



**Health  
Information  
and Quality  
Authority**

An tÚdarás Um Fhaisnéis  
agus Cáilíocht Sláinte

## Office of the Chief Inspector

# Report of an inspection of a Designated Centre for Older People

Name of designated centre:	St Ursula's Nursing Home
Name of provider:	Ballyhavil Limited
Address of centre:	Golf Links Road, Bettystown, Meath
Type of inspection:	Unannounced
Date of inspection:	14 March 2019
Centre ID:	OSV-0000171
Fieldwork ID:	MON-0023462

## About the designated centre

The following information has been submitted by the registered provider and describes the service they provide.

The centre provides 24- hour nursing care for up to 24 residents over the age of 18 years, male and female who require long-term and short-term care or respite.

The building has two storeys. Communal facilities and residents' bedroom accommodation consists of 24 single bedrooms, two of which have en-suite facilities. Communal facilities, bathrooms and toilets are available and located within a reasonable distance from bedrooms and communal areas.

The centre has a spacious lounge with a variety of seating options, and a number of other sitting areas with views outside.

A separate dining room is available on the opposite end to the lounge and sitting areas with 17 bedrooms in between and seven bedrooms on the first floor. A chair lift is available to support residents accommodated on the first floor and plans to install a passenger lift were to be completed later this year (2019). An accessible outdoor area was available and plans to enhance the facilities outdoor were also planned.

The philosophy of care is to provide high quality, personalized, friendly and informed care to residents. The Nursing Home endeavours to foster an ethos of independence and choice where residents can recover and build confidence in their abilities with a high standard of nursing and medical care provided. A commitment to providing privacy, dignity and confidentiality to the residents and their families underpins the centre's mission statement.

### **The following information outlines some additional data on this centre.**

Current registration end date:	22/02/2021
Number of residents on the date of inspection:	22

## How we inspect

This inspection was carried out to assess compliance with the Health Act 2007 (as amended), the Health Act 2007 (Care and Welfare of Residents in Designated Centres for Older People) Regulations 2013 (as amended), and the Health Act 2007 (Registration of Designated Centres for Older People) Regulations 2015 (as amended). To prepare for this inspection the inspector of social services (**hereafter referred to as inspectors**) reviewed all information about this centre. This included any previous inspection findings, registration information, information submitted by the provider or person in charge and other unsolicited information since the last inspection.

As part of our inspection, where possible, we:

- speak with residents and the people who visit them to find out their experience of the service,
- talk with staff and management to find out how they plan, deliver and monitor the care and support services that are provided to people who live in the centre,
- observe practice and daily life to see if it reflects what people tell us,
- review documents to see if appropriate records are kept and that they reflect practice and what people tell us.

In order to summarise our inspection findings and to describe how well a service is doing, we group and report on the regulations under two dimensions of:

### **1. Capacity and capability of the service:**

This section describes the leadership and management of the centre and how effective it is in ensuring that a good quality and safe service is being provided. It outlines how people who work in the centre are recruited and trained and whether there are appropriate systems and processes in place to underpin the safe delivery and oversight of the service.

### **2. Quality and safety of the service:**

This section describes the care and support people receive and if it was of a good quality and ensured people were safe. It includes information about the care and supports available for people and the environment in which they live.

A full list of all regulations and the dimension they are reported under can be seen in Appendix 1.

**This inspection was carried out during the following times:**

Date	Times of Inspection	Inspector	Role
14 March 2019	10:20hrs to 16:20hrs	Sonia McCague	Lead

## Views of people who use the service

Residents and relatives who communicated with the inspector were happy with the services received and provided.

Residents were positive with regard to the control they had in their daily lives and the choices that they could make. They told the inspector about their daily routines, activity plans and interactions with the local community. The residents expressed satisfaction regarding food, activities, visiting arrangements, the facilities and healthcare services.

Residents were happy with the support and assistance provided by staff and felt they had a 'life' in the centre. Residents were satisfied with staff numbers and skills available to meet their needs and promote autonomy.

Residents and relatives reported that staff were kind and respectful and treated them in a courteous and dignified manner. Both residents and relatives knew staff by their name and were able to identify a staff member whom they would speak with if they wanted to make enquiries or if they were unhappy with something in the centre.

## Capacity and capability

Overall, a good service was being provided to the residents, but some improvements were required.

There was a clearly defined and experienced management structure that identified the lines of authority and accountability. Assurance frameworks were in place and a record of incidents occurring in the designated centre was maintained and, where required, notified to the Chief Inspector.

Audit, monitoring and review systems were in place to promote the delivery of safe, quality care services. However, the effectiveness of auditing staff training, its analysis and planning and the impact of changing work systems required some improvement.

Operational matters and resident outcomes were evaluated and discussed within monthly governance meetings held. This information was to be incorporated within the pending annual quality review for 2018 along with resident satisfaction levels.

Records described in the Regulations were available and stored securely. Records of complaints, incidents and accidents were maintained, and the statement of purpose,

a residents guide and a record of current insurance policy was in place, as required.

There was a policy and procedures for the management of complaints. Information in relation to making a complaint was available and a complaints log was in place to records all complaints, action taken, satisfaction and the outcomes reached. Information on external agencies including the contact details of an advocacy service was also available. Management and staff were open to receiving feedback or information in order to improve the service. There were no unresolved or active complaints at the time of this inspection.

Staff had access to mandatory and relevant training and those spoken to were knowledgeable regarding their role and the residents they supported and assisted. However, some gaps in staff training were identified. For example, on the day of inspection some staff had not completed relevant training for the role and responsibilities they were performing. This was mainly attributable to delays in securing external training facilitators and a turnover in staff. Staff files were not examined on this inspection, but the person in charge and provider representative told the inspector all staff on duty had schedule 2 documents on file that included a declaration of Garda vetting.

While some actions required following the previous inspection 27 September 2017 were progressed or addressed, some required further improvement under governance and management, staff training and care planning that are restated in this compliance plan for response.

## Regulation 15: Staffing

The person in charge was responsible to ensure adequate staff numbers and skill mix, and that the staff of the designated centre includes, at all times at least one registered nurse. This was confirmed in the roster made available and from speaking with staff and residents. Arrangements were in place to respond to staff absences and agency staff had been sourced to work as and when required.

Residents spoken with were satisfied with the staffing levels and were complimentary of the support given and assistance provided by them. Staff were knowledgeable of residents likes and preferences and were seen interacting well with residents in a kind, friendly and respectful manner. For example, knocking on residents' bedroom doors and waiting for permission to enter and explaining procedures before carrying them out.

Judgment: Compliant

## Regulation 16: Training and staff development

An induction, orientation and training programme for all new and existing staff was described.

While some staff had completed a range of relevant training that included manual handling, fire safety, infection control, cardio pulmonary resuscitation (CPR), hand and food hygiene and medicine management, gaps were found in these areas.

Copies of statutory guidance, best practice protocols and relevant standards in relation to the operation of designated centres for older people were available to staff in the nursing home.

Judgment: Not compliant

## Regulation 22: Insurance

A current record of insurance cover for the nursing home was seen in place.

Judgment: Compliant

## Regulation 23: Governance and management

The designated centre had sufficient resources to ensure the delivery of care in accordance with the statement of purpose. The registered provider representative and general manager visit the Nursing Home regularly and receive monthly feedback from the Person in Charge (PIC) on residents' needs or changes within the home.

The Director of Nursing works full time in this centre as the PIC. All residents spoken with knew her and were familiar with all other management staff. The recruitment of staff was on-going in response to staff turnover experienced.

There was a clearly defined management structure that identifies the lines of authority and accountability, specifies roles, and details responsibilities for all areas of care provision. Operational and clinical audits formed part of the monitoring process.

While management systems were described and in place, some improvement was required to ensure the effectiveness of the systems so that the service provided is safe, appropriate, consistent and effectively monitored. For example, the audit and management of staff training failed to ensure appropriate provision and updating of staff training needs. Additionally, the transition arrangement to change to an alternative method of clinical recording and care planning was not sufficiently organised to ensure completeness on a phased basis. These particular matters required improvement so as they were planned and managed to ensure a person

centred, effective and safe service to all residents.

Assurances that all staff had a declaration of Garda Vetting and schedule 2 records prior to commencement on duty was given. The provider representative and person in charge told the inspector that all staff on duty had completed Garda vetting, induction and appraisal accordingly.

An annual review of the quality of the service had been completed for 2017 with a quality improvement plan. The person in charge and management told the Inspector they were in the process of completing the quality review of 2018 to inform the improvement plan of 2019.

Judgment: Substantially compliant

### Regulation 3: Statement of purpose

There was a written statement of purpose and function document available in the centre. This document had been updated and a copy was submitted to the Office of the Chief Inspector.

Judgment: Compliant

### Regulation 31: Notification of incidents

Notification were submitted to the Office of the Chief Inspector as required.

Judgment: Compliant

### Regulation 34: Complaints procedure

There was a policy and procedure in place for the management of complaints.

The person or nurse in charge was nominated to deal with complaints, and to ensure that complaints were appropriately recorded and responded to. A person responsible for managing appeals and access to the ombudsperson was also outlined within the complaints policy, statement of purpose and residents guide.

A complaints log was maintained in the centre, and this was made available to the inspector. The log included one entry since the previous inspection which was resolved in a timely manner and to the satisfaction of those involved.



Judgment: Compliant

## Quality and safety

On the day of inspection, the quality of the care and support provided to residents was of a good standard. The atmosphere was calm, friendly and welcoming. There were a total of 22 residents with one in hospital for a planned procedure and two availing of respite care.

Residents' confirmed their healthcare needs were met through timely access to medical treatment and access to allied healthcare services. The social care needs of residents were met to their satisfaction and residents felt safe in the centre.

Some quality and safety improvements were required to ensure care plans were consistently updated and renewed following changes in needs and interventions recommended or agreed. This was particularly emphasised due to the gaps found associated with a change in recording systems that involved recording clinical care in both hard and soft copy formats until a recognised electronic system was established. A review of the management of this transition was required to ensure staff (including agency staff used) had reliable, up-to-date and relevant information available to them to guide care and interventions agreed.

Residents were protected through the implementation of safeguarding policies and procedures. Systems and arrangements were in place for safeguarding resident's finances and property. The person in charge and administration staff confirmed they did not act as a pension agent for any resident. They did facilitate the safekeeping of small sums of cash for residents whose activities involved day trips, outings or appointments. A record was maintained in this regard.

A positive approach to managing responsive behaviour was promoted and demonstrated in practice. While a restraint-free environment was described, further improvement was required to ensure with National Guidance and best practice least restrictive means were promoted. Alternatives to bedrails were to be explored further, made available and trialled in advance of bedrails following an assessment. Care plans in this regard were to be subject to a review to inform the restraint register seen maintained. A review of the restraint policy, procedures and arrangements in place was required.

The inspector saw that residents' privacy and dignity was respected. Residents were seen to be well groomed and dressed in an appropriate manner with clothes and personal effects of their choosing. Residents who spoke with the inspector said they were respected, consulted with and happy.

Residents confirmed that they had been consulted with in a range of matters for example the daily routines, activities they participate in and day-to-day running of the centre. The actions required relating to activity provision had been

addressed. Residents were offered opportunities to exercise their choice and were able to develop and maintain personal relationships with family and friends in accordance with their wishes. Visitors were welcomed and encouraged to participate in residents' lives.

The design and layout of the residential service is to be enhanced further as outlined by the provider and agreed within a condition of registration. On the day of this inspection all areas in the premise met the privacy, dignity and well-being of each resident's assessed needs.

The centre was clean, warm and well ventilated. Residents had a variety of spaces to gather and socialise in. Good directional signage and decorative effects with contrasting colours was in place. The inspector was told that the dining room had been recently redecorated and saw that residents were offered two sittings to accommodate all. This was an action completed following the last inspection.

Fire safety precautions and arrangements were in place. The fire alarm was serviced on a quarterly basis and all other fire safety equipment was serviced on an annual basis. Management, certificates and records confirmed this. Suitable fire equipment was provided and advertised, and there was adequate means of escape with signage to fire exits. There were prominently displayed procedures for the safe evacuation of residents and staff in the event of fire.

Staff training records confirmed that many staff were trained in fire safety while some staff members had not. This required action had not been addressed having been highlighted in the previously inspection report. Fire drills had been completed in 2018, but further improvement was required to include all staff and include the detail and scenario simulated to ensure day and night conditions were considered, identify which of the five zones were involved, the staff attendance and practices simulated, findings and time required to complete.

### Regulation 11: Visits

Adequate arrangements for a resident to receive visitors was available.

Judgment: Compliant

### Regulation 17: Premises

Plans to improve the overall facilities and premises, as required in Schedule 6, were in progress and to be completed within the time frame agreed following the previous inspection and condition (8) of registration.

The provider representative gave assurances that the action plan of the previous

inspection and condition (8) of the registration renewed would be adhered to in relation to the physical environment in the designated centre. The premises is to be reconfigured as outlined in the plans submitted to the chief inspector on 16th November 2017. The reconfiguration must be complete by December 2019.

The standard of cleanliness throughout the centre was excellent. The centre was warm, welcoming, homely, comfortable and well maintained.

The premises met the needs of the existing residents in its layout, and design. Residents said they found it comfortable and there was suitable equipment, aids and appliances in place to support and promote the full capabilities of existing residents.

Judgment: Compliant

### Regulation 20: Information for residents

The Nursing Home had a resident's guide/brochure that contained relevant information on the services and facilities available and provided.

Judgment: Compliant

### Regulation 28: Fire precautions

Fire safety precautions and arrangements were in place. The fire alarm was serviced on a quarterly basis and all other fire safety equipment was serviced on an annual basis. Management, certificates and records confirmed this. Emergency instructions and evacuation procedures were displayed.

Staff training records confirmed that many staff were trained in fire safety, however, training gaps were identified as some staff members had not completed this mandatory training.

Fire drills had been completed in 2018, but further improvement was required to include all staff and the detail in relation to the scenario simulated to ensure day and night conditions were considered, identify which of the five zones were involved, the staff attendance and practices simulated, findings and time required to complete.

Judgment: Not compliant

### Regulation 5: Individual assessment and care plan

There was evidence of on-going resident review and assessment using a range of recognised tools covering clinical issues such as the risk of pressure ulcers, risk of malnutrition and falls risk assessments. However, gaps in the care planning and review process were evident and assessments carried out by health care professionals had not been consistently referenced or reflected within existing or available care plans to guide staff and ensure agreed best practice.

While residents' needs were identified or known, decisions previously made and changes that occurred were not consistently reflected in a dedicated and appropriate care plan that was subject to review.

The absence of specific care plan did not aid the evaluation of the interventions and treatments prescribed or given.

Judgment: Not compliant

### Regulation 6: Health care

Residents' healthcare needs were being met through good access to services and opportunities for social engagement within a warm homely environment. Resident were facilitated to retain the services of their general practitioner (GP) or avail of the services of another GP providing a weekly service to the centre.

Residents' individual nutritional and dietary needs were monitored. There were systems in place to ensure residents do not experience poor nutrition and hydration. There were preventative measures in place for any clinical risks identified. There were no residents with pressure ulcers and a low rate of falls and accidents were reported.

Judgment: Compliant

### Regulation 7: Managing behaviour that is challenging

Residents were provided with appropriate support that promoted a positive approach to responsive behaviour.

The inspector was told that a restraint free environment was promoted and that no resident was chemically restrained. The Nursing Home had a restraint policy that in the main reflects the principles of the National Guidance document. However, parts were vague and it did not provide sufficient information and guidance specific to measures available and procedures in place within the centre. Nor did it outline the alternatives to be trialled and process required in this regard to ensure the least

restrictive measure was available and deployed, where appropriate.

While bedrail assessments examined indicated a rationale for this restraint use it did not indicate if less restrictive alternatives were available, had been considered or trialled prior to its application.

Judgment: Substantially compliant

### Regulation 8: Protection

Good emphasis was placed on residents' safety. A number of measures had been taken to ensure that residents felt safe while at the same time had opportunities for maintaining independence and fulfilment.

Reasonable measures were in place to protect residents from abuse or harm in the designated centre. These measures included a policy, agreed protocols and staff training in relation to the detection and prevention of and responses to abuse. However, gaps in staff training were identified.

A dedicated safe to store resident's valuables and their possessions was available and a record of transactions was recorded.

Judgment: Substantially compliant

### Regulation 9: Residents' rights

Residents had and were satisfied with the arrangements and facilities for occupation and recreation. They told the inspector they had opportunities to participate in internal and external activities in accordance with their interests and capacities. Dedicated activity staff were available and improvements were made in this area following the last inspection.

All residents were accommodated in single occupancy bedrooms and could undertake personal activities in private. Information about current affairs and local matters were available and shared in discussions. Radio, television, telephone, newspapers and internet access were available. Voluntary groups, community resources and events locally formed part of the activity programme.

Opportunities and arrangements for residents to be consulted about and participate in the organisation of the centre were in place and access to independent advocacy services was available and advertised.

Residents were offered choice and were supported to exercise decision making in relation to their preferences and lifestyle choices. A review of the communal

environment was completed by management with residents in relation alterations required to support therapeutic or quality interactions for structured periods in the day to engage residents in meaningful activities in accordance with their interests or capacities, and communication difficulties.

Residents told the inspector they were satisfied with their current arrangements and options available to them. The provider representative described plans to reconfigure the layout and increase the footprint and communal space in the centre pending planning permission.

The inspector was satisfied that each resident, could communicate freely, having regard to his or her wellbeing, safety and health and that of other residents in the designated centre.

Judgment: Compliant

## Appendix 1 - Full list of regulations considered under each dimension

This inspection was carried out to assess compliance with the Health Act 2007 (as amended), the Health Act 2007 (Care and Welfare of Residents in Designated Centres for Older People) Regulations 2013 (as amended), and the Health Act 2007 (Registration of Designated Centres for Older People) Regulations 2015 (as amended) and the regulations considered on this inspection were:

Regulation Title	Judgment
<b>Views of people who use the service</b>	
<b>Capacity and capability</b>	
Regulation 15: Staffing	Compliant
Regulation 16: Training and staff development	Not compliant
Regulation 22: Insurance	Compliant
Regulation 23: Governance and management	Substantially compliant
Regulation 3: Statement of purpose	Compliant
Regulation 31: Notification of incidents	Compliant
Regulation 34: Complaints procedure	Compliant
<b>Quality and safety</b>	
Regulation 11: Visits	Compliant
Regulation 17: Premises	Compliant
Regulation 20: Information for residents	Compliant
Regulation 28: Fire precautions	Not compliant
Regulation 5: Individual assessment and care plan	Not compliant
Regulation 6: Health care	Compliant
Regulation 7: Managing behaviour that is challenging	Substantially compliant
Regulation 8: Protection	Substantially compliant
Regulation 9: Residents' rights	Compliant

# Compliance Plan for St Ursula's Nursing Home OSV-0000171

Inspection ID: MON-0023462

Date of inspection: 14/03/2019

## Introduction and instruction

This document sets out the regulations where it has been assessed that the provider or person in charge are not compliant with the Health Act 2007 (Care and Welfare of Residents in Designated Centres for Older People) Regulations 2013, Health Act 2007 (Registration of Designated Centres for Older People) Regulations 2015 and the National Standards for Residential Care Settings for Older People in Ireland.

This document is divided into two sections:

Section 1 is the compliance plan. It outlines which regulations the provider or person in charge must take action on to comply. In this section the provider or person in charge must consider the overall regulation when responding and not just the individual non-compliances as listed section 2.

Section 2 is the list of all regulations where it has been assessed the provider or person in charge is not compliant. Each regulation is risk assessed as to the impact of the non-compliance on the safety, health and welfare of residents using the service.

A finding of:

- **Substantially compliant** - A judgment of substantially compliant means that the provider or person in charge has generally met the requirements of the regulation but some action is required to be fully compliant. This finding will have a risk rating of yellow which is low risk.
- **Not compliant** - A judgment of not compliant means the provider or person in charge has not complied with a regulation and considerable action is required to come into compliance. Continued non-compliance or where the non-compliance poses a significant risk to the safety, health and welfare of residents using the service will be risk rated red (high risk) and the inspector have identified the date by which the provider must comply. Where the non-compliance does not pose a risk to the safety, health and welfare of residents using the service it is risk rated orange (moderate risk) and the provider must take action *within a reasonable timeframe* to come into compliance.



**Section 1**

The provider and or the person in charge is required to set out what action they have taken or intend to take to comply with the regulation in order to bring the centre back into compliance. The plan should be **SMART** in nature. **S**pecific to that regulation, **M**easurable so that they can monitor progress, **A**chievable and **R**ealistic, and **T**ime bound. The response must consider the details and risk rating of each regulation set out in section 2 when making the response. It is the provider’s responsibility to ensure they implement the actions within the timeframe.

**Compliance plan provider’s response:**

Regulation Heading	Judgment
Regulation 16: Training and staff development	Not Compliant
<p>Outline how you are going to come into compliance with Regulation 16: Training and staff development:            Training and staff development:            An audit has been completed of the staff training programme to ensure compliance with regulation 16.            The gaps identified on the day of inspection have been partially rectified and the Person in Charge ensures all training will be up to date by end of May.</p>	
Regulation 23: Governance and management	Substantially Compliant
<p>Outline how you are going to come into compliance with Regulation 23: Governance and management:            Governance and management:            The Person in Charge had training organized for staff to be completed by the end of April. Future training will now be arranged with external training facilitators well in advance of due dates to avoid gaps emerging and ensure all staff have appropriate training relevant to their roles.            Improvements in our care planning system is currently underway. Training has begun with a computerized care management system which will improve the quality of our care planning system.            Our annual review will be completed by end of April.</p>	

Regulation 28: Fire precautions	Not Compliant
<p>Outline how you are going to come into compliance with Regulation 28: Fire precautions:  All staff have now completed Fire Safety Training.  Future fire drills will now have a more detailed record of the scenario simulated which will identify which zone was involved, staff involved, findings and time required to complete the drill.</p>	
Regulation 5: Individual assessment and care plan	Not Compliant
<p>Outline how you are going to come into compliance with Regulation 5: Individual assessment and care plan:  Individual assessment and care plan:  Improvements in our care planning system is currently underway. Training has begun with a computerized care management system which will improve the quality of our care planning system. All hard copy care plans will be fully completed before they are transferred to the computerised system.</p>	
Regulation 7: Managing behaviour that is challenging	Substantially Compliant
<p>Outline how you are going to come into compliance with Regulation 7: Managing behaviour that is challenging:  Managing behaviour that is challenging:  After some consultation with our residents we are currently trialing looped safety bed mobility aids and weighted blankets as a less restrictive alternative.</p>	
Regulation 8: Protection	Substantially Compliant
<p>Outline how you are going to come into compliance with Regulation 8: Protection:</p>	

Protection:

All staff have received training in the detection and prevention of and responses to abuse and all update in training will be completed by the end of April.

## Section 2:

### Regulations to be complied with

The provider or person in charge must consider the details and risk rating of the following regulations when completing the compliance plan in section 1. Where a regulation has been risk rated red (high risk) the inspector has set out the date by which the provider or person in charge must comply. Where a regulation has been risk rated yellow (low risk) or orange (moderate risk) the provider must include a date (DD Month YY) of when they will be compliant.

The registered provider or person in charge has failed to comply with the following regulation(s).

Regulation	Regulatory requirement	Judgment	Risk rating	Date to be complied with
Regulation 16(1)(a)	The person in charge shall ensure that staff have access to appropriate training.	Not Compliant	Orange	30/05/2019
Regulation 23(c)	The registered provider shall ensure that management systems are in place to ensure that the service provided is safe, appropriate, consistent and effectively monitored.	Substantially Compliant	Yellow	30/05/2019
Regulation 23(d)	The registered provider shall ensure that there is an annual review of the quality and safety of care delivered to residents in the designated centre to ensure that such care is in accordance with relevant standards set by the	Substantially Compliant	Yellow	30/04/2019

	Authority under section 8 of the Act and approved by the Minister under section 10 of the Act.			
Regulation 28(1)(d)	The registered provider shall make arrangements for staff of the designated centre to receive suitable training in fire prevention and emergency procedures, including evacuation procedures, building layout and escape routes, location of fire alarm call points, first aid, fire fighting equipment, fire control techniques and the procedures to be followed should the clothes of a resident catch fire.	Not Compliant	Orange	09/04/2019
Regulation 28(1)(e)	The registered provider shall ensure, by means of fire safety management and fire drills at suitable intervals, that the persons working at the designated centre and, in so far as is reasonably practicable, residents, are aware of the procedure to be	Not Compliant	Orange	30/04/2019

	followed in the case of fire.			
Regulation 5(3)	The person in charge shall prepare a care plan, based on the assessment referred to in paragraph (2), for a resident no later than 48 hours after that resident's admission to the designated centre concerned.	Not Compliant	Orange	12/04/2019
Regulation 7(3)	The registered provider shall ensure that, where restraint is used in a designated centre, it is only used in accordance with national policy as published on the website of the Department of Health from time to time.	Substantially Compliant	Yellow	30/05/2019
Regulation 8(2)	The measures referred to in paragraph (1) shall include staff training in relation to the detection and prevention of and responses to abuse.	Substantially Compliant	Yellow	30/05/2019