



# Joint inspections of secure training centres

A report on the responses to consultation

---

This is a report on the outcomes of the consultation on proposed changes to the joint framework for the inspection of secure training centres, held between 17 July and 14 August 2018.

If you would like a version of this document in a different format, such as large print or Braille, please telephone 0300 123 1231 or email [enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk).

**Published:** March 2019

**Reference no:** 190006



Corporate member of  
Plain English Campaign  
Committed to clearer communication

**361**

## Contents

---

<b>Introduction</b>	<b>3</b>
The consultation method	3
<b>Summary of findings</b>	<b>4</b>
Proposal one: that we implement a revised judgement structure for joint inspections of STCs	4
Proposal two: that we reinforce the inspection response to inadequate judgements	5
Proposal three: that the HMIP on-site survey of children's views at STCs becomes a 'point-in-time' survey	5
Proposal four: that we give five days' notice for the inspection	5
<b>Findings in full</b>	<b>7</b>
Proposal one: that we implement a revised judgement structure for joint inspections of STCs	7
Our response	9
Proposal two: that we reinforce the inspection response to inadequate judgements	12
Our response	12
Proposal three: that the HMIP on-site survey of children's views at STCs becomes a 'point-in-time' survey	13
Our response	13
Proposal four: that we give five days' notice for the inspection	14
Our response	14
<b>The way forward</b>	<b>15</b>

## Introduction

1. Secure training centres (STCs) are purpose-built centres for young offenders aged from 12 to 17 years. There are three STCs in England. They are currently jointly inspected by the Office for Standards in Education, Children's Services and Skills (Ofsted), Her Majesty's Inspectorate of Prisons (HMIP) and the Care Quality Commission (CQC) under arrangements made with the Ministry of Justice (MoJ), in accordance with rule 43(1) of The Secure Training Centre Rules 1998<sup>1</sup> and section 146 of the Education and Inspections Act 2006.<sup>2</sup>
2. This report summarises the responses to a formal consultation process carried out by Ofsted, HMIP and the CQC on proposals for changes to the framework for inspecting STCs, for implementation in April 2019.
3. The consultation sought feedback from stakeholders on several proposed changes to the joint inspection framework for STCs:
  - a revised judgement structure
  - a strengthened response to inadequate judgements of STCs
  - introducing a 'point-in-time' survey of children's views ahead of inspection, replacing the on-site survey currently carried out during the inspection
  - revised arrangements for the notice we give STCs before inspection.

## The consultation method

4. The online consultation ran between 17 July 2018 and 14 August 2018. It was promoted on the Ofsted website and in the wider media, including social media. The consultation document was available to complete online or to be submitted via email or by post.
5. We received a total of 23 responses to the online consultation. We also received seven separate written submissions<sup>3</sup> and 47 responses to a questionnaire sent directly to children detained at STCs.
6. We held seven face-to-face consultation meetings with stakeholders, including two meetings with representatives from the STCs and a meeting with eight children detained at Medway STC.

---

<sup>1</sup> The Secure Training Centre Rules 1998; [www.legislation.gov.uk/uksi/1998/472/contents/made](http://www.legislation.gov.uk/uksi/1998/472/contents/made).

<sup>2</sup> Education and Inspections Act 2006; [www.legislation.gov.uk/ukpga/2006/40/contents](http://www.legislation.gov.uk/ukpga/2006/40/contents).

<sup>3</sup> From the Standing Committee for Youth Justice; Barnardos; ADCS; Howard League; YJB; Article 39; Ministry of Justice/Youth Custody Service.

7. In December 2018, we carried out a joint pilot inspection of Medway STC that tested the methodology of specific aspects of the proposed new framework, including the revised judgement structure and the notice period.
8. We are very grateful to all the children, organisations and individuals who have taken the time to participate so constructively in the consultation.

## Summary of findings

### Proposal one: that we implement a revised judgement structure for joint inspections of STCs

9. The vast majority of respondents (90%) agreed with the proposal.
10. Respondents were generally supportive of the increased focus on children's experiences and progress. They also supported the proposal to reduce the number of judgements made, including a single judgement on how well children are helped and protected.
11. The support was less strong for the removal of a graded judgement on resettlement.
12. We have made several changes to the original proposal. They take into account the feedback from the consultation and the learning from the pilot inspection.
  - We will keep a graded judgement on resettlement. In the coming months, we will work with stakeholders to explore how we can ensure that inspections take an ambitious and rigorous look at STCs' work to reduce children's reoffending.
  - The education and health judgements will be more explicitly integrated within the overall experiences and progress judgement.
  - We will use simplified, outcome-focused language for the judgement titles.
13. We will put in place the following judgement structure:
  - Overall experiences and progress of children and young people, including judgements on:
    - children's education and learning
    - children's health
    - children's resettlementtaking into account:
    - how well children and young people are helped and protected

- the effectiveness of leaders and managers.
14. As part of the review, we will explore how we can ensure that our inspections and reports take an ambitious and rigorous look at STCs' work to reduce reoffending. We will make sure that we engage all important stakeholders in this work.

### **Proposal two: that we reinforce the inspection response to inadequate judgements**

15. There was almost universal agreement with this proposal.
16. We will implement this proposal. If we judge a centre as inadequate, we will:
- hold an urgent review meeting with the MoJ to determine the most appropriate action
  - return promptly to a centre to ensure that children are safe, usually within eight weeks of an inadequate judgment.

### **Proposal three: that the HMIP on-site survey of children's views at STCs becomes a 'point-in-time' survey**

17. Three quarters (75%) of those replying to the consultation agreed with this proposal.
18. We will implement this proposal. It will provide more timely information about children's views, helping us to plan the scheduling of inspections and to establish earlier lines of enquiry.
19. Inspectors will continue to complement the findings from the questionnaire by speaking to as many children as possible during the on-site inspection itself.

### **Proposal four: that we give five days' notice for the inspection**

20. The proposed change to the survey of children's views requires a change to how we give notice and prepare for inspections.
21. We originally proposed that we give three working days' notice for the inspection (including weekends, this represents five days' notice for the STC).
22. Over half (58%) of those replying to the consultation agreed with this proposal. Most of those who disagreed with our proposal felt that we should either give shorter notice of inspection or give no notice at all.



23. We will implement a period of notice of four days. This is one day fewer than we had proposed and effectively two days fewer than the existing arrangements.
24. We believe that this is the minimum notice required to deliver a thorough and reliable inspection. This will be challenging both for the centres and for inspectors. However, the change from the original proposal reflects the strength of feeling from stakeholders that the notice we give STCs should be as short as possible.

## Findings in full

### Proposal one: that we implement a revised judgement structure for joint inspections of STCs

Q1. Do you agree that we should apply the following judgement structure to inspections of secure training centres?<sup>4</sup>

The overall experiences and progress of children and young people, taking into account:

- how well children are helped and protected
- the quality of education and related learning activities
- the quality of health care
- the effectiveness of leaders and managers.

25. The vast majority of respondents (90%) agreed with the above question.
26. Respondents broadly welcomed a reduction of the number of judgements made on inspection. The idea of this proposal is to minimise unnecessary duplication of inspection activity and to promote clearer and more concise reporting of children's experiences and progress.
27. Several stakeholders specifically welcomed that the judgement structure would more closely mirror the one used for inspections of secure children's homes (SCHs), making comparing inspection outcomes across the different types of settings easier.
28. Several comments emphasised agreement with the overall focus on children's lived experiences and the impact of centres on their lives.

'The change in focus to the "overall experiences and progress of children and young people" is a significant step in the right direction... inspections need to move away from processes and procedures to the impact of practice which is informed by children's experiences.'

---

<sup>4</sup> Currently, we make eight judgements following inspections of STCs: overall effectiveness, taking into account: the safety of young people; promoting positive behaviour; the care of young people; the achievement of young people; the health of young people; the resettlement of young people; the effectiveness of leaders and managers.

'[We] support the move to bring the new STC framework closer to the social care common inspection framework (SCCIF) and the focus this brings to expectations, experiences and outcomes rather than processes and compliance.'

29. The online consultation response supported the proposal to establish a single judgement on 'how well children are helped and protected'. This would effectively replace the separate judgements on 'promoting positive behaviour' and 'the safety of young people'.
30. Inspectors used this judgement structure during the pilot inspection of Medway STC in December 2018. We are confident that we were able to gather the evidence we needed during the pilot inspection and that the judgements were sound.
31. A single 'help and protection' judgement contributed to a more accurate and balanced narrative of how safe children were. This may not have otherwise been reported if there had been two discrete judgements on children's safety and behaviour.
32. This change may mean that, in certain circumstances, we have raised the bar for a 'good' help and protection judgement (and, by extension, for a positive overall judgement).
33. We are satisfied that this is the right thing to do. It is crucial that we do not risk telling an unbalanced story of how safe children are, simply because certain aspects of their behaviour or safety are artificially separated into two separate judgements.
34. Respondents' main source of concern about the judgement structure centred on the proposed loss of a specific 'resettlement' judgement. Most of those who advocated retaining this judgement noted our commitment to making a clear statement on the quality of resettlement work within each inspection report but felt that a clear separate judgement remained necessary.

'Including [resettlement] as a judgement would have greater force and promote greater focus.'

'We would also like to propose an additional key judgement for resettlement, taking it beyond the proposal to "make a clear statement on the quality of resettlement work" as currently proposed... transition between custody and community can be a particularly vulnerable time for young people, as well as a time of heightened risk to others.'



'We are of the opinion that "the resettlement of young people" needs to be retained as a specific judgement. Resettlement is a significant factor that if addressed effectively can help to prevent young people returning to the secure estate.'

35. A small number of respondents noted that the language of some judgement titles could be more focused on outcomes rather than 'quality'.
36. Several respondents made suggestions about the content of the evaluation criteria that will help inspectors to reach their judgements. For example, they suggested emphasising the continued importance of children being 'cared for' and stressed the need for children to keep positive links with family and friends. We have taken into account such comments when finalising the evaluation criteria. They are included in the framework guidance,<sup>5</sup> published at the same time as this consultation report.

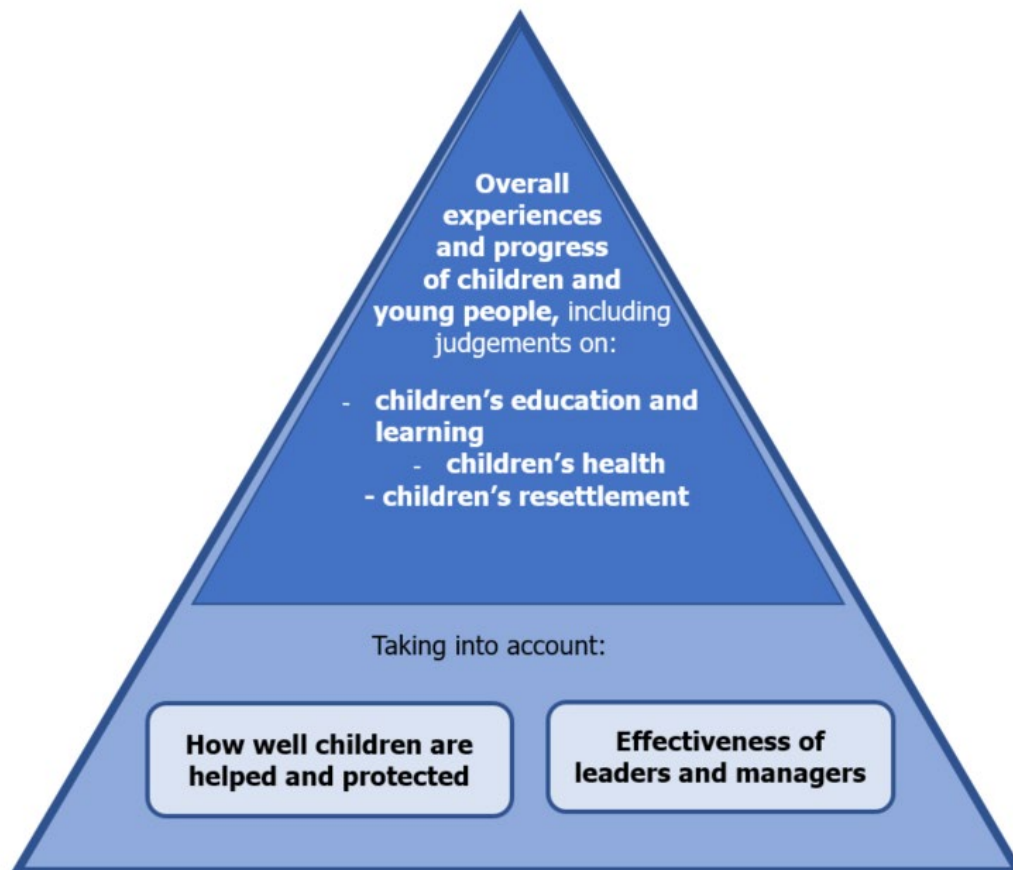
## Our response

37. We propose to put in place the following judgement structure:
- Overall experiences and progress of children and young people, including judgements on:
    - children's education and learning
    - children's health
    - children's resettlementtaking into account:
  - how well children and young people are helped and protected
  - the effectiveness of leaders and managers.
38. Figure 1 below illustrates this judgement structure.

---

<sup>5</sup> Joint inspection framework: secure training centres, Ofsted, March 2019;  
<https://www.gov.uk/government/publications/inspecting-secure-training-centres-framework>

**Figure 1: The judgement structure**



39. We believe that this is a balanced judgement structure that will enable us to:
- focus on what matters most for children
  - gather the necessary evidence to reach the right judgements
  - report clearly about children's lived experiences.
40. We will implement our original proposal to introduce a judgement on 'how well children and young people are helped and protected'.
41. We have made several changes to the original proposal:
- we will keep a graded judgement on resettlement
  - the education and health judgements are now more explicitly integrated within the overall experiences and progress judgement

- we have used simplified, outcome-focused language for the judgement titles.
- 42. We agree that effective resettlement work is critically important for children. Good planning and support must be in place if children are to make a successful transition from custody to the community, which minimises the likelihood of their reoffending. This is intrinsic to the purpose and function of STCs.
- 43. We carefully considered implementing a narrative judgement on resettlement. We believe that resettlement is integral to children's overall experiences and progress and is not easy to separate from the other judgements..
- 44. However, we have taken seriously the strong prevailing views on this matter from respondents to the consultation. The revised judgement structure will therefore include a graded judgement on the effectiveness of resettlement.
- 45. We will make sure that the findings on resettlement inform the overall judgement. To do this, we will integrate this judgement within the judgement for children's overall experiences and progress, as illustrated in figure 1 above.
- 46. We will review this decision by April 2020.
- 47. As part of the review, we will assess ways that our inspections and reports can take an ambitious and rigorous view of the work by STCs to reduce reoffending. We will make sure that we engage all important stakeholders in this work as we set out high aspirations for all children leaving STCs.
- 48. We will maintain a sharp focus on the education and health of children.
- 49. However, we do not want our evaluation of children's education and health to be stand-alone activities. We will apply a similar approach to how inspectors will look at the education and health judgements as we have done for the resettlement judgement. By integrating these judgements within the overall experiences and progress judgement, we will ensure that they properly inform the overall judgement.
- 50. Inspectors who evaluate education and health are also likely to contribute evidence for the judgements on help and protection and the effectiveness of leaders and managers.
- 51. We have made some amendments to the titles of the judgements in response to comments that we could use plainer and more outcome-focused language for some headings.

## **Proposal two: that we reinforce the inspection response to inadequate judgements**

Q2. Do you agree that there should be a more robust and consistent response to an inadequate judgement?

Q3. Do you agree with the following proposals to strengthen arrangements following a judgement of inadequate?

- Holding an urgent review meeting with the MoJ to determine the most appropriate action.
- Returning promptly to a centre (either as a monitoring visit or a full inspection) to ensure that children are safe, usually within eight weeks of an inadequate judgment.

'We would expect there to be a swift and urgent response to any inadequate judgements in relation to the secure estate that is charged with meeting the needs of some of the most vulnerable children in society.'

52. There was almost complete agreement with these proposals (95%).<sup>6</sup>
53. Stakeholders' additional comments made suggestions on how to reinforce the proposals. For example, several respondents sought reassurance that the inspectorates' responses to inadequate judgements would be flexible, dependent on circumstances and the seriousness of concerns. Others wanted full transparency on the outcomes of the return visits, including the publication of monitoring visit reports, and clearer accountability of any failure to adequately protect and care for children at the centres.

### **Our response**

54. We will implement these changes, as originally proposed.
55. We have sought to address specific issues, including those summarised in paragraphs 106-112 within the published guidance.

---

<sup>6</sup> Only one respondent to the online consultation disagreed. Seven respondents did not know.

## **Proposal three: that the HMIP on-site survey of children's views at STCs becomes a 'point-in-time' survey**

Q4. Do you agree that we should do a 'point-in-time' survey of the views of children at STCs, replacing the current on-site survey?

56. Three quarters of people (75%) replying to the consultation agreed with our proposal to implement a 'point-in-time' questionnaire.
57. Currently, when we give STCs notice of inspection, HMIP researchers arrive on site to survey the views of all children at the centre. While this survey is being carried out, the lead inspector also arrives on site to begin planning the inspection activity. The full inspection team does not arrive on site until the next Monday, six days after the lead inspector gave notice.
58. We proposed to carry out the HMIP-led survey as a separate 'point-in-time' survey of children at the three STCs. It will not form part of on-site inspection activity. The consultation made it clear that listening to children's views remained a core element of inspectors' activity during the on-site inspection.
59. Overall, respondents felt a 'point-in-time' survey was a positive change. For example, it could empower the children to speak honestly and anonymously, as well as informing the timing of inspection activity and key lines of enquiry. STCs could also use the questionnaire as an improvement tool.
60. It was not possible to fully test the objectives of the 'point-in-time' questionnaire through the pilot inspection. HMIP researchers did, however, carry out a survey of children's views at Medway STC several weeks before the inspection and the responses given provided some useful lines of enquiry for inspectors.
61. In the first 12 months after implementation of this framework, some variances in the timing of the questionnaire are likely as we move from one system to another.

### **Our response**

62. We will carry out a 'point-in-time' survey of the views of children at STCs, replacing the current on-site survey, as proposed.
63. It is important that inspectors complement the findings from the 'point-in-time' questionnaire with speaking directly to as many children as possible during the on-site inspection itself. We will monitor the extent to which children's views

inform inspectors' findings to see how successfully we have implemented this critical aspect of the joint inspections.

### **Proposal four: that we give five days' notice for the inspection**

Q5. Do you agree with the proposed five days' notice period for inspections of STCs?

'The introduction of a short... notification period is similarly welcome; we do not believe systemic failings can be covered up in this time and the unannounced nature of the current inspection adds additional and unnecessary pressure on staff of all levels.'

64. The proposed change to the survey of children's views requires a change to how we give notice and prepare for inspections.
65. We felt that five days' notice would give the inspection team the minimum time necessary to plan and prepare for a robust inspection. Over half (58%) of respondents however, agreed with our proposal for this length of notice.
66. Most of those who disagreed with our proposal felt that either we should give shorter notice of inspection or that we give no notice at all.
67. We are not surprised by the mixed response. We understand that stakeholders would like us to limit the notice we give to the absolute minimum to ensure that we have as realistic a view as possible of the lived experiences of those in STCs. Several respondents observed that we do not give any notice for inspections of SCHs.
68. Children at the centres were most likely to call for a 'no-notice' inspection.

### **Our response**

69. We will implement a period of notice of four days (two working days for Ofsted). This is one day fewer than we had proposed and effectively two days fewer than the existing arrangements.
70. This decision takes into account the following factors:
  - We follow the principle of applying the **minimum** notice that is required to deliver a robust and reliable inspection. Inspectors need enough preparation time to consider the up-to-date information that we require centres to provide promptly after we give notice. Enough time is also needed to plan a timetable for inspection that makes the best use of our time on site.

- Although it will be challenging for both the STC and for inspectors, we believe four days' notice is manageable, The reduction reflects the strength of feeling from stakeholders that the notice we give STCs should be as short as possible, particularly from children themselves.
- STCs are large, custodial establishments and are significantly larger than SCHs. We need to take into account that there are specific logistical considerations associated with STCs when planning a safe and productive inspection.

71. We will monitor how this works in practice and consider whether we should increase the length of notice or if we can safely reduce it further.

## **The way forward**

72. We published the revised framework and guidance on 11 March 2019, alongside this report of the consultation.
73. We are confident that the framework will provide increased consistency and rigour to Ofsted-led inspections of STCs.
74. We will review the implementation of the changes, in consultation with key stakeholders, and make any necessary amendments by April 2020.



The Office for Standards in Education, Children's Services and Skills (Ofsted) regulates and inspects to achieve excellence in the care of children and young people, and in education and skills for learners of all ages. It regulates and inspects childcare and children's social care, and inspects the Children and Family Court Advisory and Support Service (Cafcass), schools, colleges, initial teacher training, further education and skills, adult and community learning, and education and training in prisons and other secure establishments. It assesses council children's services, and inspects services for children looked after, safeguarding and child protection.

If you would like a copy of this document in a different format, such as large print or Braille, please telephone 0300 123 1231, or email [enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk).

You may reuse this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence, visit [www.nationalarchives.gov.uk/doc/open-government-licence](http://www.nationalarchives.gov.uk/doc/open-government-licence), write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: [psi@nationalarchives.gsi.gov.uk](mailto:psi@nationalarchives.gsi.gov.uk).

This publication is available at [www.gov.uk/government/organisations/ofsted](http://www.gov.uk/government/organisations/ofsted).

Interested in our work? You can subscribe to our monthly newsletter for more information and updates: <http://eepurl.com/iTrDn>.

Piccadilly Gate  
Store Street  
Manchester  
M1 2WD

T: 0300 123 1231  
Textphone: 0161 618 8524  
E: [enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk)  
W: [www.gov.uk/ofsted](http://www.gov.uk/ofsted)

No. 190006

© Crown copyright 2019