



TRINITY HOUSE DETENTION SCHOOL

FOLLOW-UP INSPECTION

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Introduction

The Health Information and Quality Authority (HIQA), Social Services Inspectorate (SSI) carried out an unannounced follow-up inspection of a children's detention school under Section 69 (2) of the Child Care Act 1991. This inspection, by Michael McNamara, Lead Inspector, accompanied by Orla Murphy, Co-Inspector, took place on 1st and 2nd March 2011. The purpose of the inspection was to assess compliance with the action plan returned to the Inspectorate by the Trinity House School (THS) in response to the recommendations of the report of the previous full inspection in 2010, which can be found on www.hiqa.ie (*Inspection ID 393*).

Findings

Inspectors found that of the 28 recommendations made in the report, 7 were fully implemented, 13 were partly implemented and 8 were not met. The recommendations that have yet to be met concern the following actions:

- THS to reduce the use of single separation and ensure that in every instance practice conforms to standards (5)*
- The development of single separation guidelines by Irish Youth Justice Service (IYJS) in consultation with the Department of Children and Youth Affairs and the HSE (6)*
- IYJS should arrange for the appointment of a visiting panel (14)*
- Improvement of planning for and support after discharge by IYJS in liaison with the HSE and the probation service (16)*
- The Director and Board of Management to carry out an audit of all staff files to identify and remedy any deficiencies in vetting (18)*
- THS should revise its internal forms for the notification of significant events (23)
- IYJS to determine a policy on the requirement of the standard 9.9 that the school requires written confirmation of compliance with building control and fire safety regulations (27)*
- THS in consultation with IYJS to establish a system for monitoring and evaluating offending behaviour programmes (28)*

The action plan, which includes the recommendations and the inspectors' comments on the level of implementation of each, is shown in the chart below.

Inspectors acknowledge the work that has been done to respond to the inspection. Some of the recommendations have been well met, and the directors and staff are commended for the school's standards in provision of activities to children, the advocacy programme and the school's own system of supervision. Inspectors found that several of the recommendations that concerned the development of policy had been met or partly met. For example, the IYJS had produced policies, procedures and guidelines on safeguarding and child protection, Garda vetting, notification of significant events, assessment, complaints, and the management of behaviour. THS had also set up working groups to address policy and practice issues arising from the recommendations of previous inspection reports.

At the time of the inspection, all three schools had experienced significant change in staffing following the assimilation on to the Oberstown campus of staff from Finglas Child and Adolescent Centre following its closure in late March 2010. As a consequence, some recommendations were not fully met. Inspectors acknowledge that other recommendations require further time to be met fully, in particular, revision of the statement of purpose and function needs to take into account recent and forthcoming changes in the service (1); and for the introduction of a supervision model (14), which was impacted by unusual circumstances. The IYJS and the schools need time to consider a different approach in order to comply with the standard.

Although some recommendations were not met, all had been responded to. In focussing on the whole range of recommendations inspectors note, in particular, that the majority of recommendations are not met or partly met, and they urge the IYJS, Board of Management and Director to give them their urgent attention. In preparation for the follow-up inspection, inspectors sent IYJS and the Board of Management a list of recommendations indicating which had been repeated over successive inspections. In the case of THS, eight of the recommendations made in 2009 were repeated in 2010, (indicated by * in the list above) and have yet to be implemented. In order to track the level of compliance closely the inspectors have asked the Board of Management for updates on the progress made in meeting these and other recommendations in quarterly reports to the Authority from the time of the publication of this report. There is a need for the overall level of compliance with recommendations to improve considerably. In particular, the IYJS and Board of Management are urged to give priority to all matters outstanding that have been subject of recommendations in previous inspection reports.

Compliance with the partly met and unmet recommendations will also be fully assessed at the next inspection.

Please see attached action plan in response to the inspection recommendations.

Social Services Inspectorate Action Plan for Inspection No. 393

No.	Recommendation	Actions to be taken	Person (s) Responsible	Implementation Date	SSI Response
1	The Director and Board of Management of THS, in consultation with the IYJS, should revise the statement of purpose and function and ensure it reflects the requirements of the standards and changes in the service.	Redraft statement of purpose and function to include points raised in consultation with all relevant stakeholders.	Board of Management Director Deputy Director Managers	28 th February 2011	RECOMMENDATION MET Inspectors were provided with a copy of the revised statement of purpose and function. The preparation of assessments for court was a new feature of the purpose and function. The psychologist based on the campus had retired, and there were plans to fill the post, but there were discussions in place at the time of the follow-up inspection about the style of service required by the three detention schools collectively, both for assessment and for meeting young people's mental health and emotional needs. To support the assessment function, the school bought in the services of two psychologists. The disadvantage of this arrangement was that they are unable to be present at case conferences.
2	The Director of THS should revise the young people's and parents' handbook to include details about the right of access to records and the use of single separation.	Establish a working group of all relevant stakeholders (to include young people) to redraft the handbook taking into consideration all points raised.	Working Group Director Deputy Director PPP Group	31 st March 2011	RECOMMENDATION MET Inspectors were provided with copies of the handbooks.
3	The Director of THS should further develop the roles of all staff, particularly care staff and keyworkers, in providing living skills training to young people.	Continue the training programme already implemented in relation to the delivery of the living skills pack.	Director Education Focus Group Unit Managers	31 st March 2011	RECOMMENDATION MET An inventory of staff skills was drawn up, and staff initiatives in providing activities to children were encouraged. One initiative, Core Plus, focussed on engagement in physical activity and healthy eating, and was for both staff and children.
4	The Director and Board of Management of THS, in consultation with the IYJS, should: <ul style="list-style-type: none"> develop further its policy and practice on the management of risk, develop practice that 	<ul style="list-style-type: none"> Establish a working group to develop in conjunction with the PPP Group a comprehensive policy on the Management of Risk in line with relevant 	Board of Management H&S Group Director Child Welfare Advisor IYJS CPI Instructors	31 st March 2011 30 th September 2011	RECOMMENDATION PARTLY MET The school has established a working group in accordance with the action plan. All but two staff have received training in the IYJS approved method of management of behaviour, CPI. The director affirmed to inspectors that CPI is implemented in THS. Six of the staff have been trained as CPI trainers. Inspectors were told that work was being done to analyse patterns of behaviour in depth. However, inspectors found that primary indications of difficulties in managing behaviour, such as the incidence of single separation, did not support

	distinguishes between the management of behaviour and management of risk.	<p>legislation and taking into account the specific environment of THS.</p> <ul style="list-style-type: none"> Distinguish and clarify through in-service staff training the differences between the management of behaviour and the management of risk and how they interrelate. 			<p>this assertion.</p> <p>In the full inspections of all three schools inspectors had found that staff had varying responses to questions about what they would do if a situation required physical intervention. The Board of Management was involved in discussions with the unions about implementation of the policy, and on 4th April 2011 the Board instructed all staff that CPI was to be implemented. In support of their members, unions raised several queries about the system, and these were all answered by the Child Welfare Advisor in IYJS and an implementation plan was drawn up. However, at the time of the follow-up inspection, one of the unions concerned had yet to agree to the plan, and was due to respond to the Chair of the Board of Managers after considering the details of the system as provided by IYJS. In the meantime, refresher training in CPI has been provided to staff.</p> <p>However, while the incidence of use of single separation had increased in the time between the two inspections, there had been few physical restraints. Inspectors found that they averaged four a year. Both the IYJS and Board of Management were concerned about the stalling of the implementation of the use of CPI as the approved method of behaviour management in the three schools.</p> <p>The Inspectorate requires evidence of progress in fully meeting this recommendation in the quarterly reports to be submitted to the Inspectorate following the publication of this report.</p>
5	<p>The Director and Board of Management of THS should:</p> <ul style="list-style-type: none"> reduce further the use of single separation, ensure that in every instance it conforms to the standards, and ensure that in every instance practice reflects the principles of children's rights. 	<ul style="list-style-type: none"> Continue to monitor and reduce with the assistance of quarterly reviews and ongoing analysis. Through staff training and reflective practice encompass individual staff incident analysis into the professional supervision process and the performance management system. 	Board of Management Director Deputy Director Unit Manager PPP Group Health and Safety Group	31 st January 2011	<p>RECOMMENDATION NOT MET</p> <p>There was a higher incidence of single separation in the ten months between the full inspection and the follow-up. Inspectors examined records of individual episodes and found that there was no procedure in place for systematic critical incident review, and there was no evidence of significant changes in practice as a result of examination of patterns of use of single separation. Inspectors were told that episodes of separation were for shorter duration overall, but in some cases young people were separated for periods in excess of twelve hours. Directors of the school pointed to the more rapid turnover of young people over the period between the inspections as a contributory factor in the increase. A system has been put in place to report on the number of episodes of use of single separation to the Board of Management on a monthly basis. The IYJS, which has a representative on the board, receives the same report. The Inspectorate requires evidence of progress in fully meeting this recommendation in the quarterly reports to be submitted to the</p>

					Inspectorate following the publication of this report.
6	As recommended in the previous inspection, the IYJS, in consultation with Department of Health and Children and the HSE, should develop common practice guidelines for the use of single separation.	IYJS meeting with HSE on 8 th December 2010 at which present policy and practice guidelines within the HSE will be discussed and will look to develop joint guidelines.	Child Welfare Advisor IYJS	Initial Meeting 8 th December 2010 Working group: 24 th January 2011	<p>RECOMMENDATION NOT MET</p> <p>A cross campus working group drawn from the three schools and the IYJS had met once before the inspection, but has met four times since. The cross campus working group has met five times since it was established in February 2011. A draft policy and procedure document will be submitted to the board of management for approval in autumn 2011. A system had been established for monthly monitoring of the use and incidence of single separation. One reason given for the lack of progress in this area is the fact that the IYJS has participated in a consultative process in the drawing up of new children's standards in which measures such as single separation are being considered. There is much work to do to meet this recommendation fully.</p> <p>The Inspectorate requires evidence of progress in fully meeting this recommendation in the quarterly reports to be submitted to the Inspectorate following the publication of this report.</p>
7	The Director of THS should review the staffing and organisation of activities at weekends.	Structured and pre-planned daily activity programme to be developed and implemented to involve all staff. Staff information sessions around same to be held. Develop a protocol to assist same through the PPP Group.	Director Unit Manager Deputy Director Activity Coordinator PPP Group	28 th February 2011	<p>RECOMMENDATION PARTLY MET</p> <p>Inspectors found that there had been some action to address this recommendation. A process had been established to look at the plans for shifts at weekends, and managers examined records of activities. The protocol referred to in the action plan was still under discussion with staff at the time of the inspection. The overall level of mobilities (<i>where young people in THS are able to go on outings from the school either socially or to their homes after an assessment of risk</i>) had decreased owing to the increase in the number of remands. However, inspectors found that there was a variety of on-site activities available to young people.</p>
8	The Director, managers and staff of THS, in consultation with the young people, should review the basic rules outlined in the young people's and parents' handbook with a view to eradicating the routine use of bad language.	<ul style="list-style-type: none"> As Point 2 Through the PPP Group address an awareness campaign to address the issue raised. 	Unit Manager Director Deputy Director PPP Group	31 st March 2011	<p>RECOMMENDATION MET</p> <p>A policy had been written. A group had been set up to promote awareness of the problem and monitor the implementation of the policy. Directors told inspectors that staff were reminded by managers of their duty to provide an example to young people.</p>
9	The Director and Board of Management of THS, in consultation with the IYJS, should develop protocols with the HSE	Continue the practice and protocol already in place between THS and HSE Dublin North East which	Board of Management Director Deputy	Ongoing	<p>RECOMMENDATION PARTLY MET</p> <p>Protocols have yet to be finalised between the IYJS and HSE. However, inspectors were told that notifications of child protection concerns take place. They are routed through the child care manager</p>

	for notification of child protection concerns, and ensure that all child protection concerns are appropriately notified.	includes biannual meetings and reviews.	Director DCPO		of the local health area in which the schools are situated when there is no prior social work involvement in the case. The IYJS was involved in regular meetings with the HSE to advance practice in notifications.
10	The Director and Board of Management of THS, in consultation with the IYJS, should review the safeguarding policy so that clearly distinguishes between allegations of abuse and complaints.	The draft Safeguarding Policy, prepared by the working group to go for sign-off to Board of Management meeting on 16 th December 2010 Whistle-blowing policy to be part of this. Training for the Designated Child Protection Officer (DCPO) with HSE staff to take place in December 2010	Child Welfare Advisor IYJS	DCPO Training - December 2010 Safeguarding Policy - January 2011	RECOMMENDATION PARTLY MET The safeguarding policy which included child protection and whistle-blowing had been prepared by IYJS and was in its final stages at the time of the inspection. A copy of the draft policy was provided to inspectors. It was comprehensive, gave clear definitions, background information and references, and was supported by several other documents including: Guidelines for Good Practice, Guidelines for Recognising Poor Practice, Abuse, Bullying and Mental health Problems, Guidelines and Procedures for Reporting Child Protection Concerns, and a description of the role of the campus social worker in child protection procedures. It was also complemented by parts of the IYJS Notifiable Incident Policy. The procedures for reporting child protection concerns had been drawn up in consultation with the Child Care Manager of the HSE Dublin North Local Health Area, and she was named and the key person to whom reports of suspicions of abuse or child protection concerns should be sent by the school's designated child protection officer (DCPO). In accordance with the action plan, training in <i>Children First National Guidelines for the Protection and Welfare of Children</i> had been accessed for the DCPO in THS. However, owing to the investment in training in CPI across the campus and difficulties in accessing appropriate training, staff had yet to be provided with training in Children First. Since the inspection inspectors have been informed that the safeguarding group is developing a programme of training in child protection for all staff which will be rolled out late in 2011 by the campus social worker. This last part of the recommendation will be assessed fully at the next inspection.
11	The IYJS should develop a whistle-blowing policy in accordance with the standards and ensure that staff have sufficient confidence in it for it to fulfil its purpose of protecting young people.	As above (10)			RECOMMENDATION PARTLY MET Whistle-blowing had been referred to in the safeguarding policy referred to above. Inspectors were informed that the safeguarding group had drafted a whistle-blowing policy which was due to be presented to the Board of Management for approval in autumn 2011.

12	The IYJS should develop policy and practice and set out clear objectives and definition of roles for independent advocates.	IYJS have put forward a proposal to IAYPIC ¹ in relation to setting up independent advocacy across all of the Children Detention Schools based on the Trinity House <i>Framework for Working Together</i> a protocol drawn up between THS and IAYPIC.	Child Welfare Advisor IYJS	Request re-submitted November 2010	RECOMMENDATION MET IAYPIC is fully involved in providing a service in THS. This includes attending reviews to advocate for individual young people, as requested. The school is commended for this development.
13	The Director of THS should ensure that young people are aware of their right to access to information and facilitated in the exercise of their right.	<ul style="list-style-type: none"> • Redistribute the revised Children's Booklet. • Ensure Children's Rights information is located in living areas in the units and are actively addressed through the key working process. • Further develop the weekly boys meetings with agenda and minutes to address the rights of the young people. IAYPIC to hold information sessions for staff and young people.	Unit Managers Deputy Director Key Workers	31 st March 2011	RECOMMENDATION PARTLY MET Inspectors were told that the children's booklet, which outlines children's rights, was redistributed to the young people in THS and that unit managers were required to record that young people are spoken to and encouraged to exercise their rights. Practice will be assessed at the next inspection.
14	IYJS should arrange for the appointment of a visiting panel in accordance with the Children Act 2001.	IYJS has always agreed to independent scrutiny of the CDS and has facilitated visits by outside bodies. Now that all detention schools are located on the one	Child Welfare Advisor IYJS	Recommendation to be made early 2011	RECOMMENDATION NOT MET The new Board of Management had only recently been in place at the time of the inspection. Inspectors were informed that the recommendation to appoint a visiting panel is due to be presented to the Minister for Children and Youth Affairs in Autumn 2011. The Inspectorate requires evidence of progress in fully meeting this

¹ From 17th June 2011 IAYPIC has changed its name to EPIC (Empowering People in Care)

		campus and integration is underway, recommendations will be made to the Minister regarding the establishment of visiting panel.			recommendation in the quarterly reports to be submitted to the Inspectorate following the publication of this report.
15	The Director and Board of Management of THS, in consultation with the IYJS, should monitor practice in planning and reviews of plans, and establish protocols with the HSE to ensure that care planning for young people in the care of the HSE continues when they are detained in THS.	IYJS meeting with HSE on 8 th December 2010 at which present policy and practice in relation to ongoing Social Worker involvement while in detention. Pursuing with the HIQA that this forms part of the new Standards.	Child Welfare Advisor IYJS	Initial Meeting 8 th December 2010 Standards discussions on-going.	RECOMMENDATION PARTLY MET Discussions have taken place between IYJS and the HSE about the sharing of information, particularly about risk and about the assessed needs of children in care. Inspectors were provided with a draft protocol drawn up in response to Action 63 of the <i>Report of the Commission to Inquire into Child Abuse 2009 Implementation Plan</i> . ² Directors of THS reported a greater involvement of social workers in the cases of children in care, and that there were more frequent review meetings and case conferences, but there were still some shortfalls in the sharing of information. Inspectors were informed that the draft protocol was with the HSE for review, and that a process of consultation with principal social workers was in progress. Inspectors acknowledge that the changes necessary to facilitate this process will take time. They require evidence of progress in meeting this recommendation in the quarterly reports to be submitted to the Inspectorate following the publication of this report. This will be fully assessed at the next inspection.
16	The IYJS should expedite implementation of the recommendation of the previous inspection to develop with the HSE and probation service interventions that ensure continuity of support for young people in preparation for leaving detention and aftercare.	Topic has been raised at the Oversight Group Meeting chaired by the OMCYA. Group consists of reps from IYJS, HSE, Probation, and Education. Quarterly meetings held – additional meeting planned to deal with Aftercare.	Child Welfare Advisor IYJS	Meeting 14 th December 2010 6 to 9 months.	RECOMMENDATION NOT MET At the time of the inspection some of the discussion necessary to progress this recommendation had taken place between the IYJS and the HSE. Since the inspection, inspectors have been informed that IYJS is represented on the HSE's aftercare implementation group, and a subgroup including representatives from the schools and the probation service met for the first time on 4 th August 2011. Inspectors reiterate the recommendation in full, and urge all agencies to give priority to working in partnership in order to achieve the best outcomes for children after discharge from the detention schools. They require evidence of progress in meeting this recommendation in the quarterly reports to be submitted to the Inspectorate following the publication of this report.

² Action 63 of the *Report of the Commission to Inquire into Child Abuse 2009 Implementation Plan*. reads: "the HSE will ensure that social workers who are allocated to children whom the courts place in detention continue to work in partnership with the children detention schools in care planning".

17	The Director of THS should ensure that the monitoring of practice by unit managers is evidenced in the files.	Implement audit sheets and system verifying and monitoring practice, for joint sign off by Unit Managers and Deputy Director which will form part of each individual young person's file.	Unit Managers Deputy Director	31 st January 2011	RECOMMENDATION PARTLY MET The Director and managers of the school told inspectors that there had been changes in the monitoring of practice by unit managers. However, in examining of serious incidents records inspectors formed the view that much more needs to be done to clearly evidence that this is taking place. They require evidence of progress in meeting this recommendation in the quarterly reports to be submitted to the Inspectorate following the publication of this report.
18	The Director and Board of Management of THS, in consultation with the IYJS, should remedy deficiencies in vetting.	New Vetting Policy now in place.	Board of Management Child Welfare Advisor IYJS	27 th October 2010	RECOMMENDATION NOT MET In THS there had been an audit of personnel files, and deficiencies were identified but had yet to be fully remedied. These were discussed with IYJS. In July 2010 the Board of Management approved an IYJS-issued document entitled Policy and Procedures for Garda Vetting in the Irish Youth Justice Service. The policy described Garda vetting as a core process in recruitment for sectors that work with children that enhances the ability of the detention schools to safeguard the wellbeing of children. It stated that the ultimate decision as to whether a person with convictions should be employed by the 'organisation' rests with the IYJS. It also stated that current staff of the schools would be subject to periodic vetting approximately every three years, or any time between the three year interval as deemed necessary by the school authorities. The document does not make reference to the Board of Management even though Sections 180 and 181 of the Children Act 2001 give the Board authority to appoint the director and members of staff of detention schools. The policy should be revised to include the Board's responsibilities, and the scope widened to include people who are commissioned by the schools to have intermittent access to children such as counsellors and psychologists. Essentially, the Board, with the support of the IYJS should ensure that the policy is fully implemented and both parties should take all measures necessary to satisfy themselves that the standard on vetting in all three detention schools is fully met. Inspectors require evidence of progress in meeting this recommendation in the quarterly reports to be submitted to the Inspectorate following the publication of this report. This will be assessed at the next inspection.
	As recommended in the previous inspection and in the light of changes in the service, the Board of Management of THS should	Board of Management to draft document clearly defining roles and relationships	Board of Management	31 st March 2011	RECOMMENDATION PARTLY MET At the time of the inspection a draft statement had been prepared. This has yet to be provided to inspectors.

19	produce a statement clearly defining the role of the Board, its responsibilities, authority, monitoring function in accordance with standard 6.9, including in the statement the lines of accountability of the directors and the board's relationship with the IYJS.				
20	The Board of Management of THS should give priority to arranging visits to the school in accordance with the recommendations of the previous two inspections.	Timetable of visits to be organised by the Board of Management	Board of Management	31 st January 2011	<p>RECOMMENDATION MET</p> <p>At the time of the inspection the Board of Management had been newly established, and visits had not taken place. Inspectors were informed that since the inspection there has been four unannounced visits by members of the Board of Management. Inspectors require further evidence of the progress in meeting this recommendation in the quarterly reports to be submitted to the Inspectorate following the publication of this report. This will be assessed at the next inspection.</p>
21	The IYJS should review its policy on supervision, and ensure that it is properly implemented.	Cross campus integrated Policy on Supervision to be drafted and implemented. A working group made up from school representatives with appropriate supervision experience/training to draft policy for the Board of Management to endorse.	Child Welfare Advisor IYJS	Working Group established 17 th January 2011 Draft to Board of Management 22 nd March 2011	<p>RECOMMENDATION PARTLY MET</p> <p>Inspectors were given reasons why this recommendation had not been fully met. The IYJS had made a decision to change the model of supervision being adopted by the three schools. There had been some progress in that one reputable model had been chosen, but plans had to change after a tragic incident concerning the originator of the model. At the time of the inspection there was a working group in place examining ways forward in introducing a common model of supervision for the three schools. Inspectors found that in THS there was coherent system that provided for all grades of staff to receive supervision. Records examined by inspectors showed that the scheduling of supervision was strictly adhered to, and there was very little 'slippage' in the frequency of sessions. The directors and managers of THS are to be commended for this. This recommendation will be fully met when the IYJS approved model of supervision is being used in practice in THS. Since the inspection a new model of supervision has been approved by the Board of Management in July 2011, and inspectors have been informed by IYJS that the training programme necessary for its implementation is scheduled for late 2011.</p> <p>Inspectors require evidence of progress in meeting this</p>

					recommendation in the quarterly reports to be submitted to the Inspectorate following the publication of this report. This will be assessed at the next inspection.
22	<p>The Director and Board of Management of THS, in consultation with the IYJS, should prepare a programme of training that includes:</p> <ul style="list-style-type: none"> • training for the Chair of the Board of Management, Director, deputy directors and unit managers in change management; • training in <i>Children First: Guidelines on the Protection and Welfare of Children</i> for the DCPO and unit managers; • training in health and safety for the deputy director with overall responsibility for health and safety, the health and safety and maintenance officers, and the staff health and safety representatives; • training in the rights of children in detention for care staff who have not received it. 	<ul style="list-style-type: none"> • IYJS to draw up a comprehensive and specific training programme for staff in the areas highlighted in the report. • Training for DCPO with HSE staff to take place in December 2010 • Complete the training programme delivered by IAYPIC. 	<p>Child Welfare Advisor, IYJS</p> <p>Education Focus Group Deputy Director Unit Manager</p>	<p>DCPO Training - December 2010</p> <p>30th April 2011</p>	<p>RECOMMENDATION PARTLY MET</p> <p>A training needs analysis had been completed and the areas of priority were identified. Training in the rights of children in detention had been provided to the majority of staff, but there were some who still require it. Training in Health and Safety had not been provided. Training scheduled to commence in September 2011 included: CPI refresher training, first-aid training, manual handling training, defensive driving training. These are consistent with the priorities identified in the training analysis after consultation regarding health and safety training needs with the States Claims Agency. Training in <i>Children First</i> as specified, had taken place. The safeguarding group was developing a training programme in child protection for all staff to be provided by the campus social worker in late 2011.</p> <p>It is a matter of concern to inspectors and unacceptable that training in change management, as specified in the recommendations for all three schools in two consecutive rounds of inspection reports, has not received priority in the analysis of training. This has been recommended in the context of the considerable changes that have taken place and the serious difficulties that have ensued, including upheaval for staff and significant management and industrial relations problems.</p> <p>The Authority has sought from IYJS a written explanation for this persistent omission.</p>
23	The Director of THS should revise the forms for the notification of significant events.	Establish a working group with IYJS to review the notification of significant events.	Child Welfare Advisor IYJS Director Deputy Director	31 st March 2011	<p>RECOMMENDATION NOT MET</p> <p>Inspectors were provided with a template form for reporting serious events once a month to the IYJS and the Board of Management, but the notification forms in the care files were unchanged since the last inspection. The current forms were generic. They require revision so that children's and staff issues are completely separate, and so that serious incidents have more prominence. Inspectors require evidence of progress in meeting this recommendation in the quarterly reports to be submitted to the Inspectorate following the publication of this report. This will be</p>

					assessed at the next inspection.
24	The Director and Board of Management of THS, in consultation with the IYJS, should seek a resolution of the industrial action that impedes the implementation of the medication policy.	Continue the consultation process with the relevant unions to ensure its full implementation.	Board of Management Director Deputy Director Union Reps	31 st March 2011	RECOMMENDATION MET This was still being progressed at the time of the follow-up inspection. Inspectors were told by the managers of the school and the IYJS that as a consequence of union and school negotiations, training in the completion of relevant forms, as required by the policy, was to be provided. Since the inspection the difficulties have been resolved and the policy is fully operational.
25	The Director and Board of Management of THS, in consultation with the IYJS, should review practices and the services available for addressing the emotional needs of young people in detention.	<ul style="list-style-type: none"> • Establish a working group to review and develop appropriate services in line with best practice. • Establish access to the services of Child & Adolescent Psychiatrist. • Continue to work in partnership with the HSE in developing a multidisciplinary team to address the emotional needs of young people in care. 	Board of Management Director IYJS Working Group	31 st May 2011	RECOMMENDATION PARTLY MET The IYJS had carried out an internal review of the mental health needs in the children detention schools and provided inspectors with a copy. It was extremely detailed and well researched. It recommended various actions for the assessment and treatment of mental health problems in young people placed in the detention schools. Inspectors were told that the provision of a service was subject of discussion between the IYJS and the HSE, and that there was a plan to provide a unified multidisciplinary service for the campus as a whole, in accordance with recommended action 12 of the <i>Report of the Commission to Inquire Into Child Abuse 2009 Implementation Plan</i> . ³ IYJS developed a common policy on provision for the mental health and emotional needs of young people in detention in the schools, but at the time of the inspection each school had made its own arrangement. One of the school directors had central responsibility for the provision of programmes across campus. The schools' nurse, campus social worker and a consultant child psychiatrist were involved in the process, but there had been no final determination of the way in which the service would be delivered, at the time of the follow-up inspection. Since the inspection, inspectors have been informed that the HSE's new service Assessment Consultation and Therapy Service (ACTS) will provide an onsite service to the children detention schools that will include psychology, speech and language therapy and a substance misuse specialism, once it has recruited personnel. Inspectors were told by IYJS that a forensic child and adolescent psychiatric service is also planned which will provide an in-reach service as required. This recommendation will be fully met when the intended services are in place. Inspectors require evidence of the progress made in

³ Action 12 of the *Report of the Commission to Inquire into Child Abuse 2009 Implementation Plan* reads: "In consultation with the IYJS, the HSE will develop a national specialist multidisciplinary team for children in special care and children detention facilities."

					implementing this recommendation in the quarterly reports on compliance with inspection recommendations to be submitted to the Inspectorate following the publication of this report.
26	The Director and Board of Management of THS, in consultation with the IYJS, should review the school's non-smoking policy.	Health and Safety Group to further address this matter with the objective of achieving a smoke free workplace for all.	Board of Management Health and Safety Group Director	30 th June 2011	RECOMMENDATION PARTLY MET Inspectors were told that the review had been delegated to a deputy director, and that practice issues were being actively assessed. A small group had been set up to examine ways in which THS could assure itself that the policy was fully implemented and adhered to by everybody. It is scheduled to report back to management in September 2011. Practice will be assessed at the next inspection.
27	The IYJS should determine a policy on the requirement of the standard 9.9 that the school requires written confirmation of compliance with building control and fire safety regulations.	Policy is nearing completion and will issue to the schools.	Capital Section IYJS	January 2011	RECOMMENDATION NOT MET This recommendation has been made in two consecutive inspection reports. The IYJS was still considering its position on this recommendation at the time of the follow-up inspection. It was in liaison with the Office of Public Works and a contracted fire safety consultant to finalise a fire safety policy for the schools that would include the issue of complying with standard 9.9. Inspectors were told that since full compliance with building control and fire safety regulations would not be possible due to the nature of the buildings and their purpose, IYJS was considering an amendment to the standard. This recommendation will be fully met when the determination necessary has been made and clearly communicated to the Inspectorate. Inspectors require evidence of progress in the quarterly reports on compliance with inspection recommendations to be submitted to the Inspectorate following the publication of this report.
28	The Director and Board of Management of THS, in consultation with the IYJS, should establish a means whereby the offending behaviour programme can be formally evaluated and regularly monitored.	IYJS in collaboration with the Director with responsibility for Programmes to undertake a review and evaluation of the current Offending Behaviour Programmes.	Board of Management Child Welfare Advisor IYJS Director Offending Behaviour Coordinator Director with responsibility for Programmes	Ongoing	RECOMMENDATION NOT MET Inspectors were told that a proposal for an academic evaluation of the offending behaviour programmes on the campus had been proposed to IYJS, but there is no funding available for it. The Director of OGS has responsibility for the oversight of the programmes across the campus, and confirmed that there were considerable variations in how this standard is met. Inspectors found that the offending behaviour programme in THS needed further development in order to meet the standard. IYJS have advised inspectors that there are issues of resources in meeting this standard. However, inspectors are of the view that progress could be made in ensuring that the standard is equally well met in each school, and that internal systems of monitoring and evaluation should be developed. This is not an

					<p>optional standard. It is at the heart of the purpose of the schools to operate within the principles of rehabilitation and restorative justice. Inspectors require evidence of the progress made in implementing this recommendation in the quarterly reports on compliance with inspection recommendations to be submitted to the Inspectorate following the publication of this report.</p>
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