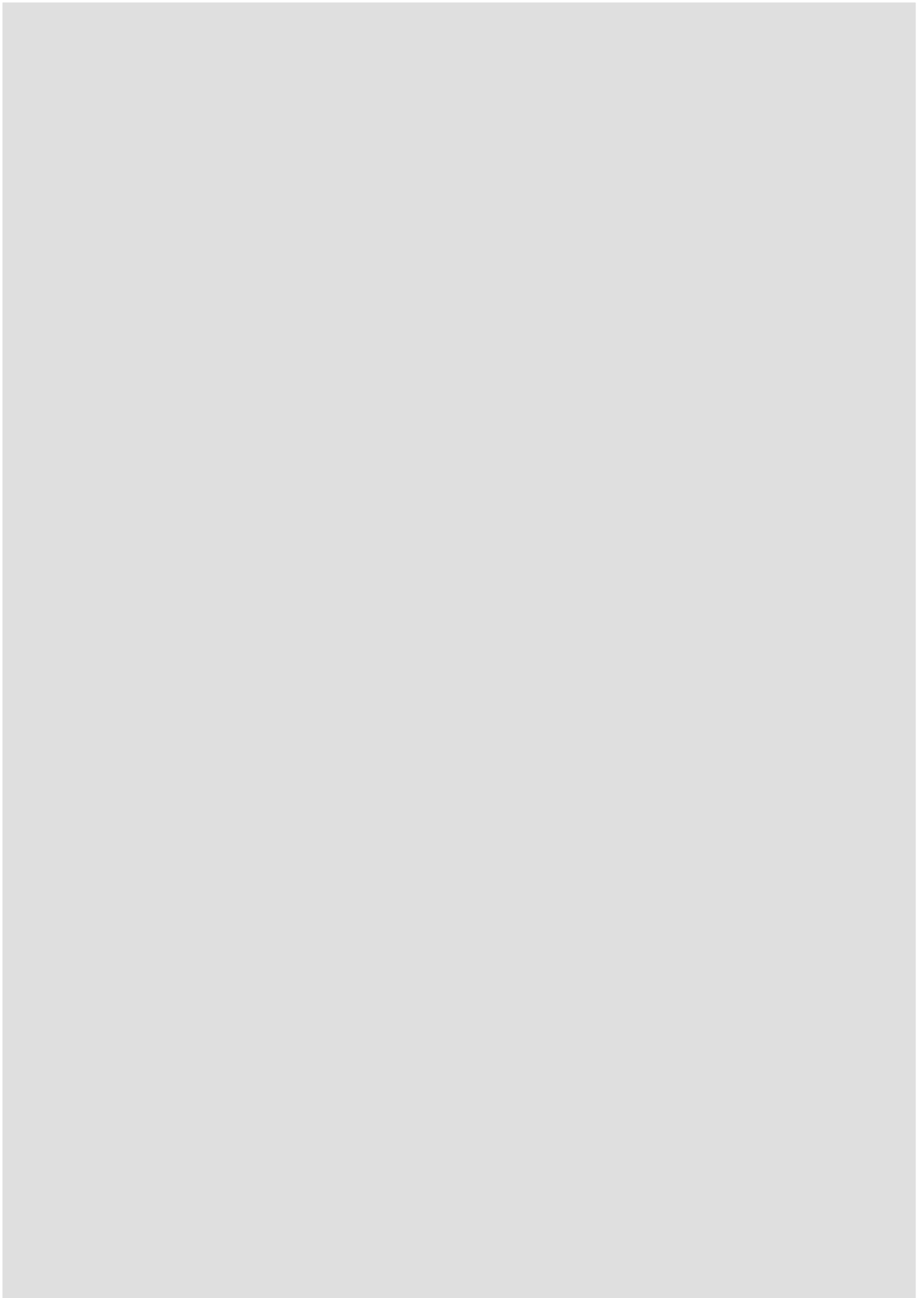
Exhibit **[CM.7]** to the Affidavit of Cristelle Mulgrove sworn on 18 January 2016.



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In the matter of the *Commissions of Inquiry Act 1950*

Commissions of Inquiry Order (No.4) 2015

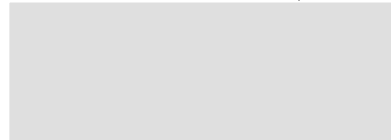
Barrett Adolescent Centre Commission of Inquiry

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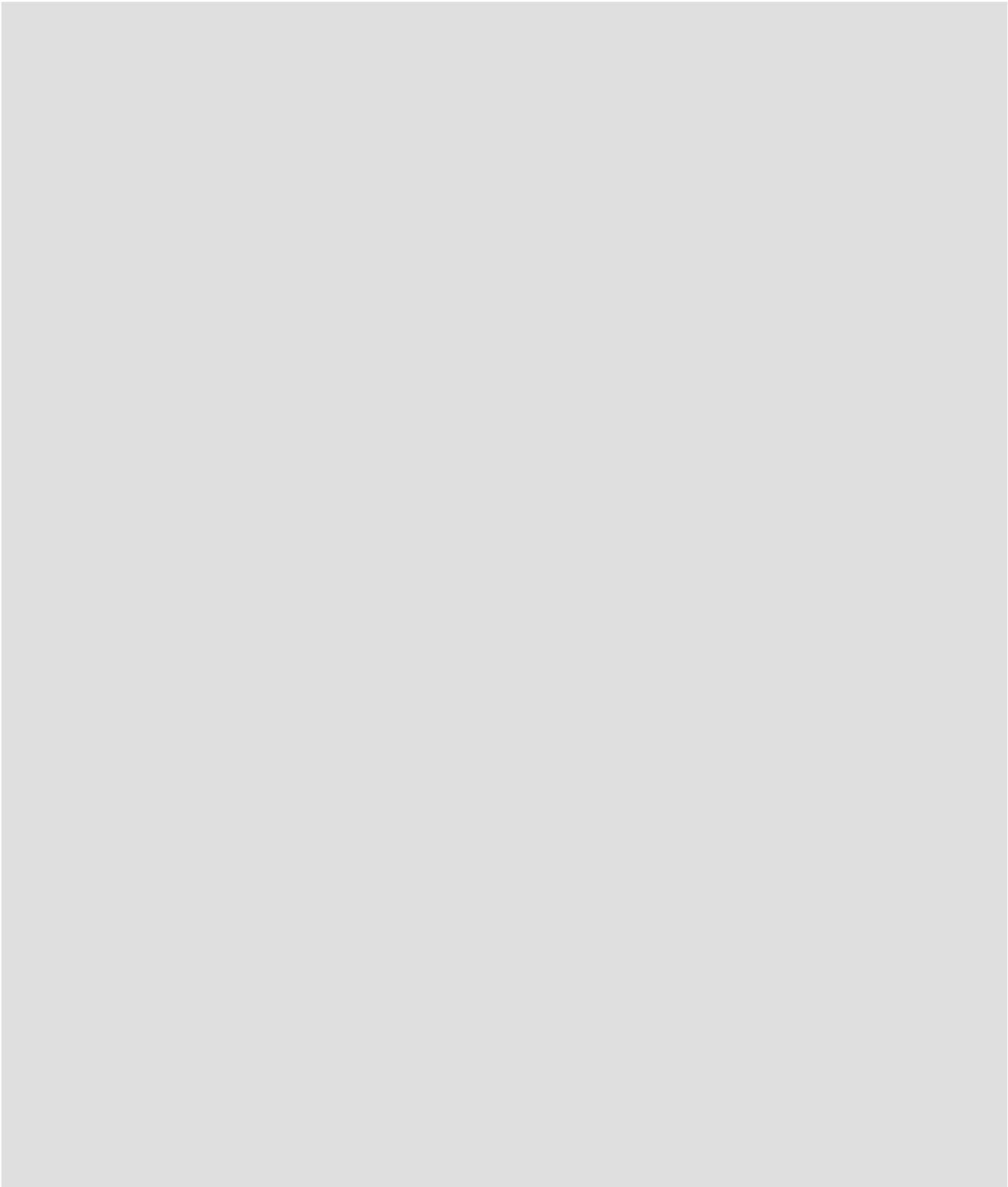
Exhibit **[CM.8]** to the Affidavit of Cristelle Mulgrove sworn on 18 January 2016.



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In the matter of the *Commissions of Inquiry Act 1950*


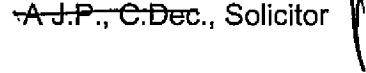
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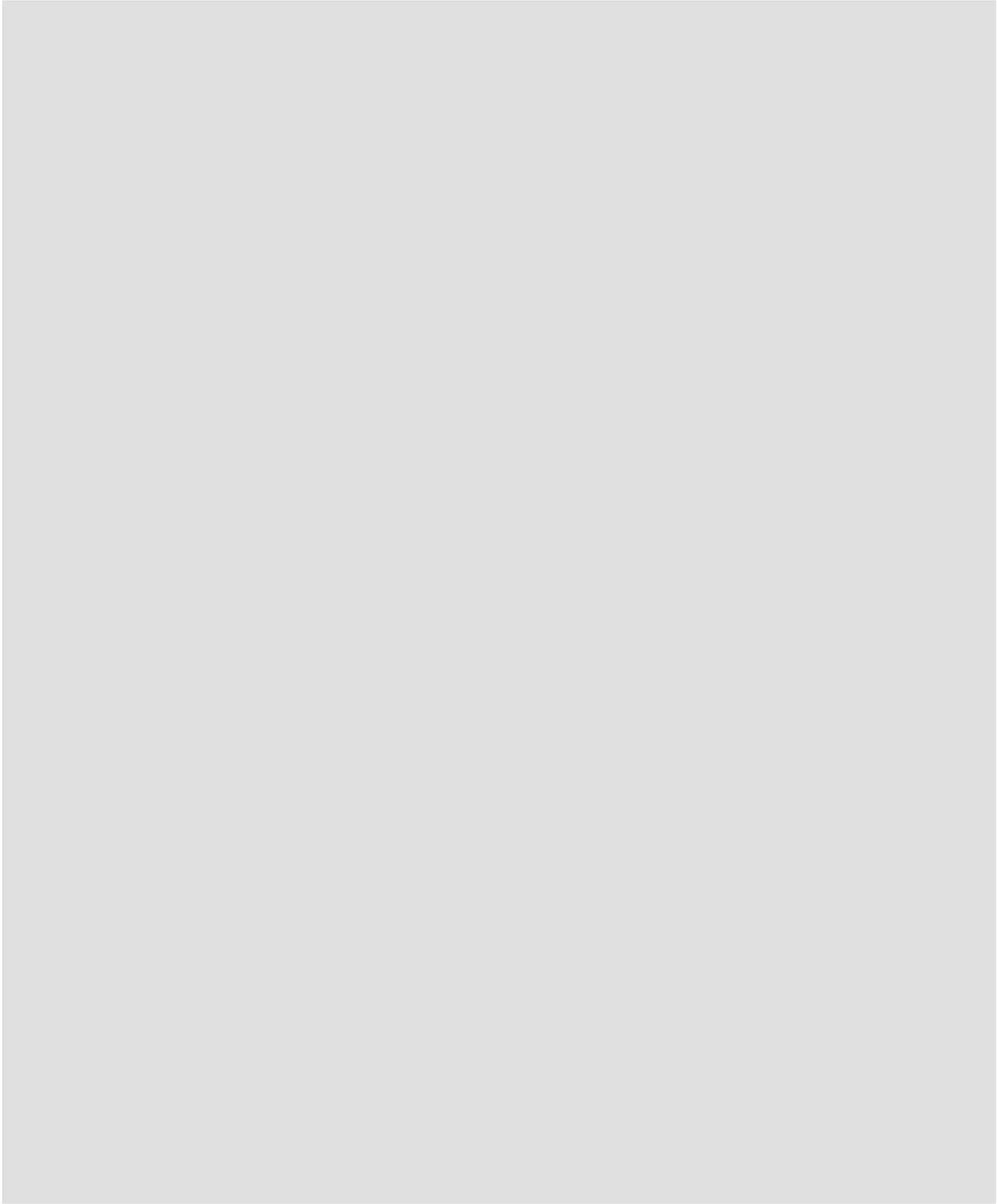
Barrett Adolescent Centre Commission of Inquiry

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Exhibit **[CM.9]** to the Affidavit of Cristelle Mulgrove sworn on 18 January 2016.


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A.J.P., C.Dec., Solicitor 



In the matter of the *Commissions of Inquiry Act 1950*

Commissions of Inquiry Order (No.4) 2015

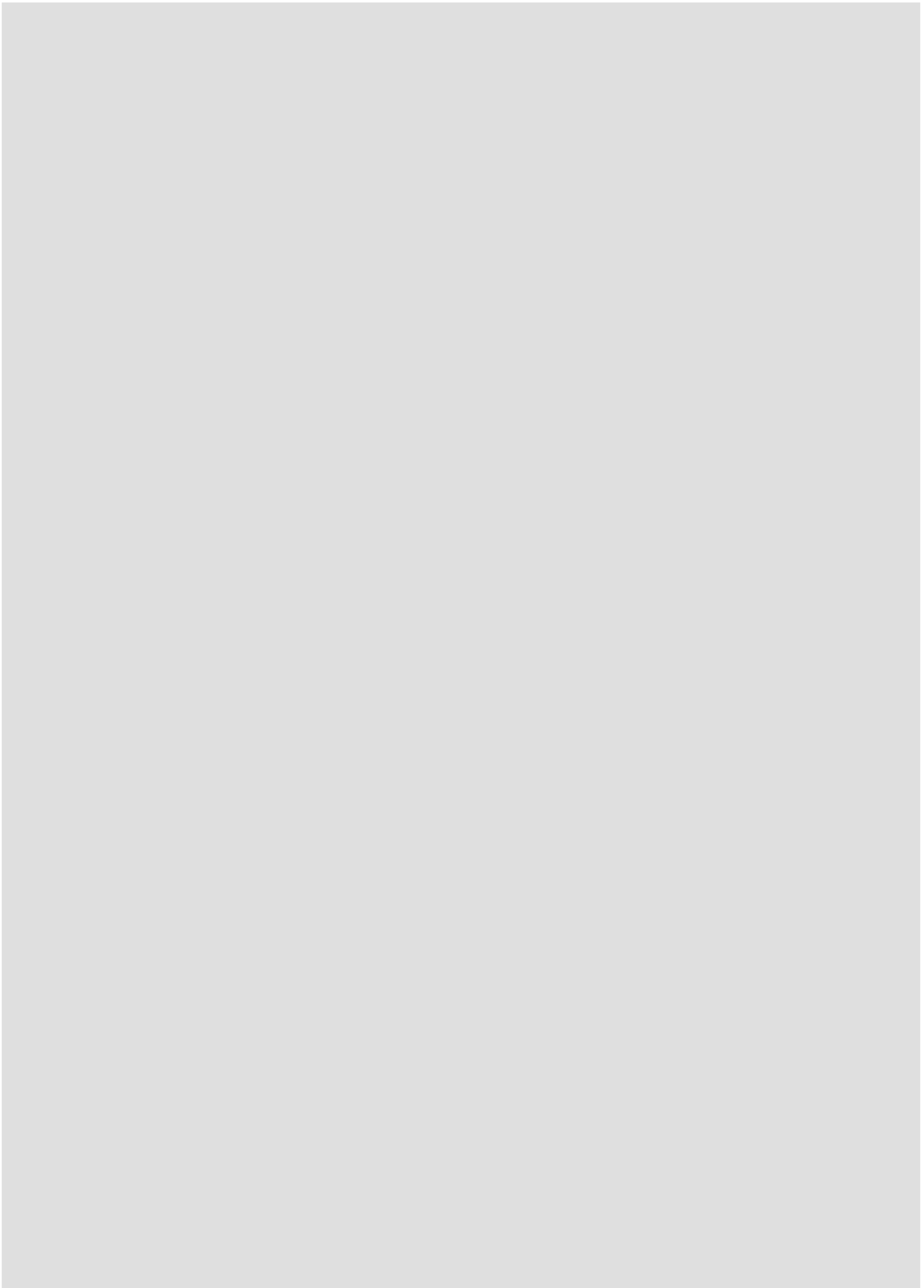
Barrett Adolescent Centre Commission of Inquiry

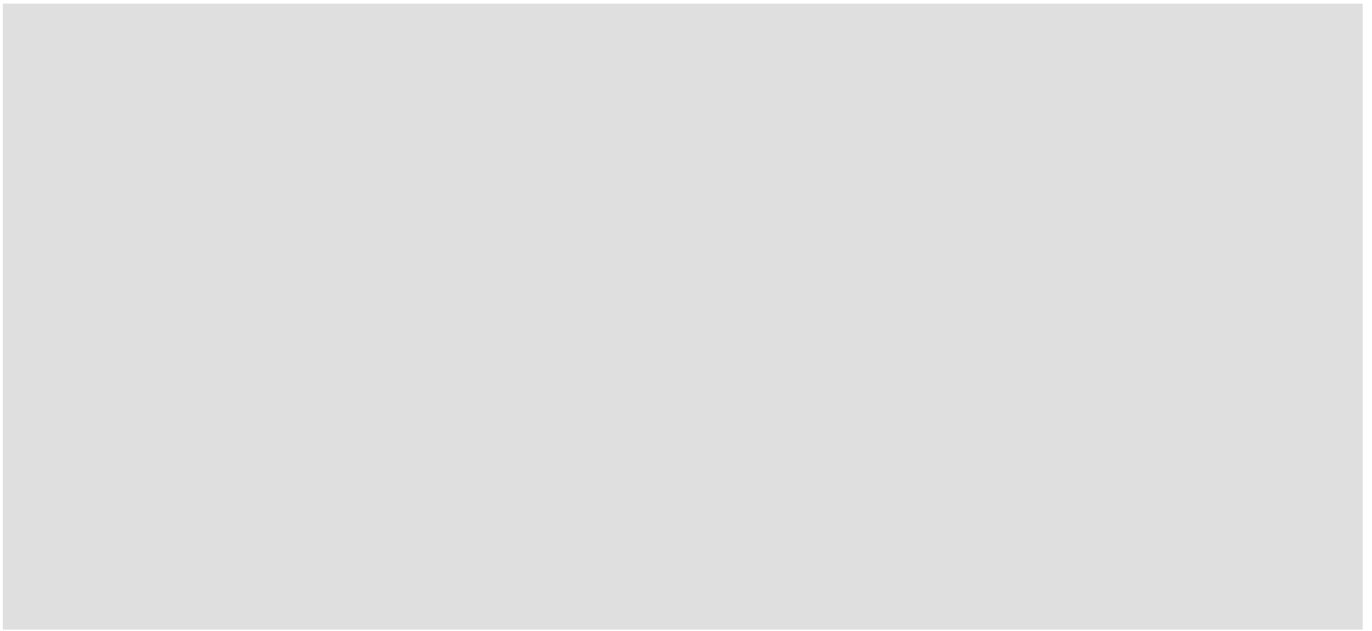
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Exhibit **[CM.10]** to the Affidavit of Cristelle Mulgrove sworn on 18 January 2016.


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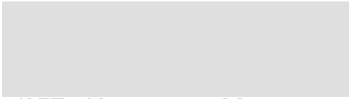
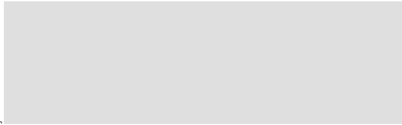
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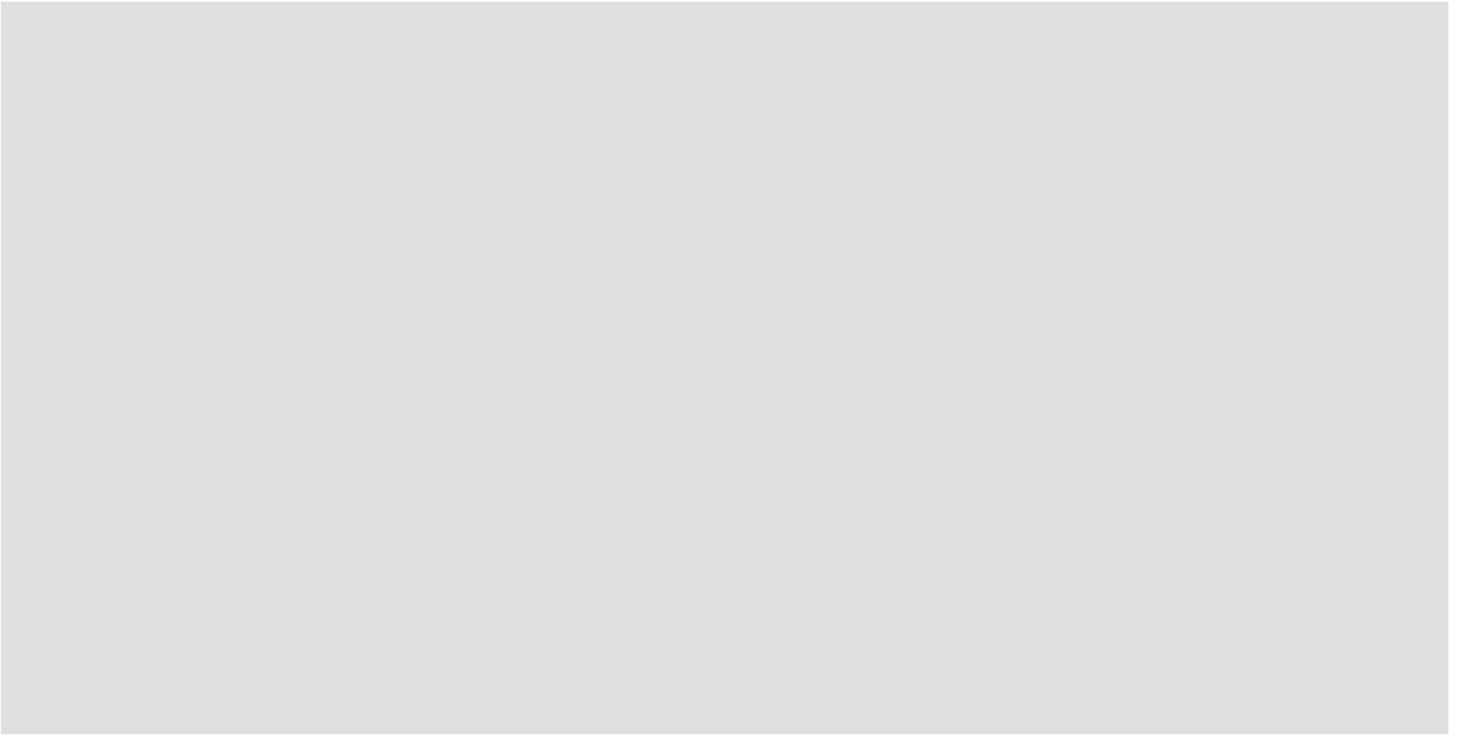
Commissions of Inquiry Order (No.4) 2015

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Exhibit **[CM.11]** to the Affidavit of Cristelle Mulgrove sworn on 18 January 2016.

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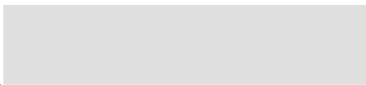

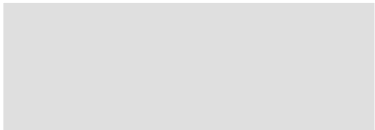

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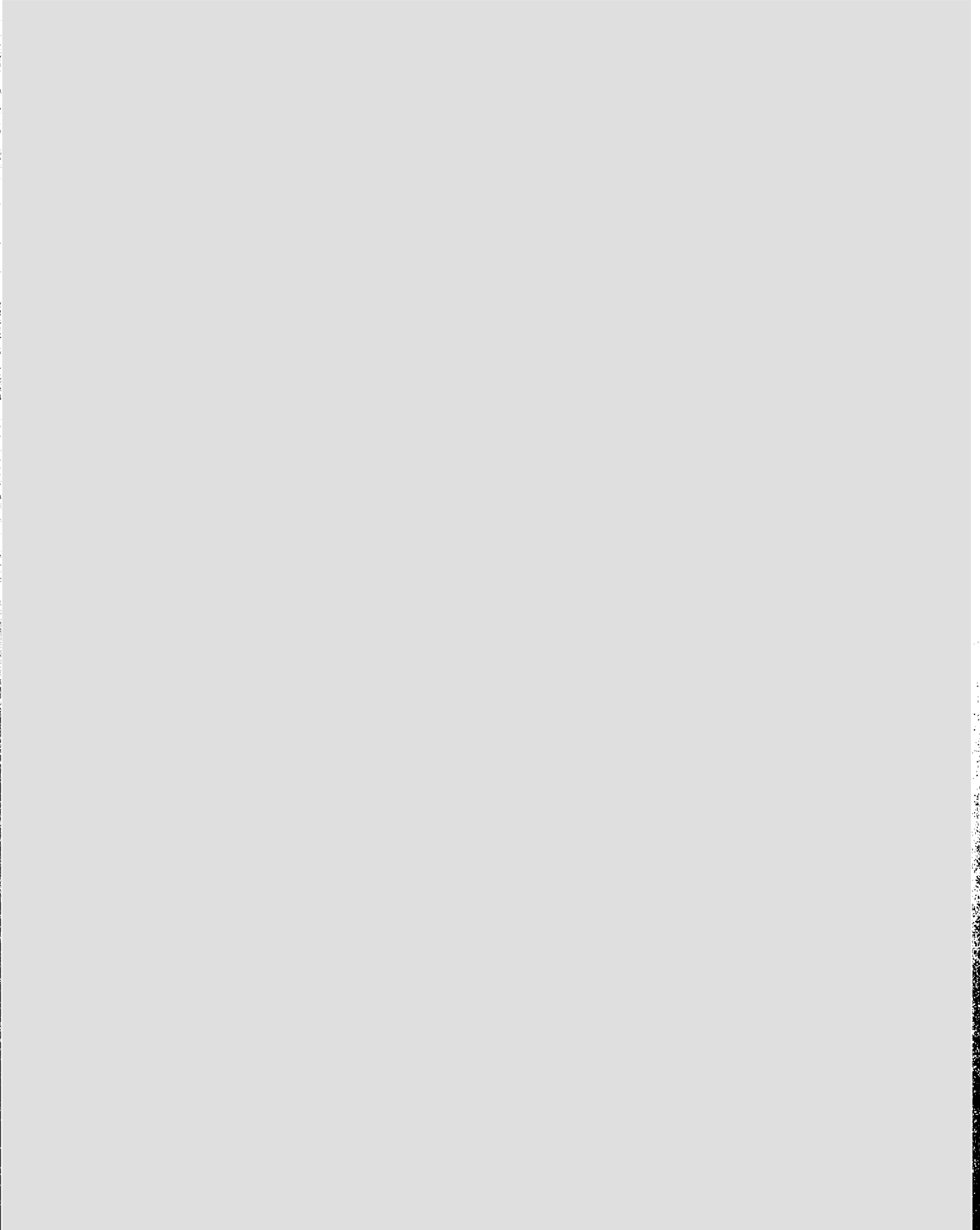
Commissions of Inquiry Order (No.4) 2015

Barrett Adolescent Centre Commission of Inquiry

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Exhibit **[CM.12]** to the Affidavit of Cristelle Mulgrove sworn on 18 January 2016.

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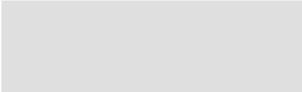
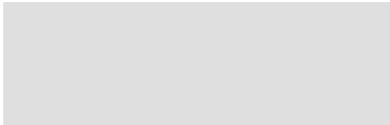
In the matter of the *Commissions of Inquiry Act 1950*

Commissions of Inquiry Order (No.4) 2015

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Exhibit **[CM.13]** to the Affidavit of Cristelle Mulgrove sworn on 18 January 2016.

 Deponent	 A.J.P., C.Dec., Solicitor
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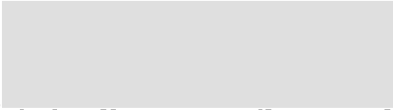
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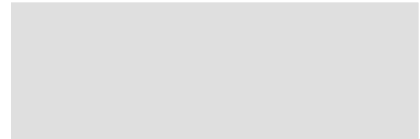
Barrett Adolescent Centre Commission of Inquiry

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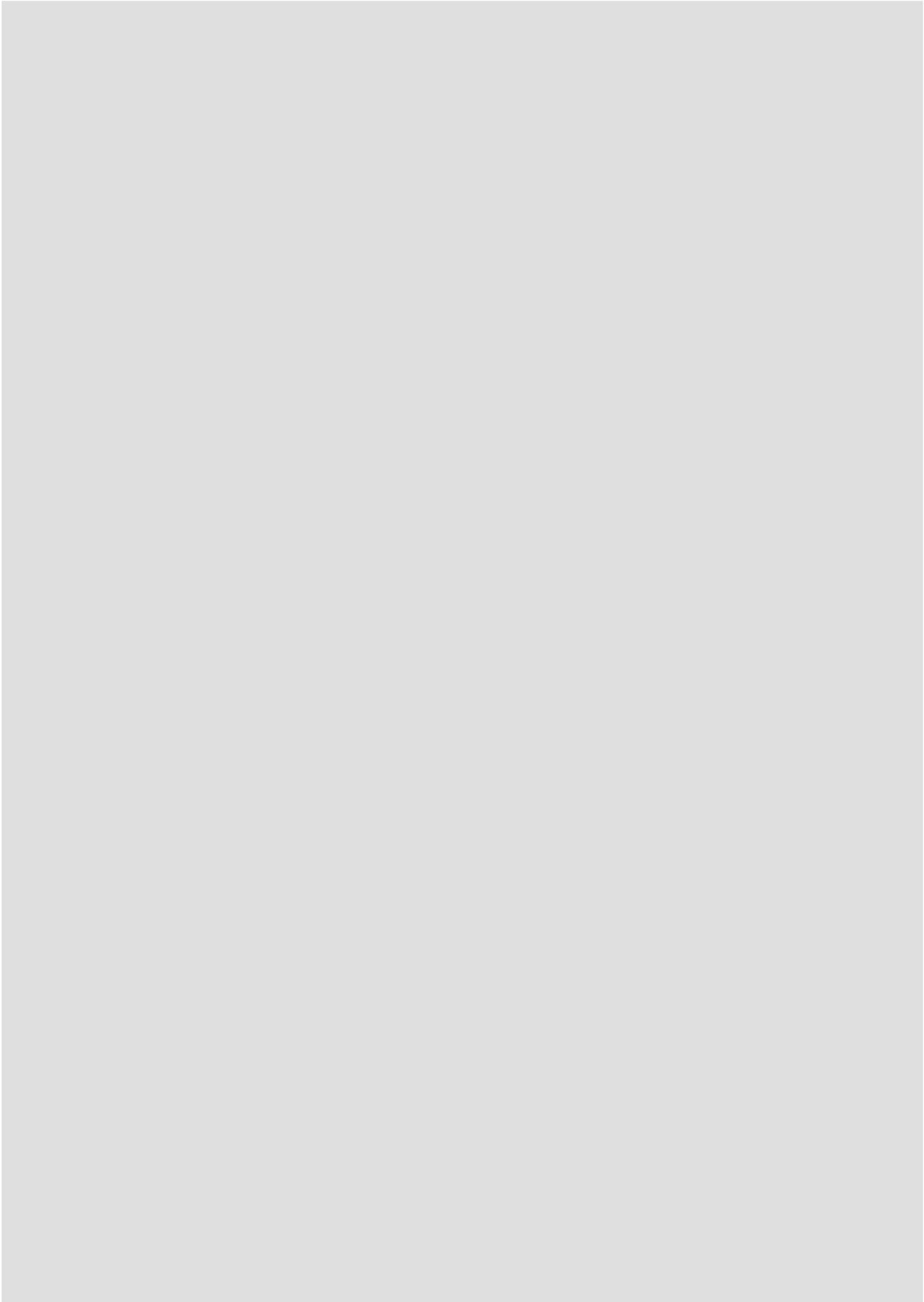
Exhibit **[CM.14]** to the Affidavit of Cristelle Mulgrove sworn on 18 January 2016.



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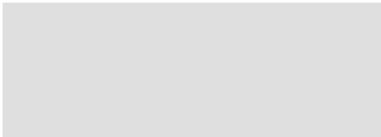
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Commissions of Inquiry Order (No.4) 2015

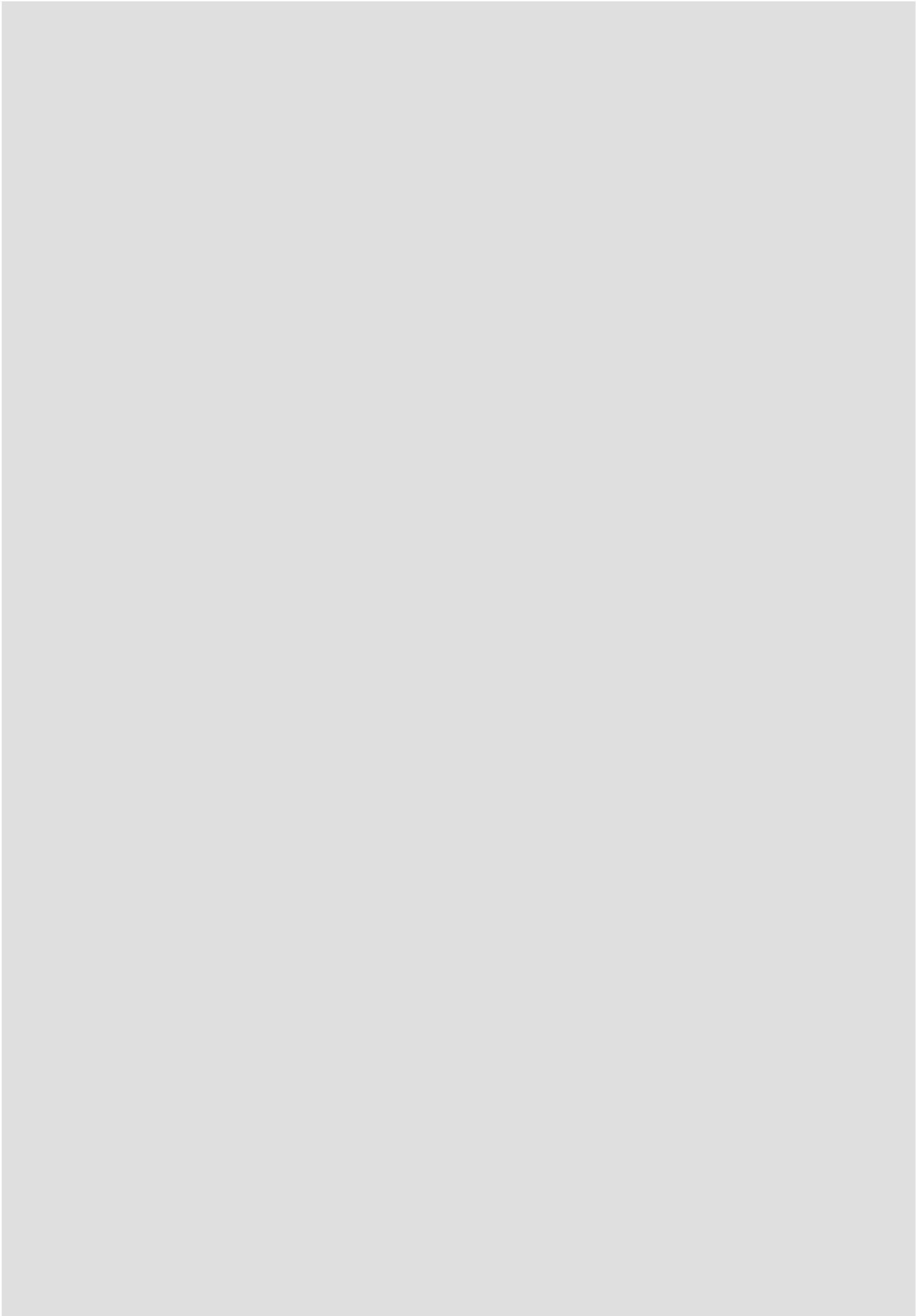
Barrett Adolescent Centre Commission of Inquiry

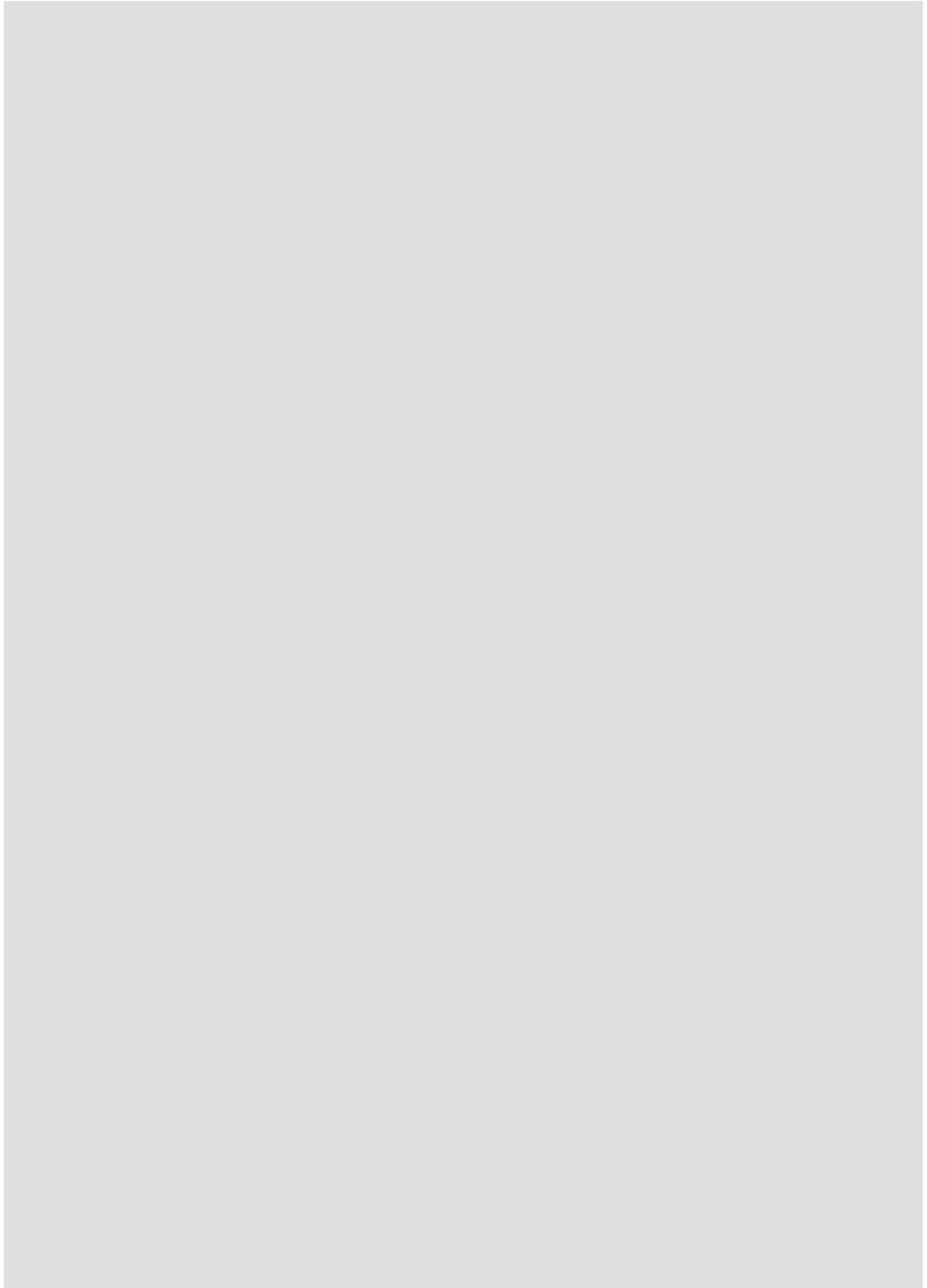
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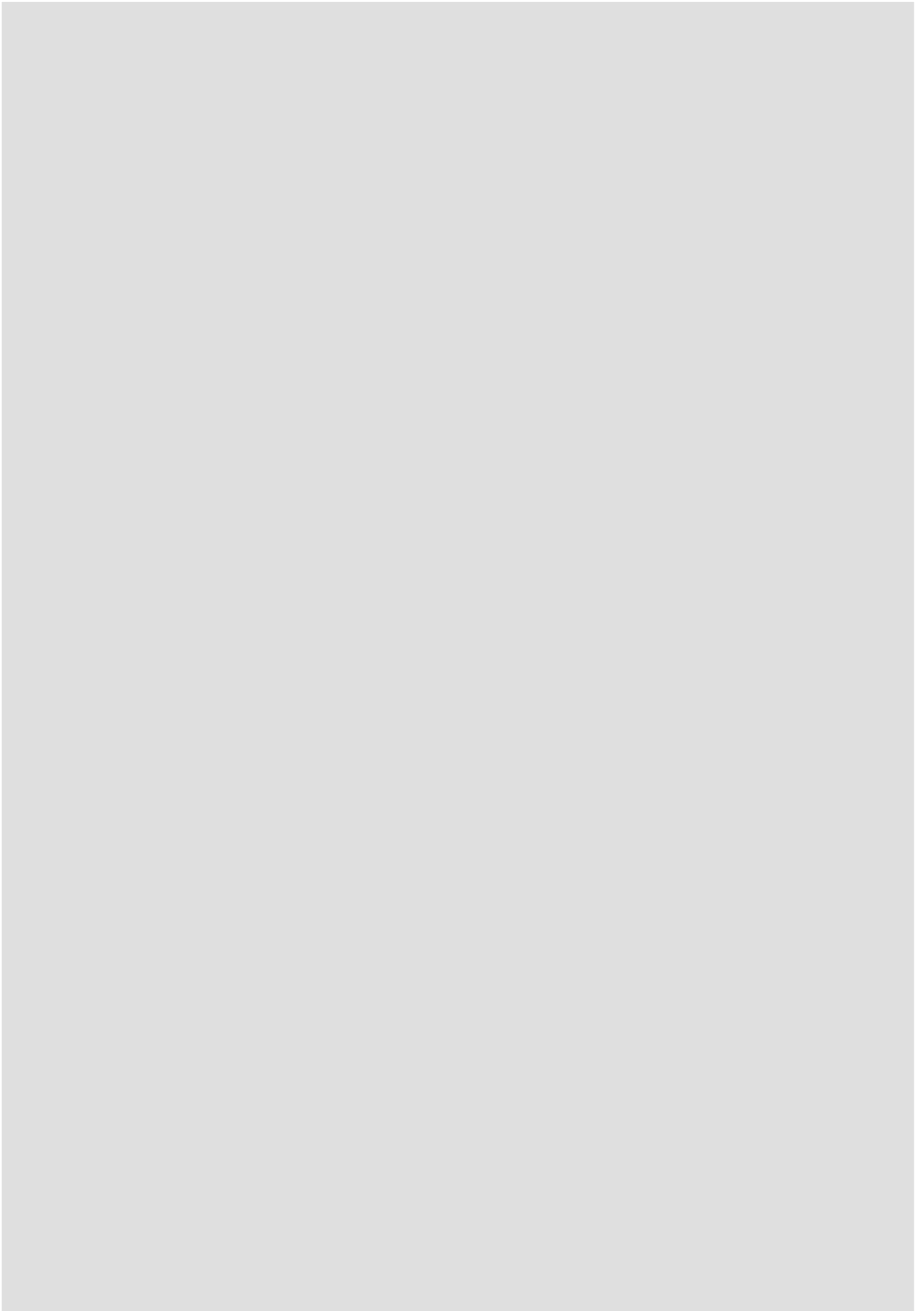
Exhibit **[CM.15]** to the Affidavit of Cristelle Mulgrove sworn on 18 January 2016.

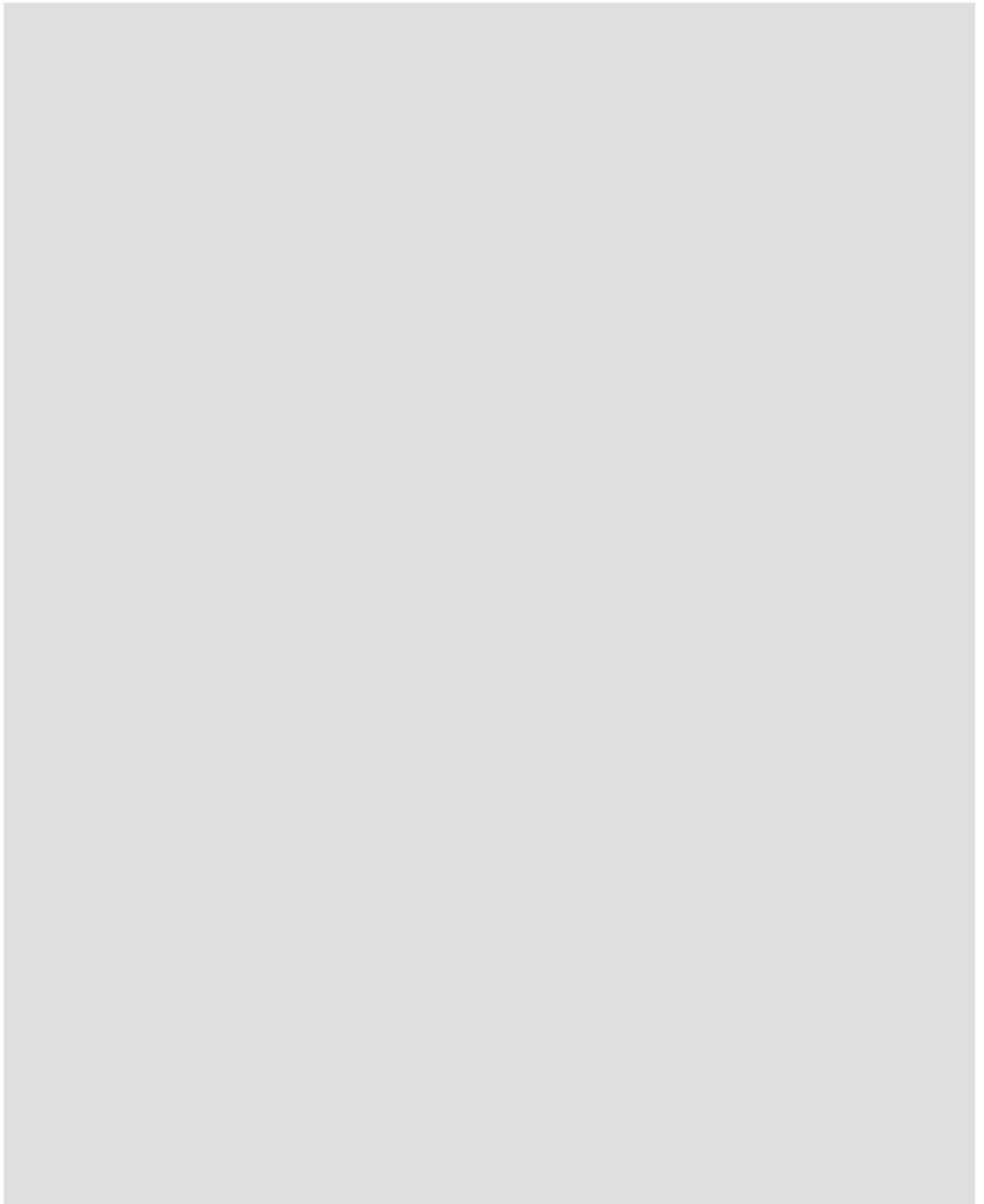
 Deponent	 A.J.P., C.Dee., Solicitor
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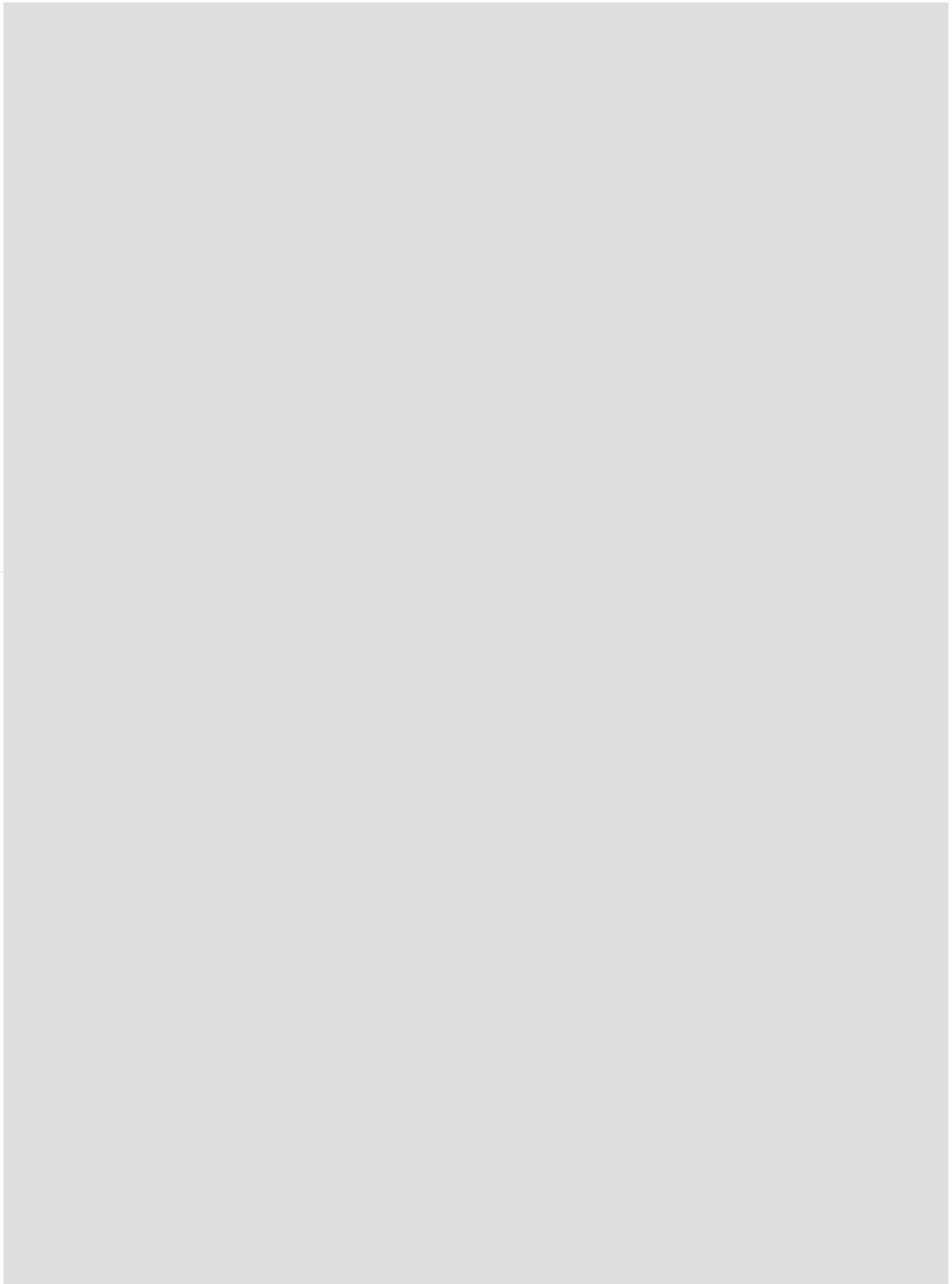
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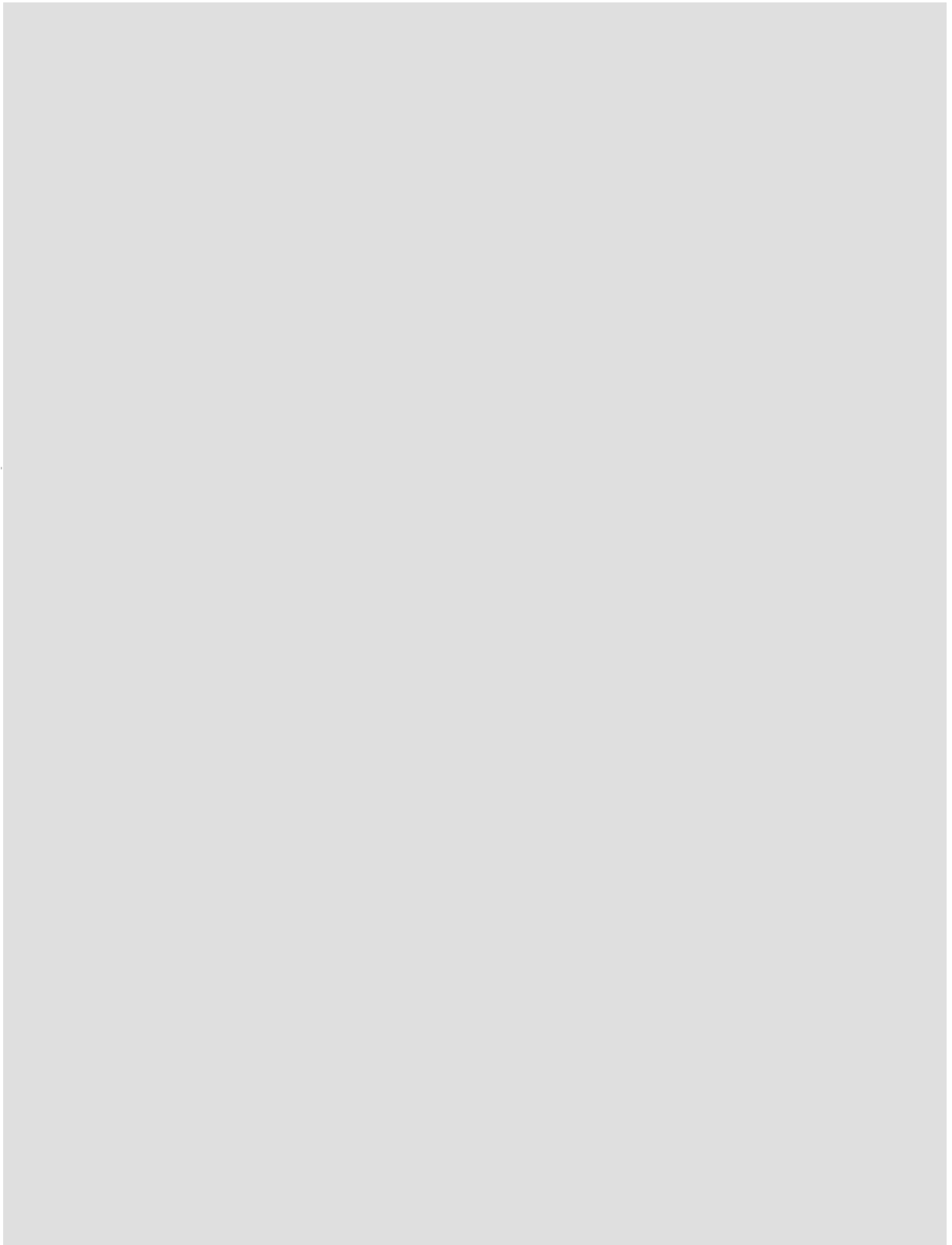












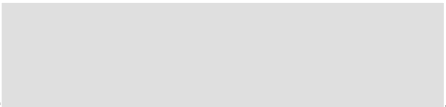
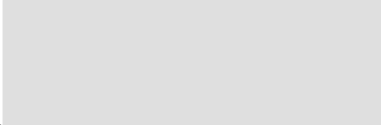
In the matter of the *Commissions of Inquiry Act 1950*

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Exhibit **[CM.16]** to the Affidavit of Cristelle Mulgrove sworn on 18 January 2016.

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