



HM Prison &
Probation Service

Action Plan: HMYOI Wetherby

Action Plan Submitted: 14 March 2024

A Response to the HMIP Inspection: 20 November – 07 December 2023

Report Published: 05 March 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

PRISON: HMYOI Wetherby

1. Rec No	2. Concerns	3. Response Action Taken/Planned	4. Responsible Owner	5. Target Date
	Priority concerns			
1	<p>The level of self-harm among girls was extremely high and this resulted in very high levels of use of force and assaults on staff.</p> <p>There was still no effective model of custody for these very vulnerable children and, despite the best efforts of staff, the YOI was not able to meet their needs. (To Youth Custody Service)</p>	<p>The Youth Custody Service (YCS) will review the support available to girls placed at HMYOI Wetherby through:</p> <ul style="list-style-type: none"> Conducting a Learning Review into the specific incident highlighted with clothing being removed from a girl who was self-harming with a ligature and explore wider learning. <p>Interim strategy</p> <ul style="list-style-type: none"> Ensuring all girls are allocated an appropriate Custody and Support Plan (CuSP) officer and that they receive weekly CuSP sessions and/or following significant events, including acts of violence, to investigate and challenge violent behaviour. Supporting all girls who self-harm through the Assessment, Care in Custody and Teamwork (ACCT) process, ensuring they have a dedicated case manager and that the most complex individuals receive enhanced monitoring and case management. Ensure all girls who commit acts of self-harm or violence are discussed at the weekly Safety Intervention Meeting where appropriate actions to support them are included in the safety action plan, additionally, girls are included as a specific agenda item at the monthly joint safety and security meeting to ensure they are receiving appropriate support. Prior to any planned Use of Force (UoF) being used on a girl, Senior Leaders will ensure all other resolutions/avenues of de-escalation have been explored, interventions have sufficiently detailed planning, attend planned interventions and 	<p>YCS DD Operations</p> <p>Governor</p>	<p>Complete</p> <p>April 2024</p> <p>Complete</p> <p>April 2024</p> <p>Complete</p>



		<p>briefings wherever practicable, ensure UoF teams are gender appropriate if a full search is required, improving management oversight and scrutiny of restraint during the event.</p> <p>Medium term strategy</p> <p>The Youth Custody Service (YCS) will review the support available to girls placed at HMYOI Wetherby by:</p> <ul style="list-style-type: none"> • Ensuring placement of any girl is needs led and in the best interest of the child in line with the placement guidance which will be updated. • Progressing a closer relationship and sharing more practice with the Women's Group. • Developing gender-specific guidance for HMYOI Wetherby for the care of girls. • Developing the medium to long term needs led girls' estate options as part of the wider YCS Children and Young Persons Strategy to be published later in 2024. 	YCS DD Operations	<p>July 2024</p> <p>July 2024</p> <p>July 2024 September 2024</p>
2	<p>Too many children were separated for too long. Children who were separated in their own cells on the main wings experienced very little time out of their cell, particularly at weekends.</p>	<p>HMYOI Wetherby will aim to reduce the length of time and improve the regime for children whilst separated by:</p> <ul style="list-style-type: none"> • Introducing the new YCS separation guidance which will enable a consistent approach to carrying out Rule 49 (R49) reviews. • An Enhanced Support Services Psychologist will provide relevant and timely Short-Term Assessment of Risk and Need (STARNS) to support efficient reintegration at the earliest opportunity. • The Head of Safety and the conflict resolution team will aim to reduce the number of children separated, improve the case management and their engagement in activities. • Care for all children will be navigated by dedicated Support Teams (ST's), escalating to Enhanced Support Teams (EST's) where appropriate. ST's and EST's 	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>July 2024</p> <p>April 2024</p> <p>June 2024</p> <p>June 2024</p>



		<p>will steer reintegration, generating actions to address the reasons behind separation, including a review of appropriate accommodation.</p> <ul style="list-style-type: none"> • 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. • Effective contract management will improve the education offer too all children, utilising Kinetic Youth to initially enhance the offer to separated children. • Providing additional resources from within mainstream services to ensure all separated children are provided with bespoke regimes that provide consistent predictable delivery. • Reviewing the Regime Management Plan (RMP) to ensure maximum delivery is realised within available resources, exploring opportunities for and improved regime design for separated children. Additionally, the review will aim to minimise the cross-deployment of conflict resolution practitioners. • Reviewing current residential accommodation to capitalise on the available infrastructure to support the reduction of separation. • Taking an action focused approach to improve reintegration planning at the weekly separation Local Management Team (LMT) meeting to improve reintegration planning, through increased accountability and assurance of progression that appropriately elevates risks to the critical case panel for support. • Introducing additional oversight of separation through daily assurance checks for any child on R49, ensuring they have been offered at minimum the mandated 2 hours' Time Out of Room (TOOR). 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. 	<p>Governor</p> <p>Education Provider</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>June 2024</p> <p>September 2024</p> <p>Complete</p> <p>May 2024</p> <p>June 2024</p> <p>May 2024</p> <p>May 2024</p>
3	There was a high number of pain-inducing restraint techniques and strip-searches	<p>HMYOI Wetherby will ensure any use of Managing Minimising Physical Restraint (MMPR) is in accordance with national policy and improve the scrutiny of video footage by:</p>	<p>Governor</p>	



	<p>under restraint. Many of these incidents were not in accordance with national policy and were not properly authorised. Scrutiny of video footage and support on the scene by leaders were poor.</p>	<ul style="list-style-type: none"> • A manager will attend all incidents, manage the incident and provide additional support and guidance to staff. • Prior to any planned UoF Senior Leaders will ensure all other resolutions/avenues of de-escalation have been explored, interventions have sufficiently detailed planning, attend all planned interventions and briefings, ensure UoF teams are gender appropriate if a full search is required, improving management oversight and scrutiny of restraint during the event. • All UoF incidents will be quality assured by an MMPR co-ordinator. Additionally, any restraint which involves a Serious Injuries and Warning Signs (SIWS), Pain Inducing Techniques (PIT), Child Protection concern or meets the Risk Management Meeting (RMM) criteria will be escalated to a Senior Leader for action and oversight within 48 hours. • Reviewing, implementing and embedding a refined search authorisation form, promoting alternatives to full searches, including an additional level of authorisation for use of restraint during searching. This process will be supported by a 10% quality assurance checked by the Head of Operations with findings presented to Senior Leaders at the monthly safety and security meeting. • All full searches under restraint will be reviewed by the Child protection panel, with any unauthorised searches escalated to the Local Authority Designated Officer. • MMPR training refreshers will mirror current incident themes, including the justification and application of PIT to improve understanding and align staffs' skills with national policies. The Governor will continue to work with the Independent Restraint Review Panel (IRRP) and the prison will publish regular learning reminders to staff around the application of PIT. • Implementing improved governance arrangements to monitor for instances of excessive UoF by staff, identifying and recording patterns and themes for evidence and future learning. This starts with daily UoF screenings but may also be raised from other sources such as; SIWS report actions and recommendations, Barnardo's Advocates, children's complaints, UoF debriefs, Child Protection referrals and reviewing Body Worn Video Camera footage following an incident. • Ensuring a risk and themes register is in place to record relevant UoF information, including separate data for boys and girls. 		<p>Complete</p> <p>Complete</p> <p>April 2024</p> <p>May 2024</p> <p>April 2024</p> <p>April 2024</p> <p>June 2024</p> <p>June 2024</p>
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		<ul style="list-style-type: none"> Strategic overview of UoF and its application will be at the quarterly RMM, where data analysis will identify any issues, themes and disproportionality of its use, so appropriate timebound actions and learning can be generated to address them. 		August 2024
4	<p>The implementation of custody support plans was weak. Many sessions did not take place and those that did were opportunistic or cursory in nature.</p>	<p>HMYOI Wetherby will improve delivery of Custody and Support Plans (CuSP) by:</p> <ul style="list-style-type: none"> Continuing to roll out CuSP in line with the YCS “CuSP Ladder” of increasing delivery across the year; CuSP sessions will follow significant events, including acts of violence, to investigate and challenge violent behaviour. Conducting a full review of the RMP, ensuring sufficient resources provide an achievable and consistent delivery of CuSP, allowing staff to spend meaningful time with children to improve relationships and have in-depth support sessions, working on progression, goals and behaviour. Delivering training to all operational band 3 and 4 staff to ensure the workforce is appropriately skilled to implement and review CuSP. Reviewing the allocation process to align resources to the current population, assigning a CuSP Officer during the induction process to provide a consistent adult through the child’s custody journey. Improving oversight of CuSP through a well-attended monthly CuSP LMT meeting, that will drive accountability and ownership of delivery through scrutiny of data and communication of emerging risks. 	Governor	<p>October 2024</p> <p>June 2024</p> <p>October 2024</p> <p>June 2024</p> <p>June 2024</p>
5	<p>Residential units required continuing maintenance. Some cells were cold and in poor repair.</p>	<p>HMYOI Wetherby will drive enhanced decency and improved conditions on residential units by:</p> <ul style="list-style-type: none"> Procuring and implementing residential damage books to provide records of outstanding maintenance that act as a tool to inform the weekly Facilities Management (FM) meeting with ‘AMEY’ (the FM contractor), to drive timely improvements in decency/conditions on residential units. Reviewing functionality of residential heating systems, including completing any identified repairs to damaged facilities, providing Additional Work Requests (AWR) to address improvements to the system to reduce further required repairs. 	<p>Governor/ FM Provider</p> <p>Governor/ FM Provider</p>	<p>July 2024</p> <p>November 2024</p>



		<ul style="list-style-type: none"> Identifying Residential Managers who will be assigned roles as decency leads to sufficiently improve maintenance assurance and effectively navigate escalation. Replace room windows on Keppel unit where necessary, to ensure fully functioning window vents for improved temperature control. Re-instating weekend room inspections carried out by Custodial Managers (CM) and Senior Leaders to elevate living conditions and support monthly SMT decency visits. A specific Graffiti removal programme will be developed and introduced. Cleaning schedules will be reviewed and extended to provide additional cleaning of the living units. Opportunities for paid part time employment, including cleaning and redecoration, will be created for both children and the cohort of over 18-year-olds, alongside incentives to instil a sense of pride and responsibility in their own communities. Weekly meetings between the Governor/Deputy Governor and AMEY will discuss the delivery and completion of estate maintenance and the annual painting schedule. Additionally, progress will be monitored at the monthly tri-partite meetings between the Governor/Deputy Governor, AMEY and the Regional Health and Safety Advisor. 	<p>Governor</p> <p>Governor/ FM Provider</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor/ FM Provider</p>	<p>May 2024</p> <p>May 2024</p> <p>Complete</p> <p>June 2024</p> <p>June 2024</p> <p>Complete</p>
6	Children spent too much time alone locked in their cells, particularly at weekends.	<p>HMYOI Wetherby will increase the TOOR offer for all children wanting to engage in the regime by:</p> <ul style="list-style-type: none"> Reviewing the RMP to ensure maximum delivery is realised within available resources and consistency of its delivery is achieved on evenings and weekends. The review will ensure there is consistent and equitable TOOR across all units for boys and girls. Submission of a business case to provide an off-unit youth club in a currently disused building to increase available activity areas during evenings and weekends. Reviewing access to available weekend activities to increase TOOR, for example Park Run. 	<p>Governor</p> <p>Governor/YCS</p> <p>Governor</p>	<p>June 2024</p> <p>June 2024</p> <p>June 2024</p>



		<ul style="list-style-type: none"> • Delivering an activity leaders' course to upskill Youth Justice Workers, providing them with confidence and the skills to manage fun and engaging non-sporting activities to children. • Appointing Activity Officers to monitor and drive education attendance, with increased scrutiny of non-delivery. • Effective contract management will improve the education offer to all children, utilising Kinetic Youth to initially enhance the offer to separated children. • Improving the quantity and quality of education and enrichment activities available for children who cannot attend the education department, ensuring planned sessions are delivered consistently and to a high standard. • The Heads of Education Skills and Work, Residence, Performance and Residential CMs will complete weekly assurance checks to ensure wing staff adhere to the published regime, ensuring children are unlocked at the published times so they can receive and access their daily entitlements on time. • The SLT will monitor the daily regime at the daily operational meeting to ensure all children can access activities and services, especially children who do not receive at least 2 hours' TOOR who don't engage in the regime. The overview includes the reasons why they have not accessed the regime and their wellbeing, with actions being taken to address them. • The Head of Safety and the conflict resolution team will support Residential Managers to reduce the number of children separated to allow larger numbers of children access to the regime, increasing the time they can spend out of room. • An increased regime monitoring tool has been introduced that captures 'case level data', providing individualised data for each child, for boys and girls, this is discussed at the daily SLT meeting, and overseen by YCS data and performance and discussed at Performance Review Meetings. The data identifies where a child is not accessing the regime and will prompt a discussion with the child to determine the reasons why, and if necessary, will generate appropriate actions to support the child. 	<p>Governor</p> <p>Governor</p> <p>YCS Contract Management Education Provider/ Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>April 2024</p> <p>July 2024</p> <p>September 2024 August 2024</p> <p>June 2024</p> <p>July 2024</p> <p>June 2024</p> <p>December 2024</p>
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7	<p>The teaching of English, including reading and mathematics, was not good enough.</p>	<p>The Head of Education Skills and Work and the Education Provider will improve the quality of English, maths and reading by:</p> <ul style="list-style-type: none"> • Ensuring all functional skills staff attend the YCS collaborative planning workshops to improve planning for learning, create clear assessment checkpoints and markers for assessing progress and develop a sequenced curriculum for delivering English and maths, also ensuring teachers use children’s starting points sufficiently well when planning learning to maintain their interest and engagement. • Developing interim outreach provision in line with the learners’ current academic abilities, ensuring it is in line with their main site education provision. • Information regarding children's Special Educational Needs and Disabilities (SEND) will be shared with all teachers and instructors following initial assessment, allowing individualised needs to be met within the classroom. • Education and Prison Managers will support teachers to improve and maintain behaviour for learning and the development of personal skills as part of the Behaviour Management Strategy, allowing teachers to sequence and organise learning in a logical and coherent way ensuring children remain engaged and focused. • The Education Provider will ensure their staff are teaching to good or outstanding grades through observations of teaching and learning, providing Continual Professional Development (CPD) and support to staff not reaching the required minimum standards, monitored through contract management processes. • Education managers will monitor the quality of the feedback provided by teachers to all children, ensuring it is of sufficient standard across all topics and that inappropriate references are challenged, so children can learn from their mistakes. • Education Managers will monitor and quality assure the academic progress and engagement scores from the ‘CURIOUS’ database each month, ensuring there are adequate interventions in place for children and young people who are not progressing (including children who cannot access the education department). • Education Managers will complete reading screeners for all children and young people who are assessed during induction at Entry level 2 or below, enrolling learners onto the reading programme to ensure specialist support is provided to accelerate their reading abilities, with monthly monitoring of progress. 	<p>Governor/YCS Contract Management/ Education Provider</p>	<p>May 2024</p> <p>April 2024</p> <p>April 2024</p> <p>May 2024</p> <p>September 2024</p> <p>May 2024</p> <p>May 2024</p> <p>May 2024</p>
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		<ul style="list-style-type: none"> • Education Managers will create a reading strategy and implement it across the prison, making sure reading for purpose and reading for pleasure is adequately planned and delivered in all lessons, including children receiving outreach tuition. • Prioritise punctuality through the management of movements to ensure learners arrive at lessons on time, so that learning time is maximised. • Improvements and progress of the quality of education delivery will be monitored and tracked at the monthly Quality Improvement Group QIG, Education Performance Review Meeting and quarterly through the Quality Contracts Review Meeting. 		<p>May 2024</p> <p>July 2024</p> <p>January 2025</p>
	Key concerns			
8	Almost half the complaints about discrimination were responded to late, which undermined children's confidence in the process.	<p>HMYOI Wetherby will improve the timeliness of discrimination complaint responses by:</p> <ul style="list-style-type: none"> • Introducing a tiered quality assurance process for Discrimination Incident Reporting Forms (DIRFs), with Equality advisors and the Head of Equalities quality checking all DIRFs, monitoring the timing and quality of investigation responses. Overdue responses will be escalated to the Deputy Governor for additional accountability, who will also conduct a 100% Quality Assurance checks of all submitted DIRFs. Feedback and guidance will be provided, as required, to all staff following the subsequent completion of any DIRF. Additional external scrutiny of DIRFs is being explored. • Aligning the recording of DIRFs with the complaints process to ensure forthcoming responses are provided the pedestal for appropriate oversight. • Celebration of good practice and escalation of risk will be through daily SLT briefings. Additional oversight will be at the monthly SLT and Equality Action Group meetings, where submitted DIRFs from the previous month will be discussed to ensure responses are on time and to identify any trends relating to discrimination. • Exploring further opportunities within the enrichment calendar to host anti-racism educational charity events for children and staff. • All staff will be regularly reminded through Notices to Staff and briefings that any discriminatory behaviour must be challenged. Managers will support staff to 	<p>Governor</p> <p>Governor/Education Provider</p> <p>Governor</p>	<p>Complete</p> <p>Complete</p> <p>April 2024</p> <p>September 2024</p> <p>April 2024</p>



		consistently challenge any negative words or behaviour, challenging those who don't.		
9	The quality of risk assessment work by resettlement practitioners was inconsistent. Some assessments lacked depth and not all available interventions and management tools were considered.	<p>The Head of Resettlement will improve the quality and consistency of Resettlement Practitioners (RP) risk assessment work by:</p> <ul style="list-style-type: none"> • Securing and delivering an appropriate catalogue of training, including Offender Assessment System (OASys) for those over the age of 18 and transitioning to the adult estate, and Prisoner Offender Management (POM) training to all RP's. • Senior Leaders and First Line Managers will highlight talent identification and knowledge gaps through an established touch point structure, to share good practice and identify learning for the training needs analysis. • Improving RP knowledge and understanding of the available intervention catalogue through awareness sessions, delivered quarterly by Treatment Managers. • Ensuring resettlement targets are shared with all children via their in-room launchpads so they are aware of their objectives, and that objectives are recorded on electronic case notes. • Conducting a quality assurance check of 10% of all risk assessments each month, with shared learning and best practice communicated effectively through function briefings. 	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>September 2024</p> <p>April 2024</p> <p>Complete</p> <p>April 2024</p> <p>May 2024</p>
10	Leaders and managers had not given sufficient oversight of quality assurance procedures to make sure that weaknesses, including those found at the previous inspection, had	<p>The Governor and the Deputy Director of YCS Operations will ensure sufficient oversight of quality assurance procedures by:</p> <ul style="list-style-type: none"> • The Deputy Director of YCS Operations will review the management structure of HMYOI Wetherby with the new Governor to ensure an efficient and effective structure that supports delivery. • Assigning responsible Senior Leaders to each priority/key concern identified by HMIP, these SLT members will hold responsibility for delivering each action, providing assurance to the Governor through performance reviews. • Conduct a full review of the SLT structure establishing understood role boundaries, improving accountability. 	<p>YCS DD Operations</p> <p>Governor</p> <p>Governor</p>	<p>July 2024</p> <p>Complete</p> <p>July 2024</p>



	been fully addressed.	<ul style="list-style-type: none"> • Implementation of insights for performance to underpin assurance infrastructure, enhancing transparency and elevating the profile of the prison's actions plans within SLT meetings. • Review current SLT touchpoints and functional reporting processes to align focus with the prison's risks, goals and business planning. • Ensuring that all meetings take place at the prescribed frequency and are attended by key stakeholders, data is analysed and meaningful timebound actions are generated and tracked to address concerns to deliver improvements. • Strategic overview of all meetings will be at the monthly Senior Management meeting, where identified risks will be raised and actions generated to address them. • The Deputy Director of YCS Operations as part of quarterly review meetings with the Governor will measure HMIP action plan progress. 	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>YCS DD Operations</p>	<p>August 2024</p> <p>August 2024</p> <p>August 2024</p> <p>August 2024</p> <p>Complete</p>
11	Waiting times for routine dental treatment were too long and there was no local orthodontic pathway for new referrals.	<p>The Governor and Healthcare provider will improve access to dental treatment by:</p> <ul style="list-style-type: none"> • Increasing the frequency of the Dentist clinic to meet the prisons demands. • Recruiting Activity Officers to maximise attendance and review Do Not Attends (DNA's) to improve the efficiency of current clinic appointments. • Utilisation of Launchpad (a platform which provides children with secure access to a content hub (information, entertainment and diversionary content) and some transactional services (including applications) via a laptop in their rooms) to improve notification and communication of appointments, to ensure both Children and Staff are informed effectively. • Formulating a standard operating procedure for an orthodontic pathway. • Effective oversight and monitoring of waiting times will be through the Prison healthcare operational meeting. 	<p>Governor/ Healthcare Provider</p>	<p>September 2024</p> <p>June 2024</p> <p>June 2024</p> <p>December 2024</p> <p>April 2024</p>

