



HM Prison &
Probation Service

Action Plan: HMYOI Feltham A

Action Plan Published: 30th October 2019

A Response to the HMIP Inspection of HMYOI Feltham A Children's Unit

Report Published: 30th October 2019

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, Community Rehabilitation Companies (CRCs) and youth offending services across England and Wales to Ministry of Justice (MoJ) and Her 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 recommendations. The action plan confirms whether recommendations are agreed, partly agreed or not agreed (see categorisations below). Where a recommendation is agreed or partly agreed, the action plans provides specific steps and actions to address these. Actions are clear, measurable, achievable and relevant with the owner and timescale of each step clearly identified. Action plans are sent to HMIP and published on the HMPPS web based Prison Finder. Progress against the implementation and delivery of the action plans will also be monitored and reported on.

Term	Definition	Additional comment
Agreed	All of the recommendation is agreed with, can be achieved and is affordable.	The response should clearly explain how the recommendation will be achieved along with timescales. Actions should be as SMART (Specific, Measurable, Achievable, Realistic and Time-bound) as possible. Actions should be specific enough to be tracked for progress.
Partly Agreed	Only part of the recommendation is agreed with, is achievable, affordable and will be implemented. This might be because we cannot implement the whole recommendation because of commissioning, policy, operational or affordability reasons.	The response must state clearly which part of the recommendation will be implemented along with SMART actions and tracked for progress. There must be an explanation of why we cannot fully agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.
Not Agreed	The recommendation is not agreed and will not be implemented. This might be because of commissioning, policy, operational or affordability reasons.	The response must clearly state the reasons why we have chosen this option. There must be an explanation of why we cannot agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.



ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMYOI Feltham A

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	Key concerns and recommendations				
	Director to: Governor				
S44	<p>Concern: Oversight of key areas that affected the safety of children was not robust enough. Too much use of force paperwork had not been completed. Debriefs with children who had been restrained and quality assurance of use of force had not been completed quickly enough to ensure that concerns were identified and safeguards put in place promptly. Weaknesses in the collection of self-harm data affected the establishment's ability to understand and address the increase in self-</p>	Agreed	<p>HMYOI Feltham will review the Safeguarding department and review current staffing and workloads within the department. The Youth Custody Service Safeguarding lead will support with a six-week recovery plan, in order to ensure that the following is in place;</p> <ul style="list-style-type: none"> • Review of all incidents where force is used, ensuring lessons are learnt to reduce the probability of force being required in future. • Sustainable procedures to maintain accurate records, including fully completed documentation for all incidents since the date of inspection. • A revised meeting structure supporting an operational focus to monthly safeguarding meetings. This will be supplemented by quarterly meetings focused on strategic change, attended by all relevant Heads of Function. • Strategic oversight of Use of Force Governance, including the identification of trends. <p>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.</p> <p>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.</p> <p>A review of data has been completed and a new data assurance process will be led by the Head of Business Assurance (HoBA) and the Business Hub to support the safeguarding function.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>January 2019</p> <p>December 2019</p> <p>January 2019</p> <p>November 2019</p>



	<p>harm levels. Levels of violence had risen, particularly against staff, and there was little understanding of the causes and limited plans to reduce it. Attendance at safeguarding meetings had been inconsistent which affected the development of a coordinated approach to managing the safety of children and staff. Until recently HMPPS had not provided enough support to help Feltham A manage these issues.</p> <p>Recommendation: Comprehensive safeguarding arrangements should be put in place and managed robustly to ensure children are kept safe.</p>		<p>The Restraint Minimisation Meeting (RMM) will now link with the weekly Behaviour Management Meetings (BMM) to review reasons for restraints and learning. The focus will be on reducing risk and working with Young People (YP) to support them in custody and improve behaviour.</p> <p>Debriefs with children who have been restrained are completed the next day by a member of the MMPPR or Safeguards team.</p> <p>A review of self-harm data has been completed and improvements made to the data base and how data is collected and used. A Band 4 safeguarding analyst will review the data, with the support of the HoBA. An assurance process has been established, providing accurate data to support managers in identifying trends and setting actions in response. Staff awareness will continue, to ensure staff have an understanding of the definitions of self-harm, which will support accurate and robust reporting.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>November 2019</p> <p>Completed</p> <p>Completed</p>
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S45	<p>Concern: The prison did not have a grip on behaviour management and did not give adequate priority at the weekly behaviour management meetings to identifying key issues and coordinating work to reduce the escalating violence. The incentives and earned privileges scheme was ineffective and poorly administered, Rule 49 was used too much and for too long and special accommodation was relied on inappropriately as a behaviour management tool.</p> <p>Recommendation: The governor should implement an effective behaviour management strategy to reduce the incidence of poor behaviour and violence.</p>	Agreed	<p><i>Building Bridges; A Positive Behaviour Framework</i> will be adopted as the Behaviour Management strategy, to set out the framework for developing positive relationships between staff and young people. This will be a culture change across Feltham A in how staff work with young people and the focus on the young person's risk and needs. The framework covers;</p> <ul style="list-style-type: none"> • Incentivising and promoting positive behaviour • Minimising behaviour that can cause harm • Working effectively with unacceptable behaviour to provide a safe and controlled environment for children, young people and staff. 	Governor	September 2020
			<p>A full review of the Safeguarding department has been completed which includes reviewing the current staffing level. The outcomes of this review will also ensure there is a joint approach from the Safeguarding Manager, Security Manager and the Head of Residences. The local <i>Special Accommodation</i> policy has also been revised; the Head of Specialist Units undertakes Quality Assurance of every use of special accommodation.</p>	Governor	Completed
			<p>HMYOI Feltham A will continue to introduce PRISM (Promoting Risk Intervention by Situation Management), a comprehensive violence reduction and management tool. Implementation will be supported by Youth Custody Service psychology leads, informed by performance data and consultation with staff and young people.</p>	Governor	September 2020
			<p>As part of the implementation of <i>Building Bridges</i>, the Head of Residence will conduct a review of all aspects of behaviour management, including Incentives and Earned Privileges (IEP), which will take place in consultation with staff and Young People. This review will include improvements to the rewards scheme, to motivate positive behaviour focussing on rewards and working with young people to improve behaviour.</p>	Governor	December 2019
			<p>Trends will be monitored through monthly safeguarding meetings, to identify measurable improvements in good behaviour amongst Young People and/or to agree actions to overcome obstacles and concerns.</p>	Governor	Completed



S47	<p>Concern: Some aspects of security were not proportionate and hampered children's access to a full and purposeful regime. Keep-apart protocols were informed by security information but were often unnecessarily restrictive and controlling and did not address the causes of children being unsafe. Children with restricted status were strip-searched and handcuffed routinely with no individual risk assessment. Closed visits were managed inconsistently and were sometimes applied punitively for incidents or intelligence that were not related to visits. Significant amounts of intelligence on drugs were processed, but suspicion drug tests were rarely conducted.</p> <p>Recommendation: The approach to security should be reviewed to ensure that security measures and</p>	Agreed	<p>The Head of Security will review current processes in relation to Risk Assessments and ensure that the focus is on activity attendance rather than activity restrictions. The Security department will work with Head of Residence and Head of Safeguarding to ensure that young people can access a full regime as soon as possible.</p>	Governor	December 2019
			<p>All intelligence reports regarding conflict will be immediately referred to the Conflict Resolution (CR) team so that CR is investigated in a much more timely manner. Positive reinforcement of working through conflict will be supported by Security & Residential managers and staff. This will be monitored monthly at the safeguarding meeting.</p>	Governor	December 2019
			<p>Work is on-going within the YCS regarding the 'keep apart' review, with the national 'non-association' task group, to monitor those Young People identified as 'keep-apart', whilst supporting the Conflict Resolution Framework.</p>	YCS	September 2020
			<p>The Security department will work with the Head of Residence to ensure that young people on restricted status have an updated individual risk assessment and this will be assurance checked within the monthly security meeting. Mandatory requirements as laid down in the Local Security Strategy will still be adhered to, however these individual risk assessments will ensure that the local searching strategy is not overly restrictive and more child focused</p>	Governor	December 2019
			<p>More resource has been provided to analyse drug related intelligence and will support greater accuracy in suspicion testing. All the above will monitored and evaluated at the Monthly security meeting</p>	Governor	December 2019



	restrictions are proportionate for children and based on individual risk assessments.				
S48	<p>Concern: The relationships between staff and children were poor across the establishment and they did not trust each other. Staff had been heard speaking inappropriately to children. The role of many prison officers was limited to administering keep-apart protocols and single unlock arrangements. Staff lacked the time and had limited opportunity to develop meaningful relationships with children in their care.</p> <p>Recommendation: Leaders and managers should be visible and support frontline staff to develop respectful, caring and effective relationships with the children in their care.</p>	Agreed	<p>The Leadership team has been strengthened on Feltham A with extra resource added to the function, including a designated Deputy Governor for Feltham A.</p> <p>Human Resources, Learning & Development, and Organisational Development expertise will be provided to support leaders, managers and frontline staff in their role:</p> <ul style="list-style-type: none"> • Undertake a comprehensive leadership and development diagnostic, and provide the appropriate training, coaching and mentoring; • Deliver training to 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. <p>Profiles will allow for weekly community meetings, which will in time link to the youth council. Actions and feedback from these meetings will help staff and SMT to improve relationships and the general care of young people.</p> <p>Custody Support Planning (CuSP) is being rolled out at Feltham A, which will provide staff with the time and opportunity to develop respectful, caring and effective relationships with children in their care. The continuing implementation of SECURE STAIRS (a psychologically informed, whole system approach to casework and planning) onto residential units, will see:</p> <ul style="list-style-type: none"> • Increased training for staff • Opportunities for reflection on Young People's behaviour through guided reflective practice • Greater understanding of the backgrounds of Young People in their care through Multi-Disciplinary Formulations and meetings. <p>This will give staff the space, tools and knowledge to develop effective and caring relationships with the children in their care.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>September 2020</p> <p>July 2020</p> <p>March 2021</p>



S49	<p>Concern: Equality data were not examined thoroughly and potentially disproportionate treatment of black and minority ethnic children was not identified at the equality action team meetings. The equality action plan covered both Feltham sites which made it difficult for managers to determine the effectiveness of outcomes for children.</p> <p>Recommendation: Data should be provided each month which enable managers to identify any disproportionality in treatment or access to the regime and to take action</p>	Agreed	<p>The Equalities team will be strengthened through the recruitment of a Band 6 specialist Equalities Manager specifically for Feltham A, supported by designated Band 3 Equalities Officer posts.</p> <p>Feltham is working with Syscon (software provider), Prison and Probation Analytical Services, and the YCS information team to split Feltham A and B's data into two separate sites. This will allow for more accurate analysis of Equalities data and trends. This data will be analysed at the monthly Equalities Action Team meeting, which is attended by stakeholders across Feltham, to ensure that there is an understanding of any potential disproportionately in treatment of young people in our care. Actions will be agreed and assigned to relevant leads, such as through the Equalities standing agenda item on the Reducing Reoffending meeting.</p> <p>The Head of Equalities will schedule consultation sessions with young people who have protected characteristics. One to ones will be arranged where populations are low. A Senior Management Team (SMT) member will be assigned to each protected characteristic to provide oversight of consultation opportunities. Equalities will be a standing agenda item on Youth Council and Community meetings, to provide an ongoing opportunity for young people to express views linked to protected characteristics.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>March 2020</p> <p>February 2020</p> <p>January 2020</p>
S50	<p>Concern: Regime restrictions and curtailments affected children's access to health and substance misuse services, leading to unsatisfactory practices and unnecessary risks. The continuing practice of telephoning residential units for information before calling an ambulance following an emergency code potentially extended the time of arrival of an</p>	Agreed	<p>Access to healthcare is a priority for the partnership board, which will oversee the reconfiguration of healthcare facilities. A steering group will be set up by December 2019 to progress plans to establish healthcare on Feltham A, above the Education department. It is anticipated that this will result in better and less disrupted access to healthcare appointments and medicine administration, reducing the need for young people to attend appointments at the healthcare unit on B side.</p> <p>Feltham has nominated a member of the SMT to link with the Head of Healthcare (Care UK). There will be regular meetings to monitor arrangements, including to discuss complaints, Young People who did not attend appointments and other concerns with the Healthcare service. These meetings will also link with monthly partnerships boards. In the meetings, concerns with Healthcare seeing those on</p>	<p>Care UK</p> <p>Governor</p>	<p>April 2020</p> <p>December 2019</p>



	<p>ambulance. Children's health care appointments were missed or seriously delayed and they did not receive essential medications at the times prescribed. The administration of medicines from the medical room in reception made access easier but was unsafe. Inefficient prison practices led to underuse of the GP, dentist and other health care workers and the waste of NHS resources was unacceptable.</p> <p>Recommendation: The prison partnership board should ensure that patients access health and substance misuse services at the required times and receive their medicines in a safe manner at the prescribed times. These arrangements should be monitored to ensure that the health of patients is not compromised.</p>		<p>Rule 49 and the consistent approach of issuing medication will be discussed and action taken if needed.</p> <p>Profile changes have improved staffing levels across Feltham A, reducing the need for cancellation of health appointments, including substance misuse services and medicine administration. All such cancellations will be authorised by the Duty Governor. In the short term NHSE and Care UK will be funding a '<i>movements officer</i>' to support the establishment in getting young people to their healthcare appointments or for medicine administration. A list of appointments is now provided daily so the Young person is aware of their appointment.</p> <p>The current Notice To Staff originally issued in August 2016 will be revised in line with requirements of Prison Service Instruction 03/2013 (<i>Medical Emergency Response Codes</i>) & London Ambulance Service. The Head of Operations will improve our systems to ensure that London Ambulance Service can be called with the emergency without unnecessary delay.</p>	<p>Governor, NHSE and Care UK</p> <p>Governor</p>	<p>Completed</p> <p>December 2019</p>
S51	<p>Concern: Leaders and managers did not prioritise the importance of education in children's lives to maximise the</p>	Agreed	<p>A new core day has been introduced, prioritising attendance at activities and supporting young people in realising their entitlement to a full education timetable. The Governor and SMT will work closely with The Head of Education (HoE) to improve attendance and punctuality, and ensure all relevant stakeholders within the establishment are regularly updated with the attendance and punctuality of all</p>	Governor	October 2019



	<p>learning time that they received. Attendance was low and children only had very few hours of education against their entitlement.</p> <p>Recommendation: The extension of the regime should be prioritised to allow children to attend education and activities and realise their entitlement to a full education timetable. Education should receive the necessary priority from across the prison and children should be well prepared for a positive education, training and employment outcome</p>		<p>learners. This will help drive improvements and increase education provision for all children.</p> <p>The Education Provider will carry out a staff consultation to determine a new working pattern to allow the time spent in education to increase in the morning sessions.</p> <p>Regime improvements will reduce the demand for Outreach provision. The Learning and Skills Manager and Head of Education will be accountable for the delivery and oversight of Outreach provision to ensure the prioritisation of education on the residential units for Outreach Learners is improved and facilitated.</p>	<p>Governor</p> <p>Governor</p>	<p>June 2020</p> <p>November 2019</p>
S52	<p>Concern: The quality of teaching, learning and assessment had deteriorated and many areas were staffed by agency staff who were not appropriately qualified. Teachers were not equipped to plan for and</p>	Agreed	<p>The education provider will develop and embed an ambitious but clear vision and strategy for providing high-quality, inclusive education and training for all. The curriculum will be refined to ensure that it is fit for purpose through effective sequencing of schemes of work and lesson planning.</p> <p>The education provider will recruit, rigorously train and support teachers by;</p> <ul style="list-style-type: none"> • Recruit skilled vocational and core practitioners to improve outcomes and reduce the reliance on agency staff. • Improve staff subject knowledge and teaching practice through regular and effective learning and development. • Implement a staff feedback process, to understand and reduce pressures and develop a balanced workload 	<p>Governor</p> <p>Governor</p>	<p>October 2019</p> <p>January 2020 and ongoing</p>



	<p>inform their decisions and effect improvement.</p> <p>Recommendation: Leaders and managers should gather appropriate data on children's achievements so that they can rigorously evaluate the provision and focus on improving outcomes for children in under-performing areas.</p>		<ul style="list-style-type: none"> Consistently analysing data, including through the Quality Improvement Group, to recognise and close gaps, particularly for vulnerable groups The resettlement team will focus on Education Training and Employability outcomes when processing release and transition plans, working with YOTs to sufficiently prioritise continuation of educational achievement upon discharge. 		
S55	<p>Concern: Most children at Feltham said that they were not well supported in establishing and maintaining contact with their families. Most family day visits had been cancelled. Many staff were unaware of family days and did little to encourage children to apply. Children did not have daily access to a telephone to contact family and friends. Processes to identify children who were fathers were inadequate and there</p>	Agreed	<p>A new profile and a new core day have been implemented, this will significantly help with association and overall staffing levels to provide visits, family days and for young people to use telephone to contact family and friends.</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> <p>Currently the induction process is being reviewed and to improve identification of those young people who are fathers.</p> <p>Termly Parent / teacher days will be run by Education to discuss academic progress. Additionally, reward ceremonies are held between education, parents and learners.</p> <p>The need for therapeutic support to nurture and develop family relationships is reviewed at the weekly Behaviour Management Meeting. Where required, the Family therapist invites parents and other important extended family to take part.</p> <p>Visits for Feltham A have now increased by two days a week which gives the opportunity of more choice for visitors and longer visiting times. Young People</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>October 2019</p> <p>September 2020</p> <p>December 2019</p> <p>December 2019</p> <p>October 2019</p> <p>November 2019</p>



	<p>was a lack of formal support for them.</p> <p>Recommendation: The regime and the staff should encourage and support children to establish and maintain contact with their family and friends.</p>		<p>who have earned <i>Gold level</i> privileges can also have visits every alternate Sunday.</p> <p>The Head of Reducing Reoffending will work with Spurgeons children's charity to organise a programme of monthly family days for Feltham A. The new profiles and core day allow for Feltham A staff to support these events, to reduce cancellations. The Head of Residence has allocated a lead to work in partnership with Head of Reducing Reoffending and Spurgeons. Awareness sessions will be provided to staff, and young people on induction, explaining the process of applying for family days, and the format/purpose. The roll out of CuSP and continuing implementation of SECURE STAIRS will assist in supporting young people to apply.</p>	Governor	March 2020
S56	<p>Concern: Meetings with children in the initial stages of their sentence focused on behaviour rather than resettlement needs.</p> <p>Targets similarly focused on behaviour management and were not written in child-friendly language.</p> <p>The number of targets was sometimes excessive. Not all staff were sufficiently involved in helping children to progress against their targets.</p> <p>Recommendation: Resettlement meetings and plans should prioritise resettlement needs which children understand to ensure a</p>	Agreed	<p>An evidenced based care plan approach is being rolled out in YOI's, providing every young person with an allocated support officer who they will work with on a weekly basis to build trust and consistency. Sites will be given additional staff to ensure the care plan is being delivered, the provision will be monitored on a database and the YCS will be releasing officers to focus on resettlement.</p> <p>The Youth Justice Reform programme includes a review of casework that will consider the role and task of casework teams alongside the introduction of the youth justice specialist role and the joint behaviour management model with NHS England. Under the casework review the '<i>How to make resettlement constructive</i>' Youth Justice Board report will be considered in addition to the findings from the Youth Resettlement thematic report.</p> <p>The Resettlement Team will look at three key areas; those young people who are on remand, those on short sentences and released from our care, and those on long term sentences who will transition to the adult estate, ensuring a focus on the young person's needs and risk to community. The Inter Departmental Risk Management Meeting has been reviewed to look at Public protection as well as needs in custody and in the community.</p> <p>Each Resettlement meeting with the young person now has a standardised structure that covers the seven pathways to reducing reoffending. Behaviour is not discussed in the meeting unless it impacts on Resettlement. The focus is on Resettlement, the young person's targets in the community and how to best support desistance from offending behaviour. The targets set for young people will follow the seven pathways and the practitioners have been briefed to set</p>	<p>YCS</p> <p>YCS</p> <p>Governor</p> <p>Governor</p>	<p>May 2020</p> <p>May 2020</p> <p>March 2020</p> <p>Completed</p>



	smooth transition into the community.		<p>specific resettlement focused targets. Documentation has been revised for external partners and is now Young Person friendly.</p> <p>The Resettlement team will provide a daily duty Resettlement Practitioner to support young people and staff with immediate issues or concerns and link functions.</p> <p>Clear escalation processes have been developed with the Youth Offending Team (YOT) if required, to ensure that all necessary information is shared and actions progressed.</p> <p>The Education Provider has implemented a partnership with Chelsea Football Club?. The Club will work with Education, delivering a resettlement pathway to learners who are due to return to their communities in three months. Young People will develop relationships, which they will then maintain in collaboration with YOT and Resettlement through the gate, with the objective of moving those released into employment or volunteering.</p>	Governor	Completed
				Governor	Completed
				Governor	Completed
S57	Concern: The extensive keep-apart list prevented the effective delivery of interventions and offending behaviour programmes. Many children waited for excessive periods to complete an intervention, and some were released with no opportunity to address their offending behaviour needs. There was a random approach to assessment when selecting the most appropriate intervention to meet the child's needs.	Agreed	<p>New staffing profiles and the introduction of movements officers will ensure that children are able to access available interventions, including non-accredited programmes, to address issues such as anger, general offending behaviour, and thinking skills, as well as health interventions and those aimed at ETE.</p> <p>The new core day will also support face to face caseworker meetings on their units or at other suitable places around the establishment. Once a Young person has been received into custody they are allocated a caseworker. Within the first week the caseworker will see the young person and, based on that discussion and other collateral information, submit an interventions screening referral, if appropriate.</p> <p>On a bi-weekly basis, referrals are discussed at a screening referral meeting. These meetings allow referrals to be raised and updated e.g. Young people who were remanded but have now been sentenced. Each young person is discussed and intervention decisions made around level of need and also time left to serve. On a case by case basis each young person will be added to an interventions waiting list, which allows monitoring of time left to serve against who is a priority.</p> <p>Prior to commencement, a list of prospective interventions groups is sent to the Conflict Resolution team to see if all young people can mix. If all young people</p>	Governor	March 2020
				Governor	December 2019
				Governor	January 2020
				Governor	January 2020



	Recommendation: Staff should ensure that children are able to access the appropriate interventions before release.		<p>can't mix, Conflict Resolution will try to resolve their conflict before the group sessions are to start.</p> <p>Recruitment campaigns continue, in an attempt to address long-standing Accredited Programme facilitator vacancies/ high staff turnover. Progress will be kept under review, to ensure that contingencies such as regional support through YCS and/or Youth Offending Teams can be pursued if necessary.</p>	Governor	March 2020
Directed to the Governor					
1.15	The regime for children being managed on ACCT documents should meet their needs for activity, support and interaction with others	Agreed	<p>A new Head of Safeguards will ensure that children at HMYOI Feltham at risk of self-harm receive consistently good care from staff by;</p> <ul style="list-style-type: none"> • Working with YCS colleagues to support staff to better understand the Assessment and Care in Custody Teamwork (ACCT) process. • Retaining an additional Safeguards Custodial Manager, to provide ACCT Management and Quality Assurance. <p>In line with national policy expectations, the following actions will ensure that children at risk of self-harm are able to access activity and education appropriately;</p> <ul style="list-style-type: none"> • ACCT plans will consistently identify actions to support the young person in engaging appropriately with the full regime. • Residential Custodial Managers will monitor engagement with the regime and ensure that appropriate plans are always in place. • ACCT Quality Assurance will record and monitor an individual's access to the regime. • The allocation board will monitor Young People on ACCT's engagement with the regime and attendance at education. An improved ACCT assurance process has taken effect, including a checklist to ensure that all key information is covered and standardised Quality Assurance by Head of Safeguards. • Trends and emerging concerns are considered at the monthly Safeguarding meeting considers any trends and concerns. • Resettlement practitioner attending all ACCT reviews to support the Child and establishment. 	<p>Governor</p> <p>Governor</p>	<p>March 2020</p> <p>December 2019</p>



2.12	Accommodation should be suitable for children. It should be clean, free of graffiti and well furnished.	Agreed	<p>All Young People are encouraged keep their rooms clean, tidy and graffiti free; this will be incentivised within the IEP policy. All rooms are being provided with new furniture and ways in which the Young People can personalise their rooms are under consideration.</p> <p>The MoJ Estates Directorate are developing a programme of refurbishment for HMYOI Feltham A which includes showers and serveries. Refurbishment has commenced, with funding in place to the end of the financial year. Further improvements are scheduled for 2020/21, subject to governance and funding. Projects are subject to regular review depending on the priorities of the estate and confirmed funding.</p> <p>The Head of Residence will:</p> <ul style="list-style-type: none"> • Refresh basic items and facilities available in communal areas in consultation with Young People. This will be kept under review by Residential CMs • Ensure that Unit Managers complete regular checks of residential units, to ensure daily Accommodation Fabric Checks (AFCs) are completed and ensure that cells are well-equipped, clean and well maintained. • Establish Community expectations with guidelines for cleanliness in communal areas, supported by the behaviour management strategy. 	Governor Governor Governor	December 2019 September 2020 March 2020
2.13	Children should be able to use showers and telephones every day.	Agreed	<p>HMYOI Feltham aims to provide daily opportunities for all those young people engaging with the regime to make a telephone call or shower.</p> <p>Custodial Managers will monitor the regime and identify young people who are not taking the opportunities to make phone calls and have showers given to them. This will be followed up by the unit manager liaising with the CUSP officer and unit officers, to ensure that issues are understood and addressed as appropriate.</p> <p>Funding is confirmed for the roll out of in-room telephony, and Feltham 'A' will be prioritised for installation. We will continue to work with British Telecom to secure a final quotation and implementation plan.</p> <p>A number of shower facilities across the site will be refurbished as a matter of priority. Contractors are on site and two shower installations are currently under refurbishment; those in Heron 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 by September 2020.</p>	Governor Governor Governor Governor	December 2019 October 2019 September 2020 September 2020



2.20	Children should be able to eat their meals together.	Agreed	<p>The introduction of new staffing profiles and a new core day will provide a full regime every day, which includes sharing meals together on the units. Young people engaging in the full regime will be able to have all three meals together on the units.</p> <p>Work is being carried out by conflict resolution with the support of a Residential Manager to drastically reduce the number of young people subject to non-association on the units.</p>	Governor Governor	December 2019 December 2019
2.48	Consultation arrangements for children with protected characteristics should be formalised and consistent so that children can express their distinctive views and their specific concerns can be addressed.	Agreed	<p>A renewed Equality strategy will be drafted, prioritising consultation with young people. The strategy will strengthen the celebration of diversity and routes to address concerns that are highlighted. It will seek to work with appropriate community groups who can add value to the work on site. Feltham A will continue to work with the Mayor's Office of Policing And Crime on disproportionality and the effect it has on young people in our care.</p> <p>The Head of Equalities will also work with all departments to;</p> <ul style="list-style-type: none"> • Improve current recording of protected characteristics to ensure that data is used within meetings and support can be given to young people by the equalities officers. • Develop community meetings and bespoke focus groups, to include monthly themes on protected characteristics. This is to encourage understanding and learning on protected characteristics. These will link with regular Equalities meetings with unit representatives. • Updated signage across Feltham around protected characteristics • Update SMT in relation to who leads on different protected characteristics • Identify a team of officers to be trained as Equalities Officers to work with young people 	Governor Governor	March 2020 March 2020
2.65	The inpatient unit should only be used for health and therapeutic purposes. Children should not be located on the inpatient unit to address operational issues	Partly Agreed	NHS England (NHSE), the establishment and the healthcare provider are working together to progress the reconfiguration of the Wren inpatient unit and a new protocol has been agreed. All admissions to the inpatient unit will be to meet the immediate needs of a young person who is experiencing some level of crisis and all decisions to place a young person on Wren Unit must be approved by the duty psychiatrist. The Senior Manager identified to work in partnership with the Healthcare provider will monitor those located onto Wren and assurance decision logs and risk assessments are appraised to ensure that the placement is in the young person's best interests.	Governor	Completed and ongoing



3.10	Children should spend at least 10 hours out of their cells each day.	Agreed	HMYOI Feltham aims to provide the opportunity for all those young people engaging with the regime to spend maximum time out of their rooms each day. New profiles are now in place and a new core day has been implemented. This will increase time for access to education and vocational training, fresh air, showers and telephones.	Governor	Completed
			HMYOI Feltham has assigned a member of the Senior Management Team to monitor and drive the regime. They will monitor attendance and work with SMT to review time out of room for young people.	Governor	June 2020
			The Education Provider will carry out a staff consultation to determine a new working pattern to allow the time spent in education to increase in the morning sessions, to ensure learners are receiving their entitlement.	Governor	June 2020
			Funding has been secured for a new library and resource centre for Feltham A. Work currently being projected for completion by the end of the Tax year March 2020. This will enable Young People to access the library during the day as part of their education provision.	Governor	March 2020
			Weekend regime focuses on maximising time out of room including dining out for all meals, room and communal area cleaning, association, time in the fresh air, Gym sessions and Church services. Going forward, some CuSP sessions will also be timetabled into the weekend depending on staffing.	Governor	Completed and ongoing
3.11	Access to the gym should be improved to ensure that all children have access to two sessions of gym a week.	Agreed	A new regime has been implemented, which continues to support access to the gym for 4.75 hours across two sessions. Improved staffing profiles will enable these sessions to be prioritised appropriately for those Young People engaging with the regime.	Governor	Completed and ongoing
			An intelligence-led protocol will be introduced by the gym staff to ensure that Young People with non-association issues are referred to Conflict Resolution, to further reduce barriers to attendance.	Governor	December 2019
3.24	Managers should monitor the time that children wait to be allocated to education and activities, ensuring that this is minimised and that they join education as soon as	Agreed	The Education Provider and the Establishment will reduce delay and ensure learners are placed into vocational subjects (where appropriate) by processing risk assessments in a timely manner. Upon induction a learner will be monitored in the education setting for their first ten days to assess their behaviour, compliance, and risk. A summary of the learner's progress will then be processed via the Learning and Skills Manager to Security, producing an informed risk assessment within 15 working days of the completion of a learner's	Governor	November 2019



	possible after arriving at the establishment		<p>prison induction. The time that children wait to be allocated will be monitored through the Quality Improvement Group (QIG).</p> <p>The Head of Security will review current processes in relation to Risk Assessments and ensure that the focus is on activity attendance rather than activity restrictions. The Security department will work with Head of Residence and Head of Safeguarding to ensure that young people can access a full regime as soon as possible.</p>	Governor	December 2019
3.31	Leaders and managers should ensure that children access and benefit from adequate learning resources in learning environments that are clean, free of graffiti and fit for purpose.	Agreed	<p>The Education provider will ensure the learning environment for all learners is fit for purpose by:</p> <ul style="list-style-type: none"> • Repainting all classrooms • Maintaining an ethos of care for learning spaces through high expectations, and implementation of the IEP policy to reduce/eradicate graffiti • Ensuring lessons are planned using the resources allowed within the custodial setting, so learners are able to progress effectively. This will include Learning Support Assistants and learning resources. 	Governor	December 2019
4.14	More use should be made of release on temporary licence for resettlement purposes.	Agreed	<p>The Head of Reducing Reoffending will ensure that all young people who are eligible for ROTL are assessed for suitability; Sentence planning and training plans will reflect this.</p> <p>ROTL data will be collated for monthly consideration by SMT at the Reducing Reoffending meeting to monitor use.</p>	Governor Governor	December 2019 December 2019
4.15	Caseworkers should be appropriately trained and supervised to assess needs and risk of harm, and to formulate plans which reflect both the custodial and community elements of the sentence.	Agreed	<p>YCS agree that training should take place to enable YOI caseworkers to provide effective support and to enable the formulation of plans that take account of both the custodial and community elements of the sentence. YCS will plan how best to achieve this in response to the current review of casework, including through the identification of appropriate training, through the YCS Casework Review team, as part of the Youth Justice Reform programme.</p> <p>The Head of Resettlement has worked with the team to ensure local training is completed. Training for resettlement staff is vital to empower them and to increase the service delivery and ability to support the child in our care. This will also include the Youth Justice Board National Standards. The Head of Resettlement will ensure that any local training available for resettlement practitioners will be to provide support in their role.</p>	YCS Governor	May 2020 and to be determined September 2020



4.25	Children who are remanded or sentenced and facing a long period in custody should have access to formal staff and peer support to help them progress through their sentence.	Agreed	The Youth Justice Reform programme includes a review of casework support, including the transition of longer term Young Persons into the adult estate.	YCS	September 2020
			The approach from the Resettlement team will focus on the areas of a young person's journey in custody; those on 'Remand', 'Short sentences' and 'Long Term Sentences'. Head of Resettlement has introduced a Life forum for all those on a life sentence. The forum will enable participants to look at:	Governor	December 2020
			<ul style="list-style-type: none"> - Processes whilst they are in YOI, such as Multi Agency Life-sentenced Risk Assessment Panels, Risk Management and Lifer annual reviews - Transitions on to the adult estate, including interventions available - Transition on to NPS, such as Offender Assessment System (OASys) and risk factors which can be identified. - Sentence Planning - Categorisation - Parole process - Open Conditions in Prison 		
			Feltham A are currently looking at Peer support to make the service available for young people and support those young people coping with long sentences. This will also be supported by Kinetic Youth and Roadlight youth support services.	Governor	January 2020
			'SPARK Inside' (a prison based coaching provider) will work with young people on longterm sentences to encourage them to change their lives and to create a crime-free future.	Governor	March 2020
			Education are working with young people on long-term sentences to achieve their GCSEs, with a focus to increase their learning and as they move into the adult estate work toward high education.	Governor	Completed
4.36	All children assessed as requiring a programme relating to sexually harmful behaviour should undertake the most	Agreed	NHSE funds a Sexually Harmful Behaviour service delivered by the mental health and wellbeing provider <i>Barnet, Enfield and Haringey Mental Health Trust</i> .	BEH Mental Health Trust	Completed
			Referrals for assessment will be identified through BMM, wellbeing based on internal sexually inappropriate or harmful behaviour and/or through resettlement processes on sentencing.	Governor	December 2019



suitable interventions to meet their needs.		The Head of Healthcare will work with the Mental Health provider and Commissioner to review the above provision in light of the HMIP recommendation, the recent Health Needs Assessment commissioned by NHS England and relevant national standards.	Governor	October 2019
		New profiles are now in place and will ensure that there is easier access to interventions. Interventions will link with conflict resolution to enable young people to mix for interventions.	Governor	December 2019
		The health partnership board will be used to hold the provider to account for delivering interventions to meet the needs of the cohort.	Governor	November 2019 and ongoing

Recommendations	
Agreed	27
Partly Agreed	1
Not Agreed	0
Total	28

