



**Health
Information
and Quality
Authority**

An tÚdarás Um Fhaisnéis
agus Cáilíocht Sláinte

**Social Services
Inspectorate**

**TRINITY HOUSE
DETENTION SCHOOL**

FOLLOW-UP INSPECTION

Carried out on 7th July 2009

INSPECTION REPORT ID NUMBER: 331

**Publication Date: 5th October 2009
SSI Inspection Period: 11
Centre ID Number: 418**

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Introduction

The Health Information and Quality Authority (HIQA), Social Services Inspectorate (SSI) carried out an announced inspection of a children's detention school under Section 69 (2) of the Child Care Act 1991. This inspection, by Michael McNamara, Lead Inspector, accompanied by the Sharron Austin, co-inspector, took place on 7th July 2009. The purpose of the inspection was to assess compliance with the action plan returned to the inspectorate by the Trinity House School (THS) in response to the recommendations of the last inspection report (*inspection ID 270*).

Inspectors found that of the 32 recommendations made in the report, nine were fully implemented, 15 were partly implemented and eight were not met.

Inspectors found that apart from the recommendations concerning safety, the director, managers and staff of the school had made considerable progress in implementing the recommendations, and they were pleased to see that the processes undertaken to respond to the recommendations involved staff at every level. In particular, the implementation of recommendations concerning the use of the skills of staff to provide young people with opportunities for exercise, fresh air and learning of social and living skills was impressive, and the managers and staff reported notable reductions in the incidence of use of physical restraint and single separation which they attributed to these initiatives. For other recommendations there were interdependencies on IYJS, the board of management and other agencies, and the discussions and developments are acknowledged by inspectors to take time to come to a conclusion; as it is acknowledged that as far as it could THS has been proactive in meeting the recommendations.

The recommendations that have yet to be met concern the following actions:

- Revision of single separation guidelines by IYJS within the process of the revision of standards by HIQA (6)
- Improvement of planning for and support after discharge by IYJS in liaison with the HSE and the probation service (16)
- Preparation of a statement by the THS board of management about its role (20)
- Streamlining of recording by THS (24)
- the board of management and director of OBS to arrange for a representative of the Fire Authority to visit the school annually in accordance with standard 9.10 (27)
- IYJS to determine a policy on the requirement of the standard 9.9 that the school requires written confirmation of compliance with building control and fire safety regulations (29)
- THS to arrange for a comprehensive health and safety audit to be carried out including an assessment of the potential for self-harm (30)
- THS to update its health and safety statement (31).

Findings

Inspectors acknowledge the work that has been done to respond to the inspection. The partly met and unmet recommendations will be followed up in the next inspection, and for the majority, which are near to the projected deadlines, inspectors have requested reports on the progress in their implementation. In focussing on the whole range of recommendations inspectors note in particular that the recommendations on safety (27, 29 – 31) are not met, and they urge the IYJS, board of management and director of THS to give them their urgent attention.

Please see attached action plan in response to the inspection recommendations.

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Action Plan for Inspection No. 270 / 331

Name of School: Trinity House School

Date Action Plan Dispatched: 30th April 2009
Date of Follow-Up Inspection: 7th July 2009

No.	Recommendation	THS Response	Person Responsible	Implementation Date	SSI Comment
1	The director and board of management of THS, in consultation with the IYJS, should revise the statement of purpose and function and ensure it reflects the requirements of the standards, the objectives and values of the Children Act 2001, the terms of the present certificate, the roles of the stakeholders, and how the school carries out its key functions.	<ul style="list-style-type: none"> ▪ IYJS will review and standardise statement of purpose and function in line with above. ▪ Redraft Purpose and Function to include points raised in consultation with all relevant stakeholders. 	Child Welfare Advisor, IYJS Director. Deputy Director. Managers. BOM.	Statement reviewed by 25.07.09 Completed 31.08.09.	<p>This recommendation is partly met.</p> <p>A draft has been prepared. A copy of the approved statement should be sent to the inspectorate by 9th October 2009.</p>
2	The director of THS should consider ways of increasing opportunities for exercise and recreation inside and outside the units, and of encouraging the young people to make better use of the facilities and open space already available.	<ul style="list-style-type: none"> ▪ In addition to all of the current facilities, proposals have been made to IYJS for redevelopment of existing outdoor facilities to include high ropes etc. ▪ Proposals to develop an Astronomy Club, Athletics Club are currently underway. ▪ Proposal to develop a Market Gardening Project to involve young people and all grades of staff has been completed. - Project itself is already underway. ▪ Structured and co-ordinated Summer Activity Programme to involve all grades of staff. ▪ Structured and pre planned coordinated Activity Programme to be developed and implemented. 	Director. Deputy Directors. Night Unit Managers. Activities Co-ordinator. Relevant THS Focus Groups.	-30.06.2009 -30.06.2009 -Ongoing -13.07.2009 -01.09.2009	<p>This recommendation has been met.</p> <p>Several schemes have been introduced, and were shown to inspectors, in response to this recommendation. Inspectors note the high level of involvement of staff in meeting these recommendations.</p>

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3	The director of THS should develop the roles of all staff, particularly care staff and keyworkers, in providing living skills training to young people.	<ul style="list-style-type: none"> ▪ Roles and Responsibilities for all staff to be developed. ▪ Redraft Policy on Keyworking to include section on living skills training. ▪ Reissue job description which covers points raised. ▪ Develop in-service training for all staff in relation to delivery of living skills pack. 	Director, Child Welfare Advisor, IYJS THS's PPP Group. Step Down Unit. Unit Managers.	31.10.2009	<p>This recommendation is partly met.</p> <p>The PPP group are in the process of reviewing the policy with 'living skills training' in mind.</p> <p>A report of the progress made in meeting this recommendation should be sent to the inspectorate by 31st October 2009.</p>
4	The director and board of management of THS, in consultation with the IYJS, should: <ul style="list-style-type: none"> • review its policy on care and control, • revise its system for managing behaviour, • review the use of physical restraint and single separation, • develop a policy and practice on the management of risk, • give consideration to making further opportunities for privacy available within the behaviour management system, • develop practice that emphasises the distinction between the management of behaviour and the management of risk. 	Implementation of CPI Policy on same.to be devised. Implementation of 'Observation Room' and development of protocols around use of same. Balance between privacy and supervision by staff will be raised during HIQA review of standards.	Director PPP Group Child Welfare Advisor, IYJS	31.01.2010 31.10.2009 Ongoing	<p>This recommendation has been partly met.</p> <p>A review of policy has taken place with regard to some of the recommendation.</p> <p>Practice will be assessed at the next inspection</p>

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5	<p>As a matter of priority, the director and board of management of THS should:</p> <ul style="list-style-type: none"> • review the use of single separation, • reduce its frequency, • ensure that in every instance it conforms to the standards, and • ensure that practice reflects the principles of children's rights. 	<p>Observation Room</p> <p>Quarterly Review and Ongoing Analysis</p> <p>Revise Policy of single separation and set criteria for use</p>	<p>Chair of the Board of Management, Director, Child Welfare Advisor, IYJS Deputy Directors Unit Managers THS's Health & Safety Group THS's PPP Group</p>	<p>Trinity House currently working on all of these however, to be addressed and ongoing with BOM</p>	<p>This recommendation has been met.</p> <p>Inspectors note that there has been a reduction in the incidence of single separation since the last inspection. To be assessed at the next inspection.</p>
6	<p>The IYJS should enter into discussion with the Department of Health and Children and the HSE with a view to developing common standards for the use of single separation in all places where young people can be legally detained.</p>	<p>Development of a common policy will comply with HIQA's review of Children's Standards.</p>	<p>Director, (Representing the four detention schools). Child Welfare Advisor, IYJS</p>	<p>Commencing on 27.05.2009. Draft standards due early 2010.</p>	<p>This recommendation has not been met.</p> <p>The revision of guidelines on single separation has yet to commence as part of the general revision of children's standards.</p>
7	<p>The director and board of management of THS should ascertain the wishes of parents about the religious upbringing of their children.</p>	<ul style="list-style-type: none"> ▪ Research and carry out audit of current young people regarding religious wishes and initial phone contact with each parent. ▪ Amend admission sheet to reflect wishes resulting from above. ▪ Draft Policy on same when complete. 	<p>Unit Manager Keyworker Chaplain THS's PPP Group</p>	<p>14.07.2009</p>	<p>This recommendation has been met.</p> <p>Practice will be assessed at the next inspection.</p>

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8	The IYJS should review the detention schools' policy on unauthorised absences to ensure clarity about the status of young people who are missing for long periods of time.	<ul style="list-style-type: none"> ▪ Present policy across four Children Detention Schools covers unauthorised absences. ▪ IYJS will proceed with planned review of Mobility/Abscond Policy ▪ Draft policy on same and implement in consultation with Gardai, Probation Office and Social Workers. 	Child Welfare Advisor, IYJS	<p>Review commenced by 30.09.2009</p> <p>Following Above.</p>	<p>This recommendation has been partly met.</p> <p>IYJS is addressing the policy on absences. However, inspectors seek clarity about the 'missing persons' policy also. A report on the progress in implementing this recommendation fully should be provided by 9th October 2009.</p>
9	<p>The director and board of management of THS, in consultation with the IYJS, should:</p> <ul style="list-style-type: none"> • should review the school's child protection policy, • develop the protocols with the HSE for notification of child protection concerns, and • consider assigning the role of designated child protection officer to a deputy director. 	<ul style="list-style-type: none"> ▪ IYJS will review current policy on Child Protection. ▪ IYJS to contact HSE to identify appropriate liaison person. ▪ Review current document and make necessary changes. ▪ Link in with HSE Personnel. ▪ Re-designate Role of the Child Protection Officer to Deputy Director and amend publications accordingly. ▪ Source and organise specific training for Child Protection Officer and two others as 'backup'. ▪ Training to continue. 	Chair of the Board of Management, Director, Deputy Director Child Welfare Advisor, IYJS	<p>Meeting arranged by 01.07.2009</p> <p>30.09.2009</p>	<p>This recommendation has been partly met.</p> <p>A new DCPO has been appointed. Training for the DCPO and unit managers has yet to be delivered. The protocols for notification to HSE have to be developed. A report on the progress in implementing this recommendation fully should be provided by 9th October 2009.</p>

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10	The director and board of management of THS, in consultation with the IYJS, should develop a safeguarding policy that encompasses all aspects of care of the young people, is strongly based in children's rights, and creates a culture in the staff where safe care can be openly discussed and promoted.	<ul style="list-style-type: none"> ▪ The Director and Board of Management to consult widely with Staff, Young People and relevant stakeholders. ▪ Draft Safe Practice Rules and circulate. ▪ Encourage continued open debate 	Chair of the Board of Management, Director, Child Welfare Advisor, IYJS Deputy Director THS's PPP Group	30.12.2009	<p>This recommendation is partly met.</p> <p>A report on the progress in implementing this recommendation fully, and a copy of the approved policy document, should be provided by 9th October 2009.</p>
11	The director and board of management of THS, in consultation with the IYJS, should review the whistleblowing policy and ensure that staff have sufficient confidence in it for it to fulfil its purpose of protecting young people.	<ul style="list-style-type: none"> ▪ Draft Policy and circulate. ▪ Implement Policy ▪ Train Staff in its use ▪ Monitor ▪ Designate nominated Manager to oversee. 	Chair of the Board of Management, Director, Child Welfare Advisor, IYJS THS's PPP Group	30.09.2009	<p>This recommendation has been only partly met as the issue is still under consideration by the IYJS.</p> <p>A progress report should be sent to the Inspectorate by IYJS by 9th October 2009. To be assessed at the next inspection.</p>

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12	The director and board of management of THS, in consultation with the IYJS, should carry out a review of practice in children's rights to ensure that staff are confident about them and able to promote their facilitation.	<ul style="list-style-type: none"> ▪ Revise current Protocol on Children's Rights and Implement accordingly. ▪ Re-distribute revised Children's Rights Document. ▪ Continued 'Awareness Sessions' for all young people with assistance from IAYPIC. ▪ Rewrite section in Young Persons Handbook. ▪ All frontline staff now trained in Children's Rights by IAYPIC. 	Chair of the Board of Management, Director, Child Welfare Advisor, IYJS Unit Managers Ass Unit Manager.	30.08.2009	This recommendation has been partly met. To be assessed at the next inspection.
13	The director and board of management of THS, in consultation with IYJS, should determine how the standard on independent advocacy is to be met.	<ul style="list-style-type: none"> ▪ Identify Standards. ▪ Ground Rules adopted between THS and IAYPIC and review meetings to be held at 6 monthly intervals. ▪ Two designated link personnel established between both agencies. ▪ Create links with Ombudsman for Children. 	Chair of the Board of Management, Director, Child Welfare Advisor, IYJS Director Deputy Directors. Link Personnel	31 st December 2009	This recommendation has been partly met. See below (14)
14	The IYJS should develop policy and set out clear objectives and definition of roles for independent advocates.	<ul style="list-style-type: none"> ▪ IYJS to appoint visiting panel as per Children Act, 2001. ▪ IYJS have commenced discussions with Irish Association of Young People in Care (IAYPIC). ▪ IYJS will review written agreement that is in place between THS and IAYPIC with a view to extending it to the other CDS. 	Child Welfare Advisor, IYJS	Panel appointed by Sept 2009. Discussions with IAYPIC commenced by 28.05.09 31 st Dec. 2009	This recommendation has been partly met. IYJS have been in discussion with the Irish Association of Young People in Care (IAYPIC) and the policy will be formulated through those discussions. To be completed by the agreed deadline of 31 st December 2009, and to be assessed at the next inspection.

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15	The director and board of management of THS, in consultation with the IYJS, should carry out a thorough review of the planning process. It should ensure that the plans, programmes of action and reviews are appropriate for every case and tailored to lengths of sentences.	<ul style="list-style-type: none"> ▪ Review Planning Process taking points into account. ▪ Standardise a Placement Plan that will follow the young person which will include an Action Plan.. 	Chair of the Board of Management, Director, Child Welfare Advisor, IYJS Night Unit Manager	30.09.2009	<p>This recommendation has been partly met.</p> <p>A progress report should be sent to the Inspectorate by the Director by 9th October 2009. To be assessed at the next inspection</p>
16	The IYJS should enter into discussion with the HSE and probation service about the continuity of support for young people in preparation for leaving and aftercare.	<ul style="list-style-type: none"> ▪ IYJS will enter into discussions with the HSE and Probation Service. 	Child Welfare Advisor, IYJS	Meeting arranged by 01.07.2009	<p>This recommendation has not been met.</p> <p>The IYJS has arranged to meet with the probation service and the HSE. A report of the progress of the IYJS in implementing this recommendation should be sent to the inspectorate by 9th October 2009.</p>
17	The director of THS should review the unit managers' role in monitoring care practices, develop more regular systems of evaluation including routine care practices, and ensure that it is evidenced in the files.	<ul style="list-style-type: none"> ▪ Monthly audit of units by Deputy Directors and Unit managers to include Files. ▪ Review and monitor Care Practices. ▪ Draft Protocol on what and how to monitor. 	Director, Deputy Director. Unit Managers.	31.08.2009	<p>This recommendation has been met.</p>

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18	The director and board of management of THS, in consultation with the IYJS, should carry out a review of the deployment of staff that includes the issue of chronic staff absences.	<ul style="list-style-type: none"> ▪ Continue to monitor Management of Absences. ▪ Continue Monthly audit and analysis of all Absences. ▪ Revise policy for addressing issues. ▪ Enhance support systems in place. 	Chair of the Board of Management, Director, Child Welfare Advisor, IYJS Unit Manager Staff Officer	30.11.2009	This recommendation has been met.
19	The director and the board of management of THS, in consultation with the IYJS, should determine how it is to remedy the deficiencies in vetting, and ensure that in all future appointments the national guidelines on vetting are rigorously followed.	<ul style="list-style-type: none"> ▪ Follow National Standards (HIQA) pertaining to same. ▪ IYJS, Board of Management and Director to review current practice in relation to Vetting. ▪ Develop Policy on same. 	Chair of the Board of Management, Director, Child Welfare Advisor, IYJS	Ongoing	This recommendation has been met.
20	The board of management of THS should produce a statement clearly defining the role of the board, its responsibilities, authority, monitoring function in accordance with standard 6.9, including in the statement the lines of accountability of the directors and the board's relationship with the IYJS.	BOM to draft document clearly defining roles and relationships.	Chair of the Board of Management,	BOM 30.09.2009	This recommendation has not been met. A copy of the new statement should be sent to the inspectorate by 9 th October 2009.

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21	The board of management of THS should give priority to arranging visits to the school in accordance with the recommendation of the 2005 inspection.	Visits to commence once Security Clearance has been received for all Board Members.	Chair of the Board of Management,	Ongoing	This recommendation has been partly met. To be assessed at the next inspection.
22	The IYJS should develop a policy on supervision, and determine which model of staff supervision is to be used in the detention schools; and the director and board of management of THS should ensure that it is properly implemented.	IYJS will commence a literature review of supervision.	Child Welfare Advisor, IYJS	Completed by 25.09.2009	This recommendation has been partly met. The IYJS have made a determination about which model of supervision is to be used. It now has to be put into practice. Progress in the full implementation of this recommendation will be assessed at the next inspection.

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23	<p>The director and board of management of THS, in consultation with the IYJS, should draw up a comprehensive programme of training for staff that includes:</p> <ul style="list-style-type: none"> • training for the chair of the board of management, director, deputy directors and unit managers in change management; • training in <i>Children First: Guidelines on the Welfare and Protection of Children</i> for the Designated Child Protection Officer and unit managers; • training in health and safety for the deputy director with overall responsibility for health and safety, the health and safety and maintenance officers, and the staff health and safety representatives; • training in fire safety for those staff who have not received it; • training in the rights of children in detention for care staff. 	<p>IYJS will review training needs.</p> <p>IYJS will draw up a comprehensive training programme for staff.</p>	Child Welfare Advisor, IYJS	<p>Training needs reviewed by 01.08.2009.</p> <p>Training programme drawn up by 01.10.2009</p>	<p>This recommendation has been partly met.</p> <p>Training for the chair of the board of managers, the director, deputy director and unit managers in change management, along with the chair of the board and managers of other children's detention schools, has yet to be undertaken.</p> <p>To be assessed at the next inspection.</p>

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24	The director of THS should streamline the system of recording and ensure that it is complete, accessible, accountable, regularly monitored, and secure.	Review current systems and adapt to meet best practice. Develop policy around same. Internal training to ensure understanding and implementation of same. Monitor and sign off on monthly basis.	Director. Unit Managers.	30.09.2009	This recommendation has not been met. A report of the progress of in implementing this recommendation should be sent to the inspectorate by 9 th October 2009.
25	The director of THS should ensure that staff store their own medication in a secure place separate from the young people's medication.	Ensure all staff secure personal belongings including medications in personal lockers provided.	Director. Unit Managers.	30.06.2009	This recommendation has been met.
26	The director and board of management of THS, in consultation with the IYJS, should review practices and the services available for addressing the emotional needs of young people in detention.	Undertake review of current practices in consultation with IYJS.	Chair of the Board of Management, Director, Child Welfare Advisor, IYJS Unit Managers	31.12.2009	This recommendation has been partly met. FCAC has access to a psychiatric service. However, IYJS has yet to review the overall provision in the children's detention schools, and develop a common policy and service. To be assessed at the next inspection.

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27	The director and board of management of THS should arrange for a representative of the Fire Authority to visit the school annually in accordance with standard 9.10, and ensure that fire drills are carried out regularly.	Consultations to take place with Local Authority.	Chair of the Board of Management, Director, Child Welfare Advisor, IYJS Maintenance Officer.	31.12.2009	This recommendation has not been met. A report of the progress of the IYJS in implementing this recommendation should be sent to the inspectorate by 9 th October 2009.
28	The director and board of management of THS, in consultation with the IYJS, should encourage and support staff in quitting smoking on the premises so that they may provide a positive example to the young people.	Already in place and continue to ensure that Non Smoking Policy is implemented in full.	Chair of the Board of Management, Director, Child Welfare Advisor, IYJS Deputy Directors Unit Managers	Ongoing	This recommendation has been met. Practice will be assessed at the next inspection.
29	The IYJS should determine a policy on the requirement of the standard 9.9 that the school requires written confirmation of compliance with building control and fire safety regulations.	IYJS will determine a policy on the requirement. Policy to be determined in tandem with HIQA review of Children's Standards.	Child Welfare Advisor, IYJS		This recommendation has not been met. A report of the progress of the IYJS in implementing this recommendation should be sent to the inspectorate by 9 th October 2009.

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30	The board of management of THS should arrange for a comprehensive health and safety audit to be carried out that includes an assessment of the potential for self-harm.	Rolling internal audits to continue. Draft Policy on same. Request IYJS to commission an independent health & safety audit.	Chair of the Board of Management, Director, Deputy Directors Maintenance Officer Unit Manager BOM	31.12.2009	This recommendation has not been met. A report of the progress of the IYJS in implementing this recommendation should be sent to the inspectorate by 9 th October 2009.
31	The director of THS should ensure that the health and safety statement is updated so that it identifies who has responsibility for the safety, health and welfare of the young people and staff.	Redraft Health & Safety Statement to address same.	Director. Deputy Directors Health & Safety Committee.	31.12.2009	This recommendation has not been met. A report of the progress of the IYJS in implementing this recommendation should be sent to the inspectorate by 9 th October 2009.
32	The director and board of management of THS, in consultation with the IYJS, should establish a means whereby the offending behaviour programme can be formally evaluated and regularly monitored.	IYJS will review offending programmes.	Director, Child Welfare Advisor, IYJS	Initial review completed. Ongoing.	This recommendation has been partly met. A report on the progress in implementing this recommendation should be provided by the IYJS to the inspectorate by 9 th October 2009.