



HM Prison &
Probation Service

Action Plan: HMYOI Feltham A

Action Plan Submitted: 25 June 2024

A Response to the HMIP Inspection: 04 – 14 March 2024

Report Published: 16 July 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 FELTHAM A

1. Rec No	2. Concerns	3. Response Action Taken/Planned	4. Responsible Owner	5. Target Date
	Priority concerns			
1	<p>Levels of violence and disorder were very high. Conflict and keep-aparts negatively affected many aspects of life at Feltham, including access to a meaningful regime, medical appointments and visits.</p>	<p>HMYOI Feltham A will aim to reduce levels of violence and disorder by:</p> <ul style="list-style-type: none"> • Reviewing the Senior Leadership Team (SLT) to create a Head of Integrated Care to oversee all aspects of behaviour management and conflict resolution. • Conducting an establishment wide Safety Summit for all staff, carrying out consultation sessions with children and undertaking a ‘deep dive’ into data and local intelligence to inform a refreshed Safety Strategy and action plan to identify and address the issues driving violence. The updated strategy will then be communicated to staff. • Reviewing and implementing Behaviour Management and Support (BMS) to equip staff with the skills to challenge inappropriate and harmful behaviours amongst children. • Reviewing the weapons strategy and embedding the lessons learned as business as usual. • The Head of Security will own the ‘non-association’ process to ensure the effectiveness of intelligence gathering, to inform the management of relationships and reduce the number of children with “non-association” markers. • Ensuring reintegration planning commences at the point of separation that includes input from all key functions, including NHSE and psychology, to ensure the child is provided with a purposeful regime from education, gymnasium, wing-based activities and psychology. 	Governor	<p>Complete</p> <p>August 2024</p> <p>July 2024</p> <p>July 2024</p> <p>September 2024</p> <p>September 2024</p>



		<ul style="list-style-type: none"> • Allocating a Conflict Resolution Practitioner to each unit who will mentor and support staff in reducing and resolving harm within communities. • Increasing the focus on installing a culture of mixing on induction, with an expectation for children to do so throughout their time at the prison. • Continuing to implement Custody Support Plans (CuSP) in line with the wider Youth Custody Service (YCS) roll-out, CuSP sessions will follow significant events, including acts of violence, to encourage positive behaviour through behavioural targets. • Reviewing adjudication procedures and tariffs, including increased use of the independent adjudicator and developing a restorative justice approach for applicable charges. • Introducing crime clinics to improve relations between the prison and police, including reducing timeframes for charges referred to them. • Rewarding mixing through activity as part of the Incentives Policy (IP) to increase time out of room and promote the benefits of positive engagement. • Improving the quality of investigations into violence to improve understanding of the causes of violence. • Regular engagement with children to discuss the issues driving violence through monthly community and Youth Council meetings, where violence will be a standing agenda/topic for discussion. • Ensuring the safety team collate and review all data relating to violence, including intelligence from investigations, to improve the understanding of causes and drivers of violence for discussion at the multi-disciplinary monthly safety strategy meeting, where appropriate actions to reduce violence will be generated and added to the consolidated safety action plan. The timescales, effectiveness and impact of all the actions will be monitored at the meeting. 		<p>September 2024</p> <p>July 2024</p> <p>September 2024</p> <p>October 2024</p> <p>July 2024</p> <p>September 2024</p> <p>September 2024</p> <p>August 2024</p> <p>September 2024</p>
2	There was a lack of support for the most vulnerable children. The closure of Alpine unit had led to	<p>The Head of Integrated Care (HoIC) will improve the support available for the most vulnerable children by:</p> <ul style="list-style-type: none"> • Refurbishing and re-opening Alpine Unit - the Enhanced Support Unit (ESU) by the end of January 2025, to accommodate the most vulnerable 	Governor	January 2025



	<p>increasingly long periods of separation.</p>	<p>and challenging children, providing them with additional support to address their needs.</p> <ul style="list-style-type: none"> • The HoIC will work collaboratively with health and psychology partners for the planning and embedding of SECURE STAIRS (The Framework for Integrated Care) across all residential units, that will complement the ESU once opened. • Refreshing and promoting Enhanced Support Services with clear operational and clinical integrated working. • Delivering Enhanced Support Team training to all appropriate staff. • Providing additional support through regular CuSP sessions to encourage children to engage and participate in the regime. • Continued oversight and collaboration of all safeguarding concerns at the weekly risk management meeting, which the Designated Officer attends or contributes towards. • Improving the quality of reintegration planning from the point of separation, that will include input from all key functions to ensure the child is provided with a purposeful regime from education, gymnasium, wing-based activities and psychology. • Introducing additional oversight to ensure children on R49 (Removal from association) have been offered at minimum the mandated 2 hours' Time Out of Room (TOOR). • Ensuring all night staff's keys are held in a secure sealed pouch. The Night Orderly Officer will check the integrity of the pouches at the start and finish of each shift. 		<p>August 2024</p> <p>January 2025</p> <p>January 2025</p> <p>August 2024</p> <p>Complete</p> <p>August 2024</p> <p>July 2024</p> <p>July 2024</p>
3	<p>Children spent too much time locked in their cells.</p>	<p>The Heads of Communities, Business Assurance, Reducing Reoffending, Security and Education Skills and Work will increase the TOOR offer for all children wanting to engage in the regime by:</p> <ul style="list-style-type: none"> • Reviewing the current staff profiles to increase the amount of time children can spend out of their rooms and at their scheduled activity. The 	Governor	<p>September 2024</p>



		<p>review will incorporate all activity spaces to increase the available opportunities for children.</p> <ul style="list-style-type: none"> • The Regime Management Plan (RMP) will be reviewed as part of the staff reprofiling exercise, ensuring that key elements of the regime are only affected as a last possible resort. • Reviewing the core day, to provide an enhanced offer for all children that provides each child with the ability to increase the amount of time they can spend learning each week. • The prison will explore ways to increase children's access to the gym as part of the review, including increased access to recreational gym where resource permits. • The review, along with improved staffing levels, will aim to consistently deliver a selection of enrichment activities and competitions during weekends, including vocational training on Saturdays and Sundays, a new Physical Education pathway and the Duke of Edinburgh award scheme. • The Head of Security will aim to reduce the number of non-associations, to allow larger numbers of children to access the regime, increasing the time they can spend out of room. • Developing inclusion pathways across all residential communities to facilitate mixing across the units i.e., football matches. • Increasing the number of work and volunteer opportunities for children aged eighteen and over. • 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 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. The overview includes the reasons why they have not accessed regime and their wellbeing, with actions being taken to address them. 		<p>September 2024</p> <p>Complete</p> <p>August 2024</p> <p>August 2024</p> <p>August 2024</p> <p>August 2024</p> <p>August 2024</p> <p>September 2024</p> <p>July 2024</p>
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		<ul style="list-style-type: none"> Introducing an increased regime monitoring tool that captures 'case level data' and provides individualised data for each child, this is discussed at the daily SLT meeting, 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. 		July 2024
4	<p>Leaders did not make sure that staff used children's starting points effectively to teach a well-structured curriculum in English and mathematics. Too few children achieved their qualifications.</p>	<p>The Governor, Education Provider (The Shaw Trust) and the Head of Education, Skills, and Work (HoESW) will ensure children's starting points are at the heart of a well-structured and richer curriculum by:</p> <ul style="list-style-type: none"> The Governor will be accountable for setting the direction and delivery of the curriculum, with improvements and progress being monitored and tracked at the monthly Quality Improvement Group (QIG) and YCS Performance Review Meeting (PRM), and quarterly at the Contract Review Meeting (CRM). Ensuring initial diagnostics and induction week teacher assessments of pupils' levels are shared with pupils, to better structure their learning journey in mathematics and English. These initial starting points will be displayed in all pupils' books and folders with SMART (Specific, Measurable, Achievable, Relevant, and Time-Bound) targets set by teachers. Implementing the revised mathematics and English curriculum and trackers, devised collaboratively with the education provider and the YCS education team. Targeting Continual Professional Development (CPD) to ensure teachers and tutors are utilising starting points, formative assessment and pupil targets effectively. All mathematics and English teachers will be set learner qualification achievement targets via the Education Providers performance appraisal process. 	YCS Contract Management/ Education Provider/ Governor	<p>Complete</p> <p>Complete</p> <p>August 2024</p> <p>July 2024</p> <p>September 2024</p>



		<ul style="list-style-type: none"> Any mathematics or English teachers who are not consistently meeting their learner qualification achievement targets will be placed on a Performance Improvement Plan (PIP). A new tracking system has been developed by the Education Provider to better gauge when pupils will be ready to sit their functional skills examinations, through teacher assessment, tracking of guided learning hours and pupils' work. Implementing monthly progress and data meetings between the Education Provider and the HoESW. These will focus on mathematics and English progress, qualification achievement data and targeted interventions. 		<p>Complete</p> <p>Complete</p> <p>Complete</p>
5	<p>Leaders did not make sure that children took part in sufficient education or that children attended, as expected, to make swift progress and gain substantial new knowledge and skills to help them in their next steps.</p>	<p>The Governor and the Education Provider will improve levels of attendance and participation in education pathways by:</p> <ul style="list-style-type: none"> The Governor and the HoESW will review and oversee the curriculum at the prison, to ensure it meets the needs of children and drives improvement in attendance. Reviewing the core day and timetable for education, to ensure it meets the needs of the population and provides an enhanced offer for all children, providing each child on the main residential units with the ability to attend at least 15 hours education per week. Implementing a new pathway and vocations allocation system based on 8-week terms, improving the tracking of pupil's progress in their core and vocational subjects. The HoESW, Head of Security and the Education Provider will work collaboratively to reduce and manage 'non-associations' to improve the allocations process, so all children can access a wide range of activities, enrichment and learning opportunities. Reviewing the IP and pay structure to improve attendance at education, including rewarding achievements. 	<p>YCS Contract Management/ Education Provider/ Governor</p>	<p>September 2024</p> <p>August 2024</p> <p>Complete</p> <p>November 2024</p> <p>August 2024</p>



		<ul style="list-style-type: none"> • The new termly allocations will have key data points, meetings and report writing scheduled, to improve the monitoring of pupils' progress and planned interventions. • Timetabling weekly meetings between Education Provider, Deputy Governor and the HoESW to analyse the attendance of each pupil. Action will be taken if pupils fall below the minimum hours and followed up through the QIG and PRM meetings, with additional oversight and monitoring of improvements by the Deputy Governor • Through the integrated care model and our partnership with internal stakeholders, we will continue to devise individual timetables for separated children and those with complex needs who cannot attend education in person, consisting of a range of care, interventions and education specific to that pupil. • The weekly Management Information (MI) meetings will measure pupil attendance, their weekly hours in education and the effectiveness of individual timetables in improving pupil outcomes. 		<p>Complete</p> <p>Complete</p> <p>August 2024</p> <p>Complete</p>
6	<p>The provision to help children maintain family contact was poor. There were insufficient opportunities for social visits and video calls were not promoted well enough to children.</p>	<p>The Heads of Reducing Reoffending and Operations will improve the available provision to help children maintain contact with their families by:</p> <ul style="list-style-type: none"> • Increasing visits capacity by the introduction of an extra weekend session to support families who work mid-week. • Increasing the capacity in the visits hall by installing additional tables, allowing more families to attend each session. • Providing prison video calls on all units during the evening, making them more accessible for families outside of school and work hours. • Advertising and promoting the availability of video calls via Launchpad (A platform which provides prisoners with secure access to a content hub (information, entertainment and diversionary content) and some transactional services (including applications) via a laptop in their cells) system and through posters around the prison. 	Governor	<p>September 2024</p> <p>September 2024</p> <p>September 2024</p> <p>September 2024</p>



		<ul style="list-style-type: none"> • Completing a survey with families and children to gain feedback on how the social visits provision could be improved, including capacity, frequency and timings. Results will be analysed and discussed at the bi-monthly Reducing Reoffending (RR) meeting to determine what actions can be generated to improve the experience. • Recruiting a Family therapist to work with complex/high risk children by applying a range of therapies to reduce the risk of harm and re-offending to help them engage/re-engage with their families. • Implementing a Family and Significant (F&S) others member of staff to offer information, support and guidance to families, children, and significant others. • Identification of children not receiving visits via a monthly Management Information report. The F&S member of staff or their CuSP officer will speak to those identified to explore the reasons why, generating appropriate actions/support as required. • Strategic monitoring of family contact will be discussed at the RR meeting, including data relating to uptake of social visits and video calls, to monitor improvements and generate actions where required, ensuring actions are tracked and completed within acceptable timeframes. 		<p>July 2024</p> <p>December 2024</p> <p>July 2024</p> <p>September 2024</p> <p>July 2024</p>
7	<p>The identification and review of children’s risk levels were weak. Resettlement practitioners had not received adequate training in public protection risk management and children that were high risk of harm were not reviewed regularly.</p>	<p>The Head of Casework will improve the identification and review of children’s risk levels by:</p> <ul style="list-style-type: none"> • Key Resettlement Practitioners (RP) and a hub manager will attend ‘Asset Plus’ training, which covers an element of risk identification and review. These staff will become train-the-trainers and deliver training to the rest of the team. • RP will complete report writing and risk assessment training, to enable better identification of risk and analysis of information from varying sources. 	Governor	<p>September 2024</p> <p>September 2024</p>



		<ul style="list-style-type: none"> Ensuring all risk assessments, including those at the point of remand into custody are fully completed, to accurately identify a child's risk so appropriate actions and referrals can be made and implemented in advance of their release date. Improving attendance at the monthly Interdepartmental Risk Management Meeting (IDRM) by reviewing the Terms of Reference and Quorum of attendees. The quorum will be mandated to attend and ensure relevant updates are brought to the meeting to manage children's risk. All high-risk children will be considered for discussion at the IDRM in advance of key points during their time in custody. The Head of Casework will quality assure 10% of all risk assessments, including written reports for MAPPA meetings, to ensure they include an analysis of the child's behaviour in custody and how it contributes towards their level of risk. Feedback and learning will be provided to RP where improvements are identified. 		<p>October 2024</p> <p>July 2024</p> <p>October 2024</p>
	Key concerns			
8	Levels of self-harm had increased and were too high.	<p>The Head of Safety will improve the care and support for the most vulnerable and those in crisis by:</p> <ul style="list-style-type: none"> Completing regular deep dives into developing trends from Assessment, Care in Custody and Teamwork (ACCTs), allocating actions from the findings to mitigate future risk. Implementing a new case coordination system to ensure consistent performance and a quality level of care. Completing an analysis of post-closure reviews to provide a child's voice, to identify how we can improve the ACCT process. Introducing "significant event CuSP" sessions to fully understand the drivers and trends for the child. 	Governor	<p>August 2024</p> <p>July 2024</p> <p>September 2024</p> <p>September 2024</p>



		<ul style="list-style-type: none"> • Discussing the most complex cases at the weekly risk management meeting, where progress against actions is reviewed and monitored. • The safety team will improve the collation and review of all data relating to self-harm, utilising feedback from all the above points to identify trends and drivers of self-harm. This information will be discussed at the safer custody meeting where appropriate actions to reduce self-harm will be added to the consolidated safety action plan. 		<p>Complete</p> <p>September 2024</p>
9	Leaders did not provide a sufficient curriculum offer at level 3 to support children to progress and meet their educational needs and interests.	<p>The Governor, HoESW and the Education Provider will improve the curriculum offer for children at Level 3 to continue their personal development in education by:</p> <ul style="list-style-type: none"> • The Governor will set the direction and agree the curriculum offer at level 3, based on the findings from the 2024 Education Needs Analysis (ENA). • Selecting additional Level 3 qualifications for our cohort from the recently completed ENA findings, with consideration of guided learning hours and security restrictions. • The Education Provider will apply for approval of additional Level 3 qualifications from the awarding body, as per the Annual Delivery Plan. Each subject area will have at least at least one full Level 3 qualification and a range of Level 3 units. • CPD will be provided to teachers to ensure they are confident, prepared, and ready to deliver the range of new Level 3 qualifications. A bank of teaching and learning materials for each new Level 3 provision will be created, ensuring they support learners to meet the assessment criteria for each Level 3 qualification/Unit in place. • Developing a revised timetable based on the academic needs of our cohort, that includes Introductory, Intermediate and Advanced Pathways. Level 3 provision will be delivered via the Advanced Pathway. • The Education Provider and YCS leadership, in collaboration with our respective Information Technology Services Teams will provide an extensive range of Level 3 Stonebridge Distance Learning (a distance 	YCS Contract Management/ Education Provider/ Governor	<p>September 2024</p> <p>September 2024</p> <p>September 2024</p> <p>September 2024</p> <p>August 2024</p> <p>January 2025</p>



		<p>learning provider) provision through the Virtual Campus platform (A secure intranet provision to support education, training, employment and resettlement), that learners will be supported to complete in class and independently via their in-room laptops.</p> <ul style="list-style-type: none"> The CRM, PRM, QIG will measure pupil progress and attainment in level 3 qualifications. 		September 2024
10	Leaders did not have sufficient oversight of the quality of the education provision and had not improved it significantly.	<p>The Governor, HoESW and the Education Provider will improve the quality of education provision by:</p> <ul style="list-style-type: none"> Creating a new Education, Skills and Work function with support from YCS central education team, to develop a robust Quality Assurance (QA) calendar in collaboration with the Shaw Trust, incorporating all partners and elements of learning to allow for accurate oversight of the full range of activities. Planning QA throughout the academic year in conjunction with Shaw Trust leaders, HoESW and YCS Education, to look at pupil progress, their learning journey and the quality of teaching and learning, including improved oversight for the curriculum and provision of mathematics and English. The Education Provider will provide CPD support to staff identified as requiring key areas for development. These are identified by leaders through data, lesson visits or book / folder scrutiny. Staff who are on a CPD Support plan will be provided with a mentor, with the plan focusing on different areas of practice over a four-week period linked to the areas of development identified. If sufficient progress is not made at the end of the four weeks, the CPD support plan will transition to a PIP. 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. 	YCS Contract Management/ Education Provider/ Governor	<p>Complete</p> <p>Complete</p> <p>August 2024</p> <p>Complete</p>



		<ul style="list-style-type: none"> • Education Managers will review and refresh the reading strategy across the whole prison, making sure reading for purpose and reading for pleasure is adequately planned and delivered in all lessons, including children receiving outreach tuition, monitored through the QA process. • Children with an identified reading age of under 12 years will be supported by the Shannon Trust (A charity that trains prisoners who can read to work on a one-to-one basis with learners) to complete the 'Turning Pages' programme on a 1:1 basis with specialist education staff. • The effectiveness of quality improvement measures will be monitored closely at the PRM, CRM and the QIG, utilising data from the Teaching and Learning Tracker and feedback from quality monitoring visits by the YCS Education Lead and monthly learning walks by the HoESW. 		<p>September 2024</p> <p>Complete</p> <p>August 2024</p>
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