



OBERSTOWN GIRLS' DETENTION SCHOOL

FOLLOW-UP INSPECTION

INSPECTION REPORT ID NUMBER: 455

Fieldwork dates: 4th March 2011

Publication Date: 18th August 2011

SSI Inspection Period: 13

Centre ID Number: 416

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 Bronagh Gibson, Co-Inspector, took place on 4th March 2011. The purpose of the inspection was to assess compliance with the action plan returned to the Inspectorate by the Oberstown Girl's School (OGS) 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 397*).

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:

- OGS 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 the Irish Youth Justice Service (IYJS) in consultation with the Department of Children and Youth Affairs and the HSE (6)*
- OGS to develop a campus-wide complaints procedure (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 of OGS, in consultation with IYJS to ensure that regular supervision is provided to staff (19)*
- The board of management and director of OGS to develop policy and procedures for the care of pregnant young women (22)
- 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 (25)*
- OGS 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, 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, protocol with HSE social workers, Garda vetting, notification of significant events, assessment, complaints, and the management of behaviour.

At the time of the inspection, all three schools on the campus were undergoing significant changes as a consequence of the closure of Finglas Child and Adolescent Centre (FCAC) and the redeployment of the FCAC staff on the Oberstown campus. Inspectors acknowledge that some recommendations require further time to be met fully, in particular the introduction of a supervision model (19), 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. However, in focussing on the whole range of recommendations, inspectors note, in particular, that two thirds 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 OGS, 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. 397

Name of Centre: Oberstown Girls Detention School ID 416

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 OGS should revise the statement and purpose of function in consultation with the IYJS, to reflect legislative changes.	Revise Statement	Director	Revised	RECOMMENDATION MET The statement had been revised, and inspectors were provided with a copy. As with the other two schools, the preparation of assessments for court was a new feature of the OGS purpose and function. The psychologist who had been based on the campus retired, and while there were plans to fill the post, but 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. The recommendations of a Public Appointments Commission report on the management of the detention school estate will mean that the statement will change yet again in the near future. This will be assessed at the next inspection.
2	The Director and Board of Management of OGS, in consultation with the IYJS, should ensure that the review of the Young Women's and Parents guide reflects rights that are in standards such as consultation, independent advocacy, and access to records.	Update guides	Unit Manager	30 th January 2011	RECOMMENDATION MET Copies of the guides were provided to inspectors. The OGS Director had been in contact with the Ombudsman for Children's Office with a view to a member of that office visiting the school to make direct contact with the young women detained there.
3	The Director of OGS should consider ways of increasing opportunities for exercise and recreation inside and outside the units, and of encouraging the young women to make better use of the facilities and open space already available.	Review activities and recreation programme	Unit Managers	January 2011	RECOMMENDATION PARTLY MET The managers and staff of OGS stated that there had been a significant increase in the opportunities for exercise, and that they are exploring other means of exercise within the confines of the school. Inspectors found that a programme of activity was introduced since the full inspection. It included regular opportunities for young women to go out into the community for swimming lessons. The gymnasium on the premises was used more, but there was a difficulty in that the school's insurer required use of the gymnasium to be supervised by a trained instructor. OGS await clarification on how this might be resolved. To be assessed further at the next inspection.

4	<p>The Director and Board of Management of OGS, in consultation with IYJS should:</p> <ol style="list-style-type: none"> 1. Review its policy on care and control, 2. Revise its system for managing behaviour, 3. Review the use of physical restraint and single separation, 4. Develop a policy and practice on the management of risk, 5. Develop practice that emphasises the distinction between the management of behaviour and the management of risk. 	<p>The Director and Chairman, Board of Management are to meet with union/staff representatives to finalise implementation plans for the bespoke CPI programme.</p>	<p>Director Chairman, Board of Management</p>	<p>13th December 211</p>	<p>RECOMMENDATION PARTLY MET</p> <p>At the time of the inspection the Board of Management was involved in discussions with the unions about implementation of the policy. 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.</p> <p>The IYJS, Board of Management and Director of OGS were concerned about the delay in the implementation of CPI. 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. The Director confirmed that there had been a high level of consultation prior to the policy being implemented, and that OGS staff had been instructed that CPI is the approved method of behaviour management and physical intervention. In the meantime, refresher training in CPI has been provided to staff.</p> <p>The Inspectorate requires evidence of progress in fully meeting this recommendation in the quarterly reports to be submitted to the Authority following the publication of this report.</p>
5	<p>As a matter of priority, the Director and Board of Management of OGS should:</p> <ul style="list-style-type: none"> • Review the use of single separation, • Reduce its frequency and duration, • Record all instances of separation (including those imposed for staff meeting purposes) • Ensure that in every instance it conforms to the standards, and • Ensure that practice reflects the principles of children's rights. 	<p>Review use of single separation and implement strategy for reducing time spent in bedrooms. Continue to record all instances of separation.</p>	<p>Director</p>	<p>Ongoing</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. In OGS there was a high 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. Although the Directors told them that they had altered the programmes to reduce the time spent in</p>

					<p>bedrooms, inspectors remain concerned, as they were in the full inspection, that the behaviour management system in use in the school entails the routine use of single separation. They were also concerned that the overall incidence of its use had risen.</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 IYJS should enter into discussion with Department of Health and Children and the HSE, with a view to developing a common policy for the use of single separation where young women can be legally detained.	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 to begin 24 th January 2011	<p>RECOMMENDATION NOT MET</p> <p>See the comments under recommendation 5 above.</p>
7	The Director of OGS should ensure that the IYJS and the Board of Management is routinely informed of the use of all extreme measures of control, including physical restraint, single separation and personal searches.	Continue to inform IYJS and Board of Management of all extreme measures of control, physical restraint and single separation and add personal searches to the reporting list.	Director	December 2010	<p>RECOMMENDATION MET</p> <p>A system has been put in place to report on the number of episodes of use of single separation, physical restraints and personal searches to the Board of Management on a monthly basis. The IYJS, which has a representative on the Board, receives a copy of the same report.</p>
8	The IYJS should review the school's child protection policy, liaise with the HSE to develop protocols for notification of child protection concerns, and ensure that a competent external element is involved in the process.	The draft Safeguarding Policy, prepared by the working group to go for sign-off to Board meeting on Dec. 16, 2010. Whistle-blowing policy to be part of this. Training for DCPO with HSE	Child Welfare Advisor, IYJS	January 2011	<p>RECOMMENDATION MET</p> <p>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 in the IYJS policy on safeguarding 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).</p>

		staff to take place in Dec. 2010.			
9	The Director and Board of Management of OGS, in consultation with IYJS, should develop practice guidelines for staff on safeguarding.	Practice guidelines to be included in revised safeguarding policy.	Child Protection Officer	January 2011	RECOMMENDATION MET Inspectors were provided with a copy of the IYJS policy on safeguarding approved by the Board of Management in December 2010. 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.
10	The IYJS, in consultation with the Director and Board of Management of OGS, should review the whistle-blowing policy and ensure that staff members have sufficient confidence in it for it to fulfil its purpose of protecting young people.	See 8 above	Child Welfare Advisor, IYJS	January 2011	RECOMMENDATION PARTLY MET Inspectors were provided with a copy of the draft IYJS policy on safeguarding which included child protection and whistle-blowing. From interviews with managers and staff it was clear to inspectors that whistle-blowing policy and procedures are still not known to staff. There is some work to do to ensure that staff understand the nature of whistle-blowing and have confidence in the measures taken to ensure that child protection or safety concerns can be safely brought to the attention of managers of the service. Since the inspection, inspectors have been informed that a whistle-blowing policy has been drafted and will be presented to the Board of Management for approval in Autumn 2011. This will be fully assessed at the next inspection.
11	The IYJS should liaise with HSE to develop protocols for sharing information about risk and child protection concerns.	To be discussed with HSE at upcoming meeting. Initial work has been done on this.	Child Welfare Advisor, IYJS	8 th December 2010. (initial plan)	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 young women in care. Inspectors were provided with a comprehensive 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> . ¹ Inspectors were informed that the draft has been issued to HSE principal social workers for consultation. Directors of OGS reported a greater involvement of social workers in the cases of young women who are in care, but there are still some shortfalls in the sharing of information. Inspectors acknowledge that the changes necessary to facilitate this process will take time. They require evidence of progress in meeting this

¹ 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".

					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.
12	The Director and Board of Management of OGS, in consultation with the IYJS, should carry out a review of practice in children's rights to ensure that staff are able to promote their facilitation.	Conduct a review of practice in children's rights	Director	February 2011	<p>RECOMMENDATION PARTLY MET</p> <p>See comments under recommendation 2 above.</p> <p>This recommendation was mostly met. A review of practice had taken place. Handbooks explaining children's rights have been developed by OGS. EPIC (Empowering People in Care) formerly the Irish Association of Young People in Care (IAYPIC)² had visited the school once, and an officer of the Ombudsman for Children had been invited. One of the unit managers was liaising with EPIC. To meet the recommendation fully OGS should ensure that staff are knowledgeable and confident in the promotion and facilitation of children's rights. Inspectors require evidence of progress in meeting this recommendation fully 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.</p>
13	The Director and Board of Management of OGS should make arrangements for an independent advocacy service to be available to all young women.	IYJS have put forward a proposal to EPIC 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> which exists with EPIC.	Child Welfare Advisor, IYJS	November 2010	<p>RECOMMENDATION PARTLY MET</p> <p>See comments under recommendation 12 above.</p> <p>At the time of the inspection IYJS was in the process of discussion with EPIC regarding the future provision of an advocacy programme across the campus. Inspectors were provided with a comprehensive draft IYJS policy on the objectives and definition of the role of independent advocates. OGS had set up an interim arrangement with EPIC pending a more comprehensive service plan. It was acknowledged that the three schools were at different stages in terms of meeting this standard, and there was still much to do in OGS. The Director of OGS has cross-campus responsibility for programmes, and advocacy is within this remit.</p> <p>Inspectors require evidence of progress in meeting this recommendation fully 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.</p>
14	The Director and Board of Management of OGS, in consultation with the IYJS, should develop a campus-wide complaints procedure that applies	In consultation with IYJS, develop campus-wide complaints procedure	Director	March 2011	<p>RECOMMENDATION NOT MET</p> <p>The Director of OGS was assigned by the Chairman of the Board of Management the task of developing a common policy on complaints for the three schools. The Director does not have a remit for the teaching staff who are in the two on-site education facilities. To meet this</p>

² From 17th June 2011 IAYPIC has changed its name to EPIC (Empowering People in Care)

	to all services provided on-site.				<p>recommendation the working group has to include Dublin Vocational Education Council (VEC) as the agency with oversight of the schools' educational provision. Inspectors were assured by IYJS that the Child Welfare Advisor has been in contact with a representative of Dublin VEC about the development of the policy. The policy on complaints should make a distinction between expressions of dissatisfaction with the service and allegations of abuse. Inspectors require a copy of the policy and procedure once it is completed.</p> <p>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.</p>
15	The Director and Board of Management of OGS should ensure that young women's right to view their records is communicated to all young women upon admission and promoted throughout their stay.	Ensure that young women are advised of their right to access to records.	Unit Manager, OGS	February 2011	<p>RECOMMENDATION PARTLY MET See comments under recommendation 12 above.</p> <p>Some of the young women in OGS at the time of the inspection had seen their file. Inspectors were of the view that there was more work to do to ensure that all young women in the school are fully aware of this right and it is regularly exercised. This is particularly important given the age of the majority of young women detained in the school.</p> <p>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.</p>
16	The Director and Board of Management of OGS, in consultation with the IYJS, should develop further its preparation for leaving and aftercare procedures and practice guidelines, and IYJS should enter into discussion with the HSE and probation service about the continuity of support for young women in preparation for and after their leaving OGS.	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	<p>Next meeting 14th December 2010.</p> <p>6 to 9 months.</p>	<p>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 4th August 2011.</p> <p>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.</p>

17	The Director and Board of Management, in consultation with the IYJS, should determine how it is to remedy the deficiencies in vetting, ensuring all staff have Garda clearance.	Director to initiate implementation of the new Vetting Policy.	Board of Management Director	Begin December 2010	<p>RECOMMENDATION PARTLY MET</p> <p>In the course of the inspection inspectors examined a sample of 18 personnel files and found evidence that the Director had checked some of the files and was in the process of updating information in them. On 17 of the files there were letters from either the Department of Education or the IYJS confirming that Garda checks were satisfactory. Some of these dated back many years. One of the files did not have a letter of confirmation nor any other evidence of Garda clearance. Inspectors found that there was no policy of renewal of checks at the time when a member of staff is promoted to a higher post. This applied to managers currently in post.</p> <p>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. It will be reviewed in due course in the light of the upcoming Vetting Bureau Bill.</p> <p>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 full 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>
18	The Board of Management should finalise the statement defining the role of the Board, ensuring it includes its responsibilities, authority, monitoring function in	Director will liaise with the Chairperson of the Board of Management	Chairperson, Board of Management	Subject to Board of Management	<p>RECOMMENDATION PARTLY MET</p> <p>At the time of the inspection a draft statement had been prepared. This has yet to be provided to inspectors.</p>

	accordance with standard 6.9, and including the lines of accountability of the Directors and the board's relationship with the IYJS. The Board of management should give priority to arranging visits to the school in accordance with the recommendation of the 2009 inspection.	regarding these issues.			
19	The IYJS should develop further its policy on supervision and ensure that it is properly implemented and that appropriate records are maintained.	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 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.</p> <p>Inspectors found that in OGS there had been some supervision but it was sporadic. This recommendation will be fully met when the IYJS approved model of supervision is being used in practice in OGS. 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 were of the view that some work is required to change OGS 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. 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.</p>

20	<p>The Director and Board of Management of OGS, in consultation with the IYJS, should draw up a comprehensive programme of training for staff that includes:</p> <ol style="list-style-type: none"> 1. Training in the rights of children in detention for care staff. 2. Training for the Chair of the Board of Management, the Director, deputy director and unit managers in change management; 3. Training in <i>Children First: Guidelines on the Welfare and Protection of Children</i> for the Designated Child Protection Officer (DCPO) and unit managers; 4. Training in health and safety for the unit manager with overall responsibility for health and safety, the maintenance officer, and the staff health and safety representatives; 5. Training in fire safety for those staff who have not received it. 	<ol style="list-style-type: none"> 1. Part of the re-submission to EPIC 2. The Public Appointments Service (PAS) are concluding a management review. Following this, Change Management requirements will be determined. 3. Training for DCPO with HSE staff to take place in Dec. 2010 4. Refresher training for health & safety & maintenance officers will be arranged. 5. Fire training to be arranged. 	<ol style="list-style-type: none"> 1. Child Welfare Advisor IYJS 2. Child Welfare Advisor IYJS Chairman of the Board of Management 3. Child Welfare Advisor IYJS 4. Director 5. Director 	<ol style="list-style-type: none"> 1. November 2010 (re-submitted to EPIC) 2. Draft Report due end of November 2010. 3. December 2010 4. March 2011 	<p>RECOMMENDATION PARTLY MET</p> <p>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.</p> <p>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>The training of the OGS Health and Safety Officer was out of date and she required refresher training. Training in health and safety for the maintenance officer and staff health and safety representative had yet to be provided. Inspectors were told that fire safety training is ongoing, but they found that seven of the staff had still not received training in fire safety, and a further seven were last trained more than two years ago; and although several were First Aid trained in the past, none had up-to-date training.</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> <p>Inspectors urge the Board of Management and IYJS to give the full implementation of this recommendation priority. They require evidence of progress in meeting this recommendation fully 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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21	The IYJS, in its review of the provision for the emotional and mental health needs of the young women, should develop with the HSE continuity of mental health services for the young women detained in OGS.	<ul style="list-style-type: none"> • Mental Health Review complete • Working with the HSE – it is being addressed as part of the Ryan Implementation Plan. 	Child Welfare Advisor, IYJS	<p>Meeting 8th December 2010</p> <p>On-going.</p>	<p>RECOMMENDATION PARTLY MET</p> <p>For the purpose of assessment, OGS had an arrangement to access privately the service of a Senior Child and Adolescent Psychiatric Consultant.</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>.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.</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>
22	The Director and Board of Management of OGS, in conjunction with the IYJS should develop policy and procedures for the care of pregnant young	In consultation with IYJS, develop a policy and procedures for the care of pregnant	Director in consultation with the Child Welfare Advisor, IYJS	February, 2011	<p>RECOMMENDATION NOT MET</p> <p>Inspectors were provided with a draft document of a proposal put forward to IYJS by OGS in response to this recommendation. The matter had not progressed at the time of the inspection. There were two issues - one being the care and management of a young woman who is pregnant while</p>

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."

	women, including risk assessment procedures.	young women including risk assessment procedures.			detained in OGS, and the other provision for the baby if born before the end of the period of detention. The Directors of OGS told inspectors that they consider this a priority and have asked for a meeting with IYJS to develop the policy further. Inspectors urge IYJS to proceed with the development of a clear policy to support all those in OGS who have to provide care for detained pregnant young women from time to time. 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.
23	The IYJS should determine the frequency of equipment checks and the Director and Board of Management of OGS should implement the agreed policy.	Equipment checks are pertinent to the individual school and part of the schools Health & Safety.	Director	Ongoing	RECOMMENDATION PARTLY MET The agreed policy had yet to be formulated at the time of the inspection. However, inspectors found from records that OGS fire safety equipment had been checked in February and October 2010. Inspectors were told that since the inspection a review of this requirement, in conjunction with State Claims Agency, was almost complete. Inspectors require confirmation that this recommendation is fully implemented as soon as possible following the publication of this report.
24	The Director and Board of Management of OGS, in conjunction with the IYJS should ensure that fire safety drills are carried out regularly in accordance with the recommendation of 2004 report.	Fire drills to be conducted on a quarterly basis and fire evacuation drills on a monthly basis.	Maintenance Officer in consultation with Unit Manager	Ongoing	RECOMMENDATION MET Inspectors were provided with records of two fire drills held since the inspection in May 2010 and February 2011. At the time of this inspection there had yet to be a determination as to the frequency of fire drills in OGS.
25	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 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. 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.

26	The Director and Board of Management of OGS, in consultation with IYJS should arrange for the addition to the Health and Safety statement of a list of signatures confirming that all staff have read it.	Ensure all staff read and sign the document.	Unit Manager	January 2011	RECOMMENDATION MET Inspectors were provided with documentary evidence that this recommendation had been met.
27	The Director and Board of Management of OGS, in consultation with the IYJS, should ensure that the recommendations of the safety officer are implemented.	In consultation with IYJS and local maintenance officer ensure recommendations are implemented.	Deputy Director, and Maintenance Officer	Ongoing	RECOMMENDATION PARTLY MET The issues with heating and ventilation in the young women's rooms, which have been brought to the attention of the Board of Management over a considerable period of time, persist. They are integral to the design and structure of the building. Inspectors were told of the measures taken to address the problems, including accessing expertise from the Office of Public Works and specialist contractors, in order to remedy the faults. However, at the time of the inspection the problems had still to be solved. The Health and Safety Officer told inspectors that other matters brought to the attention of management received a good response. 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.
28	The Director and Board of Management of OGS, in consultation with the IYJS, should establish a means whereby the offending behaviour programme can be formally evaluated and regularly monitored.	Apply to IYJS for funding for research project to evaluate the effectiveness of offending behaviour programme.	Director	December 2010	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. IYJS 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 optional standard. It is at the heart of the purpose of the schools to operate within the principles of rehabilitation and restorative justice. The programme in use in OGS, as with the OBS programme, had its own validation processes. There is a need for means to monitor its implementation, assess its suitability for some individual children as necessary, and determine whether it conforms with the standards and the rehabilitative principles on which they are based. 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. There are challenges, such as the time of delivery of the programmes, (they entail being absent from the classroom

					<p>for a period of time), and the involvement of groups as opposed to individual work.</p> <p>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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