



HM Prison &  
Probation Service

Action Plan: HMYOI Parc

Action Plan Submitted: 30 January 2024

A Response to the HMIP Inspection: 09 – 19 October 2023

Report Published: 23 January 2024

## INTRODUCTION

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



ACTION PLAN: HMIP REPORT

ESTABLISHMENT: HMYOI PARC

1. Rec No	2. Concerns	3. Response Action Taken/Planned	4. Responsible Owner	5. Target Date
	<b>Priority concerns</b>			
1	<p><b>Some children were separated for too long and their routines were subject to excessive restrictions.</b> The number of children segregated under YOI rule 49 had increased and their oversight had deteriorated.</p>	<p>The Head of the Childrens Unit will improve oversight and the regime for separated children by:</p> <ul style="list-style-type: none"> <li>• Introducing the new Youth Custody Service (YCS) separation framework which will enable a consistent approach to carrying out Rule 49 (R49) reviews.</li> <li>• Introducing a single case management model for all children separated to ensure progress and consistency between reviews.</li> <li>• A Senior YCS Psychologist will have case management oversight of all children separated on R49 to support the case manager around any potential psychological issues affecting separation.</li> <li>• Ensuring reintegration planning commences at the point of separation that includes input from all key functions to ensure the child is provided with a purposeful regime from education, gymnasium, wing-based activities and psychology.</li> <li>• Introducing additional oversight of separation through daily assurance checks for any child on R49, ensuring that they have been offered at minimal the mandated 2 hours' Time Out of Room. The assurance checks will ensure that all R49 documentation is complete, reviews happen on time, and where a child refuses to attend the review, it is recorded along with the reasons why.</li> <li>• All newly identified separated children will be allocated to a dedicated member of the Senior Leadership Team for case management and referred</li> </ul>	Director	February 2024



		<p>to the conflict resolution team to explore the reasons why they are separating, generating appropriate actions to address the reasons.</p> <ul style="list-style-type: none"> <li>• All separated children will be discussed at the daily morning meeting to ensure they are receiving appropriate and timely support.</li> <li>• The monthly Young Persons (YP) monitoring and review group meeting will monitor the use of separation to identify any trends in its use so reasons why can be explored.</li> </ul>		
2	<p><b>The promotion of equality had not been prioritised and was undermined by the absence of consistent staffing to coordinate and drive the work.</b> This hindered leaders' understanding of the perceptions of children in this area.</p>	<p>The Head of the Childrens Unit will improve the promotion, oversight and coordination of equality work by:</p> <ul style="list-style-type: none"> <li>• Identifying a Senior Manager who will be responsible for all equality work on the children's unit.</li> <li>• Introducing a new Equalities and Voice of the Child Manager (EVCN) who will be responsible for the oversight of all equality work, including the 'Childs voice', to gain a greater understanding of children's concerns and perceptions to allow HMYOI Parc to raise the profile of equality and diversity.</li> <li>• Publishing a timetable of consultation meetings where children can raise any concerns. The EVCN will ensure there is increased attendance by both children and staff at these meetings. Monitoring data will be shared at the meetings to encourage discussions and generate actions to drive improvements.</li> <li>• The EVCN will coordinate the promotion of cultural events with all departments, including the residential team, ensuring they are appropriately promoted to allow children to attend/participate in them.</li> <li>• The Head of the Childrens Unit will complete monthly Quality Assurance (QA) checks of all submitted Discrimination Incident Reporting Forms (DIRFs), ensuring they are appropriately investigated and responded to within acceptable timescales. Feedback and guidance will be provided as required to all staff following the subsequent completion of any DIRF. Additional independent external checks of DIRFs will be explored.</li> </ul>	Director	<p>Complete</p> <p>January 2024</p> <p>February 2024</p> <p>May 2024</p> <p>January 2024</p>



		<ul style="list-style-type: none"> <li>• Strategic monitoring of Diversity and Inclusion (D&amp;I) measures will be at the YP monitoring and review group meeting, chaired by the Head of the Childrens Unit, to monitor improvements and ensure actions within the action plan are tracked and completed within acceptable timeframes.</li> <li>• The EVCM will collate and analyse all D&amp;I data to identify any disproportionality for discussion at the YP monitoring and review group meeting, where appropriate actions to address issues can be agreed, generated and co-ordinated.</li> </ul>		<p>January 2024</p> <p>May 2024</p>
3	<p><b>There were inconsistencies in the deployment of education staff, and shortcomings in the quality of teaching and assessment.</b> There was insufficient oversight of learners' development; many were disengaged and made slow progress towards accreditations, and attainment in a few subjects was low.</p>	<p>The Learning and Skills (L&amp;S) provider (Novus Gower) Head of Learning and Skills (HoLS) will improve the deployment of staff and quality of teaching and assessments to improve learners' engagement and attainment by:</p> <ul style="list-style-type: none"> <li>• Recruiting three full time teaching staff and one Additional Learning Needs (ALN) support worker to ensure subjects are taught by regular tutors.</li> <li>• Introducing a new YP curriculum from March 2024 based on labour market information, that will increase vocational focus and improved opportunities for gaining higher levels and more widely recognised qualifications that consider children's future educational, training and employability needs. Including the introduction of business/employability qualifications for HMYOI Parc.</li> <li>• The L&amp;S provider will implement a full Continual Professional Development (CPD) programme and quality monitoring process to drive improvements in teaching and learning, ensuring their staff are teaching to good or outstanding grades and that tutors have a clear understanding of learners' needs.</li> <li>• The HoLS will monitor the quality of the feedback provided by teachers to children as part of the quality monitoring process, ensuring it clearly explains how learners can improve their work so they can learn from their mistakes and make consistent progress.</li> </ul>	<p>Learning and Skills Provider/ Director/ HMPPS Wales</p>	<p>February 2024</p> <p>March 2024</p> <p>Complete</p> <p>March 2024</p>



		<ul style="list-style-type: none"> <li>• Implementing a new tutorial system to support learners achieve qualifications in a timelier manner, with greater focus on careers information, advice and guidance.</li> <li>• Introducing a Personal, Social, Health and Economic and Welsh language/culture programme to support holistic development opportunities.</li> <li>• Supporting family engagement with education through parent evenings run jointly between Novus Gower and G4S.</li> <li>• Overhauling the production and quality of Individual Learning and Work Plans (ILWP) and their use throughout the learning journey, to support quicker learner progress and greater learner choice. The new ILWP will include improved 'sharper' target setting.</li> <li>• The L&amp;S provider will ensure all children have an initial need and wants assessment within five working days of arrival at the prison. The information from the assessment will be shared with all teachers and tutors and included in ILWPs so they can be offered the necessary support in their allocated activity.</li> <li>• Improving allocations so they are based upon educational needs, informed by risk through discussions at the multi-agency morning meeting.</li> <li>• Information about prisoners' ALN will be shared with all tutors as soon as the 'do it profiler' is completed, allowing them to plan lessons and support the individual.</li> <li>• Implementing an Information Technology (IT) refresh across the youth estate to allow greater access to IT equipment for learners and teachers and to embed the teaching of digital literacy skills, allowing tutors to access and share information effectively.</li> <li>• Holding quarterly Learner Voice sessions to inform development of a new curriculum offer and monitor the quality of provision.</li> <li>• Improvements and progress of the quality of education delivery will be monitored and tracked at the weekly Controllers meeting, the monthly</li> </ul>		<p>March 2024</p> <p>April 2024</p> <p>April 2024</p> <p>April 2024</p> <p>Complete</p> <p>April 2024</p> <p>April 2024</p> <p>Complete</p> <p>Complete</p> <p>Complete</p>
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		Operational Management Group (OMG) meeting and quarterly through the Contractual Review Group (CRG) meeting.		
4	<p><b>Partnership arrangements and key stakeholders had been slow to support the successful transition of education providers.</b></p> <p>Partnership arrangements to support improvements in the quality of education provision or to enhance the curriculum were only recently or not yet in place.</p>	<p>HMYOI Parc and the L&amp;S provider will improve partnership arrangements to support education and curriculum improvements by:</p> <ul style="list-style-type: none"> <li>• Implementing partnership boards between HMP and HMYOI Parc and the L&amp;S provider, co-chaired by the Director of the prison, to monitor and support education delivery and improvements across the whole site.</li> <li>• Ensuring there is a child specific agenda item to discuss specific education delivery as part of the partnership board meeting.</li> <li>• Providing new educational enrichment opportunities on Friday afternoons alongside the new curriculum.</li> <li>• G4S and Novus Gower will work together to offer educational and training Release on Temporary Licence (ROTL) options for children.</li> <li>• Monthly meetings between Novus Gower and the YP Unit Management Team to explore opportunities for increased partnership working.</li> <li>• All education staff attend the daily morning meeting to improve collaboration.</li> <li>• Improving the physical space available for education staff to collaborate, plan and operate a cohesive curriculum.</li> <li>• Ensuring tutors have improved access to data systems, physical records, teaching materials and learner resources, including the sharing of teaching staff and resources from the adult site as required to help improve delivery.</li> </ul>	Learning and Skills Provider/ Director/ HMPPS Wales	<p>Complete</p> <p>Complete</p> <p>March 2024</p> <p>May 2024</p> <p>Complete</p> <p>Complete</p> <p>April 2024</p> <p>May 2024</p>
5	<p><b>There was no reading strategy.</b> The library did not work with education to promote literacy and children who did want to read could</p>	<p>HMYOI Parc and the L&amp;S provider will implement a prison wide reading strategy to promote reading and literacy by:</p> <ul style="list-style-type: none"> <li>• Novus Gower, G4S and the library provider will develop the reading strategy and curriculum in conjunction with the wider YCS reading strategy and</li> </ul>	Learning and Skills Provider/ Director/ HMPPS Wales	<p>July 2024</p>



	<p>not search for and get a book of their choice.</p>	<p>provide staff training to implement it. The strategy will provide opportunities for learners to improve their reading, including for pleasure.</p> <ul style="list-style-type: none"> <li>• Complete in-depth screening for all children as part of the induction programme to assess their literacy levels.</li> <li>• Children with an identified literacy level below entry level 1 will be referred to the Shannon Trust literacy programme to improve their reading skills.</li> <li>• Awarding and implementing a new library contract by January 2024 enabling the library to be open and accessible Monday to Friday.</li> <li>• Children will have access to the library via the enrichment team outside of normal library hours.</li> <li>• The library will promote literacy in the library, on residential units and in education, working closely with the education provider to make sure that children can access books on topics that are part of the current curriculum. An updated catalogue of books will be made available in all areas allowing children to order books to support their current learning, or for pleasure.</li> <li>• The Families worker in collaboration with the librarian will review the current available stock of books to ensure it supports the education curriculum, then replenish stock as required.</li> <li>• All curriculum areas will support the reading strategy through the use of reading corners in classrooms as recorded in the Quality Development Plan.</li> <li>• Ensuring there is a dedicated enrichment activity for children based on reading, with oversight from the Enrichment Manager to ensure children can access the service.</li> <li>• Improvements and progress in implementing the reading strategy will be monitored and tracked at the monthly Partnership Board meeting.</li> </ul>		<p>Complete</p> <p>Complete</p> <p>Complete</p> <p>July 2024</p> <p>July 2024</p> <p>July 2024</p> <p>May 2024</p> <p>February 2024</p> <p>July 2024</p>
6	<p><b>Some ROTL risk assessments and MAPPA information sharing reports were poor.</b></p>	<p>The Resettlement Manager (RM) will improve the quality of risk assessments for Release on Temporary Licence (ROTL) and information sharing of Multi-Agency Public Protection Arrangements (MAPPA) reports by:</p>	<p>Director/ HMPPS Wales</p>	



		<ul style="list-style-type: none"> <li>• The Head of the Childrens Unit and the RM will review current ROTL risk assessment processes and paperwork to identify any potential risks. The review will ensure that all available information for each child is gathered, including information held by Youth Offending Teams (YOTs), to allow an informed judgement to be made on whether to approve an application.</li> <li>• Providing QA and formal oversight by the RM to identify any potential issues and training requirements for the resettlement team around risk assessments.</li> <li>• Reviewing the current ROTL decision making authority to ensure that decisions are made by an appropriate manager in line with the ROTL Policy Framework.</li> <li>• The RM will review the current MAPPA risk assessment processes and associated paperwork, ensuring all departments are included in information requests and analysing of risk, including the Needs, Engagement, Wellbeing Team (NEWTs) and YOTs.</li> <li>• The RM, wherever possible, will ensure that all information is collated in sufficient time to confirm MAPPA levels prior to a child's release. Where this is not possible all available information will be shared with teams in the community.</li> <li>• Strategic oversight of both processes will be at the monthly Reoffending and Resettlement public protection meeting for MAPPA and ROTL cases.</li> </ul>		<p>January 2024</p> <p>January 2024</p> <p>March 2024</p> <p>February 2024</p> <p>Complete</p> <p>Complete</p>
	<b>Key Concerns</b>			
7	<b>Oversight of healthcare was inadequate and did not provide sufficient scrutiny of the service to make sure it was safe and effective for all children.</b>	<p>The Health Provider (Cwm Taf Morgannwg University Health Board), G4S and HMPPS Wales will improve oversight and scrutiny of healthcare by:</p> <ul style="list-style-type: none"> <li>• Reviewing governance arrangements for healthcare with the Prison Director and the Director of Primary Care at the health board.</li> </ul>	Health Provider/ Director	March 2024



		<ul style="list-style-type: none"> <li>• Ensuring that all incidents are reported to healthcare in HMP and HMYOI Parc, where they will be recorded, investigated and acted upon accordingly.</li> <li>• Sharing a monthly clinical activity report for children with relevant partners to improve oversight.</li> <li>• Children will be discussed as a separate agenda item at the weekly health governance meeting, HMP Parc's monthly Multi-Disciplinary Team health meeting and at the quarterly Health Partnership Board meeting. Identified issues concerning performance and delivery arising from partnership board meetings that need escalating will be by the HMPPS Public Health Lead for Wales to the Welsh Government.</li> <li>• Adding the YP Unit as an agenda item to the monthly medicines management meeting so the needs of children can be reviewed.</li> <li>• Facilitating healthcare staff training for designated YP Nurses to allow them to complete and record specific audits, reviewed by a clinical manager and uploaded to the Health Board's Audit Management and Tracking System (AMaT) system.</li> <li>• The clinical lead based on the YP Unit who will schedule formal weekly and monthly one to one discussions with the Child and Adolescent Mental Health Services (CAMHS) nurse to improve joint working arrangements.</li> </ul>		<p>January 2024</p> <p>January 2024</p> <p>January 2024</p> <p>January 2024</p> <p>March 2024</p> <p>February 2024</p>
8	<p><b>Children did not have all their health needs assessed and did not have sufficient access to an appropriate range of therapeutic interventions, including speech and language therapy.</b></p>	<p>The Health Provider, G4S and HMPPS Wales will ensure all children have their health needs assessed and can access appropriate services by:</p> <ul style="list-style-type: none"> <li>• In partnership with the Health Board a children's health needs analysis has been commissioned to support the development of the service in meeting the needs of children. Upon completion of the needs analysis the identified needs action plan will be updated.</li> <li>• Recruiting a full-time primary care Registered Mental Nurse (RMN) for YP, part of this role will be to deliver therapeutic interventions to children to improve mental health and wellbeing and provide psychological support.</li> </ul>	<p>HMPPS Wales/ Health Provider</p> <p>Health Provider</p>	<p>September 2024</p> <p>March 2024</p>



		<ul style="list-style-type: none"> <li>Any children identified as having a speech and language need will be referred to local children's Speech and Language Therapists services.</li> <li>G4S will provide a dedicated room to allow healthcare to screen all new arrivals using the national Comprehensive Health Assessment Tool (CHAT) in a private space to allow meaningful safe discussions.</li> <li>Appointing a Registered General Nurse (RGN) for YP so all CHATs' are completed on time in line with national standards.</li> <li>The clinical lead will source training on Withdrawal Assessments for all YP Nurses, allowing them to assess all new arrivals for their substance misuse needs.</li> <li>The capacity and demand for healthcare services at HMYOI Parc will remain under continuous review via the quarterly Health Partnership Board meeting structure attended by the Director.</li> </ul>	Health Provider Health Provider Health Provider Director Health Provider/ Director	March 2024 July 2024 July 2024 July 2024 March 2024
9	<b>Children's clinical records were poor and did not provide an accurate or comprehensive account of assessment, care and treatment.</b>	<p>The Health Provider will improve the quality of clinical records by:</p> <ul style="list-style-type: none"> <li>All CAMHS documentation will be recorded on SystmOne (the electronic clinical records system).</li> <li>All new documentation will be recorded on SystmOne and all existing documentation will be migrated over.</li> <li>All appointments will be added to the clinic ledger on SystmOne to improve the auditing of patient engagement with appointments.</li> <li>The clinical lead will liaise with the senior Nurse in CAMHS to devise an audit plan covering all disciplines, including diagnosis, treatment plans and prescribing. The plan will be presented for review to the Partnership Board in March 2024. Progress and outcomes of audits will be reported to CTMUHB Quality and Safety Group (and the equivalent in Mental Health and Learning Disability (MHL) service group), and the Partnership Board subsequently.</li> </ul>	Health Provider	March 2024



10	<p><b>The education curriculum did not consider labour market or learners' needs well enough.</b> It was not sufficiently vocationally focused, and the education department had too little involvement in the development of education pathways for children.</p>	<p>The HoLS will improve the education curriculum to ensure it is more vocationally focussed by:</p> <ul style="list-style-type: none"> <li>• Introducing a new YP curriculum from March 2024, based on labour market information, that will increase vocational focus and improved opportunities for gaining higher levels and more widely recognised qualifications that consider children's future educational, training and employability needs. Including the introduction of business/employability qualifications for HMYOI Parc.</li> <li>• Implementing a new tutorial system to support learners achieve qualifications in a timelier manner with a greater focus on careers information, advice and guidance.</li> <li>• The L&amp;S provider as part of the CPD programme and quality monitoring process will ensure tutors contextualise the curriculum well enough to enable learners to apply the skills learned to their practical studies or everyday life, with progress recorded on their ILWPs.</li> <li>• Improvements and progress of the quality of education delivery will be monitored and tracked at the Controllers, OMG and CRG meetings.</li> </ul>	Learning and Skills Provider	<p>March 2024</p> <p>March 2024</p> <p>May 2024</p> <p>Complete</p>
11	<p><b>Self-evaluation of learning and skills, including the use of data, was not good enough to identify areas for improvement.</b></p>	<p>The HoLS will improve the self-evaluation of learning and skills to drive improvements in delivery by:</p> <ul style="list-style-type: none"> <li>• Introducing a new Self-Assessment Report and Quality Development Plan linking data to outcomes and future planning.</li> <li>• Introducing a culture of honest self-evaluation and assurance processes, including observations of teaching and learning, reviews of learners' work and learner surveys.</li> <li>• Improving the use of data by curriculum managers to monitor achievement rates and progress of learners, particularly those from disadvantaged backgrounds, minority ethnic groups and those who have ALN.</li> </ul>	Learning and Skills Provider	<p>Complete</p> <p>Complete</p> <p>April 2024</p>



		<ul style="list-style-type: none"><li>• Discussing data from the 'CURIOUS' database at weekly management meetings to evaluate progress and outcomes for learners, including those with ALN.</li><li>• Improvements and progress of the quality of education delivery will be monitored and tracked at the Controllers, OMG and CRG meetings.</li></ul>		Complete  Complete
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