



STANDARDS & CRITERIA
FOR
CHILDREN DETENTION SCHOOLS

CAIGHDEÁIN AGUS CRITÉIR I LEITH SCOILEANNA COINNEÁLA LEANAÍ

Department of Education & Science
An Roinn Oideachais agus Eolaíochta

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Inspection Process

A. NOTICE OF FORMAL INSPECTION

The Director of each centre will be notified of the intention to inspect 4 weeks in advance. In addition, informal inspection visits to centres may take place from time to time outside of this schedule where the inspection team considers that this is appropriate and/or necessary. The centre will be requested to provide copies in advance of all documentation concerning the operation of the centre including: written policies; procedures; names and numbers of young people and staff; health & safety statement; and other such relevant documentation which exists within the centre.

Young people within the centre will be notified by the Inspection Team, both verbally and in writing, that an inspection will be taking place and will be given the opportunity to answer a standard questionnaire. The Standards and Criteria relating to the inspection process will be outlined to the staff team (in writing) before the commencement of inspection.

B. PRE-INSPECTION VISIT

The inspection team will hold introductory meetings with the Director, key staff and young people. The role of the inspectors and the inspection will be explained and practical arrangements for the inspection will be finalised. This will be seen as an opportunity to meet with the inspection team and to raise any relevant issues regarding the process.

Inspection

Inspections at each school will typically take 8 days (not necessarily consecutive) over an agreed period. These include:

- **observations of practice**
- **interviews** (with young people, as a group and individually, parents, Director, Care Staff, Board of Management, inspector dealing with education dimension and other disciplines and significant visiting professionals)
- **an inspection of the premises**
- **analysis of documentation**
- **a feedback session** (outlining the general impressions of the centre).

C. POST INSPECTION

A draft report will be sent to the Director for a factual accuracy check. When returned the inspection team will make any necessary amendments and the final report will be submitted to the Chief Inspector of Schools and to the Principal Officer, Special Education 2, Department of Education & Science. The Department will issue the report to the director of the centre and the chairperson of the Board of Management

D. FOLLOW UP

The Department of Education & Science will write to the Board of Management requesting details of how the Board plans to implement the recommendations in the inspection report and the associated timescale. The Board will be requested to respond in writing within one month setting out its action plan and related timetable. Thereafter, the board will submit a quarterly written progress report to the Department.

The inspection team may conduct a follow up visit to assess the extent to which the actions promised have been undertaken. Implementation of the recommendations will also be considered as part of subsequent inspections.

DEFINITIONS

STANDARD:

A standard outlines what level of service will be provided and how it will be provided.

CRITERIA:

Criteria are detailed and specific statements of expectations about particular aspects of the generally stated standards.

CENTRE OR SCHOOL:

One recognised by the Department of Education & Science and certified to carry out a specific function of care for young people in detention.

1. PURPOSE & FUNCTION

The centre has a written statement of purpose and function which accurately describes what it sets out to do for young people¹, the manner in which care is provided, and how this relates to the overall service provided for young people as a whole. The statement takes account of relevant legislation and policies of the Department of Education & Science and other agencies, where relevant; and best practice in the care of young people.

A statement of Purpose & Function should:

Outline the purpose, ethos and philosophy of the centre

Acknowledge the role of residential care in the life of the young people in the centre

Describe the target group (age group, gender and legal authority for placement) in care and the service that the centre aims to provide

Describe the School's role in relation to the Courts, the other Detention Schools and the Health Boards

Be reflected in the policies and practices governing day-to-day operation of the centre

Identify the key policies developed by the centre to manage and care for the young people in residence - copies of these policies should be made available to all

Be available in a form accessible to young people, families and professionals

Be understood by management and staff

Acknowledge that public resources are allocated to the centre and, accordingly, there is an obligation to make optimum use of such resources

Be compiled and owned by all the key stakeholders and be subject to regular review

¹ The term "young people" is used throughout to generically denote children, young people and young adults.

2. CARE OF YOUNG PEOPLE

Young people are cared for by staff to whom they can relate effectively. Day-to-day care is of good quality and provided in a way which takes account of their individual needs without discrimination. The quality of care provided will be equivalent to that which would be expected of a good parent/guardian. Young people are rewarded for the achievement of acceptable behaviour and measures of control must be expressly designed to help and not to punish the young people.

Positive care of young people is achieved through:

Staff establishing good relationships with the young people while showing respect for their individuality and being aware of confidentiality

Staff relates to young people through care practices which take into account what restricted liberty means to them, as well as the effects of separation, loss and trauma.

Young people confirm that they are able to approach staff to share what they are feeling, and can be confident that they will be responded to with sensitivity and understanding.

Allowing choice for young people's personal appearance, clothing and style

Young people will be consulted about the clothing that they wear and are not obliged to share clothing.

Appropriate clothing is provided for sporting and other activities.

Facilitating practice of religion (as far as reasonably practicable) with access to chaplain

The centre facilitates young people with their rights in the area of freedom to practise.

The centre makes positive arrangements to help young people observe their religious, racial and cultural identities.

Providing a balanced diet with choice in food and involvement in menu preparation

The centre's routine for the purchase, preparation, serving and consumption of meals is sufficiently flexible to involve young people.

There is sufficient quantity and choice of food and meals are pleasant, social occasions.

Healthy eating is promoted through education, information, exercising choice and the planning and preparation of meals.

Ethnic and cultural diversity is reflected in the choice of meals offered.

Providing the opportunity to pursue leisure activities in which young people exhibit an interest or talent

The centre has a planned programme of purposeful activities that take account of the needs, interests and potential of current residents.

The choice of leisure activities is not constrained by gender stereotypes.

There is adequate staff on duty to facilitate choice and opportunities are available for leisure for young people.

Leisure pursuits are considered and encouraged at care planning meetings and reviews.

Written guidance has been developed in the centre for staff when engaged in activities and holiday pursuits with young people when away from the centre.

Offering Living Skills training in areas of personal hygiene and buying, etc

Staff is sensitive to the needs of young people and can advise on the importance of personal hygiene and the use of toiletries etc in an age appropriate manner.

Young people are given advice on good inter personal skills; how to develop their talents; how to budget pocket money and how to save; how to purchase items; the importance of friends and of becoming involved in community activities.

Having a written care and control policy

The centre has a written statement on permitted disciplinary measures that is known to all staff and young people.

Young people are aware of the disciplinary measures which will be taken as a consequence of any unacceptable behaviour.

The centre has a policy on the use of sanctions which is entirely consistent with promoting the developmental needs of young people by progressively encouraging them to exercise greater degrees of self-control and discipline.

Young people are rewarded for the achievement of acceptable behaviour and permitted sanctions are used effectively.

Restraint and single separation

Physical restraint is never used as a punishment, but only to protect the young person from immediate risk of injury to self or others, or serious damage to property. All incidents of physical restraint and the use of separation from the group are appropriately and accurately recorded. Proof of monitoring by management is in place.

Staff members are appropriately and sufficiently trained in the use of physical restraint, ***as part of an overall agreed intervention strategy***, and their competence is checked regularly and refresher training is provided.

The appropriateness of its use for individual young people should be agreed as part of the placement plan and single separation is only used in exceptional cases and conforms to laid down policy.

Single separation:

- Only used exceptionally and conforms to policy
- Only used for the minimum time necessary to restore appropriate behaviour
- Must be subject to approval by the member of management on call
- Time-scales must be inbuilt after which the member of management must be informed for a review of the situation
- Must be monitored regularly and observations recorded
- Means that the young person is not separated for a set period, but continually reviewed.

A member of management must approve its use and regular reviews must be inbuilt.

A written policy and protocol regarding absconding, drug misuse, home leave, non-return, etc. being in place.

Staff is familiar with the written procedures to be followed in the event of an absconding from the centre or from the care of staff while away from the centre. These procedures will include details of persons to be contacted and/or how to access such information.

Staff and young people are made aware of the sanctions to be applied as a result of an absconding, a non-return from home leave or misuse of drugs.

Policy on Privacy.

Daily living arrangements respect young persons' privacy and dignity, having regard to age and gender.

Young people can make and receive telephone calls with an appropriate degree of privacy except where it is adjudged that safety or security would be compromised.

Young people should normally be able to write and receive letters without staff checking the contents.

3. CHILD PROTECTION

Young people in the centre shall be protected from abuse² and there are systems in place to ensure such protection. In particular, staff members are aware of and implement practices, which are designed to safeguard young people in their care.

Each centre should ensure that:

A child protection procedure is in place that is known to all staff, young people, parents and other professionals

There is evidence of supervision and training in the “*Child Protection Document: Policy, Procedures & Protocol*” and in “*Children First*”³ for all staff (including relief and ancillary staff). All students will receive similar training.

A child friendly, age appropriate, version of the Child Protection Document is available to all young persons on admission.

There are specific safeguarding practices for keeping young people safe from self-harm and abuse from staff, family, visitors and other residents. These practices outline appropriate professional relationships between staff and young people, including one-to-one contact, and other safeguarding components.

All staff members understand the principles, practices and procedures involved in the protection of young people and take appropriate action if they have concerns or have been informed about possible evidence of abuse.

Internal and external managements regularly monitor the implementation of agreed safeguarding practices.

The procedure outlines clearly the steps to be followed and the persons to be notified.

The role of the **Designated Child Protection Officer (DCPO)** is stated clearly in the young person’s information pack. The name and location of the DCPO is known to all young people.

Young people confirm that they know how to contact the DCPO or a responsible adult to whom they feel they can speak if they have any concerns.

² *Physical Abuse, Sexual Abuse, Emotional Abuse & Neglect as defined in the Department of Health’ publication – Notification of Suspected Cases of Child Abuse between Health Boards and Gardai, April 1995.*

³ *Children First – National Guidelines for the Protection and Welfare of Children – Department of Health & Children, September 1999*

All staff members receive training in, and are familiar with, the signs, symptoms and behaviour associated with bullying, being used as a scapegoat, harassment or abuse

Young people who have been the victims or perpetrators of abuse are supervised as necessary to reduce the possibility of further abuse.

The mix within a group is such that it will not adversely impair the social, emotional, physical and personal well-being of individuals.

A 'whistle-blowing' system is in place for staff

Staff is facilitated to express concerns about the practices of colleagues where appropriate.

4. CHILDREN'S RIGHTS

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

Children's rights are protected through:

Staff being aware of the centre's policies on rights and responsibilities

The centre has a documented complaints procedure which is readily available in written format to young people (in age appropriate language), parents, guardians and other representatives.

The complaints procedure clearly outlines the following

- ❑ What constitutes a complaint
- ❑ How a young person can be helped to make a complaint; to whom he/she can make a complaint, both inside and outside the school; the procedure to be followed; (*steps to be taken, time scale, who investigates the complaint, where and how it is recorded, feedback to the complainant*).

Young people are kept informed on a regular basis both formally and informally of their right to complain.

Young people are informed of a person outside the centre to whom they may complain or to whom they may appeal the outcome of a complaint.

Staff treats the complaint procedure seriously and does not feel unduly threatened by it or play it down.

Staff encourages young people to bring dissatisfaction into the open and helps them formulate a complaint, if appropriate.

All complaints and their outcomes are centrally recorded and signed by both the staff member receiving the complaint and the young person making the complaint.

Subject to the overriding principle that the protection of children always receives priority, complaints against staff are dealt with in a way which balances the need to protect children with the need to safeguard the interests of staff concerned, following the laid down practices.

Management, internal and external, will monitor the incidents and outcomes of complaints.

Young people being involved in preparing reports for meeting, reviews etc

Young people are provided with sufficient information in which to support their involvement and enable them to make informed choices.

Young people and their families are consulted about decisions that affect their lives. Their views are sought, valued and used to inform care planning and reviews.

Staff creates the proper time, circumstances and encouragement for young people to express their views and ensures that the young people meet regularly, as a group, to share their opinions about daily life in the unit.

Young people being made aware that they have access to independent advocacy services

A list of at least two people who may be contacted by young people will be made available in the information pack.

Young people being helped to understand their responsibilities and their rights.

A booklet outlining rights and responsibilities to be made available to young people.

Access to information

Young people have access to information about their rights under the United Nations Convention on the Rights of the Child, 1989.

Young people are given information verbally and in writing of their right to access information about themselves and services available in accordance with their age and level of experience.

5. PLANNING FOR YOUNG PEOPLE

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

The following matters require consideration:

Placement (including admission criteria, legal authority, etc)

An appropriate detention order must be in place as provided for under the Children Act 1908 (or the Children Bill when enacted).

Young people are provided with age appropriate written procedures describing all aspects of the School, in particular information about visiting, phone calls, personal belongings and home leave.

Care plans (including Education and Health plans)

There is a comprehensive care plan drawn up for each young person based on his/her assessed needs which promotes the welfare of each young person.

Each care plan will contain objectives, time-scales and assigned tasks.

The care plan is distinguished from the overall placement plan.

The young person, parents and significant others are involved in drawing up the care plan and receive copies of the care plan.

Review of care plans

Each young person's care plan must be subject to formal, systematic and regular review – (at least every two months). Records of reviews should be held in the individual master files.

Each young person has an identified keyworker to progress his/her placement plan and to provide support to the young person and maintain contact with the family and outside agencies.

Young people and families confirm that they are helped to prepare for reviews, attend review meetings, are aware of their purpose and receive copies of the relevant documentation.

Legal preparation

Young people are facilitated in the access of legal representation.

Young people are well informed, prepared and supported for attendance at court.

Partnership with families/guardians

Visits from family and friends are encouraged and facilitated in private, unless safety and security are compromised, or otherwise directed by the courts.

A young person's individual log should contain a complete record of all contacts between family and young person and all appointments and/or efforts made to establish contact. A record of non-contact with parents or guardians will be maintained.

Where a review meeting has established that contact is prohibited, this should be clearly explained to the young person concerned. The reasons for restrictions should be documented and reviewed at the time of the next care plan review meeting.

External agencies

The School has established positive working relationships with all the relevant external agencies and more specifically staff is encouraged to be actively involved with the young person during his/her stay at the School and attend all key decision making meetings.

Discharges

Young people are discharged from the School in a planned manner following consultation with the relevant agencies.

Aftercare

The School has a written policy on aftercare which it has developed with relevant external agencies.

6. STAFFING & MANAGEMENT

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

The following matters require consideration:

The School is managed by an appropriately qualified person

The manager and external managers satisfy themselves that appropriate and suitable care practices and operational policies are in place.

Managers have in place mechanisms for assessing the quality and effectiveness of the services provide by the School, particularly outcomes for young people.

Recruitment and deployment of staff

Procedures are in place for ensuring that only suitable and appropriately qualified staff are recruited and employed.

The competence, experience and qualifications of staff on duty at any time are adequate for the purpose of the centre, taking account of the nature of the resident population.

Staff is deployed in an efficient and effective way to support the purpose and function of the centre taking into account the current resident population.

Working practices seek to maximise continuity of contact between young people and staff and reflect their differing needs at key points during the day.

Effective staff checking procedures

Procedures are in place for vetting all prospective staff (permanent, relief and temporary) through the checking of references or testimonies, particularly from the most recent employer/s and the obtaining of appropriate security clearances before taking up duty.

Procedures are in place for the vetting of students and other outsiders visiting the centre.

Role of the Board of Management i.e. responsibilities, authority and monitoring functions must be clearly defined.

Support and Supervision of staff

Management structures within the centre must be adequate to provide for sufficient supervision, direction and accountability.

Supervision of staff will ensure that structures are in place which reflect policy.

Staff is supported in its work by explicit policies, procedures and appropriate directives; staff members are clear about accountability and reporting lines.

Staff meetings, hand-over meetings and other forums take place regularly to ensure co-operation and consistency between all staff (care, teaching and others) in implementing individual care plans and in maintaining safety and security.

Training and development of staff

There is a staff development and training programme in place for care, education and other staff. This training should reflect the needs of the young people accommodated and provide for appropriate induction training for all new staff.

Where appropriate, training specific to working in secure environment should be provided.

Staff will receive training in child protection, race and culture awareness, the management of difficult behaviour and matters related to the rights of the young person.

Administration (including Records, Files, Logs, Incident reports, Notification of significant events, Case Review notes, etc)

The administrative systems needed to facilitate effective management and accountability by the centre both internally and externally are in place.

Controls are in place to monitor the quality of all centre records, the management of incidents by staff, the quality of decisions taken by staff, with a view to addressing deficiencies identified in the centre's systems and safeguarding the interests of residents and staff.

Each young person has a permanent, private and secure record of his/her history and progress which contains all relevant documentation. All case files are kept in perpetuity.

The centre has adequate financial management systems so that it can fulfil all relevant accountability requirements.

The centre has systems in place for assessing the quality and effectiveness of the services provided by the centre, particularly outcomes for the young people.

Cooperation with external agencies that have responsibilities in relation to the centre

There are procedures in place for ensuring prompt cooperation with outside agencies that have a statutory or regulatory role vis-à-vis the centre.

Systems to ensure that public resources provided are used in an optimum manner to provide quality care programmes and services for the young people in care.

There is efficiency and effectiveness in the provision of care programmes and services.

There is an appropriate and economic utilisation of places.

7. EDUCATION

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

Matters for consideration are:

Promotion of education

Education is actively promoted through the centre conveying an ethos where learning is valued and young people are encouraged to improve their standards of educational achievement.

There is a school plan, which is consistent with the overall aims of the centre and the outcomes are monitored and evaluated.

Educational Assessments

Each young person should have a formal educational assessment carried out that will then form the basis of his/her educational programme and become part of his/her care plan.

Providing Life Skills programmes as part of young peoples' education

The educational curriculum provided should be balanced and broadly based, promoting young people's intellectual, physical and personal development.

As far as possible the National Curriculum/Syllabus of the Department of Education & Science should form the basis for each young person's educational programme.

The effective promotion of young peoples' competencies in the key skills of reading, writing, speaking, listening, numeracy and information technology will receive priority status.

Opportunities are provided for young people to sit State Examinations.

Minimising disruption to education and keeping mainstream education open as an option

Disruption in schooling is minimised as far as possible and the centre must develop programmes of educational support when the young person is temporarily out of school.

Young people approaching school leaving age must be encouraged to participate in further education, job training programmes or vocational opportunities as appropriate to their abilities, interests and aspirations.

Staffing, accommodation and learning resources

The number, qualifications and experience of teachers match the demands of the curriculum/syllabus and the needs of the young person.

There is appropriate accommodation for the range of educational activities.

The provision of learning resources is appropriate.

8. HEALTH

Health Care is an essential element in the arrangements for the care of young people. Each young person has a right to receive appropriate health care and advice. Healthy lifestyles are promoted.

Relevant issues for consideration are:

Medical records should be complete

The centre maintains a complete record of medical and health information on each young person in its care covering as many years as possible but to include, at least, the period since he/she was admitted.

A written record of all vaccinations administered shall be available.

All medical records are kept up to date and are appropriately stored.

There is confidentiality of information.

Regular health checks

Young people should, where possible, be given a choice of general practitioner.

Appropriate arrangements are in place to ensure that regular health assessments are carried out on each young person prior to review meetings.

Arrangements are in place to ensure access to a GP, dentist and other specialist services as required.

Consent of young person and/or parent/guardian

Procedures are in place to obtain the young person's consent and that of the parent/guardian where this is appropriate or necessary for the administration of medical treatment.

The consent of young people (over 16 years of age) is sought for medical examinations or treatments, in compliance with the **Non-Fatal Offences Against the Person Act, 1977** Section 23(1).

Parents/guardians are routinely kept informed of their son/ or daughter's state of health and health needs.

Emotional & Specialist support

Care and placement plans include programmes of work to address particular issues of identified need and behaviour.

External support is available to staff to provide for assessments, consultancy and treatment for individual young people.

Inter-agency cooperation in the matter of access to specialist services has been pursued.

Controls over the administration of medicines

Procedures for safeguarding and storage of medicines and other similar substances are in place.

Records of dispensing of medicines to the young people are kept and checked by medical personnel on a regular basis.

A policy for the destruction of non-used prescribed medicines is in place.

Education programmes in sex/relationships, drug misuse, effects of smoking, etc

Programmes of prevention and health education, which address issues such as smoking, alcohol or substance abuse, sexual misbehaviour, sexual abuse, sexually transmitted diseases, AIDS/HIV, personal hygiene, etc will be provided in an age appropriate manner.

The centre has policies and guidelines for staff members who are providing age appropriate advice on sexuality and relationships for young people.

Promotion of healthy eating habits among young people and provision of adequate quantities of wholesome/nutritious food

Arrangements are in place to ensure that young people receive adequate nutrition and healthy eating habits are promoted through the provision of education and information, encouraging the young people to exercise choice and become involved in the planning and preparation of meals.

Young people are encouraged to eat at least one meal together with other young people and staff daily so that meals are regarded as positive social events.

The provision of regular leisure time pursuits and recreation

Arrangements are in place to facilitate young people becoming involved in leisure and recreational activities and staff, as role models, will encourage such pursuits.

Facilities are in place to allow for regular leisure and recreational exercise.

9. PREMISES, SAFETY & SECURITY

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

Relevant considerations are:

Each young person has his/her own room which is furnished to acceptable standards and permits personalisation to the extent agreed

There is guidance for young people and staff about young people's entitlements to furniture and personal possessions on admission. Any withdrawal of entitlements is clearly documented and justified in the interests of safety and security. Young people are made aware of the centre's policy in this regard. No withdrawal of entitlements is to be used as a sanction.

Young people can use bathrooms and toilets without being overlooked.

There is sufficient space to meet the full range of young people's identified needs

Young people have space for recreational activities both indoors and outdoors which is appropriate to their ages, abilities and interests.

The centre is decorated to a good standard and equipment and furnishings are clean and of suitable quality.

The centre is adequately lit, heated and ventilated.

Within the constraints of safety and security, the centre provides a domestic and homely living environment.

There is a written statement on safety policy, fire precautions and emergency procedures, which is understood by staff and young people

The Centre has written confirmation from a certified engineer or a qualified architect that all the relevant requirements relating to fire safety and building control have been complied with.

There are arrangements with the Fire Authority for annual visits to advise on fire safety and monitor previous recommendations.

The centre is equipped with suitable fire safety equipment, including smoke/fire detector alarms and an emergency lighting system. Routine checking of fire safety appliances and regular fire drills take place. An effective record is kept of fire drills, appliance checks as well as responses to accidents and incidents.

The administration and safe keeping of keys and security equipment and the locking of doors are carefully managed.

There is an effective and reliable call system that enables young people to summon help immediately from their bedrooms.

Systems are in place to ensure that all furnishings are fire retardant. Combustible substances must be rigorously controlled and stored safely.

Staff demonstrates safe kitchen practices and receives training and advice on food safety and hygiene.

A systematic approach to maintenance and premises checks exists

Repairs are prioritised, appropriately recorded and signed off when completed. A record is kept so that progress and outstanding issues can be monitored.

A systematic and formal approach is taken to risk assessment in relation to new admissions, personal possessions in young people's rooms, mobility and the use of high-risk areas.

There is a comprehensive strategy for preventing illicit items being imported into the School.

Need for searches

There is a comprehensive strategy for the prevention of illicit importation of specified dangerous or prohibited items to the centre by young people, visitors or staff.

There are detailed policies, procedures and guidance that include keeping appropriate records on room and clothing searches. These will include the means by which searches will be carried out and in what circumstances. *[Whenever possible, young people should be present when their rooms are being searched.]*

10. DEALING WITH OFFENDING BEHAVIOUR

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

Relevant considerations are:

Individual programmes are based on assessed needs

Each young person's programme is developed taking account of his/her presenting criminal tendencies as an integral part of the young person's care plan.

Frequent reviews

Review of the programme takes place as part of the overall Care Plan Review.

The keyworker, in consultation with other staff, ensures that reviews are carried out and recorded on the young person's file.

Evaluation & Monitoring

A mechanism is in place to evaluate the effectiveness of the individual and general offending behaviour programmes.

Monitoring of the programme will be in place and clear records will be maintained.

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