

# ARGYLL & BUTE COUNCIL

## Internal Audit Section

### INTERNAL AUDIT REPORT

CUSTOMER DEPARTMENT	COMMUNITY SERVICES
AUDIT DESCRIPTION	VERIFICATION AUDIT
AUDIT TITLE	REVIEW OF SCHOOL HOSTELS
AUDIT DATE	FEBRUARY 2016

2015/2016



## 1. BACKGROUND

This report has been prepared as a result of the Internal Audit review of School Hostels within Community Services Department as part of the 2015 – 16 Internal Audit programme.

School care accommodation services form one part of the wide range of care services regulated by the Care Inspectorate of Social Care and Social Work Improvement Scotland (SCSWIS), who draws its power from the Public Services Reform (Scotland) Act 2010. School care accommodation services are those described in Schedule 12, section 3 (1) of the Act:

- (a) Consists of the provision of residential accommodation to a pupil in a place in or out with a public, independent or grant-aided school;
- (b) Is provided (whether or not during term-time) for the purpose of or in connection with the pupil's attendance at the school (whether current or otherwise); and
- (c) Is provided to the pupil by –
  - (i) An education authority or the managers of an independent or grant-aided school; or
  - (ii) Any person under arrangements made between that person and any such authority or managers.

The National Care Standards for school care accommodation services have been developed from the point of view of children or young people who use the services. They describe what each individual child or young person can expect from the school or hostel. They focus on the quality of life that the child or young person using the service actually experiences around the principles of Dignity, Privacy, Choice, Safety, Realising Potential and Equality & Diversity.

The standards for school care accommodation services are grouped under headings that follow the child or young person's journey through the service from Settling in, leading your life through to leaving school and expressing your views. The full set of standards can be viewed at <http://www.gov.scot/Resource/Doc/349584/0116842.pdf>.

Argyll and Bute Council operate 2 School Accommodation Hostels:

Dunoon School Hostel supports young people from Lochgoilhead, Carrick, Tighnabruaich, Cairndow, Strathlachlan and the outlying areas of Colintrave and Glendaruel. With a budget of £505K, Dunoon School Hostel has a capacity for up to 70 young people, with 36 currently in residence, equating to 51.4% occupancy.

Glencruitten Hostel in Oban supports young people from Bridge of Orchy and the islands of Colonsay, Coll, Mull, Lismore, Iona, Kerrera, Shuna and Easdale. With a budget of £690K, accommodation at Glencruitten hostel has a capacity for over 80 young people, with 50 currently in residence, equating to 62.5% occupancy.

- Both hostels offer accommodation for pupils in a mix of single, double and triple rooms and one Disability Discrimination Act (DDA) compliant ensuite facility with ground floor access for pupils with special needs.
- Roll numbers for both hostels are projected to increase over the next 8 years based on roll numbers from primary schools within the catchment areas.

The budget allocated to the hostels is calculated from the previous year's budgetary costs plus an additional allowance in line with inflation. Both Glencruitten and Dunoon School Hostel have a similar budgetary cost per resident of around £14K.

There are currently 4 other local authorities that offer School Hostel accommodation; The Highland Council, Orkney Islands Council, Shetland Islands Council and Aberdeen City Council. The Aberdeen City Council hostel is solely for music school students. The service structures of these four councils vary, with responsibilities for the school hostel falling under various services; however responsibility at departmental level predominantly includes Education.

## **2. AUDIT SCOPE AND OBJECTIVES**

The objective of the audit was to review policies and procedures in place, their practical application and assess current level of compliance with national standards.

The scope included selecting a sample of standards from which to assess compliance, we visited both Dunoon School and Glencruitten Hostels to review both physical and documentary evidence.

### 3. RISKS CONSIDERED

- SRR – Risk 8: Reputation  
 SRR – Risk 9: Operating – Demographic change  
 SRR – Risk 12: Engagement – Alignment of service delivery
- ORR – ED02: Secondary children realise potential through Curriculum for Excellence
- ORR – CF01: Failure to improve the life chances of looked after children  
 ORR – CF02: Failure to safeguard young people and families at risk
- Audit risk: Failure to comply with legislation

### 4. AUDIT OPINION

The level of assurance given for this report is Substantial.

Level of Assurance	Reason for the level of Assurance given
<b>High</b>	Internal Control, Governance and the Management of Risk are at a high standard with only marginal elements of residual risk, which are either being accepted or dealt with.
<b>Substantial</b>	Internal Control, Governance and the Management of Risk have displayed a mixture of little residual risk, but other elements of residual risk that are slightly above an acceptable level and need to be addressed within a reasonable timescale.
<b>Limited</b>	Internal Control, Governance and the Management of Risk are displaying a general trend of unacceptable residual risk and weaknesses must be addressed within a reasonable timescale, with management allocating appropriate resource to the issues.
<b>Very Limited</b>	Internal Control, Governance and the Management of Risk are displaying key weaknesses and extensive residual risk above an acceptable level which must be addressed urgently, with management allocating appropriate resource to the issues.

This framework for internal audit ratings has been developed and agreed with Council management for prioritising internal audit findings according to their relative significance depending on their impact to the process. The individual internal audit findings contained in this report have been discussed and rated with management.

A system of grading audit findings, which have resulted in an action, has been adopted in order that the significance of the findings can be ascertained. Each finding is classified as High, Medium or Low. The definitions of each classification are set out below:-

**High** - major observations on high level controls and other important internal controls. Significant matters relating to factors critical to the success of the objectives of the system. The weakness may therefore give rise to loss or error;

**Medium** - observations on less important internal controls, improvements to the efficiency and effectiveness of controls which will assist in meeting the objectives of the system and items which could be significant in the future. The weakness is not necessarily great, but the risk of error would be significantly reduced if it were rectified;

**Low** - minor recommendations to improve the efficiency and effectiveness of controls, one-off items subsequently corrected. The weakness does not appear to affect the ability of the system to meet its objectives in any significant way.

## 5. FINDINGS

The following findings were generated by the audit:

### Settling In: Standard 1 – Arriving for the first time

It was evidenced that the handbooks provided by both hostels were well written and provided parents and young people with the necessary information to prepare for life as a hostel resident. The roles and responsibilities of staff and senior residents are clearly defined within the handbooks. Both hostels follow an admissions policy to prepare newcomers prior to arrival including staff visits to feeder schools and visits to the hostel from parents and future residents. Key workers are allocated to newcomers prior to arrival as well as buddies/befrienders (senior residents). There was evidence of consultation and good communication between the hostels, schools & parents.

The Handbook for Glencruitten is available within the website for Oban High School, however it was noted that this is not the current version. The Dunoon School Hostel Handbook is currently not available on the internet; however, the hostel is currently developing

their own website to allow access to this amongst other policies and procedures. It was also noted the Dunoon School Hostel Handbook does not include information regarding the professional qualifications gained by staff as required in National Care standard for school care accommodation 1.1.

### Settling In: Standard 3 – Care and Protection

Staffing levels are agreed with the Care Inspectorate and shifts are scheduled accordingly. Both hostels offer resources and activities to residents according to their age e.g. DVDs and Video games rated below or above age 15 are viewed in separate areas within the hostel. The Hostels computer resources are connected to the Local Authority networks and filtering systems to avoid access to inappropriate content. All care staff are trained in child protection with annual refreshers courses at both hostels. In addition, domestic and janitorial staff also undertake Child protection training. Care staff are also trained to deal with situations in such a way as to avoid the need for restraint i.e. Crisis, Aggression, Limitation and Management (CALM) and Therapeutic Crisis Intervention (TCI).

Both Hostels have comprehensive policies, procedures and guidelines in place covering Safe Touch, Bullying & Discrimination, Missing Young Persons, and Confidentiality. There are posters displayed within each of the establishments offering advice on when and how to contact ChildLine, including a contact telephone number.

Sanctions imposed are decided on a case by case basis and recorded within the daily log book; sanctions are also recorded on the personal file in the event of a serious or recurring matter. Staff at both hostels are aware of the need to avoid punishing groups as a result of the actions of one individual. This is noted within Dunoon's staff code of conduct, however, a similar document was not provided by Glencruitten.

### Leading Your Life: Standard 13 – Keeping Well – Medication

Both Hostels follow "Administration of Medicines in Residential Child Care" draft policy created in consultation between Argyll and Bute Council and NHS Highland. Internal Audit has been advised that this policy has been in draft format for approximately 2 years. It was evidenced that both hostels request and receive signed authorisation forms from parents to allow for administration and self-administration of medication.

In Dunoon School Hostel, young people have lockable wardrobe drawers in their bedroom where they can safely store prescribed medication for self-administration. The same facility is available in Glencruitten, however, this is not currently in use. Bedroom doors can also be locked (although they were not locked during our visit).

It was evidenced that medication and first aid supplies within Dunoon School Hostel were stored safely and securely in a designated locked cabinet within the medical room, there is also a facility for refrigerated storage, although not currently in use. Glencruitten Hostel has a medical room within each accommodation block; internal audit viewed the medical room within block B (boys). The room provided refrigerated storage which was in use to store medication for one young person. The medical room was locked and entry was gained through use of a numbered keypad, however, the main medication cabinet door was ajar upon entry with the key remaining in the lock. The officer in charge advised internal audit that when locked the only key is stored on top of the cabinet. In addition to this, internal audit was shown a supply of 31 boxes of paracetamol stored in an ununlockable cupboard below the sink next to the first aid supplies.

Specific training is sourced from medical professionals on how to administer non-standard medication where required. It was evidenced through review of documentation and discussion with management that, within Dunoon School Hostel, 8 members of care staff are currently fully trained in first aid allowing for at least one to be present on every work shift. In Glencruitten Hostel, there are 2 members of care staff fully trained in first aid with the remainder trained to a basic first aid level. There was no evidence that either hostel had prominent notices displaying information of the identity of the first aiders for the building in line with Argyll and Bute management standard on first aid at work.

It was evidenced that both hostels maintained a medical administration record (MAR) for each young person and that weekly audits are undertaken to ensure that record keeping is accurate and stock levels are as expected. In Glencruitten Hostel, Internal Audit reviewed the MAR for one young person and found that it had not been updated upon replenishment of medication.

#### Leaving School: Standard 16 – Leaving School

It was evidenced through review of documentation and discussion with management that both hostels encourage young people to discuss any anxieties they may have about leaving school with their key worker. Hostels also work closely with the school's guidance

staff to support young people to gain positive outcomes and prepare them for the transition to independent living. The hostels compile care/support plans for looked after children and liaise with external parties where appropriate.

Young people are encouraged to visit the Hostels after leaving and often do.

### Expressing Your Views: Standard 17 – Concerns, comments and complaints

Both hostels encourage the young people to express their views and offer a variety of ways to do so. It was evidenced on both site visits that the wishes and requests of young people had been discussed and progressed where possible and explanations provided when not possible.

Both hostels follow Argyll and Bute Council's formal complaints policy. A 'child friendly' complaints leaflet, explaining the procedure in simpler terms, is available for the young people. Contact information for the Care Inspectorate is included in both handbooks and posters are displayed on the notice boards in both hostels.

## **6. CONCLUSION**

This audit has provided a Substantial level of assurance. There were a number of recommendations for improvement identified as part of the audit and these are set out in Appendix 1 and 2. There were 4 high and 1 medium recommendations set out in Appendix 1 which will be reported to the Audit Committee. There are 4 low recommendations which are not reported to the Audit Committee.

Appendices 1 and 2 set out the action management have agreed to take as a result of the recommendations, the persons responsible for the action and the target date for completion of the action. Progress with implementation of actions will be monitored by Internal Audit and reported to management and the Audit Committee.

Thanks are due to Dunoon School Hostel and Glencruitten Hostel staff and management for their co-operation and assistance during the Audit and the preparation of the report and action plan.



**APPENDIX 1 ACTION PLAN**

<b>Findings</b>	<b>Risk Impact</b>	<b>Rating</b>	<b>Agreed Action</b>	<b>Responsible person agreed implementation date</b>
<b>1. Administration of Medicines Policy</b>		<b>High/ Medium or Low</b>		
The “Administration of Medicines in Residential Child Care” draft policy created in consultation between Argyll and Bute Council and NHS Highland has been in draft format for approximately 2 years.	Failure to have a final policy in place may lead to staff adhering to instructions that are not agreed or out of date.	High	<b>Management to liaise with NHS Highland with a view to finalising policy as soon as possible.</b>	<b>Locality Manager (Oban, Lorn &amp; Isles)  30 April 2016</b>
<b>2. Safe storage of Medication</b>		<b>High/ Medium or Low</b>		
There are inconsistencies in storage of prescribed and non-prescribed medication.	Failure to ensure safe storage of medication may lead to unauthorised access resulting in misuse and non-availability of medication.	High	<b>Within Glencruitten Hostel, management will provide lockable storage within the bedrooms of young people and source larger, lockable medicine cabinet to accommodate all medication within the medical room.</b>	<b>Officer In Charge (Glencruitten Hostel)  31 March 2016</b>

<b>3. Medicine Cabinet</b>		<b>High/ Medium or Low</b>		
The door of the medication cabinet within Glencruitten Hostel medical room (block b) was ajar upon entry and the key left in the lock, when locked the key is stored on top of the cabinet.	Failure to secure medicine cabinet may lead to unauthorised access resulting in misuse and non-availability of medication.	High	<b>Senior management to instruct hostel management to follow safe storage practices.</b>	<b>Locality Manager (Oban, Lorn &amp; Isles)</b> <b>29 February 2016</b>
<b>4. Completion of Medical Administration Records</b>		<b>High/ Medium or Low</b>		
In Glencruitten Hostel, Internal Audit reviewed the Medical Administration Record (MAR) Form for one young person and found that it had not been updated upon replenishment of medication.	Failure to maintain accurate and complete records may lead to discrepancies that are unable to be resolved.	High	<b>Senior management will instruct hostel management on need to maintain and complete accurate records.</b>	<b>Locality Manager (Oban, Lorn &amp; Isles)</b> <b>29 February 2016</b>
<b>5. Glencruitten Medical Room Access</b>		<b>High/ Medium or Low</b>		
Access to the medical room (block b) within Glencruitten Hostel was gained through use of a numbered keypad.	Frequent visitors may learn the entry code leading to unauthorised entry resulting in misuse and non-availability of medication, medical supplies and equipment.	Medium	<b>Management will review access to medical room with a view to ensuring that the access coded is changed on a regular basis.</b>	<b>Locality Manager (Oban, Lorn &amp; Isles)</b> <b>29 February 2016</b>



## Contact Details

Name Mhairi Weldon & Abbie Macalister

Address Whitegates, Lochgilphead, Argyll, PA31 8RT

Telephone 01546 604294 & 01546 604272

Email [mhairi.weldon@argyll-bute.gov.uk](mailto:mhairi.weldon@argyll-bute.gov.uk) & [abbie.macalister@argyll-bute.gov.uk](mailto:abbie.macalister@argyll-bute.gov.uk)

[www.argyll-bute.gov.uk](http://www.argyll-bute.gov.uk)

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