



**Health
Information
and Quality
Authority**

An tÚdarás Um Fhaisnéis
agus Cáilíocht Sláinte

**Social Services
Inspectorate**

OBERSTOWN GIRLS' DETENTION SCHOOL

INSPECTION REPORT ID NUMBER: 397

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4. Findings

5. Summary of recommendations

Name of Detention School	Oberstown Girl's School (OGS)
Dates of Inspection	2 nd – 4 th June 2010
Authority to Inspect	The Health Information and Quality Authority (HIQA) Social Services Inspectorate (SSI) carry out inspections of Children's Detention Schools under Section 185 of the Children Act 2001 as amended by the Criminal Justice Act 2006.
Inspectors	Orla Murphy (Lead Inspector) Michael McNamara (Co-Inspector)
Purpose and Function	OGS accepts up to eight girls aged between 10 and 18 on admission ¹ who are convicted for criminal offences. ² It is designated to remand young women in custody, ³ and to carry out assessments for the court. It also accommodated young women in respect of whom the court had postponed a decision.
Number of places: Original Certificate	A maximum of 12 places ⁴
Certificate at time of inspection	8 (8 on committal, 0 on remand)
Occupancy on Inspection	5 (5 on committal)
Age range	10 - 18 years
Accommodation	OGS was run by the Department of Education and Science (DoES) from 1990 until March 2007 when it transferred to the Department of Justice, Equality and Law Reform (DJELR) under the Children Act 2001. OGS is funded by the DJELR and managed by an executive board of management. It is one of three establishments that provide a residential service to the courts for young offenders, and is the only one that detains girls. At the time of inspection remand and committal cases were accommodated together. OGS consists of three independent buildings on a campus shared with two other detention schools. It is situated in a rural setting and surrounded by a security fence. The only accommodation in use at the time of the inspection, Cuan Beag, was a single-storey purpose-built six-bedded secure unit with an integrated outdoor recreational space and a gymnasium.

¹ Under section 196 of the Children Act 2001, as amended.

² Under section 88 of the Children Act 2001, as amended.

³ Under section 142 of the Children Act 2001, as amended.

⁴ Under section 195 of the Children Act 2001, as amended.

Management and Staffing

OGS is managed by a board of management appointed by the Minister for Justice, Equality and Law Reform. The board of management is responsible for the direct governance of OGS and the other two schools that share the campus but overall responsibility for policy and funding rests with the Irish Youth Justice Service (IYJS) an operational arm of the DJELR. It is also responsible for the selection, vetting, appointment and dismissal of staff subject to the Minister’s approval, financial management and control, the maintenance and upkeep of the premises, furniture and equipment, and the provision of an annual report on the operation of the school and such other reports, statistics and information as the Minister may require.

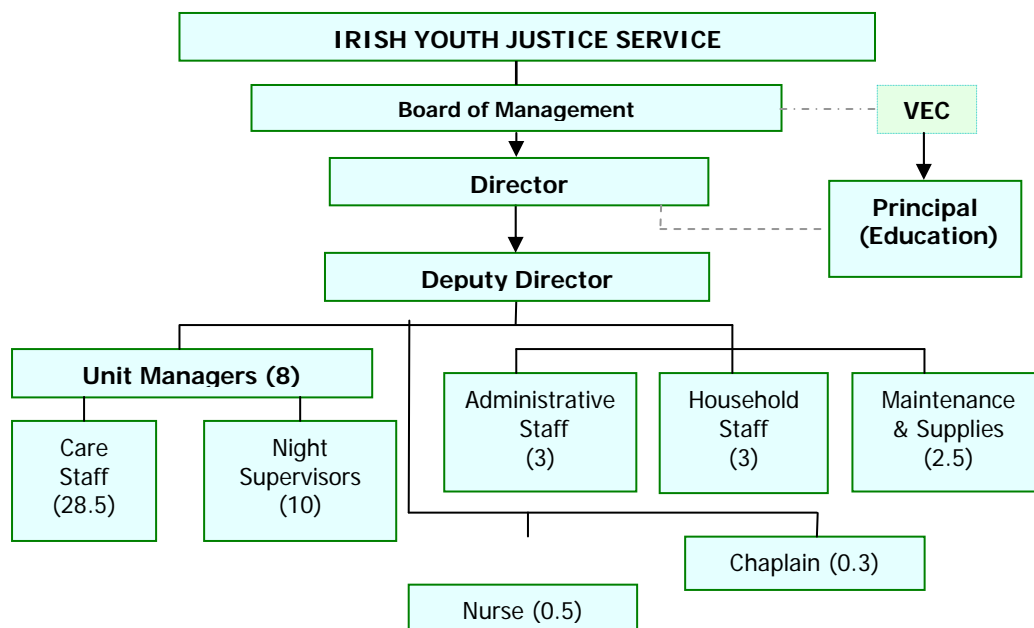
The overall operational responsibility for the day-to-day management of the school rests with the director, supported by a deputy director. The director attends board meetings, as a non-voting member, along with the directors of the other two detention schools on the campus. A representative of the IYJS also attended. Prior to the inspection, the chair person had resigned and during the inspection a new chairperson was appointed by the Minister.

At the time of inspection, the school employed 57 staff in 54.8 posts:

- | | |
|----------------------------------|--------------------------------------|
| 1 Director, | 1 Deputy Director, |
| 28.5 child care workers, | 10 Night Supervisors (in 8.5 posts), |
| 7 Unit Managers (in 6 posts) | 1 Night Unit Manager, |
| 3 household staff (in 2.6 posts) | 1 maintenance officer |
| | 1 assistant maintenance officer,, |
| 1 supplies officer (part-time), | 1 Chaplain (covering 3 schools), |
| 1 Nurse (covering 3 schools), | 3 Administrative staff (in 2 posts). |

As a result of the closure of the Finglas Child and Adolescent Centre (FCAC), 14 Staff transferred to the Oberstown girl’s school in March 2010.

Management Structure of OGS, June 2010



<p style="text-align: center;">Overall responsibility</p>	<p>The overall operational responsibility for the day-to-day management of the school rests with the director, supported by a deputy director. The director attends board meetings, as a non-voting member, along with the directors of the other two detention schools on the campus. A representative of the IYJS also attended.</p>
<p style="text-align: center;">Methodology</p>	<p>The inspection was carried out using the <i>Standards and Criteria for Children Detention Schools</i>, issued by the DoES in November 2004 and adopted in November 2008 by the IYJS.</p> <p>Although the term 'school' is used in this report, the inspection examined the residential care provided only. The school was previously inspected by the Health Information and Quality Authority, Social Services Inspectorate in January 2009 and follow up inspection in July 2009. These reports can be accessed through the Inspectorate's website www.hiqa.ie, (inspection report numbers 282 and 386). Prior to this, OBS was inspected in 2006 by inspectors commissioned by the DoES. In this report reference is made to the recommendations of the 2009 inspections only.⁵ Inspectors' judgements are based on evidence verified from several sources gathered through direct observation, an inspection of accommodation, and interviews with the director, the deputy director, three unit managers, the health and safety representative, four social care workers, the school's nurse, the chaplain and four young women. Telephone interviews also took place with three probation officers, a psychologist, one social worker and two parents. All facilities in Cuan Beag (the residential unit) were inspected and documentation including the following:</p> <ul style="list-style-type: none"> • The school's statement of purpose and function, policies and procedures, • Information for parents and young women, • A health and safety statement, • Health and safety assessments, • Board of Management terms of reference (draft) • The young women's care files, • Administrative records and staff personnel records, • Details of the use of single separation for the previous twelve months, • Details of unauthorised absences for previous twelve months, • Details of the use of physical restraint for the previous twelve months • Details of serious incidents in the previous twelve months, • Details of complaints in the previous twelve months, • Questionnaires completed by three probation officers • Questionnaires completed by three young women • Questionnaires completed by a parent and two social workers.

⁵ Section 186 (1) of the *Children Act 2001* (as amended by section 152 of the *Criminal Justice Act 2006*) requires inspections of detention schools to be carried out annually.

1. Introduction

1.1 Acknowledgements

The inspectors wish to acknowledge the co-operation of the young women, parents, the director, managers and staff of the detention school, the IYJS and other professionals who participated in this inspection.

1.2 Background

OGS was established in 1984 as a remand and assessment centre, and in 1991 as a reformatory school and place of detention for remand and assessment. It is a national resource, one of three detention facilities for young offenders, and is certified as a children detention school by the DJELR under the Children Act 2001 to take up to 12 girls aged 10 to 18 on admission. At the time of the inspection neither the long-term unit nor the step-down facility were operational, and the school was run in Cuan Beag, a small modern stand-alone building that was originally intended for use by Trinity House School. Education was provided in Oberstown Education Centre, a facility shared with Oberstown Boys' School. The IYJS have an overall plan to redevelop the detention schools as one integrated service on the Oberstown campus. OGS was last inspected in 2009 by inspectors of the SSI. This was the second inspection of the school by HIQA SSI, an independent organisation incorporating the social services inspectorate established under the Health Act 2007. This inspection was unannounced. Section 186 (1) of the Children Act 2001 (as amended by section 152 of the Criminal Justice Act 2006) requires inspections of children detention schools to be carried out annually.

1.3 Data on young people

Details of young people in OGS at the time of the inspection, listed in order of admission.

<i>Young Person</i>	<i>Month & Year of admission</i>	<i>Age on admission</i>	<i>Length of remand</i>	<i>Length of committal</i>	<i>Month & Year of discharge</i>
#1	July 2009	14 years 9 months	2 days		July 2009
	April 2010	15 years 6 months		12 months	April 2011
#2	September 2009	16 years 4 months		2 years	May 2011
#3	September 2009	16 years 8 months	4 days		September 2009
	March 2010	17 years 2 months	2 weeks 2 days		April 2010
	April 2010	17 years 3 months		8 months*	June 2010
#4	September 2009	15 years 9 months	7 weeks		October 2009
	April 2010	16 years 4 months	2 weeks 3 days		April 2010
	May 2010	16 years 5 months		12 months	May 2011
#5	November 2009	17 years 2 months	6 days		November 2009
	February 2010	17 years 5 months		5 months	July 2010
#6	February 2010	17 year 4 months	6 days		February 2010
	May 2010	17 years 7 months	2 weeks		May 2010
	May 2010	17 years 9 months		5 months	September 2010

* = Sentenced to 4 months detention and 4 months supervision

2. Recommendations of the previous report

There were 31 recommendations arising from the first SSI HIQA inspection in 2009. At the time of the follow-up inspection in July 2009, four of these were fully met, twelve were partly met and fifteen were not met. Where necessary in this inspection, recommendations of the 2009 inspection have been repeated.

<i>No</i>	<i>Recommendations of the 2009 OGS inspection</i>	<i>Responsibility for Implementation</i>	<i>Status</i>
1	The director and board of management of OGS should revise the statement of purpose and function in consultation with the IYJS, to reflect legislative and other changes.	Board of Management, IYJS, Director of OGS	Partly met
2	The director and board of management of OGS, in consultation with the IYJS, should ensure that the review of the young people's and parents' guides reflects rights that are in the standards such as consultation, independent advocacy, and access to records.	Board of Management, IYJS, Director of OGS	Met
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 people to make better use of the facilities and open space already available.	Director of OGS	Partly met
4	The director and board of management of OGS, in consultation with the IYJS, should: <ul style="list-style-type: none"> • review its policy on care and control, • revise its system for managing behaviour, • review the use of physical restraint and single separation, • develop a policy and practice on the management of risk, • give consideration to making further opportunities for privacy available within the behaviour management system, • develop practice that emphasises the distinction between the management of behaviour and the management of risk. 	Board of Management, IYJS, Director of OGS	Not met
5	As a matter of priority, the director and board of management of OGS should: <ul style="list-style-type: none"> • review the use of single separation, • reduce its frequency, • ensure that in every instance it conforms to the standards, and • ensure that practice reflects the principles of children's rights. 	Board of Management, Director of OGS	Not met
6	The IYJS should enter into discussion with the Department of Health and Children and the HSE with a view to developing a common policy for the use of single separation in all places where young people can be legally detained.	IYJS	Not met
7	The director and board of management of OGS, in consultation with the IYJS, in revising the system for the management of behaviour should give consideration to making further opportunities for privacy available.	Board of Management, IYJS, Director of OGS	Met
8	The director of OGS should ensure that IYJS and the board of management is routinely informed of the use of all extreme measures of control, including physical restraints, single separation, and personal searches.	Director of OGS	Met

9	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.	IYJS	Not met
10	The director and board of management of OGS, in consultation with the IYJS, should develop practice guidance for staff on safeguarding.	Board of Management, IYJS, Director of OGS	Not met
11	The IYJS, in consultation with the director and board of management of OGS, should review the whistle-blowing policy and ensure that staff have sufficient confidence in it for it to fulfil its purpose of protecting young people.	Board of Management, IYJS, Director of OGS	Not met
12	The IYJS should liaise with HSE to develop protocols for sharing information about risk and child protection concerns.	IYJS	Not met
13	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.	Board of Management, IYJS, Director of OGS	Partly met
14	The director and board of management of OGS, in consultation with the IYJS, should introduce a formal risk assessment at the point of admission of young people placed on remand that informs an individualised programme for managing risk and behaviour.	Board of Management, IYJS, Director of OGS	Not met
15	The director and board of management of OGS, in consultation with the IYJS, should carry out a thorough review of the planning process, and: <ul style="list-style-type: none"> • rename the plans to avoid confusion with statutory care plans, • ensure that the plans and reviews are co-ordinated with those of the HSE for young people who are in care, and • tailor the frequency of reviews to shorter sentences. 	Board of Management, IYJS, Director of OGS	Partly met
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 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 OGS.	Board of Management, IYJS, Director of OGS	Not met
17	The director and board of management of OGS, in consultation with the IYJS, should strengthen the unit managers' role in evaluating care practices and ensure that it is better evidenced.	Board of Management, IYJS, Director of OGS	Met
18	In light of the numbers of staff on sick leave, the director and board of management of OGS, in consultation with the IYJS, should review the deployment of staff and utilisation of places.	Board of Management, IYJS, Director of OGS	Partly met
19	The director and the 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, and those appointed in the last two years have three references, and develop a system to ensure that in all future appointments the national guidelines on vetting are rigorously followed.	Board of Management, IYJS, Director of OGS	Partly met

20	The board of management should review the 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.	Board of Management	Not met
21	The board of management should give priority to arranging visits to the school in accordance with the recommendation of the 2006 inspection.	Board of Management	Not met
22	The IYJS should develop a policy on supervision, determine which model of staff supervision is to be used in the detention schools, and the OGS director should ensure that it is properly implemented.	IYJS, Director of OGS	Not met
23	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: <ul style="list-style-type: none"> • training in the rights of children in detention for care staff, • training for the chair of the board of management, the director, deputy director and unit managers in change management, • training in <i>Children First: National Guidelines for the Protection and Welfare of Children, 1999</i> for the Designated Child Protection Officer and unit managers, • 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, • training in fire safety for those staff who have not received it. 	Board of Management, IYJS, Director of OGS	Not met
24	The director of OGS should revise the system of recording to ensure that it is complete, accessible, regularly monitored, and secure.	Director of OGS	Partly met
25	The IYJS, in its review of the provision for the emotional and mental health needs of the young people, should enter into discussion with the HSE about continuity of mental health services for the young people detained in OGS.	IYJS	Partly met
26	The director and board of management of OGS, in consultation with the IYJS, should arrange for a representative of the Fire Authority to visit the school annually in accordance with standard 9.10, and ensure that fire drills are carried out regularly in accordance with the recommendation of the 2004 report.	Board of Management, IYJS, Director of OGS	Partly met
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.	IYJS	Partly met
28	The director and board of management of OGS, in consultation with the IYJS, should arrange for a health and safety audit of the unit to be carried out that assesses the potential for self-harm.	Board of Management, IYJS, Director of OGS	Partly met
29	The director and board of management of OGS, in consultation with the IYJS, should arrange for the addition to the health and safety statement of a list of signatures confirming that all staff have read it.	Board of Management, Director of OGS	Not met
30	The director and board of management of OGS, in consultation with the IYJS, should ensure that the recommendations of the safety officer are implemented.	Board of Management, Director of OGS	Partly met

31	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.	Board of Management, IYJS, Director of OGS	Not met
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3. Findings

3.1 Practices that met the required standard

3.1.1 Register

The school was required to keep a register, and daily reports on occupancy were sent to the IYJS. The register consisted of an electronically held list of remands, remands for assessment, committals and discharges. Inspectors examined the register to assess in part the degree to which standards 1.10, which requires the school to make optimum use of the public resources allocated to it and 6.24, which requires an appropriate and economic utilisation of places, were met.

In the twelve months prior to the inspection the school's register showed that there had been 64 admissions involving 43 young women. 52 had been remands, and 12 were committals. The average age of the girls at the point of admission was just over 15 years, with two thirds being aged between 16 and 17 and the youngest being 13 years. Twenty-four were from Dublin, 11 from Cork, six from Limerick, five from Galway and the remaining 18 were from nine counties throughout the state. The average length of remand was just under two weeks, and the average length of committal was six months. Inspectors noted that the lengths of sentences had increased significantly from the average of 10.5 weeks noted in the 2009 inspection.

3.1.2 Discharges

The register of discharges showed that there had been 58 discharges in the year prior to inspection involving 34 young women. There were 13 re-admissions to OGS during the year, and for two young women their last admission had been their third. The majority of young women were discharged to their families. Inspectors were provided with information about preparation for leaving programmes that had been provided previously in the step-down unit, and were now being used in Cuan Beag.

3.1.3 Good relationships

Inspectors interviewed four young women. Two young women chose not to speak to inspectors. The young women told inspectors that they were well looked after by staff who were friendly and easy to talk to. Inspectors found evidence that there were generally good relationships between staff and young women. Young women, two parents, three probation officers and a social worker said that the staff were friendly and considered the welfare of young women. Those who had been in the school for a while could all name individual staff they could trust and to whom they would bring complaints they had about how they were treated. One young person was heavily pregnant at the time of the inspection and was distressed about the future plans for her child. Inspectors observed staff treating her with sensitivity and understanding about this issue and the young person informed inspectors that staff were supportive and had her best interests at heart. Staff were observed advocating on her behalf with other professionals. This young person has since transferred to another centre that is more suited to support a mother and baby.

3.1.4 Religion

The standard on religion was well met. The school shared the services of a chaplain with the two other schools on campus. The chaplain provided different religious services including communion on Sundays, prayers for young women who had bereavements, and preparation for sacraments. Young women and staff interviewed by inspectors were appreciative of the role of the chaplain as a befriender. There were 11 young women admitted in the year prior to inspection who had different ethnic backgrounds. Inspectors found that the chaplain was aware of the spiritual needs of young women detained in the school whose culture and religion differed from the majority.

3.1.5 Quality and choice of food

Inspectors found that the quality and choice of food was good. All of the young women interviewed liked the meals provided, and said that they could request favourite dishes, and had healthy options at each meal. They were also able to access food to make snacks. Inspectors were invited to an evening meal at which staff were observed joining young women for meals.

3.1.6 Partnership with families

The standard on contact with families was good. Details of contacts were provided to inspectors. Each young person had the opportunity to make phone calls to family twice a day for a limited time, and could also receive calls from family. OGS accepted visits from families, and for individual young women there were occasional visits home. Parents were invited to case conferences and care plan reviews. The parents interviewed by inspectors spoke highly of the staff, felt informed about their daughters' progress and felt that their daughters were well cared for and safe. One parent informed inspectors that she felt the school was "the best place" for her daughter.

3.1.7 Partnership with external agencies and statutory agencies

The standard on co-operation with statutory agencies was well met. Directors, managers and staff of the school were fully co-operative with the inspection process. They also had good relationships with the IYJS, the courts and the Gardai. Social workers who were assigned to young women in the school were satisfied with the quality of care received and said that they were kept well informed of progress.

3.1.8 Education

The standard on education was well met. There was a well-equipped education facility on the campus that OGS shared with the Oberstown Boys' School. There was a good relationship between the care and education staff. For the most part, attendance was good, and the young women interviewed by inspectors said that they enjoyed education. They were able to access a full curriculum and study for exam courses. The majority of young women residing in the centre had not been attending school prior to detention and have since achieved City and Guilds qualifications through their engagement with the educational provision. The education facility was under the aegis of the Vocational Education Council (VEC), had its own board of management. Inspectors were concerned that the complaints procedure of the school differed from that of the detention centre and as a result, the deputy director who was the designated child protection officer (DCPO) had no formal jurisdiction for the education centre. This is discussed in further detail in the section on complaints below.

3.1.9 Health

The standard on health was met. The young women had a range of complex medical needs that were met appropriately. All the young women were registered with a local GP practice, and the records showed that they received a medical examination on admission. Young women had access to dental and ophthalmic assessments and treatment, and inspectors were told that there was no delay in accessing appropriate services. The school had access to a nurse who divided her time between the three detention schools on the campus. She had her own small clinic and medication was administered there.

At the time of this inspection, one of the young women was heavily pregnant. The nurse had been involved with this young person daily, and was providing invaluable emotional and practical support to this young person regarding the impending birth and advising her as a first time mother.

There were lockable medicine cabinets in the unit staff office. There was a good system for administration of medication which included separate clear recording for prescribed and over-the-counter medication, stock control and weekly monitoring by the nurse. Inspectors examined the medication stock and advised staff that the quantity of over-the-counter medication should be monitored to ensure it does not become excessive. An IYJS working group, which included staff from all the children detention schools produced new guidelines on the administration of medication, but this had not yet been implemented due to a union directive regarding co-operation with new working practices. This is referred to in greater detail in the section on Health and Safety below. The development of a common procedure is commendable and inspectors will track its development in future inspections.

3.1.10 Unauthorised Absences

In the year prior to the inspection there had been one unauthorised absence. In August 2009, a young person failed to return when out of the school with permission, and was absent for four days. The young person returned to the school of their own accord. Parents and the probation service were notified. There was no evidence of notification of the absence to the IYJS in the record provided to inspectors. A recommendation on the notification of significant events is made later in this report.

3.1.11 Offending behaviour programme, life skills programmes

Standard 10 requires the school to have individual offending behaviour programmes consistent with each young person's assessed needs. In accordance with the standard, the school had a detailed, well-considered life skills/offending behaviour programme in place. Most of the staff had received training in a programme specifically designed for young women. Inspectors were told that the programme's central tenet was a focus on self-esteem. Staff had encountered difficulties in delivering the programme effectively because of the rapid throughput of young women in the school, but as sentence lengths have increased, there has been more time available to address this. Inspectors commend the school for the quality of the programme and its suitability for the young women. Inspectors were informed that the director of OGS has recently been given responsibility for submitting proposals to the IYJS for programmes and assessments across campus.

However, as recommended in the 2009 inspection, to meet the standard a process needs to be established whereby it can be formally evaluated and regularly monitored, Inspectors recommend the IYJS establish a process of evaluation and monitoring of programmes.

3.2 Practices that partly met the required standard

3.2.1 Care of young people

All the young women interviewed said that they felt safe in the unit. They really enjoyed school, where they had an opportunity to meet the young men in Oberstown Boy's School. There were opportunities to take part in activities and hobbies. There was an external play area and a modern, well-equipped gymnasium. Young women were able to play music in their rooms, watch TV and play computer games. They were all encouraged and facilitated in the practice of their religion.

All of the young women had three keyworkers each. They saw them frequently, and for those who were being assessed, the keyworkers played a major role in carrying out the programme of assessment. Otherwise they saw keyworkers as staff who prepared them for meetings and helped them present their views, and prepared them for attending court. The young women themselves were able to attend only part of their planning meetings.

A description of the daily routines was provided to inspectors. On a weekday the young women were called between 8.45 a.m. and 9.00 a.m., and had breakfast between 9.00 and 10.00 a.m. They attended school from 10.15 a.m. to 3.45 p.m. with a break from 12.30 – 2.00 p.m. for lunch. From 3.45 to 4.30 p.m. the young women had a cup of tea and relaxed. Tea was from 6.00 or 6.30 to 7.00 p.m., and the following two and a half hours were spent in recreational activities such as: gym and TV, and individual programmes of work.

Bedtime was at 9.30 p.m. and lights out at midnight. On Wednesdays and weekends the young women could watch DVDs, and those who were eligible for mobilities, that is, supervised outings in the community, could go swimming, play tennis, or on short walks around the campus. Young women informed inspectors they felt choice in recreational time was too rigid and the choices of activities were limited. Inspectors recommended previously that the director should arrange for a critical analysis of the effectiveness of routines in terms of meeting the needs of young women, and of procedures and practices that are institutional. In this inspection inspectors found that this had not been addressed, for example the practice of separating the young women four times per day to enable staff to meet was still in use. The weekend programme was similar, except for not having to attend school, and being able to go to bed half an hour later. Visits from members of the young women's families were facilitated at any time, within reason.

There was a room with games such as pool and table football. There was a modern gymnasium equipped with a range of fitness machinery. The current group of young women used this facility regularly. There was an enclosed open space by the building that could be accessed for exercise in fresh air, and use of this area had increased.

At the time of the last inspection, several of the young women commented on the lack of adequate heating and the problems with ventilation in their bedrooms which is described in further detail in the Health and Safety standard.

3.2.2 Use of Physical Restraint

The standard on physical restraint was mostly well met. Restraints were infrequent and mostly of short duration. There had been nine instances in which physical restraint was used to control five young women in the year prior to the inspection. One young person, on being admitted to the centre, had to be restrained several times over a three hour period involving both staff and Gardai. The restraints varied in duration from one to five minutes. Records provided to inspectors indicated that the director, IYJS, other managers and parents and social workers were notified in each case.

The method of restraint previously used in the school was Therapeutic Crisis Intervention (TCI) but a new method was introduced earlier in the year. The new agreed model of crisis intervention was Crisis Prevention Intervention (CPI). All staff were trained in this method prior to the inspection, but a union directive to staff not to engage in new work practices meant that this was not implemented at the time of the inspection. Staff training in, TCI had lapsed and there was a period of time where staff were unclear about which method would be used if a restraint was necessary. This was unsafe for staff and young women. Inspectors were informed following the inspection that the union had since rescinded the directive and CPI had been implemented.

3.2.3 Management of behaviour

There was a system of behaviour management referred to as 'points'. It entailed scoring behaviour in a limited range of criteria to arrive at a score that determined what access a young person would get to privileges. Inspectors found that young women did not know on what basis judgements were made to award or withdraw points. The young women that spoke to inspectors found the system complicated, rigid and unfair. Young women informed inspectors they felt the behaviour management system in another school seemed much more reasonable and achievable. They were also aware that the points system allowed for a young person to be punished several times for one action. For example, a young woman who disrespected staff may be told to go to her room for a period of time, in other words a period of directed separation. Whilst in her room, the power supply would be switched off to prevent use of the radio or TV. In addition, she would lose points from her daily accrual, which would mean loss of pocket money and possibly an early bedtime. This amounts to four punishments for one action, which in the inspector's opinion, is excessive. Young women also informed inspectors that while the points system may discourage them from misbehaving; it would be because they did not want to lose money or the use of electrics or be separated, not because they saw the value in behaving well. Inspectors feel this is not effective, as any behaviour management system should promote positive behaviour and incentivise the benefits of acceptable behaviour to young women. The amount of weekly pocket money and mobilities, that is, walks in the grounds of the campus and outings in the community were determined by the points gained. Inspectors could understand some of the appeal of the system, but wondered whether it was age-appropriate for young women on the verge of adulthood, and in several cases nearing the time when they would leave HSE care as well as OGS. Inspectors recommend, as at the previous inspection, that the system should be reviewed immediately, in consultation with the young women, to assess its effectiveness and appropriateness. Inspectors have been advised that the system has been reviewed, this will be assessed at the follow up inspection.

The majority of young women said that they understood most of the rules, but they did not have a say in what the rules were, and they did not like some of them. In particular, some thought the ban on smoking was unfair as they felt smoking helped to reduce stress. Some young women felt that other young women were treated differently to them but inspectors did not find any evidence to support this view.

Inspectors were provided with details of 29 serious incidents that occurred in the year prior to the inspection. Several concerned damage to property and verbally abusing staff, and three were assaults by young women on staff. One young person had absconded whilst on leave from the school, and three were instances of attempted self-harm. For serious misbehaviour the principal sanction was separation. The young women interviewed by inspectors described fixed periods of time when they were locked in a bedroom for certain behaviours.

The young women's booklet outlined consequences for misbehaviour that included being (sent to your room for 15 minutes, or longer if you are not listening, or if you lost three points.) Single separation should be used only for the management of risk and not as part of a behaviour management programme, and several of the reasons used for imposing a sanction of 15 minute periods of time out were not consistent with policy, standards and good practice, nor were they consistent with children's rights.

Inspectors reiterate the recommendation of the 2009 inspection that OGS, in consultation with the IYJS, and after consultation with the young women, reviews the system for managing behaviour. In the review consideration should be given to whether a points system is appropriate for young women nearing adulthood. It should also reappraise the use of serious measures of control, particularly single separation, which is referred to in greater detail later in the report.

3.2.4 Child Protection

The school had written procedures and guidelines entitled *Child Protection and Welfare Procedures and Guidelines for the Children Detention Schools*, which was produced in 2002 and adopted by the children detention schools. The deputy director was the designated child protection officer (DCPO). His role was to ensure that the established procedures were followed in regard to any suspicion or concern about abuse or inappropriate treatment of young women. On interviewing young women inspectors found that his role was seen as the person one took complaints to, but some of the young women were unsure who they would talk to if they had a concern about their safety. One young person was concerned that there was no one 'outside' the school to talk to if she did not wish to talk to staff. In the view of inspectors this further supports the need for an independent advocacy service for the school, as required by the standards.

The relationship between some staff and individual young women developed to a level of trust sufficient for the young person to be confident in disclosing to the staff member. In the year prior to the inspection there were three child protection concerns, all concerning disclosures of abuse that had taken place in other settings and times in the young women's lives. They were reported to the appropriate sections of the HSE.

Inspectors noted that three of the young women in OGS at the time of the inspection were in the care of the HSE. As at the last inspection, there were still some difficulties in the relationship between the school and the HSE in respect of child protection concerns. The DCPO described difficulties arising from the fact that the school is a national resource, but there are variations in practice in different local health areas, and within them variations in the way each individual case is managed. OGS experienced difficulties in obtaining relevant information from the HSE about risk in individual cases. This was also the case at the previous inspection, and again, this is a major safeguarding concern. In this inspection, inspectors were told that a working group consisting of the DCPO's of all three schools and IYJS representatives has been established to look at policy and practice in child protection and safeguarding.

The board of management and the director of OGS, in consultation with the IYJS should revise its policy in order to identify where the school is located within the national child protection system. There should be clarity about notification, and protocols should be developed with the IYJS and the HSE to ensure that there is a reliable reporting protocol in place. This applies both ways.

3.2.5 Safeguarding

The confusion between complaints and child protection procedures and the problems associated with the sharing of information and notification to the HSE do not support best practice in safeguarding. As identified at the previous inspection, it is equally important that young women know that they may refer concerns to people outside the school, and that they may have independent advocacy. Their right to independent advocacy should be promoted and facilitated. Inspectors strongly recommend that the recommendation of the previous inspection regarding children's rights is implemented, and that OGS develops a safeguarding policy that encompasses all aspects of care of the young women, is strongly based in children's rights, and creates a culture in the staff where safe care can be openly discussed and promoted.

3.2.6 Whistle-blowing

The school's child protection policy makes it clear that all staff of the school have a responsibility to ensure that they report any concerns or suspicions of child abuse or mistreatment to the designated child protection officer. However, there was no written 'whistle-blowing' policy, as required by the standards, and as recommended in the previous inspection. The IYJS, in consultation with the school's director and board of management should develop a whistleblowing policy and ensure that staff have sufficient guidance and confidence in it for it to fulfil its purpose of protecting young women.

3.2.7 Children's rights – complaints

The young women were uncertain about children's rights. All those interviewed told inspectors that the information contained in the young women's booklet was explained to them on admission, and that they were aware of the role of the DCPO and about making a complaint within the school. They were confident that the DCPO would investigate any complaints they may have. They were less clear about their right to make the complaint to people outside the school and did not feel there was anyone they could talk to externally. This is referred to further in the section on independent advocacy below. One young person had made a formal complaint about a teacher in the education facility. Inspectors

were concerned that because the complaints procedure of the school differed from that of the detention centre, the DCPO had no formal jurisdiction to investigate a complaint that arose in the education centre. The complaint was resolved by all parties meeting voluntarily and discussing the issue, but highlighted the need for one campus-wide complaints procedure that all staff must engage with, irrespective of whom they are employed by.

3.2.8 Children's rights - consultation

The young women had experience of being consulted about day to day issues such as choice of meals or which DVD's to watch, but were not aware that they had a right to be consulted regarding their care. Young women told inspectors that they felt that there was no flexibility in the routines of the school and as a result, they felt there would be no meaningful consultation. One young person said *"they tell you what to do, we should be asked what we want to do"*. Inspectors accept that a place of detention will have rules in place and the authority to direct the young women in certain areas, but feel given the age of the majority of young women being detained, there should be increased opportunities for them to feel they have "a voice" and contribute to decisions about their routines, activities and management of themselves.

3.2.9 Planning and review

The school had a policy of formulating detention plans for each young person. The meetings at which detention plans were prepared were referred to as 'case conferences'. The purpose of the school's plan was to provide focus for the work to be done to address the individual needs of each young person during their stay in the school. It is important that planning is co-ordinated for all young women in detention who are in the care of the HSE. Three of the young women were in HSE care, and there was evidence of clear planning for them. Young women attended only part of their reviews. Policy and practice on participation in reviews should be brought into line with the standard, and practice should be revised to ensure that participation is as full as possible without compromising the safety and welfare of the young women.

3.2.10 Evaluation of practice

Inspectors found from the records that there was evidence of some intermittent monitoring by managers which marks an improvement in practice since the last inspection. It was clear from observation and interviews with staff and young women that the deputy director was present on the unit on a daily basis, and that he was kept well informed of situations as they arose. Following the inspection, inspectors received copies of staff supervision which indicated that some practice issues were discussed during supervision. Keeping in mind the average age of young women detained in OGS, inspectors recommend that a system of evaluation be developed that includes consultation with the young women wherever possible.

3.2.11 Management

The director is supported by a deputy director, unit managers, night supervisors, residential care staff, clinical nurse manager and a staff officer. Inspectors received draft terms of reference for the Board of Management for the Oberstown Campus. At the time of the inspection the chairperson of the Board had resigned and a new chairperson had just been appointed by the Minister for Children and Youth Affairs. The role of the board needed further development to comply with standard 6.1 which requires it to satisfy itself by

frequent visits to the school that both the care of the young women and the condition of the school are satisfactory. Inspectors recommend that visits are made by board members on a regular basis with reports of all visits being made to board meetings. Some visits should focus on the condition of the premises and others consider the care of the young women.

Inspectors were told that the outgoing chairperson visited the centre and met with the young women. Inspectors were informed that the board was due to meet in the coming months and the role of the board would be discussed then. It is important to note that given the frequent turnover of young women detained, board members should visit regularly to ensure they are available to and can assess the care provided to a majority of the young women detained at different times in the school.

The director provided monthly reports to the board on significant events affecting young women and staff. These incidents included absences, restraints, single separations and accidents. Due to the change in the chairperson it was not possible to seek a view from the board on operations of the school or the board's plans for it.

The previous inspection identified the need for change management training for directors and the board of management, but this has not been addressed. The school had experienced considerable change in the twelve months prior to the inspection including the transfer of staff from the remand centre in FCAC to all three schools on the Oberstown campus. It was evident to inspectors that change management training would provide significant support to the Director and managers to address ongoing challenges, particularly for long-serving staff, and inspectors recommend this training is sourced and delivered as a matter of priority.

3.2.12 Staff support

The standard on staff support was partly met. Supervision is an important forum for providing support. Staff told inspectors that the deputy director spent time each day on the unit, and was fully informed of events and available to offer guidance and support. All staff interviewed stated they received formal supervision, but there was confusion regarding the confidentiality of these records, and as a result there was a delay in inspectors accessing them.

3.2.13 Training

The majority of staff were trained to third level, and 38 staff had third level qualifications. The school encouraged training and development, and had supported 16 staff in gaining relevant qualifications. At the time of the inspection in-service training had been provided as follows: all staff had received training in the chosen method of restraint, CPI, Fifteen staff had training in ASSET, a programme used in carrying out assessments for the court, eight were trained as trainers and 36 staff as practitioners in the Ross life skills programme for young women. Twenty-four were trained in First Aid, five staff were trained as a CPI trainer, two were trained as fire marshals, and two in fire safety.

Funding and responsibility for training in the children detention schools rests with the IYJS. At the last inspection inspectors recommended a range of training for staff but the recommendation had not been implemented. Inspectors also recommended that the chair

of the board of management, the director, and unit managers should receive specific appropriate training in change management. They also recommended that training in *Children First: Guidelines on the Welfare and Protection of Children* be provided to the designated child protection officer and unit managers, and that appropriate training in health and safety should be provided to the deputy director with overall responsibility for health and safety, the maintenance officer, and the staff health and safety representatives, training in fire safety should be extended to the remaining staff who have not received it, and training in the rights of children in detention should be provided to all of the care staff. Inspectors reiterate the recommendation of the last inspection report, and recommend particularly that the IYJS consider means of achieving congruence between national policy and practice on child protection. This consideration should extend to facilitating the school's DCPO in accessing nationally provided training.

3.2.14 Administration

The standard of administrative records was good, and the administrative system generally was in good order. Most information on young women was records on the unit which formed a running record giving a chronological account of each young person's day. The main care file did not indicate other places where information could be found. The files had evidence of monitoring by senior managers. The files should indicate routes of notification of significant events. Structurally, staff personnel files were of a high standard. As a consequence, the deficiencies in them referred to in the section on 'Vetting' were easy to track. Inspectors recommend that OGS review its recording and filing practices, and that IYJS develop a clear policy about the foundation documents required in care and personnel files.

3.2.15 Utilisation of spaces.

By the nature of detention, the units cannot plan admissions, and numbers fluctuated depending on sentences or remands from the court. Previously, the school had converted two rooms to use as bedrooms when occupancy fluctuated above six young women. The long-term unit, which was much older than Cuan Beag, had been refurbished and redecorated just before the last inspection, but there were insufficient staff to run two separate units. Inspectors were informed that although fourteen staff had transferred from the remand centre in Finglas, these staff had different terms and conditions of employment and this made the amalgamation of rosters or the re-opening of the long-term unit difficult. Inspectors were concerned about the use of inappropriate rooms for bedrooms, even though they acknowledge the difficulties the school had in meeting the requirements of its certification. They recommend that OGS, in consultation with IYJS, review the utilisation of places along with the deployment of staff, considering the transfer of additional staff from the remand centre in Finglas.

3.2.16 Emotional & Specialist Support

Inspectors found that the quality of emotional and specialist support was good. Social workers and relatives of the young women praised the staff for the concern and care shown towards the young women. A psychologist informed inspectors that staff dealt sensitively with young women who had complex emotional needs. Specialist supports, such as psychiatric or psychological services, were accessed according to individual need. Inspectors noted that at the point of admission several of the young women were already receiving treatment for emotional or psychological problems. A significant number of young

women had a history of self-harming. Inspectors recommended at the last inspection that the school and the IYJS review of the provision for the emotional and mental health needs of the young women in discussion with the HSE about continuity of services for the young women, many of whom are detained at a considerable distance from the services in their home areas, and for short, but significantly disruptive periods of time. The director told inspectors that a group has been set up to address this and membership includes the director and representatives from the HSE and the IYJS.

3.2.17 Healthy eating and exercise

The standard on healthy eating was well met, but the standard on exercise less so. The unit had a well-equipped modern gymnasium, and this was used regularly by some of the young women. There were some recreational facilities indoors, and an open space within an inner courtyard which was used when weather permitted. Young women informed inspectors that there was a limited facility for individual young women to go for walks with staff in the grounds of the campus and spend time outdoors playing tennis or relaxing in fine weather. They were able to observe young people from another school on the campus spending considerable time outdoors engaged in organised activities. Inspectors observed young women going for short walks on the three days of the inspection, but recommend that more consideration be given to increased opportunities to spend time in the campus grounds, in consultation with the young women.

3.2.18 Accommodation

The accommodation consisted of a purpose-built single storey building around a central open space. It had six bedrooms, administration offices, a laundry, a small gymnasium, a staff office, a sitting room, dining room, kitchen and additional rooms. It was modern, in good condition and its construction and fittings were suited to an environment in which security was paramount. Inspectors viewed most rooms and the young women had personalised their bedrooms and had adequate storage. All bedrooms had an en-suite bathroom, complete with shower and toilet. It was of a suitable standard, but recommendations referring to heating and ventilation below, and to the adoption of rooms as extra bedrooms (described elsewhere in this report) should be addressed.

3.2.19 Health and Safety

Inspectors interviewed the unit manager with responsibility for health and safety. In a health and safety audit in October 2008 the two key issues were heating and ventilation. The heating system was ineffective in the young women's bedrooms, bedroom corridor and sitting room. The ventilation system was also inadequate. To air the unit it was necessary to open doors into the enclosed courtyard, or a door opening to the outside of the building. There were vents below the windows, but it was not possible to close them sufficiently to prevent draughts. Inspectors observed these conditions directly but were also told that the rooms were extremely cold in the winter. Works have been carried out since the previous inspection, but it will be difficult to gauge the effectiveness of these until there are further spells of cold weather.

At the time of the last inspection, inspectors were given a copy of a comprehensive health and safety statement, revised in accordance with the Safety, Health and Welfare at Work Act 2005 and signed by the director and deputy director in October 2008. It made reference to the duty of the director to provide a safe environment for staff. It committed

managers to acting on the recommendations made by duly appointed safety representatives, and it said that fire drills and evacuation drills would be held once a month. Evidence provided to inspectors showed there had been no fire drills since 2008, and this is discussed further in the section on 'Fire Safety'. The safety statement recommended that managers arrange for the addition to the statement of a list of signatures confirming that all staff have read it but this has not been addressed. Inspectors recommend staff read and sign the statement immediately.

Inspectors were informed about two industrial relation issues that directly impacted on safety within the school. A union directive was issued that staff should not engage in any new work practices. This resulted in staff not implementing the new form of restraint, CPI, despite being trained in this method and their training in the previous method having lapsed. Staff interviewed were unclear which method they would use if they needed to restrain a young person. This could have resulted in unsafe situations for both young women and staff if the need for restraint arose.

The second issue related to a new system of the administration of medicines. The new system was designed to improve the stock control, administration and accountability of medication administration. As staff already administered medicines, it was difficult to understand how this was viewed as a new practice, particularly when it would make the task safer for both staff and young women. Inspectors were informed after this inspection that the union directive had since been lifted.

The State Claims Agency had undertaken a health and safety assessment of all three schools on the campus and had incorporated potential for self-harm by young women in this assessment. This assessment was in draft at the time of the inspection, and has yet to be made available to inspectors.

3.2.20 Maintenance and repair

The standard on maintenance was mostly well met. OGS had two full time maintenance officers and a responsive system for dealing with requests for repairs. Inspectors found that Cuan Beag was in good overall condition. There were continuing problems with heating and ventilation, which was also identified at the last inspection. Inspectors were told that there had been considerable work done to rectify the problems, but with limited success. They recommend that the IYJS address the chronic problems of inadequate heating and ventilation in Cuan Beag as a matter of priority.

3.2.21 Premises and Safety

The standard on premises and safety was partly met. Plans for redevelopment of the Oberstown campus have been accelerated by the IYJS, but the long-term unit remains unused.

The school did not have written confirmation of compliance with building control and fire safety regulations as required by standard 9.9. At the time of the last inspection inspectors were provided with a letter from the local council indicating that such building controls did not apply to the school because of its function as a place of detention. The discrepancy between the standard and the letter should be addressed by the IYJS and a clear directive given about whether the standard applies.

3.2.22 Supervision

The standard on supervision was not met at the last inspection. Inspectors were provided with dates of staff's supervision at the time of this inspection. The director told inspectors that although supervision was carried out, it was confidential to the supervisee and she could not give her permission for inspectors to view these records.

Inspectors requested the IYJS, which has management responsibility for the detention schools to resolve the issue and make these records available for examination as soon as possible. Copies of supervision records for 39 staff were then sent to the inspectorate. Examination of these records showed that staff had between one and three supervision sessions in this year. Some staff had not signed the records. The records reflected agenda items mostly and not the details of the discussions or the actions or outcomes. The IYJS had already determined which model of supervision was to be used in the schools, but there was a delay in its implementation owing to circumstances beyond the control of the IYJS. The Director has since advised inspectors that the model of supervision referred to had not been conveyed to the Board of Management or the Director at the time of the inspection.

Inspectors recommend that the director and Board of Management of the OGS ensure that IYJS policy on supervision is properly implemented.

3.3 Practices that did not meet the required standard

3.3.1 Single separation

The standard on single separation was not met at this or the previous inspection, because the level of use was unacceptable, and reasons for its use were not consistent with policy and best practice. Single separation is involuntary isolation from peers, and often entails being locked in a room. In OGS it usually meant being confined to or locked in a bedroom and primarily being separated from peers. In the year prior to the inspection there had been 286 instances of use of single separation involving 21 young women which is a marked increase on the number for the previous year. The length of separations had reduced in the year prior to inspection, but lengthy separations of 7.5-11.5 hours, with occasional breaks for 15-30 minutes, still occurred. Two young women were separated on 74 and 76 occasions respectively as part of a 'separate program'. This represents over half of the total for the whole group for the year.

As a place of detention the school has legal authority to use single separation, but it should be an exceptional measure of control used in situations of serious immediate risk. It should not be used to effect compliance or as a punishment. On inspecting the details provided by the school, inspectors found that single separation had been used appropriately in some instances where young women had put themselves and others at risk. However, they also found that it was used frequently as a consequence for not complying with a programme of behaviour management, showing disrespect to staff, and disruption. Inspectors were informed that a separate program may be used for some young women who are presenting negative behaviour or distress as a result of mental health difficulties but it could also be used for behaviour that had a destructive or negative impact on the group. Each separation was recorded as a single event in one day, but in practice some

separations exceeded 50 hours, as all young women are in their bedrooms from 9.30 pm. Records provided to Inspectors showed that all separations were notified to the director and parents of the young person, and those relevant were notified to social workers, but few were notified to the IYJS. Whilst the circumstances of a young women being in detention may vary, their rights and the legal obligations of those who care for them do not.

The 2006 inspection report recommended that the use of fixed periods of separation be discontinued and replaced by an arrangement in which managers monitor separation with a view to discontinuing it when the young person has regained self-control and appropriate behaviour has been restored. In this inspection, inspectors found that the practice of fixed periods of separation continued, and were particularly concerned that young women spent time in their rooms to facilitate staff meetings. Young women confirmed with inspectors that they were sent to their rooms to facilitate staff meetings, regarding the behaviour points system, four times a day. These periods of separation were not recorded as separation. Bedroom doors were not locked at this time but if young women stepped outside the room, the door would then be locked and other consequences, such as the loss of electricity in the room and deduction of points would be applied. A young person being directed to go to their room is not elective separation, as they have not chosen to be separated and risk sanctions if they do not comply. This is directed separation and as such, should be recorded as a single separation.

The previous inspection report recommended that the school should revise its policy on care and control and review the practice of routine use of single separation. Direction and guidance should be given to staff to enable them to separate the management of behaviour from the management of risk. Every effort should be made to reduce the frequency of single separation. In looking at the use of extreme measures of control the school should consider the effectiveness of the 'points' system, and remove the consequence of 15 minutes separation for the loss of three points in one day. The revision of policy and practice should include a system of notification to the IYJS, parents, the board of management and others with a bona fide interest in the case. National guidelines on the use of single separation issued by the Department of Health and Children in 2003 postdate the detention schools' policy, which was drawn up in 2002. Inspectors recommended in the last inspection, that the IYJS enter into discussion with the Department of Health and Children and the HSE urgently with a view to developing common standards for the use of single separation in all places where young women can be legally detained. In response to the recommendation the IYJS deferred to the development of common standards for children's service which were subject of consultation since the last inspection. The draft standards require those places which have legal authority to use the measure to follow any national guidelines issued. Inspectors repeat the recommendation of the last inspection that the IYJS enter into discussion with the Department of Health and Children and the HSE with a view to producing common standards for the use of single separation.

3.3.2 Vetting

Inspectors examined a sample of personnel files and found some deficiencies in vetting practice in the files of staff that had transferred from the FCAC. Two of these staff had no references on file and four staff had only one reference on file. Another two staff had no

evidence of a Garda check on file. Of the school's 71 staff, records provided to inspectors indicated that all had Garda checks but one file was not available to inspectors. The majority of staff had had written references. However, clearances and three references had been received prior to commencement of employment for only 10 staff. For four staff there were verbal but no written references. Four staff had one written and two verbal references. The director and the board of management, in consultation with the IYJS, should obtain Garda checks where required, ensure that three references are in place for all staff appointed in the last two years, and develop a system to ensure that in all future appointments the standard on vetting is met. The director and board of management should also give consideration to updating Garda clearance for long-serving staff.

3.3.3 Children's rights – access to records

The young women were unaware of their right to access to personal information. One young person told inspectors she did not want to see her file. Policy and practice on the right of access to records should be radically revised.

3.3.4 Children's rights – independent advocacy

The standard on independent advocacy was not met at this or the previous inspection. Young women interviewed by inspectors were not aware of their rights. It is a matter of concern to inspectors that young women's rights were not actively promoted and revisited regularly to ensure young women were empowered within the school.

The young person's guide to the detention school describes "Rights" and "Responsibilities". Young women informed inspectors that they had no one outside the detention school setting to speak to if they had concerns or questions regarding their care. None of the young women interviewed had heard of the Irish Association of Young People In Care (IAYPIC). At the last inspection, inspectors recommended a review of practice in children's rights. IAYPIC has been in discussion and involved with two other schools on the Oberstown campus and has been involved with individual cases in OGS.

As indicated in the section above on training, inspectors recommended at the previous inspection that care staff receive training in the rights of children in detention, but this had not happened. Rights are a significant element in one of the programmes being used by the OGS staff for life skills training. They should be integrated into all the programmes dealing with offending behaviour. The school should ensure that staff are confident about the young women's rights are and that they are able to explain them and promote their facilitation.

3.3.5 Aftercare

The standard on aftercare was not fully met at the last inspection and the issue has not been progressed. OGS should have aftercare plans for all young women, and they should be based on involvement of the young person in their formulation and implementation. With the step-down unit being closed, OGS should develop new ways of preparing young women for leaving detention. The capacity of the school to offer outreach on a systematic basis should be explored by the director in consultation with the IYJS, and preparation for leaving and aftercare procedures and practice guidelines should be developed. The HSE has a duty to provide after care for young women who have been in HSE care, even those detained in children detention schools, and OGS has a duty under the standards to assess

needs in terms of aftercare for each individual young person. Inspectors were told by IYJS that discussions with the HSE were commencing. The IYJS, HSE and probation service should enter into discussion about the continuity of support for young women in preparation for and after leaving the school.

3.3.6 Fire Safety

The standard on fire safety was not met in several respects. Inspectors were provided with information about fire drills, and the most recent drill had been carried out in December 2008. The 2009 inspection had recommended that fire drills take place monthly and the school's health and safety statement had supported this frequency. At the time of the inspection that recommendation applied to different buildings. Documents provided to inspectors showed that in the year prior to the inspection, there had been no fire drills in OGS. The director informed inspectors that there had been drills since 2008. Inspectors were provided with a copy of a certificate of maintenance indicating that the fire fighting equipment had last been serviced in December 2008. Inspectors recommend that the IYJS determine the frequency of service checks and the director and board of management ensure the agreed policy is implemented. Inspectors also recommend in accordance with standard 9.10, and that OGS comes to an agreement with the fire authority on the frequency of fire drills.

OGS did not have written confirmation of compliance with building control and fire safety regulations as required by standard 9.9. Inspectors were provided with a copy of a letter Fingal County Council Fire Safety Department dated March 2001 stating that the Building Control Act 1990 did not apply to the premises. The discrepancy between the standard and letter should be addressed by the IYJS and a clear directive given to the school about whether or not written confirmation is required.

4. Findings:

1. Purpose and function

Standard

The school has a written statement of purpose and function that accurately describes what the centre sets out to do for young people and the manner in which care is provided, and how this relates to the overall service provided for young people as a whole. The statement is available, accessible and understood. It takes into account relevant legislation, the policies of the Irish Youth Justice Service and other agencies where relevant, and best practice in the care of young people.

	<i>Practice met the required standard</i>	<i>Practice partly met the required standard</i>	<i>Practice did not meet the required standard</i>
Purpose and function		√	

Recommendations:

1. The director and board of management of OGS should revise the statement of purpose and function in consultation with the IYJS, to reflect legislative and other changes.
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' guides reflects rights that are in the standards such as consultation, independent advocacy, and access to records.

2. Care of Young People

Standard

Young people are cared for by staff that they can relate to effectively. Day-to-day care is of good quality and provided in a way that takes account of their individual needs without discrimination. The quality of care provided is equivalent of that which would be expected of a good parent/guardian. Young people are rewarded for the achievement of acceptable behaviour and measures of control are expressly designed to help rather than punish the young people.

	<i>Practice met the required standard</i>	<i>Practice partly met the required standard</i>	<i>Practice did not meet the required standard</i>
Good relationships	√		
Personal choice	√		
Religion	√		
Quality and choice of food	√		
Leisure activities		√	
Living skills training		√	
Management of behaviour		√	
Physical restraint	√		
Single separation			√
Absconding	√		
Privacy	√		

Recommendations:

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.
4. The director and board of management of OGS, in consultation with the IYJS, should:
 - review its policy on care and control,
 - revise its system for managing behaviour,
 - review the use of physical restraint and single separation,
 - develop a policy and practice on the management of risk,
 - develop practice that emphasises the distinction between the management of behaviour and the management of risk.
5. As a matter of priority, the director and board of management of OGS should:
 - 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.
6. The IYJS should enter into discussion with the Department of Health and Children and the HSE with a view to developing a common policy for the use of single separation in all places where young women can be legally detained.
7. The director of OGS should ensure that IYJS and the board of management is routinely informed of the use of all extreme measures of control, including physical restraints, single separation, and personal searches.

3. Child Protection

Standard

Young people in the school are protected from abuse and there are systems in place to ensure such protection. In particular, staff members are aware of and implement practices that are designed to safeguard the young people in their care.

	<i>Practice met the required standard</i>	<i>Practice partly met the required standard</i>	<i>Practice did not meet the required standard</i>
Child Protection		√	
Safeguarding		√	
'Whistle-blowing'		√	

Recommendations:

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.

9. The director and board of management of OGS, in consultation with the IYJS, should develop practice guidance for staff on safeguarding.
10. The IYJS, in consultation with the director and board of management of OGS, should review the whistleblowing policy and ensure that staff have sufficient confidence in it for it to fulfil its purpose of protecting young people.
11. The IYJS should liaise with HSE to develop protocols for sharing information about risk and child protection concerns.

4. Children's rights

Standard

Young people receive care in a manner that safeguards their rights and actively promotes their welfare. The practices of the centre should promote the additional rights afforded to young people living away from home.

	<i>Practice met the required standard</i>	<i>Practice partly met the required standard</i>	<i>Practice did not meet the required standard</i>
Complaints		√	
Consultation		√	
Independent advocacy			√
Access to information			√

Recommendations:

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.
13. The director and board of management of OGS should make arrangements for an independent advocacy service to be available to all young women.
14. The director and board of management of OGS, in consultation with the IYJS, should develop a campus-wide complaints procedure that applies to all services provided on-site.
15. The director and the 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.

5. Planning for children and young people

Standard

The school has a written care plan for each young person entering its care. The plan is developed in consultation with parents/guardians and the young person concerned and is subject of regular review. The plan stresses the need for regular contact with family and prepares the young person for leaving care. The plan promotes the general welfare of the young person including appropriate provision to meet his/her educational, health, emotional and psychological needs. The experience of the young people is enhanced by positive working relationships between professionals.

	<i>Practice met the required standard</i>	<i>Practice partly met the required standard</i>	<i>Practice did not meet the required standard</i>
Admission	√		
Planning and review	√		
Partnership with families	√		
Partnership with external agencies	√		
Discharge	√		
Aftercare			√

Recommendations:

- 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 the 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.

6. Staffing and Management

Standard

Staff in the school are organised and managed in a manner designed to deliver the best possible care and protection for young people in an efficient and effective manner.

	<i>Practice met the required standard</i>	<i>Practice partly met the required standard</i>	<i>Practice did not meet the required standard</i>
Evaluation of care practices		√	
Recruitment and deployment of staff	√		
Vetting		√	
Supervision and support		√	
Training			√
Administration		√	
Co-operation with statutory agencies	√		
Utilisation of places	√		

Recommendations:

17. The director and the 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.
18. The board of management should finalise the statement defining the role of the board, ensuring it includes its responsibilities, authority, monitoring function in 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.
19. The IYJS should develop further its policy on supervision and ensure that it is properly implemented and that appropriate records are maintained.
20. 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:
 - training in the rights of children in detention for care staff.
 - training for the chair of the board of management, the director, deputy director and unit managers in change management;
 - training in *Children First: Guidelines on the Welfare and Protection of Children* for the Designated Child Protection Officer and unit managers;
 - 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;
 - training in fire safety for those staff who have not received it.

7. Education

Standard

Education is recognised as an important factor in the lives of young people in detention. Each young person has a right to receive an appropriate education, which is actively promoted and supported by those with responsibility for the care of the young person.

	<i>Practice met the required standard</i>	<i>Practice partly met the required standard</i>	<i>Practice did not meet the required standard</i>
Education	√		

8. Health

Standard

Health care is essential in the arrangements for the care of young people. Each young person receives appropriate health care and advice. Healthy lifestyles are promoted.

	<i>Practice met the required standard</i>	<i>Practice partly met the required standard</i>	<i>Practice did not meet the required standard</i>
Health	√		
Emotional and Specialist support		√	
Health education	√		
Healthy eating and exercise	√		

Recommendations:

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.
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 women, including risk assessment procedures.

9. Premises, Safety and Security

Standard

The school is located in premises that are suitable, safe and secure for the purpose of providing residential care to young people.

	<i>Practice met the required standard</i>	<i>Practice partly met the required standard</i>	<i>Practice did not meet the required standard</i>
Accommodation		√	
Health and Safety		√	
Fire safety			√
Maintenance and repair		√	
Security		√	

Recommendations:

23. The IYJS should determine the frequency of equipment checks and the director and board of management of OGS should implement the agreed policy.
24. The director and board of management of OGS, in consultation with the IYJS, should ensure that fire drills are carried out regularly in accordance with the recommendation of the 2004 report.
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.
26. The director and board of management of OGS, in consultation with the IYJS, should arrange for the addition to the health and safety statement of a list of signatures confirming that all staff have read it.
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.

10. Dealing with Offending Behaviour

Standard

Individual offending behaviour programmes consistent with the young person's assessed needs are in place. There are mechanisms in place to develop, monitor and evaluate the effectiveness of offending behaviour programmes.

	<i>Practice met the required standard</i>	<i>Practice partly met the required standard</i>	<i>Practice did not meet the required standard</i>
Individual programmes	√		
Frequent reviews	√		
Evaluation and Monitoring		√	

Recommendation:

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.

5. Summary of Recommendations

1. The director and board of management of OGS should revise the statement of purpose and function in consultation with the IYJS, to reflect legislative and other changes.
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' guides reflects rights that are in the standards such as consultation, independent advocacy, and access to records.
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.
4. The director and board of management of OGS, in consultation with the IYJS, should:
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9. The director and board of management of OGS, in consultation with the IYJS, should develop practice guidance for staff on safeguarding.

10. The IYJS, in consultation with the director and board of management of OGS, should review the whistle-blowing policy and ensure that staff have sufficient confidence in it for it to fulfil its purpose of protecting young people.
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