



Jake Richards MP
Parliamentary Under-Secretary
of State for Justice

Colin Allars,
Chair, Independent Restraint Review Panel (IRRP)

MoJ ref: ADR137579

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via email: colin.allars@govfsl.com

RESPONSE TO THE ANNUAL INDEPENDENT RESTRAINT REVIEW PANEL REPORT FOR 2025

Dear Colin,

Thank you for your letter of 30 June 2026 and for sharing the Independent Restraint Review Panel's (IRRP) Annual Report for 2025.

I am grateful to you and all Panel members for the considerable time and expertise you continue to devote to independently scrutinising the use of restraint across the youth estate. The challenge and assurance provided by the Panel remain an important part of our efforts to ensure that children are cared for safely, fairly and with dignity.

I welcome the report's headline finding that the use of Pain Inducing Techniques (PIT) reduced substantially during 2025. This shows good progress and reflects the focus across the youth estate on reducing the use of force wherever possible. I was also pleased to hear about the continuous improvement in de-briefing and recording of these incidents. More broadly, I welcomed the positive observations about improvements in post-incident reviews and the commitment shown by frontline staff working in often exceptionally challenging circumstances. It is important that this dedication is recognised alongside the areas where further improvement is needed. Whilst progress has been made, I recognise that the report identifies areas where standards must continue to improve, and I welcome the Panel's challenge in helping us achieve this

I thank you for making the YCS aware of the incidents where staff have not interacted correctly with young people throughout this year, and I have been assured that these matters have been reviewed locally and that appropriate action has been taken where necessary. The YCS remains committed to embedding the principles of integrated care across the youth estate, recognising the central role that positive relationships and relational practice play in supporting children, reducing conflict, and improving outcomes.

I will address the other broad points in your letter:

Site Engagement with the IRRP

I was glad to hear of the trust that has developed between staff at youth estate sites and the IRRP over the recent years, which has now resulted in a healthy environment where constructive challenges between all parties can take place. I concur with the approach taken by the IRRP both during and after its visits and look forward to this working relationship evolving. Constructive challenge from the Panel continues to support operational learning and improvement across establishments.

Engagement with Children

I admire the direct approach by the panel in speaking to children directly as well as you acknowledging the need to speak to a greater variety of children, to gain greater understanding of how they perceive the area of use of force. I was particularly interested in the feedback gathered directly from children. Your report highlights the importance of positive relationships between children and staff and reinforces the value of listening carefully to children's experiences and concerns. I am pleased that children continue to engage constructively with the Panel and that establishments are responding to issues raised through that engagement.

PAVA

I have also considered carefully the Panel's observations regarding the early deployment of PAVA within the youth estate. I recognise the concerns you have raised in relation to some deployments and your conclusion that, in some cases, the justification for use was not sufficiently evidenced or alternatives were not fully explored. I note the view that the availability of PAVA may have contributed to preventing some incidents from escalating. However, it remains essential that any deployment is fully justified, proportionate and subject to robust scrutiny.

As you know, the Government has decided to extend authorisation for a further 12 months. This will allow further evidence to be gathered on the effectiveness, appropriateness and impact of PAVA in youth settings before any longer-term decision is made. Additionally, the YCS is strengthening governance and oversight of PAVA, with a particular focus on disproportionality. Where disparities are identified, establishments will be expected to examine underlying causes and demonstrate the actions being taken to address them. This also includes improving data capture and analysis to better identify trends over time, ensuring the use of force remains proportionate and non-discriminatory, implementing recommendations from the review of disparity training and reviewing the composition of panels to support diverse and representative scrutiny. Further we are updating the Children's Rights Impact Assessment (CRIA) and operational guidance to capture the concerns and planned mitigating actions.

Placements of Vulnerable Children

I also note the issues highlighted in relation to placements, particularly for some of the most vulnerable children, including girls with complex needs.

I agree that it would be preferable to place girls in Secure Children's Homes (SCHs), for some girls, their risk to others or prior history within SCHs and therefore refusals by SCH managers

may mean that an SCH placement is not possible.

As you know, in 2024, MoJ commissioned Susannah Hancock to conduct an independent review into the placement of girls in youth custody. The review shone a vital light on the experiences of some of the most vulnerable children in our justice system and made clear recommendations for reform. The government immediately acted on the first recommendation, which means girls are no longer placed in YOIs. This marked a significant shift in ensuring girls receive the right support in custody. However, SCHs can decline a placement if they feel that they are not able to meet the needs of that child, or that doing so would mean that they would not be able to meet the needs of other children already in placement at an SCH. We are also piloting a new placement protocol for children who we identify as most suitable for placement in SCHs, including girls; NHSE is leading on the development of an enhanced pathway for girls in custody; and we are working with Oakhill Secure Training Centre (STC) to ensure that they can provide appropriate care for girls who cannot be placed in an SCH.

The Government is developing a Youth Custody Transformation Plan as part of the wider youth justice reforms set out in *Cutting Youth Crime, Changing Young Lives*. The plan will consider how the youth estate can better protect the public, support rehabilitation and improve outcomes for children in custody. The plan will be published in the Autumn, and we will continue to engage with a range of stakeholders as this work progresses.

I thank you again for your continued leadership of the IRRP and for your ongoing support in improving outcomes for the children and staff within the youth estate.

A handwritten signature in black ink, appearing to read 'Jake Richards', with a stylized flourish at the end.

JAKE RICHARDS MP