

# Health Information and Quality Authority

An tÚdarás Um Fhaisnéis agus Cáilíocht Sláinte

# Report of a Designated Centre Special Care Unit

Name of designated	Coovagh House Special Care Unit
centre:	
Name of provider:	The Child and Family Agency
Address of centre:	Limerick
Type of inspection:	Announced
Date of inspection:	10 <sup>th</sup> and 11 <sup>th</sup> of April 2018
Centre ID:	OSV 0004219
Fieldwork ID	MON-0021250

## About the designated centre

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

Coovagh House special care unit is one of four special care units in the country. The occupancy of the special care unit is up to four children of mixed gender, aged between 11 and 17 years on admission. It is located on the grounds of a hospital in Limerick. Inside the special care unit, there are four buildings; a residential unit, an administration building, a school and a gym. The residential unit, school and gym buildings face onto a large open space.

The aim of the special care unit is to provide a short-term period of stabilisation to children who are detained under a High Court order, when their behaviour poses a real and substantial risk of harm to their life, health, safety, development or welfare. The unit is described as a secure Unit meaning it is locked and the young people are not allowed to leave without permission.

The objective of the special care unit is to provide a safe and caring environment and therapeutic environment where children learn to make safer choices and develop their wellbeing, reduce their risk taking behaviour and so enable the child to return to a less secure placement as soon as possible based on the needs of that child.

#### The following information outlines some additional data of this centre.

Current registration end date:	New application
Number of children on the date of inspection:	Three

#### How we inspect

To prepare for this inspection the inspector or inspectors reviewed all information about this centre. This included any previous inspection findings, registration information and information submitted by the provider or person in charge since the last inspection.

As part of our inspection, where possible, we:

- speak with children and the people who visit them to find out their experience of the service,
- talk to staff and management to find out how they plan, deliver and monitor the care and support services that are provided to children 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 summarize our inspection findings and to describe how well a service is doing, we group and report on the regulations under two dimensions:

#### 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 children 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
10 APRIL 2018	09:00hrs to 17:30hrs	Ruadhan Hogan, Tom Flanagan, Jane McCarroll	Inspector
11 APRIL 2018	08:15hrs to 15:30hrs	Ruadhan Hogan, Tom Flanagan, Jane McCarroll	Inspector

#### Views of children who use the service

Children said that they did not like being locked up in the special care unit. While children said they knew about their rights and could go to their social workers and guardians ad lietim along with staff in the centre should they want to raise an issue, they said they did not have choice or control over what happened in their lives. Some children said they wanted to be moved to another placement immediately as there was no freedom and no comfort in the special care unit.

Some children told inspectors they were very angry at having to stay in the special care unit as a follow on placement had not been identified at the time the placement was due to end.

Children could maintain contact with their families through phone contact and visits inside and outside of the centre. Some children said that they would like time on their own with their families as it was their only time away from staff.

Children told inspectors that rules in the special care unit were applied in different ways by staff. They said that this caused them frustration. Some children said that other rules were not fair, such as being locked in their bedrooms at nine o clock each night, which they said caused them anxiety.

Children said that they had a good relationship with some staff and did not with other staff. Children said they could go to a favourite staff member when they needed to talk about something but they did not like the amount of new staff as they did not like change.

#### Capacity and capability

Governance and management arrangements required significant improvements. The Child and Family Agency (Tusla) did not have adequate arrangements in place in line with the regulations for the appointment of the person in charge, oversight and supervision of practice and the implementation of policies and procedures in a consistent manner to ensure safe and effective care. While children at the time of inspection were not at risk and, in general, were receiving adequate care, the governance and management arrangements left the service with potential risks that had not been adequately assessed and or managed.

Children were detained in a special care unit because their behaviours placed them

at a significant risk. Work was undertaken with the child in a multidisciplinary manner by the social care staff, the child's social work team and the Assessment Consultant Therapy Service team, to stabilise these behaviours so the child could move to an appropriate follow on placement. This happened primarily through the programme of care, and protective measures.

While there was a governance structure in place, management systems in the centre did not identify clear lines of accountability and authority. The management team was relatively new and key staff were unsure as to their role despite requesting role clarification during supervision with their line manager. Some staff told inspectors they had not been formally delegated specific responsibilities and as a result they were not sure what they were responsible for.

The arrangements that the provider had put in place for the appointment of a person in charge were not adequate for geographical reasons and the relevant regulatory documentation had not been submitted by the provider. While the person in charge met the requirements of the regulations in that the post was full time, and they were suitably experienced and capable to undertake the role, they did not have the capacity to be the person in charge for two designated centres that they were responsible for as one was based in Dublin and the other was based in Limerick. Inspectors found that the person in charge had been in this special care unit four times since his appointment. While there were arrangements in place for staff to raise concerns about the quality and safety of the care provided, some concerns had not been investigated in a timely manner. Inspectors found that the person in charge, was not aware of the concerns and subsequently committed to undertaking an investigation. The inspectors were not satisfied with this arrangement as the person in charge was not sufficiently engaged in the effective governance, operational management and administration of the unit.

While all of the required policies and procedures required under Schedule 2 were in place, not all had been reviewed and were not up-to-date to provide good guidance to the staff team.

Inspectors found the staff group were dedicated and professional, but there were staff shortages and the registered provider was reliant on a large number of agency staff to ensure a full staff compliment. Some staff were newer, less experienced and needed to be rostered with more experienced staff. This did not always happen. Additionally, the supervision of staff was not frequent and in line with the policy. This impacted on the continuity of care and support and consistency in practice with children as the programme of care, behavioural support and consistent measures to protect children had not been fully implemented. For example, when some behaviours that were challenging arose, they were not always managed in the best way as staff did not have the confidence to intervene at the right time and on seven occasions this resulted in An Garda Síochána being called to the unit to manage the situation. In addition due to the lack of consistency of the staff team and poor managerial oversight children experienced inconsistent boundaries which frustrated them. For example inconsistent bedtime routines and some staff allowed children to smoke just outside the unit, while others did not which was not consistent with the special care policy on smoking.

Deficits in staff skills, specifically in responding to behaviours that were challenging had been identified following an internal investigation in August 2017 but no additional training had been provided or scheduled at the time of inspection to address this identified deficit. In the interim, the person in charge told inspectors that the occupancy of the unit was to be reduced to a maximum of two children. At the time of inspection, the occupancy of the unit was three children and the reduction in occupancy did not take place until the day after the inspection. The person in charge said that this would allow the whole staff group to build up the skills, competency and confidence to safely manage behaviours that challenge in the special care unit.

Some areas were in compliance such as the centre register, insurance and care records. Additionally, inspectors found good systems in place for the management of children's complaints. There were some measures being developed as a means to monitor the units compliance with the regulations such as auditing.

Following the fieldwork inspectors met with a representative of the provider to discuss the concerns regarding the governance and management arrangements. The provider identified that they were reviewing and intended to revise the person in charge arrangements. In addition they spoke about the challenges they have been presented with in recruiting staff for special care units due to the nature of the work. However, they reported that they have had some success in recruiting staff on a three year contract basis for the special care unit and they would be in place in the near future which should improve the continuity of care and support that the children receive.

## Regulation 5: Statement of purpose

There was a statement of purpose that was not compliant with the regulations as it did not outline all aspects of Schedule 1 of the regulations. For example, not all services provided in the special care unit were outlined such as the school. Additionally, it did not adequately describe the full organisational structure of the special care unit and did not include the layout of the special care unit. The registered provider did not ensure that a child friendly version of the statement was provided to children.

#### Judgment: Not compliant

#### Regulation 6: Care practices, operational policies and procedures

The registered provider did not ensure: that all care practices, operational policies and procedures were in place in line with Schedule 2 of the regulations, had been reviewed in line with the regulations and that the person in charge had implemented the practices, policies and procedures.

The person in charge did not have any systems in place to ensure these practices, policies and procedures were implemented and therefore did not sufficiently promote and protect the life, health, safety, development and welfare of each child who is detained in the special care unit. For example, children in the centre were not permitted to smoke and all parafenalia such as tobacco, matches and lighters were required to be handed up. Despite this, children took these items in secretly. This impacted on fire safety across the whole unit as incidents of fire setting in bedroms increased due to children having prohibited items. The person in charge acknowledged this during interviews and said alternative procedures were required to guide staff so these behaviours did not escalate.

Judgment: Not compliant

# Regulation 13: Person in charge

At the time of the inspection the person in charge was not adequately engaged in the effective governance, operational management and administration of the centre. The registered provider did not ensure that information and documentation for the person in charge was obtained as specified in Part A & B of Schedule 3 of the regulations.

#### Judgment: Not compliant

Regulation 14: Staff members and others working in the Special Care Unit

The registered provider did not ensure that: there was a suitable number, experience, and availability of staff members in the special care unit and that children received continuity of care and support due to the high number of agency staff in use. The registered provider did not ensure there were appropriate numbers of staff present in the unit at all times.

The registered provider did not maintain records specified in Part A and B of Schedule 3 of the regulations in relation to all staff members in the special care unit. The person in charge did not keep a written report of his duties under the regulations which he may, from time to time, delegate to appropriately qualified staff.

Judgment: Not compliant

#### Regulation 15: Training and staff development

The person in charge did not ensure that all staff members in the special care unit had access to training to enable them to provide care in line with the statement of purpose and policies and procedures. Training figures for staff provided to HIQA showed that a significant number of staff did not have training in key areas, for example, medicines management, the safe use of ligature cutters and restrictive practices as per the unit own training and staff development policy. The person in charge did not ensure that all staff members were informed of the regulations, standards and guidance. Some staff who spoke to inspectors did not know the requirements of the regulations and had not received adequate guidance/training on the regulations.

Judgment: Not compliant

# Regulation 16: Staff supervision and support

The person in charge did not ensure that an appropriate level of supervision and support was provided to staff members in the unit.

Judgment: Not compliant

#### Regulation 19: Care record

Care records were well maintained, and had all the requirements of schedule 5 of the regulations.

Judgment: Compliant

#### Regulation 20: Maintenance of records

All records met the requirements of the regulation, and contained all records required under schedule 6.

Judgment: Compliant

Regulation 21: Register of children detained in the special care unit

The register was up-to-date and met the requirements of the regulation.

Judgment: Compliant

Regulation 22: Record of a person employed in the special care unit

The person in charge did not maintain the records as set out in Part B of Schedule 3 of the regulations for each staff member in the special care unit. Records reviewed by inspectors had up-to-date An Garda Síochána vetting. However, there were significant gaps in the full time Tusla staff records where documents such as references and evidence of the persons identity were not on file. For the 13 agency staff employed in the special care unit, the person in charge was provided with assurance from the agency, that these staff members had some but not all of the required documents.

Judgment: Not compliant

Regulation 23: Insurance

Insurance was in place in line with regulations.

Judgment: Compliant

Regulation 24: Governance and management

The registered provider did not ensure that there was a clearly defined management structure that identified lines of authority and accountability, specified roles and detailed responsibilities for the area of special care provision. The registered provider did not ensure that some management systems were in place to ensure the service was delivered in a consistent way and monitored effectively. Some management systems, such as notifications, auditing and oversight of the programme of care were developed and reliable. Deficiencies were found in other systems such as delegation of authority, risk management, oversight of staff and monitoring and oversight of staff records. The lines of authority and accountability were not clear as staff in the centre did not fully know their roles and responsibilities. Additionally, the registered provider did not ensure that effective arrangements were in place to investigate when staff members raised concerns about the quality and safety of special care provided to children.

Judgment: Not compliant

Regulation 28: Notification of procedures, arrangements and periods when the person in charge is absent from the special care unit

There were no periods where the person in charge was absent from their role as person in charge from the special care unit.

Judgment: Compliant

Regulation 29: Complaints

Complaints were dealt with and managed well, and in line with their policy.

Judgment: Compliant

Registration regulation 6: Changes to information supplied for registration purposes

A new person in charge had been appointed on the 20 February 2018 but at the time of inspection the required documentation had not been submitted by the registered provider.

Judgment: Not compliant

Quality and safety

Children were placed in the special care unit by a High Court order for a 12 week

special care programme which was an individualised programme of support and skilled therapeutic intervention to enable the child to stabilise and then move to a less secure placement based on the assessed needs of that child.

The documented programmes of care for the children were comprehensive but these were not always being implemented consistently. Reccommendions were made by the multi-disciplinary team to guide interventions for staff in stabilising children in the special care unit. While some of these interventions were effective, not all of the childrens behaviours were being consistently addressed. For example, incidents of drug use and fire setting continued, indicating interventions were either not effective or were not being fully implemented and monitored by the person in charge.

Some of the children's needs were met while living in the centre. Children had access to a range of services to meet their needs. There was a school on the premises which children were facilitated and supported to attend. Independent living skills were promoted within the centre as children were encouraged to undertake activities such as cleaning, cooking and laundry. Children could occupy their time in the gym, out in the community on activities with staff and could access music, movies and television that they liked in their bedrooms.

Children were not always protected from abuse while living in the centre. Incidents of alleged abuse were notified to the relevant social work department in line with Children First 2017: National Guidance on the Protection and Welfare of Children. Care practices had not been consistently implemented and as such were not effective at preventing one incident of alleged peer abuse. Following the alleged incident safeguarding measures were put in place to prevent further incidents. Inspectors also found one child was not adequately supported to develop the knowledge and skills for self care and protection.

Behavioural support in the unit required improvement. Plans in place to address behavioural support were comprehensive, identifying early warning signs and diversion techniques but had not always been fully implemented. Inspectors found practice in the use of restraint and restrictive practices were transparent, as it was carried out in accordance with the national policy. However, children who displayed behaviours that were challenging were not always appropriately responded to so as to de-escalate their behaviour. As a result, on occasion, staff relied on An Garda Síochána to manage these behaviours. The impact for children was that they did not learn how to manage their own behaviour thus reinforcing the reason why they were detained in a special care unit. In addition, children observed that the staff team were not in control of the situation which in turn impacted on their experience of feeling safe. Findings from two previous HIQA monitoring inspections of the special care unit in 2016 and 2017 against the National Standards for Special Care Units found the premises was not fit for purpose in the provision of safe and effective care. Refurbishment works were underway at the time of the inspection and included a redesign of the interiors, replacing internal doors and installing windows into the building to let in more light. Investment had also been made to upgrade and equip the gym which provided children with opportunities for stimulation. During the inspection, the person in charge identified that further investment was required to ensure children could safely access the internet and had adequate outdoor recreational facilities.

The premises was well maintained with newly painted walls. Children had their own bedrooms which were basic. However, they could decorate them if staff deemed it appropriate and safe to do so. Each bedroom was ensuite and had a television secured behind a locked see through cabinet. Communal and cooking areas were clean and facilitated children in healthy eating habits. Fire safety precautions within the special care unit required timely improvement as fire doors, that were due to be replaced, were not effective at preventing smoke from spreading.

#### Regulation 7: Programme of care

A suite of comprehensive documentation describing the programme of care was in place, it was reviewed regularly and was of good quality. However, the person in charge did not consult with the social workers assigned responsibility for the children to inform himself of the special care provided. In addition he did not oversee the implementation of each child's programme of special care.

Judgment: Not compliant

#### Regulation 8: Healthcare

Children had access to range of services to meet these needs including general practitioner, other health professionals such as occupational health, psychology and psychiatry. Health records held in the centre were of good quality. Medicines were safely and securely stored and medicines management was of good quality. However, records of administration of medicines required improvement. The person in charge did not ensure the child's care record included how medication was administered by staff.

Judgment: Substantially compliant

# Regulation 9: Education, individual needs, religion, ethnicity, culture and language

Children were facilitated and supported to attend school. Childrens rights were promoted and protected while living in the unit. Children had opportunities to attend reviews to contribute to decisions about their care. Children's privacy and dignity was respected.

The registered provider did not ensure that each child had appropriate access to internet.

Judgment: Substantially compliant

Regulation 10: Family contact and visiting arrangements

There were arrangements in place for children to have access with their families where appropriate.

Judgment: Compliant

Regulation 11: Positive behavioural support

The registered provider did not ensure each person employed in the special care unit had up-to-date knowledge and skills to assist and support a child to manage their own behaviour.

The person in charge did not ensure that all staff members had up-to-date knowledge and skills to respond to some behaviours that were challenging. The person in charge did not ensure that consistent efforts were made to intervene at the right time in order to alleviate the cause of the child's behaviour. The person in charge did not ensure staff members received training in the management of behaviours that were challenging.

Judgment: Not compliant

**Regulation 12: Protection** 

The registered provider did ensure that social work departments were informed of allegations of abuse and neglect. The registered provider did not ensure that:

children in the unit were protected from all forms of abuse and that following disclosures of alleged abuse, some children were not supported to develop the knowledge, self awarerness and skills needed for self care and protection.

The person in charge did not ensure that all staff members received training in relation to safeguarding of children.

Judgment: Not compliant

## Regulation 17: Accommodation

While works were underway at the time of the inspection, they had not been completed. Due to these unfinished works inspectors found that the registered provider had not yet provided adequate and suitable accommodation as set out in Schedule 4 of the regulations, for example, adequate outdoor recreational facilities.

Judgment: Not compliant

Regulation 18: Food, nutrition and cooking facilities

Adequate arrangements were in place for the provision of food and cooking facilities, in line with the regulations.

Judgment: Compliant

## Regulation 25: Risk management

While the registered provider ensured a risk management policy was in place they did not ensure it was implemented throughout the unit. Individual risk assessments for children were good quality. However, there were gaps in categorisation of risks, and some risks were not adequately addressed, such as young people bringing cigarette lighters into the unit.

Judgment: Not compliant

Regulation 26: Fire precautions

The registered provider had not ensured that adequate precautions had been taken against the risk of fire and had not made adequate arrangements for maintaining the building fabric. Fire safety plans identified there had been damage to smoke seals around the doors thus preventing the containment of smoke within a room where a fire was ongoing. Fire doors had been ordered but had not been installed at the time of the inspection.

The registered provider had not made suitable arrangements for all staff members to receive training in fire safety and first aid and had not ensured that all persons in the special care unit were aware of procedures to be followed in the event of a fire. Inspectors found that records in relation to fire drills and the fire register were not kept.

Worryingly, there had been several incidents of fire setting by children which increased the risk and these had not been sufficiently managed to ensure further incidents did not take place.

Judgment: Not compliant

Regulation 27: Notification of incidents

With the exception of one incident, the person in charge notified all incidents to the chief inspector as required, following an incident where there was an allegation of child abuse.

Judgment: Not Compliant

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

Regulation Title	Judgment
Capacity and capability	
Regulation 5: Statement of purpose	Not compliant
Regulation 6: care practices, operational policies and procedures	Not compliant
Regulation 13: Person in charge	Not compliant
Regulation 14: Staff members and others working in the Special Care Unit	Not compliant
Regulation 15: Training and staff development	Not compliant
Regulation 16: Staff supervision and support	Not compliant
Regulation 19: Care record	Compliant
Regulation 20: Maintenance of records	Compliant
Regulation 21: Register of children detained in the special care unit	Compliant
Regulation 22: Record of a person employed in the special care unit	Not compliant
Regulation 23: Insurance	Compliant
Regulation 24: Governance and management	Not compliant
Regulation 28: Notification of procedures, arrangments and periods when the person in charge is absent from the special care unit	Compliant
Regulation 29: Complaints	Compliant
Registration Regulation 6: Changes to information supplied for registration purposes	Not compliant
Quality and safety	
Regulation 7: Programme of care	Not compliant
Regulation 8: Health care	Substantially compliant
Regulation 9: Education, individual needs, religion, ethnicity, culture and language	Substantially compliant
Regulation 10: Family contact and visiting arrangements	Compliant
Regulation 11: Positive behavioural support	Not compliant
Regulation 12: Protection	Not compliant
Regulation 17: Accommodation	Substantially
	compliant
Regulation 18: Food, nutrition and cooking facilities	Compliant
Regulation 25: Risk management	Not compliant
Regulation 26: Fire precautions	Not compliant
Regulation 27: Notification of incidents	Compliant

# Compliance Plan for Coovagh House Special Care Unit OSV – 004219

Inspection ID: MON-0021250

Date of inspection: 10 April 2018

#### 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 Children in Special Care Units) Regulations 2017, as amended, Health Act 2007 (Registration of Designated Centres) (Special Care Units) Regulations 2017 and the National Standards for Special Care Units 2015.

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 children 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 children 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 noncompliance does not pose a risk to the safety, health and welfare of children 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. Specific 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		
Registration Regulation 6: Changes to information supplied for registration purposes	Not Compliant		
Outline how you are going to come into comp information supplied for registration purposes	bliance with Registration Regulation 6: Changes to		
The Registered Provider has notified HIQA in person in Charge of Coovagh House.	n relation to the changes made in relation to the		
	This person is full time, has more than three years' experience in a supervisory role in Social Care and holds an appropriate qualification in Social Care.		
We have also supplied all information as specified in Part A & B of Schedule 3 of regulation to the Chief Inspector.			
Regulation 5: Statement of purposeNot CompliantOutline how you are going to come into compliance with Regulation 5: Statement of purpose:			
The Registered Provider will provide a Statement of Purpose in relation to Coovagh House which encompasses the information set out in schedule 1 of the regulations.			
An age appropriate Statement of Purpose document will be provided to the service by the registered provider. This has been given to the current young people residing in Coovagh House and all new residents will be provided with this booklet on the day of their admission.			
A copy of the Statement of Purpose will be given to Social Workers, GALs and parents within one week of a young person being admitted to the centre.			
The Registered Provider will review The State services are being delivered within the scope	ement of Purpose annually to provide assurance that of the Statement of Purpose.		
Regulation 6: Care practices, operational policies and procedures	Not Compliant		
Outline how you are going to come into comp policies and procedures:	bliance with Regulation 6: Care practices, operational		

The Registered Provider will produce an Interim set of Policies & Procedures in line with Schedule 2 of the Regulations whilst we await the completion of the National Policies which are currently being reviewed.

This document will support staff to deliver a safe and quality service in Coovagh House.

The Person in Charge will ensure that staff will receive training in relation to the implementation of these 20 policies & procedures at staff meetings and this will be recorded in the Coovagh House training record. Training records will be reviewed by the provider on a monthly basis through review of the Centre Governance reports.

The Registered Provider shall ensure that once the National Suite of Policies and Procedures have been updated that they are reviewed and updated at least every three years and such reviews shall have due regard to any recommendations made by the chief inspector and will reflect best practice.

A child friendly document outlining the updated care practices, operational policies & procedures in line with schedule 2 of the regulations will be produced by the Registered Provider.

The Registered Provider will ensure that training and education in relation to health risks relating to smoking will be rolled out to all staff and young people admitted to the centre.

A review of daily routines and activities shall be undertaken by the registered provider on a monthly basis and discussed with the Person in Charge during supervision.

Regulation 7: Programme of Care	Not Compliant
Outline how you are going to come into comp	liance with Regulation 7: Programme of Care:

The Registered Provider appointed a new Person in Charge on the 30<sup>th</sup> of April 2018.

The Person in Charge will chair a SCOAP meeting at the beginning of each young person's placement. This meeting will be attended by the representatives from the School, ACTS and Social Workers to develop a programme of care that is to be implemented for the young person.

The Person in Charge will review the care records on a monthly basis in advance of the Child in Care Review and will attend the Child in Care Reviews to ensure that the programme of care agreed at the SCOAP meeting is delivered as planned by the Multi-disciplinary team.

Any deviation from the plan will be escalated to the Registered Provider for review and action as appropriate.

Regulation 8: Health care	Not Compliant
Outline how you are going to come into compliance with Regulation 8: Health care:	

The Person in Charge will ensure that Tusla's Medication Management policy training has been delivered to all staff members in Coovagh House.

Additionally the Person in charge has implemented a new medication management recording system in Coovagh House.

Safe medicines management practices are reviewed and monitored by the Person in Charge on a monthly basis. This will include ensuring the route of administering medication by care staff is included in the medication management recording system.

There was a scheduled Administration of Medication Audit was completed on the 16<sup>th</sup> July 2018.

Regulation 9: Education, individual needs,	Not Compliant
religion, ethnicity, culture and language	

Outline how you are going to come into compliance with Regulation 9: Education, individual needs, religion, ethnicity, culture and language:

The Registered Provider will install internet access in designated areas within the centre. The young people will access the internet through the use of a laptop in the gym and smart TVs, based on risk assessment.

Regulation 11: Positive behavioral support Not Compliant

Outline how you are going to come into compliance with Regulation 11: Positive behavioural support:

The Director of the service will prepare a three year plan which will look to improve the following elements:

- Environment
- Staff and young people's wellbeing
- Resources available to the young people
- Ensuring the rights of young people are paramount
- Reducing restrictive practices
- Enhancing the training modules available to staff.

This will be broken down in to monthly targets which will be reviewed monthly by the Director of service in conjunction with both young people resident and Social Care Staff.

The Person in Charge will carry out a quarterly Training Needs Analysis and any specific training requirements for staff following this review will be escalated to the Director of Service to ensure that relevant training is procured.

The Person in Charge will ensure that all staff members have up to date training in behaviour management. When this training is completed all staff will receive 6 monthly refresher training in behaviour management. Training records will be updated monthly.

The Registered provider will ensure that all staff members receive training in relation to attachment and trauma.

The Person in Charge will ensure that every effort is made to identify and alleviate the cause of child's behaviour through ensuring that the following takes place:

- Weekly Treatment Planning Meetings with ACTS and key worker and young person
- Clinical review of young person's presentation where there is a pattern of challenging

behaviour.

- Training
- Supervision
- Incident review all incidents involving the use of a restrictive practice will be reviewed by management using the SERG template and any learning or recommendations will be documented and the young person's Placement Support Plan will be updated accordingly. Completed SERG's will be filed in a SERG folder in the PIC's office.

If there is a pattern of risk taking behaviour and initial interventions are not effective, a professionals SERG will be convened by the Person in Charge to identify possible alternative intervention strategies and every effort will be made to identify and alleviate the cause of the young person's challenging behaviour to ensure that all alternative measures are considered before a restrictive procedure is used.

The Director has arranged for extra training in positive behavioural supports to further enhance the staff team's skills.

The Registered Provider will ensure that operational care practices & procedures in relation to restrictive practices such as full searches, room searches, and positive behaviour supports will be reviewed and updated and made available to all Social Care Staff.

Regulation 12: Protection	Not Compliant
Outline how you are going to come into comp	1

A safeguarding policy & procedure as per policy no.3 in Schedule 2 of Regulations will be prepared in writing, adopted and implemented by the Registered Provider; these will be available to all staff.

The Person in Charge has ensured that all staff members currently working in Coovagh House have completed all 3 Children First on line training courses, The person in charge will ensure that all staff receive Tell Us training.

The Person in Charge will, where there has been an incident, allegation or suspicion of abuse ensure that the requirements of National Guidance for The Protection & Welfare of Children are complied with.

A safety plan to support the young person to be put in place in conjunction with other professionals.

All such incidents are notified to HIQA through provider portal.

The Person in Charge will ensure that a programme to support the young people in Coovagh House is implemented in consultation with ACTS. This will aim to develop the knowledge, selfawareness and skills needed for self care and protection. This will be delivered through Treatment Planning Meetings that are carried out with the young people on a weekly basis in collaboration with ACTS and the young person's key working team.

Where it is identified by Person in Charge that additional supports are required for a young person and where these services are not available within our own services these will be procured externally by the Director of services.

	_
Regulation 13: Person in charge Not Compliant	
Outling how you are aging to some into compliance with Deculation 12, Derson in charges	

Outline how you are going to come into compliance with Regulation 13: Person in charge:

The Registered Provider has notified HIQA in relation to the changes made in relation to the person in Charge of Coovagh House.

This person is full time has more than three years' experience in a supervisory role in Social Care and holds an appropriate qualification in Social Care.

We have also supplied all information in part A and part B of Schedule 3 of Regulation to the Chief Inspector.

Regulation 14: Staff members and others	Not Compliant
working in the special care unit	

Outline how you are going to come into compliance with Regulation 14: Staff members and others working in the special care unit

The Registered Provider has addressed the deficit in staffing through a three prong recruitment and selection campaign. This includes Tusla contracts offered to agency staff working in Coovagh House over 12 months. We now have a full staff team in situ.

The staff roster is reviewed weekly by the Person in Charge to ensure that there is a suitable number of staff working in the centre. The roster is populated with Tusla staff in the first instance and any gaps filled with the approved agency social care workers.

In the event that the service cannot be staffed by the Person in Charge this will be escalated to the Director of Service who convene an emergency meeting of the National Management Team CRS to discuss alternative measures to staff the Centre.

Records specified in Part A and B of Schedule 3 of the regulations will be held in respect of all staff members, The Person in Charge of the service will complete an Audit of all staff in the center as per regulation 22 to ensure all records are in place and that they comply with Part A and B of Schedule 3.

The Person in Charge will prepare a written record of any duties under the regulations that she delegates to other appropriately qualified staff, these records will be held by the Person in Charge.

Regulation 15: Training and staff development	Not Compliant

Outline how you are going to come into compliance with Regulation 15: Training and staff development:

The Person in Charge will ensure that all staff have access to professional development courses and training. This will be provided by Workforce training and development and additional training identified as required by the Person in charge will focus primarily on child centered care and protection. The Person in Charge will ensure that all staff are aware of the legislation relevant to their roles and responsibilities. Copies of the relevant legislation and regulations will be made easily available to all staff. A staff training policy will be developed to ensure that all staff receive relevant training in a timely manner.

The Person in Charge completed a staff training needs analysis which will be reviewed on a quarterly basis which will review the following:

- All staff trained in 8 mandatory trainings identified by National Director CRS
- Training is provided to staff team on up to date evidence based practice
- CPD training focus on the needs of the young people in Special Care
- Training provided reflects Statement of Purpose.

Regulation 16: Staff supervision and	Not Compliant
support	

Outline how you are going to come into compliance with Regulation 16: Staff supervision and support:

The Person in Charge will ensure that all staff members receive support and supervision by appropriately qualified staff to ensure that they perform their duties to the best of their ability in line with our Supervision Policy.

A written record of each supervisor session will be maintained with a signed copy given to the supervisee.

All staff will receive supervisee training.

If supervisor is absent for an extended period, a contingency plan will be put in place by the Person in Charge to maintain regular supervision for all staff, additional support from other Special Care Services will be brought in as required to ensure this is maintained.

Regulation 17: Accommodation	Not Compliant	

Outline how you are going to come into compliance with Regulation 17: Accommodation:

The Registered provider has ensured that building works to upgrade the centre have commenced this phase of the works are scheduled for completion 31<sup>st</sup> August 2018. Following completion of these structural works the registered provider will explore opportunities to make both the indoor and outdoor environment more young person friendly, stimulating and homely. The Director of the Service will undertake this initiative in conjunction with staff team and young people resident in the centre.

The design and layout of the centre will be outlined in Statement of Purpose by the Registered Provider.

A proposal has been submitted to the Registered Provider by the Person in Charge on 15<sup>th</sup> of June 2018 to develop outdoor recreational facilities; Soccer goals and basketball nets are have now

been purchased and will be installed by the maintenance section. Additional resources will be sourced through our capital finance budget.

Regulation 22: Record of a person	Not Compliant
employed in the special care unit	

Outline how you are going to come into compliance with Regulation 22: Record of a person employed in the special care unit:

A gap analysis has been completed by the Person in Charge and our Human Relations Officer. A plan is now in place to obtain all outstanding records required in Part B of Schedule 3 of the Regulations.

The Person in Charge will ensure that all records are present on an ongoing basis by scheduling a 6 monthly review of Tusla CFA and any staff from the agency we will also review their records.

This review to include that staff records are accurate, complete, legible and up to date. Also, that staff records are kept secure but easily retrievable through our online "Therefore "system in conjunction with our HR Manager and that staff records are kept for the required timeframe.

Regulation 24: Governance and	Not Compliant
management	

Outline how you are going to come into compliance with Regulation 24: Governance and management:

The Registered Provider will ensure that a clear organisational Structure is outlined in the Statement of Purpose.

The facility and service provided is now reflected in the Statement of purpose.

The Registered Provider will ensure that the Management Structure is clearly defined and identifies the lines of authority and accountability and specifies roles and details responsibilities for all areas of service provision.

The facility and service provided is now reflected in the Statement of purpose

There is a delegation folder put in place, available to all staff, to inform management and staff of delegations of authority.

A six monthly review of the quality and safety of care and support provided in Coovagh House will be completed by the Registered Provider to ensure that practice is based on best practice and complies with legislative and regulatory requirements.

A copy of this review will be made available to the young people and their families.

The Registered Provider has begun to investigate the staff concerns identified during inspection and an action plan is being formulated to ensure that any concerns raised by staff are addressed within a clearly defined timescale.

Regulation 25:	Risk manageme	ent	Not	Complian	t		
	•	•	1.	1.1 D	1.1	07 D' 1	

Outline how you are going to come into compliance with Regulation 25: Risk management:.

The Registered provider will ensure that the young people are more actively engaged in the development of risk assessments relating to their behaviors. The current risk assessment format will be revised to reflect this involvement and will seek to develop a culture of learning and support in relation to risk taking behaviors.

The registered provider will ensure that the Tusla National Risk Management Policy will be fully implemented within the service and will be complemented by local procedures specific to the service. Training will be provided to all staff to ensure that there is familiarity with policy.

The registered provider will audit the risk assessments on a fortnightly basis to ensure the correct categorization of risk and appropriate escalation as required.

The registered provider will implement a risk management strategy which will be implemented for managing situations where the safety of the young people and or staff may be compromised.

Regulation 26: Fire precautions	Not Compliant
Outline how you are going to come into comp	liance with Regulation 26: Fire precautions:

The Registered provider has scheduled staff training in relation to fire safety.

The Registered provider scheduled a Fire safety review which was completed in conjunction with the Fire Officer to identify any further deficits. The Registered Provider will ensure that all identified deficits are addressed.

Fire equipment such as the alarm, fire extinguishers and emergency lighting will be serviced by a professional provider.

New doors and fire seals have been installed and fire seals where they were missing have been retrofitted on older doors.

The registered provider will ensure that all staff are briefed in relation to completing the fire register to ensure that all fire records include details of fire drills, fire alarm tests, fire-fighting equipment, regular checks of escape routes, exits and fire doors.

Fire plans will be displayed in prominent areas and all staff through their fire training will be made aware of the content and location of these plans.

The risk posed by fire will remain on the risk register and will be reviewed fortnightly by the registered provider.

All young people and staff will be included in fire drills and each young person will have a Personal Emergency Evacuation Plan (PEEP)

Critical review will take place immediately after all incidents of fire setting in order to extract learning for individuals involved in the management of these incident, supports for staff and young people will be offered.

Regulation 27: Notification of incidents Not Compliant

Outline how you are going to come into compliance with Regulation 27: Notification of incidents:

All incidents will be notified to HIQA in accordance with regulation 27, The person in Charge will review all incidents on a weekly basis to ensure that they have been promptly notified.

## 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	Judgment	Risk	Date to be
	requirement		rating	complied with
	Notwithstanding	Not Compliant	Orange	31 <sup>th</sup> May 2018
	paragraph (1), the			
	registered provider			
	shall in any event			
	notify the chief			
	inspector in writing,			
	within 10 days of			
	this occurring, where			
	the person in charge			
	of a special care unit			
Registration	has ceased to be in			
Regulation 6(2)(a)	charge.			
	Notwithstanding	Not Compliant	Orange	31 <sup>th</sup> May 2018
	paragraph (1), the			
	registered provider			
	shall in any event			
	supply, within 10			
	days of the			
	appointment of a			
	new person in charge			
	of the special care			
	unit, the information			
	set out in paragraph			
	5 of Schedule 2 and			
	paragraph 3 of			
	Schedule 3 in respect			
Registration	of the new person in			
Regulation $6(2)(b)$	charge.			
	The registered	Not Compliant	Yellow	10 <sup>th</sup> August 2018
	provider shall	_		
	prepare in writing a			
Regulation 5(1)	statement of purpose			

	1.1.1			
	relating to the			
	special care unit			
	concerned which			
	shall contain the			
	information set out			
	in Schedule 1			
	The registered	Substantially	Yellow	31 <sup>st</sup> September
	provider shall put in	Compliant		2018
	place appropriate	- I ···		
	procedures to ensure			
	that a child detained			
	in the special care			
	unit is provided with			
	-			
	a copy of the			
	statement of purpose			
	in a format which			
	shall be age			
	appropriate to ensure			
	the child's			
Regulation 5(5)	understanding of it.			
	The registered	Not Compliant	Red	30 June 2018
	provider shall			
	promote and protect			
	the life, health,			
	safety, development			
	and welfare of each			
	child who is detained			
	in the special care			
Regulation 6(1)	unit.			
	The registered	Not Compliant	Orange	10 <sup>th</sup> August 2018
	provider shall ensure	I	0	0
	that the special care			
	unit has care			
	practices,			
	operational policies			
	and procedures in			
	place in accordance			
	with best practice			
	-			
	and paragraph (1)			
	having regard to the			
	number of children			
	detained in the			
	special care unit and			
	the nature of their			
	needs, which			
	practices, policies			
	and procedures shall			
	include, but shall not			
Regulation 6(2)	be limited to, the matters set out in			

<b></b>		I	1	
	Schedule 2 and the			
	obligations of the			
	person in charge			
	under these			
	Regulations.			
	The care practices,	Not Compliant	Orange	10 <sup>th</sup> August 2018
	operational policies	Not Compliant	Orange	10 August 2010
	and procedures			
	referred to in			
	paragraph (2) shall			
	be set out in writing			
	by the registered			
Regulation 6(3)	provider.			
	The registered	Not Compliant	Red	30 June 2018
	provider shall ensure	I I I		
	that the care			
	practices,			
	- ·			
	operational policies			
	and procedures			
	referred to in			
	paragraph (2) are			
	implemented by the			
	person in charge			
	having regard to the			
	particular needs of			
Regulation 6(4)	each child.			
	The registered	Not Compliant	Orange	10 <sup>th</sup> August 2018
	provider shall ensure	Not Compliant	Orange	10 August 2010
	1			
	that all written care			
	practices,			
	operational policies			
	and procedures are			
	reviewed and			
	updated in			
	accordance with best			
	practice and such			
	reviews shall have			
	due regard to any			
	recommendations			
	made by the chief			
Regulation 6(5)(a)	inspector.			1 oth A second
	The registered	Not Compliant	Orange	10 <sup>th</sup> August 2021
	provider shall ensure			
	that all written care			
	practices,			
	operational policies			
	and procedures are			
	reviewed and			
	updated at least			
	every three years and			
Regulation $6(5)(c)$	AVATU TATAA VOOTO ODA			

				1
	such reviews shall			
	have due regard to			
	any			
	recommendations			
	made by the chief			
	inspector.			
	The registered	Not Compliant	Orange	31 <sup>st</sup> November
	provider shall ensure			2018
	that all written care			
	practices,			
	operational policies			
	and procedures are			
	reviewed and			
	updated when, in			
	accordance with			
	Regulation (5), there			
	has been a change in			
	the statement of			
	purpose and such			
	reviews shall have			
	due regard to any			
	recommendations			
	made by the chief			
Regulation 6(5)(d)	inspector.			
	The registered	Not Compliant	Orange	31 <sup>st</sup> August 2018
	provider shall ensure	_		-
	that there are			
	appropriate			
	procedures put in			
	place by the person			
	in charge to ensure			
	that a child detained			
	in the special care			
	unit is made aware			
	of the care practices,			
	operational policies			
	and practices of the			
	special care unit and			
	that information			
	provided in			
	accordance with this			
	Regulation is			
	accessible and age			
	appropriate to ensure			
Regulation 6(7)	understanding.			
	The person in charge	Not Compliant	Red	30 June 2018
	shall implement the	<b>F</b>		
	care practices,			
	operational policies			
Regulation 6(8)	and procedures			
	Proceedines	1	1	

	required to be put in			
	place by the			
	registered provider			
	under paragraph (2)			
	and shall, in so			
	doing, promote and			
	protect the life,			
	health, safety,			
	development and			
	welfare of each child			
	who is detained in			
	the special care unit.			
	Where a child is to	Not Compliant	Orange	30 <sup>th</sup> April 2018
	be detained in a	r r	6	
	special care unit, the			
	person in charge			
	shall consult with the			
	social worker			
	assigned			
	responsibility for the			
	child by the Child			
	and Family Agency			
	to inform himself or			
	herself of the special			
	care to be provided			
	to the child while the			
	child is detained in			
<b>D</b> ogulation $7(1)$	the special care unit.			
Regulation 7(1)		Not Compliant	Oreran	30 <sup>th</sup> April 2018
	Following consultation with the	Not Compliant	Orange	50 April 2018
	social worker			
	assigned			
	responsibility for the			
	child by the Child			
	and Family Agency,			
	the person in charge			
	shall oversee, in			
	conjunction with the			
	social worker so			
	assigned, the			
	implementation of a			
	programme of			
	special care for the			
	child, in accordance			
	with the interim			
	special care order or			
	special care order			
Deculation 7(2)	-			
Regulation 7(2)	relating to the child.			at
Regulation 7(2)	-	Not Compliant	Yellow	31 <sup>st</sup> July 2018

			[	1
	child's Care Record			
	details of (b) any			
	medication			
	administered,			
	whether or not it was			
	prescribed by a			
	registered medical			
	practitioner, to a			
	child detained in the			
	special care unit.			
	The registered	Not Compliant	Yellow	31 <sup>st</sup> August 2018
	provider shall ensure		1011011	01 1108000 2010
	that each child has			
	appropriate access to			
	a telephone and			
	appropriate media,			
	such as television,			
	newspapers and			
	internet, if available,			
	in accordance with			
	the relevant policies			
	set out in Schedule			
Regulation 9(7)	2.			- +
	The person in charge	Not Compliant	Orange	31 <sup>st</sup> November
	shall ensure that staff			2018
	members in the			
	special care unit			
	have up to date			
	knowledge and			
	skills, appropriate to			
	their role, to respond			
	to behaviour that is			
	challenging and to			
	support a child			
	detained in the			
	special care unit to			
	manage his or her			
Regulation 11(3)	behaviour.			
	The registered	Not Compliant	Orange	31 <sup>st</sup> July 2018
	-		Orange	51 July 2010
	provider shall ensure			
	that each person			
	employed in the			
	special care unit has			
	up to date			
	knowledge and skills			
	to identify			
	underlying causes of			
Regulation 11(4)(a)	behaviour.			at
	The registered	Not Compliant	Orange	31 <sup>st</sup> July 2018
Regulation 11(4)(b)	provider shall ensure			

				1
	that each person			
	employed in the			
	special care unit has			
	up to date			
	knowledge and skills			
	to assist and support			
	a child to manage his			
	or her behaviour.			
		Not Compliant	Oren an	21 <sup>st</sup> Inter 2019
	The person in charge	Not Compliant	Orange	31 <sup>st</sup> July 2018
	shall ensure that			
	every effort is made			
	to identify and			
	alleviate the cause of			
	the child's			
Regulation 11(5)(a)	behaviour.			
	The person in charge	Not Compliant	Orange	27 <sup>th</sup> July 2018
	shall ensure that staff	1	U	2
	members in the			
	special care unit			
	receive training in			
	the management of			
	e			
	behaviour that is			
	challenging			
	including the use of			
	restraint, single			
	separation and de-			
	escalation			
	techniques, and that			
	only approved			
	techniques are used,			
	in accordance, where			
	applicable, with the			
	child's individual			
	crisis management			
Degulation 11(6)	U			
Regulation 11(6)	plan.	Net Cemelient	0	21 <sup>st</sup> I1 2010
	The registered	Not Compliant	Orange	31 <sup>st</sup> July 2018
	provider shall ensure			
	that each child			
	placed in the special			
	care unit is assisted			
	and supported to			
	develop the			
	knowledge, self-			
	awareness,			
	understanding and			
	skills needed for			
	self-care and			
Regulation 12(1)	protection.			
	The registered	Not Compliant	Red	15 June 2018
Regulation 12(2)	-		neu	15 June 2010
Regulation 12(2)	provider shall			

	1		1	1
	protect all children			
	placed in the special			
	care unit from all			
	forms of abuse.			
	The person in charge	Not Compliant	Orange	09 <sup>th</sup> July 2018
	shall ensure that all	1	U	
	staff members			
	receive training in			
	relation to			
	safeguarding			
	children and in the			
	prevention, detection			
	and response to			
Regulation 12(5)	abuse.			
	A person may be	Not Compliant	Red	15 June 2018
	appointed as a			
	person in charge of			
	more than one			
	special care unit if			
	the chief inspector is			
	satisfied that he or			
	she is engaged in the			
	effective			
	governance,			
	operational			
	management and			
	administration of the			
D 1 ( 12(2)	special care units			
Regulation 13(2)	concerned.			21 <sup>st</sup> 2510
	The registered	Not Compliant	Orange	31 <sup>st</sup> May 2018
	provider shall ensure			
	that he or she has			
	obtained, in respect			
	of the person in			
	charge, the			
	information and			
	documents specified			
	in Part A of			
Regulation 13(5)	Schedule 3.			
	The registered	Not Compliant	Orange	31 <sup>st</sup> July 2018
	provider shall ensure	1	0	
	that the number,			
	qualifications,			
	experience,			
	suitability and			
	availability of staff			
	members in the			
	special care unit is			
D 1 ( 14/1)	appropriate, having			
Regulation 14(1)	regard to the number			

	1 1 1 1		1	
	and assessed need of			
	children detained in			
	the special care unit,			
	the statement of			
	purpose and the size			
	and layout of the			
	special care unit.			
	The registered	Not Compliant	Orange	31 <sup>st</sup> July 2018
	Ū.	Not Compliant	Orange	51 July 2018
	provider shall ensure			
	that the children			
	receive continuity of			
	care and support,			
	particularly in			
	circumstances where			
	staff are employed			
	on a less than full			
Regulation 14(2)	time basis.			
Regulation 14(3)(b)	A person shall not be	Not Compliant	Orange	31 <sup>st</sup> May 2018
Regulation 14(3)(0)	employed in a	Not Compliant	Orange	51 Widy 2010
	special care unit, or			
	work in the unit as			
	an intern, a trainee or			
	a person on a			
	placement as part of			
	a vocational training			
	course, unless and			
	until the registered			
	provider has			
	obtained, in respect			
	of that person, the			
	records and			
	documents specified			
	in Part A of			
	Schedule 3.			
	The registered	Not Compliant	Orange	31 <sup>st</sup> May 2018
	provider shall ensure			
	that there are			
	appropriate numbers			
	of staff members			
	present in the special			
	care unit at all times			
	to supervise each			
	child detained in the			
	special care unit in			
	accordance with the			
	requirements of			
	registration of the			
Regulation 14(4)	special care unit.			
	The person in charge	Not Compliant	Orange	31 <sup>st</sup> July 2018
Regulation 14(5)	shall ensure that an		_	
			1	

			r	
	appropriate level of			
	professional			
	supervision and			
	support is provided			
	to staff members in			
	the special care unit.			
	The person in charge	Not Compliant	Red	31 <sup>st</sup> July 2018
	may, from time to	1101 Compliant	Rea	51 July 2010
	time, delegate all or			
	-			
	some of his or her			
	duties under these			
	Regulations to one			
	or more			
	appropriately			
	qualified staff			
	members in the			
	special care unit and			
	shall keep a written			
	report of when and			
	to whom he or she			
	has delegated those			
Regulation 14(7)	duties.			
	The registered	Not Compliant	Orange	31 <sup>st</sup> July 2018
	provider shall	Not Compliant	Orange	51 July 2010
	-			
	maintain, as			
	appropriate, the			
	records specified in			
	Part B of Schedule 3,			
	in relation to each			
	staff member in the			
	special care unit and			
	each person working			
	as an intern, a trainee			
	or a person on a			
	placement as part of			
	a vocational training			
Regulation 14(8)	course.			
	The person in charge	Not Compliant	Orange	12 <sup>th</sup> July 2018
	shall ensure that		8-	
	each staff member in			
	the special care unit			
	and each person			
	working as an intern,			
	-			
	a trainee or a person			
	on a placement as			
	part of a vocational			
	training course has			
	access to appropriate			
	training, including			
Regulation 15(1)(a)	refresher training, as			

		[		
	part of a continuous			
	professional			
	development			
	programme to enable			
	the staff member to			
	provide care in			
	accordance with			
	evidence based			
	practice, the			
	statement of purpose			
	and policies and			
	procedures.			
	The person in charge	Not Compliant	Orange	31 <sup>st</sup> Oct 2018
	shall ensure that	rior compliant	orange	51 0002010
	each staff member in			
	the special care unit			
	and each person			
	working as an intern,			
	a trainee or a person			
	on a placement as			
	part of a vocational			
	-			
	training course is informed of the			
	provisions of Acts of			
	the Oireachtas and			
	all regulations,			
	standards and			
	guidelines made			
	thereunder, or			
	otherwise, dealing			
	with the care,			
	welfare and			
	protection of			
	children detained in			
Regulation 15(1)(b)	a special care unit.			
	The person in charge	Not Compliant	Orange	30 <sup>th</sup> September
	shall ensure that an	-		2018
	appropriate level of			
	professional			
	supervision and			
	support is provided			
	to staff members in			
Regulation 16	the special care unit.			
	The registered	Not Compliant	Red	30 November
	provider shall	compnunt		2018
	provide adequate			
	and suitable			
	accommodation, as			
	set out in Schedule			
Regulation 17	4, having regard to			
Regulation 17	+, naving regard to			

	the number of			
	children detained in			
	the special care unit			
	and the nature of the			
	needs of each child.			
	The person in charge	Not Compliant	Orange	30 <sup>th</sup> September
	shall maintain the		0101180	2018
	records set out in			2010
	Part B of Schedule 3			
	in a secure, safe and			
	accessible place, for			
	each staff member			
	employed in the			
Regulation 22	special care unit.			
	The registered	Not Compliant	Red	15 June 2018
	provider shall ensure			
	that there is a clearly			
	defined management			
	structure in the			
	special care unit that			
	identifies the lines of			
	authority and			
	accountability,			
	-			
	specifies roles, and			
	details			
	responsibilities for			
	areas of special care			
Regulation 24(1)(b)	provision.			
	The registered	Not Compliant	Orange	15 <sup>th</sup> June 2018
	provider shall ensure			
	that management			
	systems are in place			
	to ensure that the			
	service provided is			
	safe, appropriate to			
	the child's needs,			
	consistent and			
	effectively			
$\mathbf{P}_{\text{anylotion}} \mathcal{D}_{1(1)(z)}$	monitored.			
Regulation 24(1)(c)		Net Cen 1' t	0	20 <sup>th</sup> Canton 1
	The registered	Not Compliant	Orange	30 <sup>th</sup> September
	provider shall ensure			2018
	that effective			
	arrangements are in			
	place to facilitate			
	persons employed in			
	the special care unit			
	to raise concerns			
	about the quality and			
	safety of the special			
Regulation 24(2)	care provided			
	p			

			r	<b>ر</b>
	generally or the			
	special care provided			
	to any specific child			
	detained in the			
	special care unit.			
	The registered	Not Compliant	Orange	31 <sup>st</sup> October 2018
	provider shall ensure	1	0	
	that the special care			
	unit has a risk			
	management policy			
	in place and that it is			
	implemented			
	-			
D = 1 + 25(1)	throughout the			
Regulation 25(1)	special care unit.			21 <sup>st</sup> 0 1 2010
	The registered	Not Compliant	Orange	31 <sup>st</sup> October 2018
	provider shall ensure			
	that the risk			
	management policy			
	includes the			
	following: (a) the			
	ongoing			
	identification,			
	assessment,			
	management and			
	review of risks			
	throughout the			
	special care unit, (b)			
	the measures and			
	actions in place to			
	control the risks			
	identified, (c) the			
	measures and actions			
	in place to control			
	the following risks to			
	Ū.			
	a child— (i) child			
	abuse, (ii) situations			
	where a child may			
	be removed or			
	absconds from the			
	special care unit, (iii)			
	accidental injury to a			
	child, (iv) aggression			
	and violence from or			
	towards a child, and			
	(v) self-harm, (d)			
	arrangements for the			
	identification,			
	recording,			
	investigation and			
Regulation 25(2)	learning from			
		1	L	

		[		T1
	incidents involving			
	children detained in			
	the special care unit,			
	(e) accidental injury			
	to a staff member, an			
	intern, a trainee or a			
	person on a			
	placement as part of			
	a vocational training			
	-			
	course in the special			
	care unit, and (f)			
	aggression and			
	violence towards a			
	staff member, an			
	intern, a trainee or a			
	person on a			
	placement as part of			
	a vocational training			
	course in the special			
	care unit.			
	The person in charge	Not Compliant	Orange	31 <sup>st</sup> July 2018
	shall keep a report of	Not Compliant	Orange	51 July 2010
	an accident or an			
	injury to a child			
	detained in the			
	special care unit in			
	the child's Care			
Regulation 25(8)	Record.			
	The registered	Not Compliant	Red	15 June 2018
	provider shall take			
	adequate precautions			
	against the risk of			
Regulation 26(1)(a)	fire.			
	The registered	Not Compliant	Red	15 June 2018
	provider shall make	pinant		
	adequate			
Regulation	arrangements for			
-	preventing fire.			
26(1)(d)(i)	· · · ·	Not Compliant	Ded	15 June 2019
	The registered	Not Compliant	Red	15 June 2018
	provider shall make			
	adequate			
	arrangements for			
	maintaining of all			
	fire equipment,			
	means of escape,			
Regulation	building fabric and			
26(1)(d)(vi)	building services.			
	The registered	Not Compliant	Red	15 June 2018
	provider shall make	- r		
Regulation 26(1)(e)	arrangements for			
10501001 20(1)(0)	unungements 101	l		

			1	,
	staff members,			
	interns, trainees and			
	persons on			
	placements as part of			
	vocational training			
	courses at the special			
	care unit to receive			
	suitable training in			
	fire prevention,			
	emergency			
	procedures, building			
	layout and escape			
	routes, location of			
	fire alarm call points			
	and first aid, fire			
	fighting equipment,			
	fire control			
	techniques and the			
	procedures to be			
	followed should the			
	clothes of a child			
	detained in the			
	special care unit			
	catch fire, and			
	arrangements for the			
	evacuation of			
	children detained in			
	the special care unit,			
	calling the fire			
	service and for			
	assisting the fire			
	brigade.			
	The registered	Not Compliant	Orange	30 <sup>th</sup> August 2018
	provider shall			
	ensure, by means of			
	fire safety			
	management and fire			
	drills at suitable			
	intervals, that staff			
	members, interns,			
	trainees, persons on			
	placements as part of			
	vocational training			
	courses at the special			
	care unit and, in so			
	far as is reasonably			
	practicable, children			
	detained in the			
	special care unit, are			
Regulation 26(1)(f)	aware of the			
			1	

	procedure to be followed in the case of fire, including the procedure for saving life.			
Regulation 27(1)(d)	The person in charge shall give the chief inspector notice in writing within three working days of the following incidents occurring in a special care unit an allegation of child abuse.	Not Compliant	Orange	31 <sup>st</sup> August 2018