



HMYOI Feltham 'A' Urgent Notification: Initial Action Plan

Updated: 19 August 2019

Priority Theme	No	Actions	Completion Date
Leadership and Operational Grip	1	(i) The Leadership team has been strengthened.	Immediate
		(ii) A Deputy Governor, with extensive experience of youth custody, has been deployed to the prison on secondment for 3 months to oversee the daily management of Feltham 'A'.	Completed
		(iii) The safer custody lead from the national Youth Custody Service has been deployed at the site, to support the new head of safeguarding and lead a 6-week safeguarding recovery plan.	Immediate
		(iv) A temporary residential manager will be deployed from HMYOI Wetherby to support the existing senior team for a period of 3 months. A new Head of Residence is also in the process of being appointed from outside the existing senior leadership team.	Immediate
		(v) The Prison Group Director will undertake a review of the SMT structure in order to ensure that the senior structure is suitable to effectively manage the complex and diverse needs of both Feltham A and Feltham B, recognising that both sides of the establishment are fundamentally different.	End August 2019
		(vi) We have reduced operational capacity at Feltham 'A', and have temporarily paused new placements to assist improvement measures and refurbishment initiatives. Placements will resume when the Prison Group Director and Governor judge that the establishment has achieved the necessary operational stability and can offer a full regime to all children.	Immediate
		(vii) The Prison Group Director and a central support team working with the Governor and SMT will deliver a 9 month programme of activity including the development of a strategic recovery plan and governance and risk management arrangements, supported by an engagement and communication strategy. Activity will focus on delivery and enablement of HMIP recommendations, leadership, safety, resource and building capability, and accountability.	Immediate



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		<p>(viii) HMPPS will conduct a whole system review of data and assurance processes at HMYOI Feltham, and work with the Governor, Senior Management Team and Prison Group Director to further develop the Assurance Framework and Governance Structure. This work will include:</p> <ul style="list-style-type: none"> • Prison & Probation Analytical Services (PPAS) working with HMYOI Feltham to separate Feltham A and B CNOMIS data on HMPPS databases, with a view to allow performance, reporting and diagnostic tools to be used effectively; • The YCS Performance team working with HMYOI Feltham to ensure that governance meetings have relevant and assured data available to them; • Employing a fulltime Safety Analyst; and • Delivering training on interpreting data to the SMT. 	End of September 2019
Staff Training and Development	2	<p>Human Resources, Learning and Development, and Organisational Development expertise will be provided to:</p> <ul style="list-style-type: none"> • Undertake a comprehensive leadership and development diagnostic, and provide the appropriate training, coaching and mentoring; • Deliver a First Line Manager Course to all Band 5s to develop their skills in managing performance, influencing, feedback, attendance, and conducting high quality conversations; • Implement a mentoring system to enable staff to perform to their full potential; • Deliver workshops on Courageous conversations to first line managers; • Deliver defensible decision-making training to all Orderly officers; • Undertake a Training needs analysis by the Learning and Development Business Partner within Bands 7 and 8 to assess development needs and deliver the appropriate courses; and • Set up a Mentoring/Support scheme for Custodial Managers from the wider YCS estate. 	<p>June 2020</p> <p>End of December 2019</p> <p>End of August 2019</p> <p>End of October 2019</p> <p>End of December 2019</p> <p>End of August 2019</p> <p>1st September 2019</p>



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	3	<p>Inexperienced staff</p> <p>(i) The standards coaching team model will be adapted for use within the YCS. A YCS specific team will be selected and trained to work alongside frontline staff with a focus on improving the consistency and quality of those tasks core to the role of an officer, with a specific focus on working with children.</p>	End of September 2019
		<p>(ii) The HMPPS Prison Officer Guide will be adapted for use in YCS to support inexperienced staff, with the aim of increasing confidence and capability when working with children, including areas such as how to use conflict resolution techniques appropriately, enforce expectations in relation to decency, respect and in motivating children to attend education.</p>	End of October 2019
		<p>(iii) We will use national expertise to support the delivery of “good practice development workshops” to upskill Band 3 officers to improve confidence and enhance development.</p>	End of September 2019
		<p>(iv) The establishment will advertise externally to recruit experienced Custodial Managers to manage, support and develop staff locally.</p>	End of August 2019
Safety (Safeguarding)	4	<p>Safety Strategy</p> <p>(i) The Safety Strategy will be reviewed and the recent Promoting Risk Intervention by Situational Management (PRISM) will be mapped into this. HMPPS National Safety Team and Youth Custody Services' Safety Team will work with the Group Psychology Team to support the Head of Safeguarding.</p>	End of November 2019
		<p>(ii) The HMPPS National Safety, YCS Safety and Psychology Teams will work together to plan support that will improve the care and support offered to the children on Assessment, Care in Custody and Teamwork (ACCT). This will include coaching and workshops for case managers to improve understanding of risks and triggers including risk identification and risk management in order to manage the ACCT process more effectively.</p>	15 th September 2019
		<p>(iii) The National Safety and YCS Safety Teams will provide support to improve quality assurance arrangements for the ACCT process.</p>	End of September 2019



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		(iv) The Operational System and Assurance Group will undertake a further review on safety with a focus on identifying further actions related to violence reduction, suicide prevention, and self-harm reduction.	End of December 2019
	5	<p>Cell Call Bells</p> <p>Appropriate local management information will be developed to provide assurance of cell call bell response times. Local procedures will be reviewed to include the introduction of formal covert testing and a system to ensure that staff prioritise the response to cell bells for those vulnerable children subject to or at risk of self-harm, and all cell call bells are responded to in a timely manner. Activity will be supported by the YCS Safety Team.</p>	End of August 2019
	6	<p>Management of harmful behaviour, and levels of violence</p> <p>(i) The recording, capacity and targeted referral of effective interventions and programmes for children demonstrating, or at risk of harmful behaviour will be improved to:</p> <ul style="list-style-type: none"> • Enable children to access available interventions; • Ensuring all interventions are approved and assured via the Youth Custody Assurance Board (YCAB); • Ensure that Caseworkers have the relevant skills and knowledge to identify and refer children to both internal and appropriate community based interventions based on need; and • The YCAB will ensure gaps in intervention provision are identified and addressed so the needs of all children can be addressed including those involved in Harmful Group Behaviour (HGB) or at risk of exploitation. 	<p>End of September 2019 End of September 2019</p> <p>End of August 2019 End of November 2019</p>
		(ii) National expertise will be provided alongside, police and other external partners to develop data sets and provide the training and intelligence needed to produce a profile on Harmful Group Behaviour linked to the emerging issue of county lines that can inform the Promoting Risk Intervention by Situational Management (PRISM) plan.	End of November 2019



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		(iii) The HMPPS National and Youth Custody Services Safety Teams, with support from HMPPS Psychology resources, will provide ongoing support into understanding the drivers of violence. This will include improved data collection and use of the Safety Diagnostics Tool, a peace summit and a bespoke support plan.	End of December 2019
		(iv) The bespoke PRISM plan has been drawn up and is being implemented at the establishment that allows structure and co-ordination of all activity (both at site and organisational level) focused on reducing the risk of violence.	End of March 2020
	7	Use of Force	
		(i) The Operational System and Assurance Group (OSAG) will undertake an audit to evaluate the local processes and procedures, including policy compliance and governance arrangements in respect of Use of Force. The Group will also report on any key trends and themes that are contributing to the performance around Use of Force with a view to improving and strengthening local practice.	End of December 2019
		(ii) National Minimising and Managing Physical Restraint (MMPR) specialists will undertake a targeted review of Use of Force governance within the establishment, focussing on reporting procedures, techniques and practice.	End of September 2019
		(iii) The National MMPR team will provide a conversion course to up skill staff on Feltham B in MMPR techniques to allow them to transfer to Feltham A to work with children.	End of September 2019
		(iv) A local Use of Force manager will: <ul style="list-style-type: none"> • Review all incidents where force is used and ensures lessons are learnt to reduce to probability of force being required in future; • Have oversight of Use of Force Governance, including the identification of trends and the full completion of documentation; and • Ensure that the 900 Use of Force reports are urgently reviewed. 	<p>Immediate</p> <p>Immediate</p> <p>End of November 2019</p>



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	8	Incentive and Earned privilege policy (Reward and Sanction)	
		(i) With support from the National Evidence-Based Practice team a Child Centred Reward and Sanction policy will be produced based on the Incentive Policy Framework published in July 2019.	End of September 2019
		(ii) The YCS Safety and Psychology Teams, will support the development of the conflict resolution processes and ensure that it is actioned and followed by all staff. This will reduce the need for restrictive measures and enable children to engage in education and other activities.	End of September 2019
Regime and Non Association	9	(i) National expertise will be provided to support the establishment to initiate a wholesale change of policy, practice, and culture, in relation to 'keep apart' (non association) practice. This will include: <ul style="list-style-type: none"> • Ensuring that all Non-Association markers are justified in writing and a plan is developed in all cases; • Appointing a manager to have oversight of all Non-Association decisions and markers; and • Ensuring that young people can move around the establishment in a safe and orderly manner that allows them to take responsibility for their own behaviour, and arrive at their activities on time. 	End of November 2019
		(ii) The establishment will ensure that all young people will have access to a daily regime that provides, as a minimum, access to education and vocational training as well as an opportunity to spend time in the fresh air, shower and have access to telephones.	End of August 2019
		(iii) The Prison Group Director and the Governor will have full oversight of the level of regime being delivered and ensure that there are mechanisms in place that provide assurance of regime delivery, and that sudden or notable changes to a regime are identified and where necessary, support measures put in place to address them.	Immediate
		(iv) HMPPS Service Improvement Group (SIG) will continue to support the development of the establishment's Regime Management Plan in line with resource adjustments. This includes delivery of workshops, localised document development, ongoing guidance around good practice, and deployment of subject matter experts to support effective resource management.	End of August 2019



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		(v) The staff work profiles and associated attendance patterns will be adjusted to provide a full regime every day.	15 th September 2019
Health	10	Healthcare Commissioners and Providers will:	
		(i) Support the effective enablement of medication management whilst the establishment addresses the difficulties in enabling the delivery of healthcare. This will include NHSE&I and Care UK meeting the costs of a 'movement officer' for an initial period of six (6) months to help bring immediate improvement in healthcare access for young people and relieve pressure on the establishment.	Immediate
		(ii) NHSE&I will progress both the reconfiguration of the Wren Inpatient Unit and development of dedicated healthcare facilities within A side.	1st February 2020 (the process will take 3 to 6 months)
		(iii) Provide a focused training programme to support the risk assessment and management of children with complex mental health problems, including those that self-harm, or are at risk of self-harming.	Immediate
		(iv) Funding will be continued to support the development and roll out of the integrated care framework 'SECURE STAIRS'. This will include: <ul style="list-style-type: none"> • Providing facilitated support to the Senior Management Team to help move towards a more trauma informed and therapeutic environment if desired; • The NHSE Central Implementation Team providing additional support to both clinical and operational staff to ensure that SECURE STAIRS is embedded into the establishment and supports the culture and leadership work led by YCS. • A joined up approach to assessment, sentence / intervention planning and care through the implementation of SECURE STAIRS; and • Seeking to ensure that staff have the right skills and support to care for children appropriately. 	Immediate
Built Environment	11	Showers	
		(i) Plans are mobilised to refurbish a number of shower facilities across the site as a matter of priority. Contractors are on site and two shower installations are currently under refurbishment; those in Heron	End of March 2020



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		and Eagle have commenced. Funding has been secured to continue this refurbishment programme throughout the financial year with a further five installations at tender stage; this will enable completion during the financial year.	(The initial two installations in Heron and Eagle will be completed by the end of September 2019)
		(ii) The reduction in numbers at Feltham has allowed a residential unit to be decanted in order for the refurbishment work to commence. Once the work is completed on this unit, children will be moved back on there from another unit, which will then be the next unit to be refurbished.	As per decant programme
	12	Serveries Food serveries across the site will be subject to deep clean. Food serveries will be refurbished subject to funding. Funding has already been secured for one unit (Heron) and work is due to commence imminently. Bids for further funding are currently being developed.	(contractors are currently onsite) Targeted refurbishments will be completed by End of March 2020
	13	Decorations programme (i) Plans are in place to introduce a self-help wing painting work party, where possible within the delivery of vocational training for young people in order to improve standards of decoration within cell accommodation and landings.	End of October 2019
		(ii) A full scope of repairs and decoration will be taken with work to begin on decanted units and then throughout the year commencing with Heron and Eagle.	[This will be a rolling programme] Heron and Eagle will be completed by end of September 2019.
	14	Routine Maintenance A review of priority works will be undertaken to ensure that available funding for refurbishment is targeted at priority maintenance projects.	Completed (Funding is now in place)



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	15	<p>In-room Telephony</p> <p>We have committed funding for the roll out of in-room telephony, and Feltham 'A' will be prioritised for installation. We will continue to work with BT regarding final quotation and the implementation plan.</p>	By March 2020
Education	16	(i) A permanent Band 4 Officer has been allocated to have oversight and responsibility of ensuring the efficient and full movement of all learners to and from education.	Immediate
		(ii) The Head of Education (HoE) will work with the Governor and SMT to improve attendance and punctuality, and ensure all relevant stakeholders within the establishment are regularly updated with the attendance and punctuality of all learners. This will help drive improvements and increase education provision for all children.	Immediate
		(iii) A revised profile has been developed which revises the current core day, this will significantly improve attendance and punctuality across Feltham 'A'.	From August 2019
		(iv) The Advisory Body Terms of Reference will be revised. The frequency of these meetings will be increased to ensure timely access to performance data and the opportunity for challenge to the Head of Education and Governor. Concerns around delivery will be escalated to the YCS.	End of September 2019
		(v) The Learning and Skills Manager will be accountable for the delivery and oversight of Outreach delivery to ensure the prioritisation of education on the residential units for Outreach Learners is improved and facilitated.	End of September 2019
		(vi) An experienced Trauma Informed Practitioner (TIP) will be employed to work with both learners and staff to develop a better understanding and awareness of the complexities of the learners. The TIP will provide strategies and Continuous Professional Development (CPD) on how to manage learner behaviour and improve outcomes.	End of November 2019
		(vii) The Trauma Informed Practitioner will develop a training programme which will be delivered to the education team during the autumn term, this will include training on communication skills.	End of November 2019



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		(viii) Bespoke CPD will be provided to education staff to improve resilience, confidence and provide them with skills and strategies on how to moderate learners' behaviour and language effectively. The CPD programme will further up-skill the teachers and provide them with additional strategies to engage the learners.	From September 2019 (12 months rolling programme)
		(ix) The Special Education Needs and Disabilities Co-ordinator (SENDCo) will have oversight and responsibility for ensuring that Education, Health and Care Plans (EHCPs) are reviewed and that teachers have the detailed information they require to ensure that they accommodate all the learner's needs, and observe teaching of all children with EHCPs to ensure their needs are being met on a fortnightly basis.	End of September 2019
		(x) All existing learners will be assessed in English and Maths over the next four weeks, to ascertain their baseline starting point.	End of August 2019
		(xi) Subject specific staff will set SMART targets for each learner, across all subjects, using the new baseline data. These targets will be set in collaboration with learners, and the services of the Ixion Learning and Skills Team will be utilised to observe and improve teaching, learning and assessment.	End of August 2019
		(xii) A new bespoke 'pupil progress' data system has been written specifically for Feltham learners, and will be live from September 2019. End of term data input will be rigorously analysed and used to identify under-performance in learners and/or staff.	From September 2019
Resettlement	17	Family visits	
		(i) The new staffing profiles will ensure that family visits are identified as a core regime activity that is resourced properly and managers will ensure that this activity is prioritised and not dropped or cancelled in the future.	From September 2019
		Access to interventions	
		(ii) New staffing profiles and the introduction of movement's officers will ensure that children are able to access the interventions that they have been identified to complete, and caseworkers will be able to have access to children face to face on their units or at other suitable places around the establishment.	From September 2019



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		<p>Pre-release planning</p> <p>(iii) Children without stable accommodation to go to on release are already identified early in their sentence. An escalation process will be established for accelerating cases within local authorities where suitable accommodation has not yet been identified one month before release. Alongside accommodation issues, planning of suitable Employment Training and Education outcomes will be more robustly pursued with community Youth Offending Teams.</p>	October 2019
Assurance	18	<p>Assurance</p> <p>HMIP will publish their full report and we will respond with our action plan in October 2019. Following this, the national Operational System and Assurance Group (OSAG) will undertake ongoing independent assessment of progress against HMIP recommendations.</p>	End of January 2020