



OBERSTOWN BOYS' DETENTION SCHOOL

FOLLOW-UP INSPECTION

INSPECTION REPORT ID NUMBER: 454

Publication Date: 18th August 2011

Fieldwork Dates: 2nd-3rd March 2011

SSI Inspection Period: 13

Centre ID Number: 415

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 Kieran O'Connor, Co-Inspector, took place on 2nd and 3rd March 2011. The purpose of the inspection was to assess compliance with the action plan returned to the Inspectorate by the Oberstown Boy's School (OBS) in response to the recommendations of the report of the previous full inspection in 2010. That inspection report can be found on www.hiqa.ie (*Inspection ID 396*).

Findings

Inspectors found that of the 19 recommendations made in the report, 3 were fully implemented, 6 were partly implemented and 10 were not met. The recommendations that have yet to be met concern the following actions:

- OBS to reduce the use of single separation and ensure that in every instance practice conforms to standards (4)*
- The development of single separation guidelines by Irish Youth Justice Service (IYJS) in consultation with the Department of Children and Youth Affairs and the Health Service Executive (HSE) (5)*
- IYJS to arrange for key personnel to receive training in change management (7)
- Improvement of planning for and support after discharge by IYJS in liaison with the HSE and the probation service (8 & 9)*
- The Board of Management and Director of OBS to carry out an audit of all staff files to identify and remedy any deficiencies in vetting (12)*
- OBS to look at streamlining the system of recording (13)
- The Board of Management and Director of OBS, in consultation with IYJS to ensure that regular supervision is provided to staff (14)*
- The Board of Management and Director of OBS to arrange for a representative of the Fire Authority to visit the school annually in accordance with standard 9.10 (17)*
- 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 (18)*

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, and some of the recommendations have been well met. 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.

Inspectors also found that of the three schools OBS had undergone the most radical 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. OBS took in 26 new staff. This entailed the loss of a considerable cohort of experienced staff on temporary contracts; and a later change in the configuration of staffing followed the acceptance of a retirement package by 13 staff. As a consequence, recommendations concerning review of the deployment of staff and an audit of staff training were not fully met. Inspectors also 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.

Inspectors were concerned that some of the recommendations had resulted in no action, such as the recommendation on auditing staff files in order to ensure that the standard on vetting is met (12), and the recommendation on streamlining the recording system (13).

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 OBS, 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. 396

Name of Centre: Oberstown Boys' Detention School ID 415

Date Action Plan Dispatched:

22nd October 2010

Date of Follow-up Inspection:

4th March 2011

No.	Recommendation	Response	Person (s) Responsible	Implementation Date	SSI Comment
1	The Director and Board of Management of OBS in consultation with the IYJS should agree and approve the purpose and function and review yearly.	Director to raise this matter with the Chair of the Board of Management in December 2010.	Director	To be confirmed	<p>RECOMMENDATION PARTLY MET</p> <p>In interviews with the Director and staff inspectors were told that there had been an increase in the numbers of young people sent to OBS by the courts on remand for assessment. The consequence was that there was a greater throughput of remand cases, and committals were for longer periods than previously, with sentences ranging from 6 months to two years.</p> <p>The preparation of assessments for court was a new feature of the OBS purpose and function. At the time of the inspection, assessments were co-ordinated by one of the OBS unit managers, and the campus based social worker had a key role in all assessments.</p> <p>The psychologist who had been based on the campus retired, and while there were plans to fill the post, there were also discussions 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.</p> <p>To support the assessment function, the school bought in the services of two psychologists. It was explained to inspectors that the disadvantage of this arrangement was that they were unable to attend at case conferences.</p> <p>The recommendation will be fully met when the recommendations of a Public Appointments Commission report on the management of the detention school estate are implemented. This will require a statement of purpose and function that describes the particular role of OBS in the context of the combined management structure and its relationship with the other two detention schools. This will be assessed at the next inspection.</p>
2	The Director and Board of Management of OBS in consultation with the IJYS should develop a system for seeking parent's views on the religious upbringing of their son on admission to the school.	A letter sent to parents when their son is admitted to the school includes a question re. religious upbringing.	School Chaplain	Ongoing	<p>RECOMMENDATION MET</p> <p>The schools' Chaplain made contact with parents and ascertained their wishes in respect of the religious upbringing of their sons, and kept a record of their responses.</p>

3	The Director and Board of Management of OBS, in consultation with the IYJS, and staff representatives should agree on the implementation of the IYJS behaviour management policy.	The Director and Chairman of BOM are to meet with union/staff representatives to finalise implementation plans for the bespoke CPI programme.	Director Chairman, Board of Management	20 th December 2010	<p>RECOMMENDATION PARTLY MET</p> <p>At the time of the full inspection the Director of OBS wrote to the unions expressing concerns about safety issues that may arise from the delay in implementing the new behaviour management policy.</p> <p>The Board of Management was involved in discussions with the unions about implementation of the policy. 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.</p> <p>The Director told inspectors that there was a high level of consultation prior to the policy being implemented. The OBS Director affirmed that he had instructed staff that CPI is the OBS approved method of behaviour management and physical intervention. He also told inspectors that the incidence of injury leave was low, and there had been no injuries to children as a result of physical restraints.</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. This is unsatisfactory and unsafe, and impacts on staff's and children's safety. In examining the OBS records of restraints inspectors found that, in three instances, there was clear confusion about which intervention to use, and two of these resulted in injury to staff. In the second of these the member of staff went off duty on 'assault leave', which is a special arrangement the school has to ensure that staff who are on leave as a consequence of an assault do not lose their general leave entitlement. 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. It is imperative that there is no further delay in implementation and that to promote the safety of children and staff there is absolute clarity about what staff are expected to do in practice when challenging behaviours are presented. 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>
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4	<p>The Director and Board of Management of OBS 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. • ensure that in every instance practice reflects children's rights. 	<p>The Deputy Director will initiate a monthly review with unit managers to look at the use of separation: to attempt to reduce the use of separation; to establish and record compliance with standards and practice.</p>	Deputy Director	10 th December 2010	<p>RECOMMENDATION NOT MET</p> <p>OBS school had 'continued to examine' the use of single separation, but the use of it for refusal to go to school was still standard practice at the time of the follow-up inspection, even though the inspectorate had recommended that the practice cease as it is an inappropriate use of a measure specifically authorised in children detention units for the management of risk only. The use of separation for school refusal had been modified. A child who did not attend school was kept in his room until 4.00 p.m. rather than 5.00 p.m. This meant that he would be released from confinement at the time other children returned to the unit from school.</p> <p>There is much work to do to meet this recommendation. There should be absolute clarity that the legal authority to use single separation is for the management of risk, not the management of behaviour. The IYJS and the Board of Management should provide unequivocal guidelines and ensure that the incidence of the use of single separation is continuously and rigorously monitored so that practice is consistent in the three detention schools.</p> <p>The Inspectorate requires evidence of progress in meeting this recommendation in the quarterly reports to be submitted to the inspectorate following the publication of this report.</p>
5	<p>The IYJS, in consultation with Department of Health and Children and the HSE, should develop common practice guidelines for the use of single separation.</p>	<p>IYJS meeting with HSE on 8th December 2010 at which present policy and practice guidelines within the HSE will be discussed and will look to develop joint guidelines.</p>	Child Welfare Advisor, IYJS	<p>Initial Meeting 8th December 2010</p> <p>Working group to begin 24th January 2011</p>	<p>RECOMMENDATION NOT MET</p> <p>See the comments under recommendation 4 above.</p> <p>A campus-wide working group, made up of care and education staff, had been convened by the IYJS to discuss single separation and had met once prior to the follow-up inspection, but met four times since. A draft policy and procedure has been prepared and is to be submitted to the Board of Management for approval in Autumn 2011.</p> <p>One reason given for the slow progress in this area was the fact that the IYJS was participating in a consultative process with HIQA, which also involved representatives of the HSE, in the drawing up of new children's standards in which measures such as single separation were being considered. 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. They were particularly concerned that separation continued to be used in OBS for the routine management of challenging behaviour.</p> <p>This recommendation will be met when the agreed practice guidelines are issued. 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.</p>

6	The Director and Board of Management of OBS, in consultation with the IYJS, should develop the child protection, whistle-blowing and safeguarding policies and provide training to staff, in particular training in Children First for the DCPO.	<p>The draft Safeguarding Policy, prepared by the working group to go for approval to Board meeting on 16th December 2010. Whistle-blowing policy to be part of this.</p> <p>Training for DCPO with HSE staff to take place in December 2010.</p>	Child Welfare Advisor, IYJS	<p>DCPO Training December 2010</p> <p>Safeguarding Policy January 2011</p>	<p>RECOMMENDATION PARTLY MET</p> <p>This recommendation was mostly met. Inspectors were provided with a copy of the draft IYJS policy on safeguarding which included child protection and whistle-blowing. 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 as 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 recommendation, training in <i>Children First National Guidelines for the Protection and Welfare of Children</i> had been accessed for the DCPO in OBS, the Directors, Chairman of the Board of Managers and Designated Child Protection Officers from the other two schools. 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. This last part of the recommendation will be assessed fully at the next inspection.</p>
7	The IYJS should arrange for key personnel in OBS to receive training in change management.	The Public Appointments Service (PAS) are concluding a management review. Following this, Change Management requirements will be determined.	Child Welfare Advisor, IYJS Chairman, Board of Management	Draft Report due end of November 2010	<p>RECOMMENDATION NOT MET</p> <p>Inspectors have made this recommendation in each of the school's inspection reports in two consecutive years. In that time considerable changes had taken place. One of the four detention schools closed in March 2010. All the temporary staff on the Oberstown campus were laid off, and in the case of OBS, there was a significant influx of new staff. Subsequently, some staff took the opportunity to accept a retirement package and resign their posts. There have been industrial relations negotiations since, and further change is envisaged as the three schools move to operating as an integrated service. See further comments on staffing changes under recommendation 10 below.</p> <p>Inspectors reiterate this recommendation, and urge the IYJS and Board of Management to ensure that this training is provided to school directors and unit managers as a matter of priority. 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.</p>

8	The IYJS should enter into discussion with the HSE and probation service about the continuity of support for young people in preparation for and after their leaving the school.	Topic has been raised at the Oversight Group Meeting chaired by the OMCYA. Group consists of representatives from IYJS, HSE, Probation, and Education. Quarterly meetings held – additional meeting planned to deal with Aftercare.	Child Welfare Advisor, IYJS	Next meeting 14 th December 2010 Between 6 and 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, and IYJS is represented on the HSE's Aftercare Implementation Group, which met for the first time on 4 th August 2011. Inspectors reiterate the recommendation in full, and urge all three 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.
9	IYJS should undertake a lead role in the development of a national strategy of aftercare to attain high levels of co-operation and engagement with local services.	As above	Child Welfare Advisor, IYJS	Next meeting 14 th December 2010 6 to 9 months	RECOMMENDATION NOT MET See comments under recommendation 8 above.
10	The Director and Board of Management of OBS in consultation with the IYJS should continue to review the deployment of staff considering the evolving number of staff available and the reconfiguration of the Oberstown campus.	Process in place. Proposals regarding central allocations office for the deployment of all staff approved by the Board of Management.	Director	May 2011	RECOMMENDATION PARTLY MET Inspectors have made this recommendation in each of the school's inspection reports in two consecutive years. In that time considerable change had taken place. There was an influx of 26 staff as a consequence of the closure of Finglas Child and Adolescent Centre (FCAC) on 31 st March 2010. A redundancy package was offered to staff in order to reduce the overall numbers on the campus. Thirteen of the 26 in OBS took the package. There is much to do to meet this recommendation fully. However, there is a comprehensive programme in place that includes such features as mobility – meaning the facility for staff to be deployed across the campus in any of the three schools as need arises. There have been problems with rosters since there are minor, but significant, differences between the OBS roster and that used in FCAC. This was a problem at the time of the full inspection, and had yet to be resolved at the time of the follow-up. Inspectors were provided with a copy of the campus-wide staffing proposal dated November 2010. Part of the proposal was that all staff employed on the campus be employed by the one Board of Management and may be

					assigned from time to time to work as part of a multidisciplinary team in any one of the three schools. The Director of OBS has been given responsibility for the management of cross-campus operations and, when the system is working fully, will direct staff resources in line with service needs. Inspectors acknowledge that this process involves careful negotiation and 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.
11	The Director and Board of Management of OBS, in consultation with the IYJS, undertake an audit of training required by staff and develop a training schedule and prioritise the training needs of staff.	A Training Needs/Skills Analysis template has been designed and issued to the three schools. The information to be collated through each school and fed into a single data base within the IYJS.	Child Welfare Advisor, IYJS	Data collection: 28 th January 2011 Data Base: 25 th February 2011 Training Schedule: March 2011	RECOMMENDATION MET There had not been a systematic audit of training needs since the full inspection, but it was intended that IYJS would carry out an audit. Since the inspection IYJS has told inspectors that the Training Needs audit has been completed and the areas of priority have been identified. Training scheduled to commence in September 2011 included: CPI refresher training, first-aid training, manual handling training, and 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. It was planned that regular meetings of staff would be used to provide regular training in court procedures, safeguarding and team-building. This would follow a model already in practice in one of the other detention schools. Inspectors found that the Directors, Chairman of the Board of Mangers and Designated Child Protection Officers from the three schools had all received training in <i>Children First: National Guidelines for the Protection and Welfare of Children</i> . 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. There had been no training on the rights of children in detention. 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.
12	The Director and Board of Management of OBS in consultation with the IYJS should ensure that an audit is undertaken of all staff files and actions taken to address any	The director to write to the IYJS to seek updated Garda clearance on all staff. Director to initiate	Director	Begin December 2010	RECOMMENDATION NOT MET The fact that this recommendation has not been met is a serious deficiency in terms of compliance with standards. At the time of this inspection, inspectors were told that an audit of staff files still needed to be done. They also examined a sample of 10 files, and found that there was no copy of a Garda check on 9 of them.

	deficiencies identified.	implementation of the new Vetting Policy.			<p>Two had letters from the Department of Education indicating that a check had been received. Two had the completed Garda clearance application forms, but there was no evidence of a response. Three of the files had no references, and where there were references some were internal references from current line managers. Some of the files checked were of people in managerial positions in the school. The lead inspector brought this unsatisfactory situation to the attention of the Chair of the Board of Management.</p> <p>In July 2010 the IYJS issued a document entitled Draft 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.</p> <p>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.</p> <p>Inspectors urge the Board of Management and IYJS to give the implementation of this recommendation priority. They 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.</p>
13	The Director and Board of Management of OBS in consultation with the IYJS should ensure that the record-keeping system is reviewed and changed so as to streamline the information on files and facilitating access to information	All files have been archived as per instructions from the IYJS. Secure storage currently a work in progress.	Deputy Director OBS Administration Officer	January 2011	<p>RECOMMENDATION NOT MET</p> <p>This recommendation arose from the full inspection whereby inspectors found that information held in children's files was detailed, but records were duplicated in many cases and information was difficult to locate owing to the volume of information. They recommended a change in the recording system to streamline the information and improve access to it. Inspectors found that the revision of the recording system envisaged in the recommendation did not take place. The files maintained the same</p>

	as required.				structure, and some information remained difficult to track. 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.
14	The Director and Board of Management of OBS, in consultation with the IYJS, should ensure that the school policy on supervision is adhered to and that the Director monitor that supervision is provided on a regular basis to staff in the school.	Cross-campus integrated Policy on Supervision to be drafted and implemented. A working group made up of 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 NOT MET</p> <p>Inspectors were given reasons why this recommendation had not been 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. This project was being led by the Director of OGS as part of her cross-campus remit. 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 found that in OBS there was no coherent system. There had been some supervision, and inspectors were provided with dates, but they were sporadic and the system was not adequately monitored by managers. For example, a group of six staff had received one formal supervision session between July 2010 and March 2011. One Unit Manager met with groups of staff every four weeks. This was described as group supervision.</p> <p>One Unit Manager described the main issue arising in supervision sessions as the anxiety stemming from the uncertainty regarding the integration process and movement of staff. This is understandable, but the purpose of supervision is to focus on the key areas of professional development and provide a platform for individual accountability. Inspectors were of the view that some work is required to change the culture of OBS in respect of supervision, and that there is a pressing need for the IYJS to provide a lead in policy with an expectation that policy will be fully realised in practice.</p> <p>Inspectors were of the view that some work is required to change OBS practice in respect of supervision, and that there is a pressing need for the IYJS to provide a lead in policy with an expectation that policy will be fully realised in practice. This recommendation will be fully met when the IYJS approved model of supervision is being used in practice in OBS.</p>

					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.
15	The Director and Board of Management of OBS, in consultation with the IYJS, should access adolescent psychiatric services for young people as required.	HSE – Mental Health have been requested to provide a service to IYJS (CDS) and this to be followed up at the next meeting. A business plan has been received.	Child Welfare Advisor, IYJS	Meeting HSE 8 th December 2010	<p>RECOMMENDATION PARTLY MET</p> <p>For the purpose of assessment, and particularly for forensic assessments and reports, OBS had an arrangement to access privately the service of an Adult Psychiatrist who has had a long association with the detention school system. However, there was no child and adolescent psychiatric service in OBS.</p> <p>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>.¹</p> <p>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.</p> <p>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.</p> <p>This recommendation will be fully met when the intended services are in place. 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>
16	The Director and Board of Management of OBS should ensure that there are regular fire drills and that appropriate levels of fire safety training are	On-going drills taking place.	OBS Safety Officer		<p>RECOMMENDATION PARTLY MET</p> <p>Inspectors found that fire drills had taken place, but there were deficiencies in fire safety training.</p>

¹ Recommendation 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."

	maintained for all staff.				
17	The Director and Board of Management of OBS in consultation with the IYJS should arrange for a representative from the fire authority to visit the school annually.	Letter to be issued.	OBS Safety Officer OBS Maintenance Officer	3 rd December 2010	RECOMMENDATION NOT MET The inspectors were informed that a written request had been made to the Fire Authority to visit the school as per the standard. At the time of the inspection a visit had not taken place. OBS managers and staff were of the view that IYJS should provide clear guidelines about this standard, a view inspectors concur with. The Board of Management has a responsibility for the safety of staff and children in OBS, and should liaise with IYJS to ensure that there is single agreed approach to meeting the standard. 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.
18	The IYJS should determine a policy on the requirements 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 be issued 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. The action plan indicated that this was included in discussion with HIQA about new Children's Standards. Since the inspection, inspectors have been informed that IYJS 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 also 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.
19	The IYJS should ensure that the completed audit undertaken by the State Claims Agency is issued to the Inspectorate without delay.	Gap Analysis completed. Peer review mechanism developed.	Capital Section IYJS	December 2011	RECOMMENDATION MET The Inspectorate was provided with a copy of the audit report at the time of the inspection.