

| Number | Key Findings | Action | Owner | Target Date |
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| 1 | Children live in a dilapidated environment, experience frequent incidents of violence and use of force and are often cared for by inexperienced staff. | i. Cleaning of units has commenced by an external contractor who will complete a deep clean of all units, bathrooms, kitchens and replace damaged furniture. All residential units will be painted by the target date and the centre will be subject to an ongoing painting and maintenance regime. | G4S Head of Facilities Management | 10 December 2021 |
| | | ii. A full refurbishment plan for Oakhill STC will be developed by the end of December 2021 and work will commence thereafter. | SPV | 31 December 2021 |
| | | iii. Middle managers will check 10% of the 100% Daily Fabric Checks conducted by the frontline staff to improve and sustain living conditions. Middle managers will be briefed on the required standards expected within the living environment and will be made aware of the reporting process to Facilities Management. | G4S Head of Residence | 12 November 2021 |
| | | iv. The following actions have been taken to improve the regime and reduce violence: <ul style="list-style-type: none"> o Time out of room for the children has been increased to 13 hours per day during the week and 12 hours per day at the weekend o Education is now delivered consistently for 5 hours per day o Peer interactions and engagement have increased | G4S Head of Residence | Complete |
| | | v. A mentoring provision will be agreed and provided for children involved in serious youth violence to empower them to make positive choices, with the aim of reducing violent incidents. G4S and the YCS will monitor the trends via the live monitoring platform (G4S Smartsheets). | G4S Head of Safety | 31 December 2021 |
| | | vi. The phasing of the increase of children from the current agreed level will be commensurate with the experience of the staff. The current agreed capacity is up to 40 children. This will be reviewed following the return of OFSTED in relation to the Urgent Notification. | G4S Director | 31 December 2021 |

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| 2 | Staff are reluctant to challenge low level poor behaviour. This failure frequently leads to more serious incidents, including violence. This is exacerbated by the lack of an effective behaviour management strategy to support staff in how to deal with challenging behaviour. | i. | The Earned Incentive Scheme (EIS) policy will be relaunched in conjunction with HMPPS Psychology Services. As part of this, G4S will implement the Behaviour Management Strategy that will be underpinned by the YCS Building Bridges approach which sets out the framework for positive relationships between staff and children. Awareness and understanding of the process and Behaviour Management Strategy will be delivered to staff as part of the EIS briefings and in discussions with line managers during staff supervision sessions. The process is also discussed with the children daily at the community meeting. | G4S Head of Reform | 31 December 2021 |
| | | ii. | To ensure the scheme is being applied appropriately with consistent application, records will be checked daily by frontline managers and weekly by Senior Residential Managers (RMs). Senior RM's or the Head of Residence will check a minimum of 10% of front-line manager EIS entries per week. An understanding and awareness of the process will be discussed with Line Managers during staff supervision sessions. | G4S Head of Residence | 30 November 2021 |
| | | iii. | Staff supervision sessions will be held on a monthly basis. All staff will meet with their line manager to discuss personal development; performance concerns, training needs and requirements for support (see key finding 10, action iii). Action plans for the staff will be drawn up following supervision sessions and actions followed up at all subsequent meetings. | G4S Head of Residence | 31 December 2021 |
| | | iv. | Weekly behaviour management meetings will be introduced to scrutinise centre wide trends, hot spots and risks to enable focused and targeted work with staffing groups to ensure they have necessary strategies to challenge low level poor behaviour before it escalates. | G4S Head of Residence | 30 November 2021 |
| | | v. | Children Intervention Plans will be relaunched for those identified within the Behaviour Management Meetings/EIS Review meetings. These will be used to formulate a bespoke strategy to incentivise and support children with the highest needs to achieve the expected levels of behaviour and, prevent escalation of poor behaviour. The Children Intervention Plans will be discussed during line manager/staff supervision sessions. | G4S Head of Residence | 30 November 2021 |
| 3 | Levels of use of force are very high. There are incidents where the use of force on children is not justified and contrary to legislation. Staff are not sufficiently skilled in the use of physical restraint | i. | The Duty Director reviews all incidents of force on CCTV and Body Worn Cameras after the incident. All incidents of Minimising and Managing Physical Restraint (MMPR) are reviewed within 24 hours by the MMPR team and during the Behaviour Management/Harm Minimisation meetings. | G4S Deputy Director/Director | Complete and ongoing |
| | | ii. | A middle manager will attend all incidents to ensure a dynamic risk assessment takes place to prevent risk to the child, staff or other children, and will populate the decision log (within the occurrence log) to provide the rationale for the decision. A daily review of the Decision Log will be conducted by the Duty Director. | G4S Deputy Director/Director | 30 November 2021 |

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| | <p>techniques to ensure that children are always safeguarded. Governance and quality assurance of the use of force and the physical restraint of children is ineffective. Poor practice is not identified and addressed quickly enough, leading to delays in taking action.</p> | <p>iii. YCS and G4S have collaboratively commissioned a full review of MMPR policies and procedures, leadership, practice and governance which will inform a revised local policy to improve safety for children.</p> | G4S Director | 31 December 2021 |
| | | <p>iv. G4S have appointed a MMPR Subject Matter Expert to review and develop local practices and policies.</p> | G4S Director | Complete |
| 4 | <p>Systems for safeguarding children are in disarray. Senior leaders failed to ensure that safeguarding concerns and allegations are referred to statutory agencies as required. There is a considerable backlog of safeguarding concerns awaiting action. Children therefore remain at risk of serious harm.</p> | <p>The YCS are currently commissioning an independent full review of safeguarding from an experienced Director of Children's Services or equivalent. This review will cover:</p> <ul style="list-style-type: none"> • The effectiveness of safeguarding processes within Oakhill and whether they provide good quality outcomes for children, and that processes have checks and balances to prevent system failure. • That Safeguarding is well understood and supported by all of the senior management team and that a safeguarding culture is embedded in all staff. • Decisions made in relation to safeguarding are both proportionate and defensible and actively make a positive difference to children. • The YCS will ensure that partnership agencies are working together effectively and providing appropriate professional challenge to safeguard children within Oakhill through their relationships with the Local Authority and through monitoring activity. <p>Recommendations will be shared with the Secretary of State.</p> | YCS | 28 th February 2022 |
| | | <p>i. The YCS to increase the frequency of updates from the centre safeguarding team to twice weekly in relation to specific serious allegations being investigated.</p> <p>ii. The YCS to meet with the G4S safeguarding team monthly to address all open safeguarding cases and the actions being taken.</p> <p>iii. The YCS to meet the Milton Keynes Local Authority relevant Designated Officer on a monthly basis to ensure the centre is doing all that is required to support their investigations.</p> | YCS | Complete and ongoing |
| | | <p>iv. All outstanding cases have been reviewed in a multi-agency meeting between Head of Safeguarding, Milton Keynes Local Authority Designated Officer (LADO) and Thames Valley Police, and the Referral log updated for all agencies to be aware of progress.</p> | G4S Head of Safeguarding/ G4S Deputy Director | Complete |

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| | | <p>v. All referrals agreed at the multi-agency meeting have been referred to the Local Authority Children's Services. Additional funding has been provided by G4S to the Local Authority for a minimum of three months to assist in processing the actions associated with the backlog.</p> | G4S Head of Safeguarding/ G4S Deputy Director | 31 January 2022 |
| | | <p>vi. G4S have increased the safeguarding team and will enhance the process as follows:</p> <ul style="list-style-type: none"> ○ One additional Social Worker to assist the current Safeguarding Manager to take action on the safeguarding referrals and provide support with actions for child protection cases. ○ One Resettlement Caseworker to act as a Safeguarding Officer to support training, and timeliness of information sharing. ○ Recruitment of an additional safeguarding administrator to support with case closures. ○ Introduction of a functional mailbox which the Safeguarding Team and all Duty Directors can access to ensure immediate referrals are made to relevant agencies. ○ Refresher training for Senior Operational Managers and Duty Directors on managing child protection referrals including referrals to the LADO and Multi-Agency Safeguarding Hub (MASH). ○ Monthly meetings with the LADO to review non referred cases to ensure reporting is aligned to the agreed threshold. ○ New referrals will be discussed during the morning briefing (Monday-Friday) with the Director/Deputy Director. During weekends the Duty Director will engage with the on-call Director/Deputy Director. ○ Weekly reporting to the Chief Operating Officer and Managing Director of G4S. ○ Monthly reporting through the G4S division trading reviews. ○ Quarterly audits by members of G4S Central Leadership Team. ○ Reviewing the Child Protection policy in collaboration with the Local Authority. ○ All referrals will be shared with the G4S Care and Rehabilitation Services Chief Operating Officer who will monitor progress on a weekly basis with the Centre Director. ○ Incidents of self-harm will be reviewed by each child's caseworker, who will engage with the child to understand the cause of their frustrations and self-harm incidents. | G4S Head of Safeguarding/ G4S Deputy Director | 31 December 2021 |
| 5 | Safeguarding concerns have been investigated internally contrary to statutory guidance. This could compromise any future investigations. | <p>i. G4S will refer all cases to the Local Authority to agree on the approach for the initial review. The G4S Care and Rehabilitation Services Central Audit Team will conduct a weekly review of the management of cases.</p> | G4S Head of Safeguarding/ G4S Deputy Director | 30 November 2021 |

28 Day Urgent Notification Action Plan Oakhill Secure Training Centre

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| 6 | Children have access to inappropriate adult content channels via their in-room televisions. Senior managers have been aware of this since March 2021, but no action has been taken. | i. G4S and the YCS have investigated children's access to TV channels and children are not able to access the inappropriate adult content channels. A Notice to Staff has been issued to communicate awareness of the concern. Weekly checks are conducted to ensure there is no access to adult channels. Duty Directors conduct monthly night checks to ensure this is consistently working. | G4S Head of Security | Complete |
| | | ii. The additional safeguard of implementing a channel blocking software to block inappropriate adult content TV channels will be installed by the end of November 2021 in addition to the weekly and monthly checks. | G4S Head of Security | 30 November 2021 |
| 7 | Most children reported a lack of confidence in the complaints system, discouraging them from raising concerns. This has serious implications for safeguarding as it could allow harmful behaviour to go undetected. | i. A survey will be conducted with the children to understand their concerns with the current complaints process. | G4S Head of Operational Delivery and Compliance | 8 November 2021 |
| | | ii. All complaints are shared with the child's caseworker or suitable advocate to support the child throughout the process. The child is kept informed throughout all stages of the complaint process. | G4S Head of Safeguarding | Complete |
| | | iii. G4S will introduce quality assurance processes as follows: <ul style="list-style-type: none"> o A 10% sample of responses to the children will be reviewed by the Deputy Director or Director on a monthly basis. o A checklist will be implemented for investigating officers listing items to focus practice on to ensure the child feels listened to, valued and represented. o Complaints will be allocated to a department not linked to the source of the complaint to ensure impartiality. o All staff complaints will be investigated and where necessary directed to the safeguarding team and HR. o Children's satisfaction will be monitored by the caseworker and the outcome shared with the YCS and Advocacy Service to ensure they feel listened to. | G4S Deputy Director/Director | 30 November 2021 |
| | | iv. G4S will ensure that the children's voices are represented so that key issues are identified and actioned. This will be evidenced by: <ul style="list-style-type: none"> o Youth Council Meeting Minutes and Community Meeting logs (stored on the unit). o Barnardo's Advocacy Service engaging with the children and sharing the learning with the Operator and YCS. | G4S Deputy Director | 31 December 2021 |
| 8 | Residential staff are not able to access key information to | i. All children case overviews are regularly updated by the resettlement team and made available for residential staff in unit offices. | G4S Head of Residence | 30 November 2021 |

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| | inform their day-to-day care of children. In addition, some staff stated to inspectors that they had been given the choice of whether to read relevant information. Some had chosen not to. Children are therefore being cared for by staff who are not equipped with all the information they need to keep the children safe and to meet their individual needs. | <ul style="list-style-type: none"> ii. Staff Supervision Sessions will include an agenda item for all residential staff in monthly supervision to ensure they have a detailed understanding of the individual plans of the children residing in their unit. iii. The Head of Residence and Senior Residential Managers will conduct weekly assurance checks to ensure staff have read relevant information regarding children. Weekly briefings will be conducted by Senior Residential Managers to ensure that unit staff are aware of individual assessments and plans for each child residing on their unit. | G4S Head of Residence | 30 November 2021 |
| 9 | Staffing of the centre remains fragile. The centre's records dated September 2021 show an annual staff attrition rate of 27%, resulting in unstable, transient relationships with children. This has been a primary factor in children's experiences of poor care and control | <ul style="list-style-type: none"> i. G4S will deploy appropriate staff from other G4S establishments to improve the number of staff available daily. This will be for a minimum period of 13 weeks, whilst local recruitment and improved retention rates enables Oakhill STC to become self-sufficient. ii. Initial Training Courses for new recruits will commence on a 4 weekly cycle to ensure a steady intake of new recruits. This will include a one-day Challenge of Chance resilience training which is an evidence-based intervention designed to enhance personal resilience. Priority will be given to those new recruits and any staff member who is identified as requiring support. Staff members requesting support with resilience will also be offered access to the course. iii. G4S have introduced a salary increase of 11% and a £1500 retention enhancement to encourage front line staff retention. The introduction of these initiatives has had a positive impact on staff retention iv. A change in shift/attendance patterns will be introduced to provide improved coverage of staff at all times, particularly during weekends. v. Safer recruitment training will be delivered to all managers responsible for the recruitment of operational staff to ensure people with the right attributes to work with children are recruited. | G4S Deputy Director/Director | 31 January 2022 |
| | | | G4S HR | Complete |
| | | | G4S HR | Complete |
| | | | G4S HR | 31 January 2022 |
| | | | G4S Head of Safeguarding | 31 March 2022 |
| 10 | Frontline staff are poorly managed and supported. | <ul style="list-style-type: none"> i. The recruitment of frontline managers is being finalised to support new and existing Secure Care Officers (SCOs) to increase the visibility and support across the Centre. | G4S Head of Residence | 31 December 2021 |

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| | Many have not received any purposeful training and development beyond their mandatory programmes. No training needs analysis has been completed. | ii. A management development programme will commence in November 2021 on a rolling programme for frontline managers to support SCO's comprising of the following modules: <ul style="list-style-type: none"> ○ Role of a Manager ○ Effective Communication ○ Managing Team and Individual Performance <p>Delivery will be through 3 x1-day workshops, complemented by digital learning and knowledge checks.</p> | G4S Head of Residence | 28 February 2022 |
| | | iii. A tracker has been introduced for all frontline staff to monitor monthly sessions that will include: <ul style="list-style-type: none"> ○ Discussion with line manager regarding recent performance ○ Training and Personal Development needs ○ Opportunity for the staff member to raise concern or support needs relevant for SCOs and for the RMs to discuss trainee plans ○ Supervision of Senior Residential Managers will be completed by the month end to ensure all staff have attended supervision sessions as planned ○ Quarterly reviews of the tracker to inform the annual training plan. | G4S Head of Residence | Complete and ongoing |
| | | iv. A full training needs analysis will be completed by reviewing the Annual Appraisal objectives for all staffing groups. This will inform the Annual Training Plan, which will be subject to monitoring via the tracker. | G4S Deputy Director/HR | 31 March 2022 |
| 11 | The decision by senior leaders to lock children into their rooms for an average of approximately 19 hours per day in July and August was wholly inappropriate and risk averse. Children's experiences during this period were bleak, and barely met minimum standards of human decency. This practice ended shortly after the monitoring visit. | i. The regime has been re-established due to improved staffing levels and a reduction in the number of children being looked after. This will be closely monitored in the coming months to ensure the centre can continue to deliver the regime based on the staffing levels. The phasing of the increase of children from the current agreed level will be commensurate with the experience of the staff. The current agreed capacity is up to 40 children. This will be reviewed following the return of OFSTED in relation to the Urgent Notification. <p>Since 13 September 2021 all children have consistently been afforded 13 hours out of room on a weekday and 12 hours out of room on a weekend and 25 hours of face to face education delivery per week. All children are offered a minimum of one-hour time in the open air each day.</p> | G4S Deputy Director/Director | 31 December 2021 Complete and ongoing |
| | | ii. When children do not engage with the regime, staff actively encourage participation whilst promoting the benefits of the Centre's EIS scheme. Attendance is monitored daily, ongoing concerns are escalated to the Safety team, and there will be a meeting with the child on an individual basis to seek a suitable resolution. | G4S Head of Residence | Complete |

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| 12 | <p>The centre director has begun to exert some grip, but as she is a temporary appointee, we do not have confidence in the sustainability of progress. The provider advised that a recruitment campaign is under way to appoint a new director. We do not know whether the provider will be able to provide high quality and consistent leadership through the appointment of a director with suitable skill and experience, including specific experience in children's care and services, to make the necessary improvements rapidly.</p> | <ul style="list-style-type: none"> i. The YCS have put an experienced public sector prison governor in place to work alongside and support the director and to scrutinise G4S's delivery and improvements. This experienced senior leader will direct a team of YCS staff on-site who will test G4S's progress and will be responsible for driving G4S to deliver on their responsibilities within this action plan. ii. The YCS have provided an experienced senior manager, with specific experience in safeguarding to ensure enhanced operational oversight. iii. A new Centre Director has been identified subject to approval by the Ministry of Justice with a planned start date 20th December 2021. The Interim Director will remain in post until this date and will be supported by the G4S Care and Rehabilitation Services Central Team, including the Chief Operating Officer, Commercial, Operational and HR colleagues. | <p>YCS YCS G4S Managing Director/YCS</p> | <p>Complete Complete 31 December 2021</p> |
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