



HM Prison &
Probation Service

Action Plan Submitted: 1st November 2022

A Response to: A Thematic Review of Outcomes for Girls in Custody (HMI Prisons)

Report Published: 21st September 2022

INTRODUCTION

HM Inspectorate of Prisons (HMIP) and HM Inspectorate of Probation for England and Wales are independent inspectorates which provide scrutiny of the conditions for, and treatment of prisoners and offenders. They report their findings for prisons, Young Offender Institutions, and effectiveness of the work of probation, and youth offending services across England and Wales to Ministry of Justice (MoJ) and His Majesty's Prison and Probation Service (HMPPS). In response to the report HMPPS / MoJ are required to draft a robust and timely action plan to address the priority and key concerns. Action plans provide specific steps and actions to address the priority and key concerns, that are clear, outcome focussed, measurable, achievable, and relevant with the owner and timescale of each step clearly identified. Action plans are sent to HMIP and published on the GOV.UK website. Progress against the implementation and delivery of the action plans will also be monitored and reported on.



		intervention and ensure the best use of resources to prevent girls coming into custody.		
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2	<p>The national system for caring for girls in custody did not function well; often girls with the highest level of need were placed into the institution with the least resources.</p> <p>There were two different types of institution in England and Wales for fewer than 20 girls. Legislation (see glossary) required secure children's homes to refuse to provide placements for a girl if they could not meet their needs. The consequence of this was that girls with the highest level of need were held in Wetherby Young Offender Institution, which had fewer resources to meet their needs.</p>	<p>Although the number of girls in the secure estate remains small, the proportion of girls with complex needs has over the years increased. Many of the girls under Youth Custody Service (YCS) care present as high-risk, high-harm and highly vulnerable.</p> <p>To ensure the distinct needs of the girls' cohort are recognised and addressed, the YCS has convened a Board to draw together strands of work around the improvement of processes surrounding, and outcomes for, girls in custody. The Board will oversee YCS' Girls Delivery Plan which will incorporate activity aligned to the response to this thematic.</p> <p>The YCS Critical Case Pathway provides a YCS wide approach to supporting sites on the care and management of the most challenging and complex children in YCS care. The pathway is set for review in 2022 to ensure that sites continue to get the support (and where appropriate, resources) they require.</p> <p>The YCS are working closely with Secure Children's Home (SCH) Registered Managers to improve the operating models in SCHs and provide packages of support for the management of the most challenging girls.</p> <p>The YCS are considering future provision for all children (including girls) via an internal assessment of the role and purpose of each sector to ensure sufficient capacity and suitable environments. This will inform the longer-term, strategic direction of provision for children in the YCS including girls.</p> <p>The Quality Development Team will review effectiveness of provision for girls at Wetherby YOI in early 2023. The YCS have already agreed an uplift in staff for the Girls Unit at Wetherby, which reflects the staffing levels achieved in Enhanced Support Units. Recruitment for the increased number of staff is currently underway locally.</p>	<p>YCS Quality Development Team</p> <p>YCS Placements, Casework & Operational Contract Management Team</p> <p>YCS Strategy & Commissioning Team</p> <p>YCS Operations Team YCS Quality Development Team</p>	<p>Completed</p> <p>December 2022</p> <p>Completed</p> <p>March 2023</p> <p>June 2023</p>
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3	<p>Girls were far more likely than boys to harm themselves, experience restraint and to be involved in violence during their time in custody.</p> <p>While there are occasions when staff have to use restraint to prevent girls harming themselves, we saw examples of girls being restrained multiple times in a short period with little support offered after the incident to address the underlying cause of self-harm.</p>	<p>The YCS have commissioned the Centre for Mental Health to help create an Effective Practice Briefing for frontline staff specifically in the area of girls and self-harm. The development of the briefing will include clinical expertise input from the NHSE Managed Clinical Advisory Group (MCAG) and engagement with girls currently placed in the secure estate.</p> <p>The YCS psychology team will review the use of restraint on girls at Wetherby, which will inform our programme of work moving forwards.</p> <p>YCS will also develop a Safeguarding Strategy and Policy so that staff working in the secure estate, with both boys and girls, are clear about child protection responsibilities.</p> <p>The YCS are undertaking a training needs analysis for staff at Wetherby YOI looking at the training needs required for managing both girls and boys in their care. Further support will be provided to staff at Wetherby to recognise and respond to the distinct needs of girls.</p> <p>A joint learning approach over and above the local quality assurance by the establishment's Minimising and Managing Physical Restraint (MMPR) Co-Ordinators has been introduced at Wetherby; restraints involving girls are collaboratively scrutinised by Wetherby's Safeguarding Team and YCS specialists within the fields of Use of Force, Restraint, Integrated Care and Psychology.</p> <p>Additional assurances are in place at Wetherby regarding the development of MMPR handling plans for all girls to provide consistency and continuity within the decision-making process prior to and during restraint.</p>	<p>YCS Quality Development Team</p> <p>HMPPS YCS Psychology Team</p> <p>YCS Safeguarding Team</p> <p>HMPPS YCS Psychology Team</p> <p>YCS Operations Team</p> <p>YCS Operations Team</p>	<p>March 2023</p> <p>Completed</p> <p>January 2023</p> <p>March 2023</p> <p>Completed</p> <p>Completed</p>
4	<p>Girls who needed tier 4 mental health beds waited too long for transfer to hospital.</p> <p>During this delay, very unwell girls were held in institutions unable to meet their needs.</p>	<p>From 2018 – 2019 to 2021 – 2022, three girls transferred to a secure hospital under the Mental Health Act 1983 Part III from the Children & Young People Secure Estate. Most children transfer to a secure hospital in a timely way. There are a small number of cases where the child either has a complicated presentation that requires an extended assessment period; the right type of bed is not available or where the child does not fit the criteria for admission and/or detention. For example, access to extra care areas, gender specific services or services for children and young people with a learning disability can all affect bed suitability. Additionally,</p>		



		<p>during this time period, there was an unprecedented pressure on inpatient placements linked to the COVID-19 response.</p> <p>NHS England Specialised Commissioning has invested capital funding from 2021 to 2023 for environmental changes to ensure the right provision is available to meet the needs of all children who require assessment and treatment under the Mental Health Act 1983.</p> <p>The revised procedure for the transfer or remission of children under the Mental Health Act 1983 Part III for the Children and Young People Secure Estate was published in November 2021. The revised procedure is designed to support staff to work well with colleagues to ensure that the established transfer process works smoothly and that there are no unacceptable delays in providing a child with inpatient mental health care if that is what they need. Children who await transfer to a mental health bed may require enhanced observation during this period. In YOIs this is delivered by YCS and funded by NHS England. In SCHs additional provision is provided by NHS England if appropriate, though in some cases additional care staff may be required as agreed with YCS. The contracted healthcare provider in each setting would continue to provide additional oversight and support as needed.</p> <p>Centre for Mental Health have been commissioned by NHS England and the Youth Custody Service to conduct a review of current evidence, policy, and practice on enhanced observations. The final report, including recommendations to improve policy is due to be presented to NHS England and the towards the end of the year.</p>	<p>NHS England</p> <p>NHS England and Youth Custody Service</p> <p>NHS England and Youth Custody Service</p>	<p>December 2023</p> <p>Completed</p> <p>December 2022</p>
5	<p>Transition plans had little impact on the day-to-day experience of young women when they were transferred to the adult estate.</p> <p>Cases we examined showed 18-year-olds were often overwhelmed by the transition and did not know how to adjust to life in adult establishments.</p>	<p>In April 2022, YCS published the 'Transition of young people from youth to adult custody' policy framework which sets clear requirements for both youth and adult custodial settings and is expected to be implemented by March 2023.</p> <p>Operational guidance for young adult women in prison has now been developed. Women's prisons will be required to develop a local response</p>	<p>YCS Placements, Casework & Operational Contract Management Team</p> <p>Women's Directorate</p>	<p>March 2023</p> <p>March 2023</p>



		<p>to key elements of the guidance to ensure they meet the needs of girls transitioning from the youth estate.</p> <p>Women's team are piloting a bespoke residential approach to better support young adult women in custody, including girls who are transitioning from YCS provision. The unit/s will provide a trauma responsive, multi-disciplinary and more individualised and therapeutic approach to working with young women. This will include an enhanced staffing model, more effective key work and other services, such as social care, trauma interventions and additional psychology and health provision.</p> <p>A local prison lead/case manager for each girl being transitioned from YCS will be identified in advance via the Women's Estate Case Advice and Support Panel (WECASP) system. A visit or video call will be organised for girls to meet the identified staff prior to arrival in the establishment. Post-transition meeting to be held for all girls to review the transition process and receive girls' feedback.</p>	<p>Women's Directorate</p> <p>Women's Directorate</p>	<p>March 2023</p> <p>March 2023</p>
6	<p>Suitable accommodation was not secured early enough before release.</p> <p>This prevented effective planning for health care and education, training and employment. When accommodation was arranged it was not always suitable.</p>	<p>The MoJ recognises the importance of suitable and timely accommodation arrangements for constructive resettlement journeys out of custody. To support YOTs to develop robust and effective processes in relation to arranging accommodation, MoJ has established a new 'key performance indicator (KPI)' focused on the suitability and timeliness of accommodation arrangements for children (this is being introduced alongside a number of new YOT KPIs which will be launched in April 2023).</p> <p>Whilst local authorities (LAs) have statutory duties to ensure sufficient appropriate accommodation for children in their area, we recognize that some LAs sometimes find it difficult accessing the most appropriate accommodation, including for girls in the justice system. The lack of available and suitable placements for the most vulnerable children is something this Government takes seriously, and we are taking significant steps to support LAs to fulfil their statutory duties, as set out above in <i>Concern 1</i>.</p>	<p>Youth Justice Board</p> <p>Looked After Children's Division, Department for Education</p>	<p>April 2023</p> <p>December 2022 to December 2025</p>



		<p>In Wales, the Youth Justice Blueprint Resettlement and Transitions workstream has ensured that the Welsh youth justice workforce has received training in Constructive Resettlement (CR) and Identity Shift. Relevant guidance and resources are available on the Youth Justice Board Resource Hub.</p> <p>The workstream has commissioned, at the request of YOT Managers Cymru (YMC) and key stakeholders, a CR guidance document for Wales, this is currently in the drafting process.</p>	<p>Youth Justice Blueprints project board, WG</p> <p>Youth Justice Blueprints project board, WG</p>	<p>Completed</p> <p>March 2023</p>
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