



HM Prison &
Probation Service

Action Plan: HMP & YOI Parc - Young Persons' Unit

Action Plan Submitted 24 April 2019

A Response to the HMIP Inspection 15 - 25 October 2018

Report Published 26 February 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 |
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| 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, Measureable, 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: HMP & YOI PARC

| 1. Rec No | 2. Recommendation | 3. Agreed / Partly Agreed / Not Agreed | 4. Response Action Taken/Planned | 5. Responsible Owner | 6. Target Date |
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| | Main Recommendations | | | | |
| | To the Director | | | | |
| 5.1 | The prison should ensure that all boys receive sufficient food to support their developmental needs and the food is of good enough quality to encourage them to eat well. (S39) | Agreed | The base menu provided by Aramark, and other food supplements provided by G4S, amount to a calorie intake of around 3,255 per young person which is sufficient to meet diet requirements of a teenage boy between ages 15 to 18. Changes to current weekly menu's and daily supplementary items will be made following consultation with young people. | Director of HMP & YOI Parc (G4S) | May 2019 |
| | | | A comprehensive review of the food menu will be completed and further changes will be made to meals following consultation with the young people. The catering manager will attend meetings with the young people each month, which will allow them to raise any concerns and a survey of all boys will take place in April and September 2019. The review will include food preparation, menu options, daily supplementary items and food service. | Director of HMP & YOI Parc (G4S) | September 2019 |
| | | | There is a daily manager's assurance check, in place at point of service in order to ensure, handling, safety and food temperature checks are in place and adhered to. | Director of HMP & YOI Parc (G4S) | Completed |
| 5.2 | Comprehensive assessments of risk of harm which demonstrate full consideration of all available information should be promptly completed for boys and used to inform their management while on the unit and resettlement work. All subsequent resettlement and release planning work undertaken by internal and external partners should be coordinated through the responsible NEWT case manager. (S40) | Agreed | National standards for children in custody stipulates that secure providers should, on arrival of a child in custody or as soon as possible thereafter, conduct a comprehensive assessment which includes an assessment of safety and risk of harm. A formal review of the case management system will be completed comprising the below actions. | Director of HMP & YOI Parc (G4S) | August 2019 |
| | | | The Needs, Engagement and Wellbeing Team (NEWT), will coordinate resettlement and release planning undertaken by internal Young Person's Unit (YPU) staff and external Youth Offending Service (YOS) partners. | Director of HMP & YOI Parc (G4S) | Completed |
| | | | Revised Risk management and resettlement guidance for NEWT's and the Resettlement Manager will inform staff | Director of HMP & YOI Parc (G4S) | Completed |

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| | | | practice in risk identification and management, recording of action and communication with YOS in order to develop appropriate risk focused resettlement planning. | | |
| | | | A training programme for NEWT's and the Resettlement Manager to include: Identifying, recording, communicating and managing risk. | Director of HMP & YOI Parc (G4S) | Completed and ongoing |
| | | | Coaching and mentoring by the National Probation Service (NPS) Senior Probation Manager of NEWTs case work focusing on risk identification and management, sharing good practice where appropriate. | Director of HMP & YOI Parc (G4S) | Completed and ongoing |
| | | | A revised quality assurance process for case management. The process will focus on the identification and assessment of risk of harm. To ensure all available information is considered, reviewed and incorporated into resettlement planning. Informing the management of young people, while on the unit and in resettlement work. | Director of HMP & YOI Parc (G4S) | Completed and ongoing |
| | | | NEWT and the Resettlement Manager are scheduled to attend the community phase of HMIP thematic review of resettlement of young people. NEWTs will attend HMIP feedback to YOS, for Youth Offending Teams (YOT) identified as managing young people previously held at Parc. The purpose of the exercise is to share practice, identify weakness in collective systems and better inform resettlement practice and joint working. Learning from the review will be included in the final process model. | Director of HMP & YOI Parc (G4S) | June 2019 |
| | | | On completion of internal actions and allowing a period for the revised approach and processes to be incorporated into daily practice, a review of resettlement practice will be completed by HMPPS / YCS Controllers departments to assure the required actions taken in respect of the recommendation. | Director of HMP & YOI Parc (G4S) | August 2019 |
| | Recommendations | | | | |
| | To the Ministry of Justice and Youth Custody Service | | | | |
| | Training planning and remand management | | | | |
| 5.3 | The statutory entitlements of looked-after children should be met promptly and suitable release addresses identified at the earliest opportunity. (4.20) | Partly Agreed | This recommendation is partly agreed because the MoJ and YCS are not responsible for enforcing these statutory entitlements. This is supported by Prison Service Instructions (PSI 08/2012) Care and Management of Young People which set out the roles/responsibilities. The Children and Young People's (CYP) | Director, Youth Custody Service (YCS), HMPPS | May 2019 |

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| | | | <p>local authorities identify suitable release addresses at the earliest possible date for young people. It is for the responsible local authority to make arrangements for regular contact with the looked after child and continue to review their care or pathway plan and make appropriate plans for living arrangements in advance of the end of the sentence.</p> <p>The YCS will raise this as a strategic issue with the Youth Justice Board in Wales and seek to ensure that this is discussed at the appropriate strategic meetings with key partners including YJB, YOTs and local authorities.</p> | | |
| | Reintegration planning | | | | |
| 5.4 | A strategy should be developed to ensure that boys leaving custody are provided with suitable accommodation in time for other elements of release planning to be completed. (4.25) | Partly Agreed | <p>This recommendation is partly agreed because this is a statutory obligation of the Local Authority.</p> <p>Case Managers at HMP/YOI Parc currently have a process in place to escalate accommodation issues with the Youth Offending Team (YOT) Manager, YCS, YJB and Social Services, that meet the requirements as outlined in Section 7 of the Custody and Resettlement Case Management Guidance 2014.</p> | Director, Youth Custody Service (YCS), HMPPS | Completed |
| | To HM Prison and Probation Service (HMPPS), Youth Custody Service (YCS) G4S and the Welsh Government | | | | |
| | Reintegration Planning | | | | |
| 5.5 | Suitable interventions should be available for boys convicted of sexual offences. (4.41) | Not Agreed | This recommendation is Not Agreed as the prison is currently not contracted or commissioned to provide these specific interventions and would require additional funding and change to contract and facilitate. | Director, Youth Custody Service (YCS), HMPPS | |
| | Recommendations | | | | |
| | To HM Prison and Probation Service (HMPPS), Youth Custody Service (YCS) and Prisoner Escort and Custody Services (PECS) | | | | |
| | Courts, escort and transfers | | | | |
| 5.6 | Boys should be transported to custody as soon as their case has | Partly Agreed | This recommendation is partly agreed because it is not always logistically possible to return prisoners once their case has finished. Reducing waiting time is dependent on the assistance of | Prisoner Escort and Custody Service (PECS) | Completed and ongoing |

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| | finished and arrive into custody before 7pm. (1.2) | | <p>other stakeholders, notably Her Majesty's Courts and Tribunals Service and also on the times that the prisoners' cases are dealt with by the courts. There may also be occasions when traffic conditions, adverse weather or redirections that the contractor encounters on route have a detrimental impact on arrival times. In such instances, where a late arrival is unavoidable, the escorts are required to ensure that receiving prisons are informed of delays and agreement is sought in advance for the safe receipt of any late arrivals.</p> <p>Very late arrivals are highlighted to the on call PECS Contract Delivery Manager (CDM) and entry is negotiated. The regional CDM will then follow up these extreme examples the following day.</p> | | |
| | To HM Prison and Probation Service (HMPPS) and Youth Custody Service (YCS) | | | | |
| | Behaviour management | | | | |
| 5.7 | Current prison service instructions for the management of boys classified as potential restricted status should be reviewed to facilitate contact with family members during the first 72 hours of custody. (1.38) | Not Agreed | <p>This recommendation is Not Agreed for Policy reasons as the process is informed by mandatory actions contained within Prison Service Instruction (PSI 09/2015) The Identification, Initial Categorisation and Management of Potential and Provisional Category A / Restricted Status Prisoners.</p> <p>The PSI is being revised to meet the new policy framework refresh but phone restrictions will still apply. The current PSI, remains as operational policy at this time.</p> | Long Term High Secure Prisons Group, HMPPS | |
| | To the Director | | | | |
| | Care and protection of children and young people | | | | |
| 5.8 | The frequency of observations of boys on assessment, care in custody and teamwork (ACCT) documents should be unpredictable. (1.21) | Partly Agreed | <p>This recommendation is partly agreed, it is very difficult to make the frequency of observations less predictable where boys are on five observations per hour. That frequency is adopted only where the risk of self-harm is highest. It requires closely-spaced observations to reduce the time in which a boy can harm himself unobserved, which means the intervals can differ by only a few minutes.</p> <p>Updated guidance has been issued to all staff that work with Assessment, Care in Custody and Teamwork (ACCT) procedures.</p> | Director of HMP & YOI Parc (G4S) | Completed |

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| | | | Operational Managers conduct daily ACCT quality checks. These checks include the frequency of observations of boys and whether they are unpredictable. If issues are identified, staff are identified and advice, coaching and mentoring is introduced and given where required. | Director of HMP & YOI Parc (G4S) | Completed |
| | | | A Senior Manager undertakes a weekly quality assurance of all ACCT documentation. A document is used to ensure staff practice is as per PSI 2011-64 (Management of Prisoners At Risk of Harm to Self, to Others and From Others). Identified issues are fed back through line management structures and advice, coaching and mentoring introduced and given where required. | Director of HMP & YOI Parc (G4S) | Completed |
| | | | All staff are scheduled to attend Suicide and Self Harm (SASH) training. | Director of HMP & YOI Parc (G4S) | December 2019 |
| | Behaviour management | | | | |
| 5.9 | The outcomes of all disciplinary procedures (adjudications and minor reports) should be scrutinised to ensure that only the most serious incidents are dealt with through adjudication. (1.39) | Agreed | A trained Adjudication Liaison Officer (ALO) screens all adjudications on the YPU. The Safeguarding Manager completes a monthly review of the outcomes of adjudications to identify trends, ensuring only the most serious incidents are managed through the adjudication process. | Director of HMP & YOI Parc (G4S) | Completed |
| | | | HMP/YOI Parc have a revised adjudication process in place. The process included a review of adjudication paperwork (DIS 1, DIS 3, DIS 6, DIS 7), the introduction of YPU Managers Adjudication Checklist and a revised Supervision Log. A Monitoring and Review report, will be presented to the safeguarding meeting, chaired by the head of the Young Persons Unit on a monthly basis. Following a previous HMIP Inspection in 2016, HMP/YOI Parc opted not to use Minor Reports and considered the unit had sufficient processes in place to manage behaviour. The processes available to staff include Challenge Support and Intervention Plan (CSIP), mediation and conflict resolution, adjudications, Incentives and Earned Privileges Scheme and token economy (Respect Programme), which was commented on positively by HMIP in October 2018. Staff have been trained in Trauma Informed practice, which underpins their understanding of CYP development and the effect childhood trauma has on normal cognitive and emotional development. | Director of HMP & YOI Parc (G4S) | Completed and ongoing |
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| 5.10 | There should be a unit-specific action plan based on evidence from the monitoring and analysis of incidents to address the underlying causes and further reduce the high levels of violence. (1.45) | Agreed | HMP/YOI Parc are developing unit specific action plans which will be informed by an analysis of violent incidents that occurred during 2018, taking data from PNOMIS (An electronic prisoner database) and, Minimising and Managing Physical Restraint (MMPR) incidents. The action plan will focus on addressing the underlying causes of violence and exploring opportunities to reduce it. The action plan is in the late stages of collation by the head of the unit and will be published in June 2019. | Director of HMP & YOI Parc (G4S) | June 2019 |
| | | | In order to support the monitoring and analysis of incidents, the YCS Information Development Project has assessed the recording and reporting of assault incidents data across Youth Custody Service establishments, and has agreed a single methodology going forward. This change in methodology was implemented with effect from 1 st April 2019. The YCS Information Development Project has also issued reporting guidance to YOIs that aligns to their existing (and remaining) reporting system, to clarify detail relating to data recording processes. These changes made, and how they're understood by establishment staff, will continue to be monitored over the course of 2019 and beyond. | Director, Youth Custody Service (YCS), HMPPS | Completed |
| 5.11 | Following an incident of force, de-brief documentation should be fully completed to assist in analysis and learning to reduce the level of force used. (1.51) | Agreed | Revised governance procedures will be introduced. Following each incident of force, a full de-brief will take place with the staff and boys to identify areas of concern and good practice. | Director of HMP & YOI Parc (G4S) | May 2019 |
| | | | A weekly review chaired by the Head of The Young Persons Unit, and attended by MMPR Coordinators, Seconded Social Services, Health and YCS Controller, will take place to identify learning points from incidents. Use of Force data will be monitored to identify trends and inform training for staff and discussed at the monthly Safeguarding meeting. | Director of HMP & YOI Parc (G4S) | Completed and ongoing |
| | | | The YCS and MoJ have recognised the need for a fundamental reform of youth custody to ensure that the safety, welfare and rehabilitation of CYP are prioritised across all aspects of the system. As part of this, the YCS are: | | |
| | | | Conducting an urgent review into safeguarding across the Youth Secure Estate. | Director, Youth Custody Service (YCS), HMPPS | August 2019 |

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| | | | Rolling out new specialist training for Prison Officer Entry Level Training | Director, Youth Custody Service (YCS), HMPPS | March 2021 |
| | | | Have commissioned an independent review of pain inducing restraint techniques. | Director, Youth Custody Service (YCS), HMPPS | August 2019 |
| 5.12 | Pain-inducing techniques should not be used on children. (1.52, repeated recommendation 1.64) | Not Agreed | This recommendation is not agreed because HMP/YOI Parc currently comply with the current Restraint Minimisation policy: Use of force in the young people's estate (PSI 2014-06), which reflects agreed practice following Minimising and Managing Physical Restraint (MMPR) implementation on the unit. Pain-inducing techniques are only used as a last resort and used in line with the agreed MMPR practice. | Director of HMP & YOI Parc (G4S) | |
| 5.13 | Documentation for boys on separation should be explicit about the award given and the management of the individual to ensure consistency in the delivery of the punishment. (1.55) | Agreed | Adjudication and supervision paperwork will be reviewed to ensure that each award is explicit and that the management of the individual is consistent with the punishment. | Director of HMP & YOI Parc (G4S) | May 2019 |
| | | | Supervision documents will be monitored to identify any trends and a monthly report produced in order to analyse the consistency of delivery. | Director of HMP & YOI Parc (G4S) | May 2019 |
| | | | HMP/YOI Parc have a revised process in place and have reviewed DIS 1, DIS 3, DIS 6, DIS 7 and introduced a YPU Managers Adjudication Checklist, Revised Supervision Log and MARG report. The information is considered at the monthly safeguarding meeting which is chaired by the Head of The YPU. Data is reviewed and if issues are identified, are included for action. | Director of HMP & YOI Parc (G4S) | Completed |
| | Health Services | | | | |
| 5.14 | The confidential health complaints system should be clearly advertised and accessible to boys. All responses should be respectful, consistent, timely and focused on the issues raised. (2.39) | Agreed | The confidential health complaint system will be explained to all boys during the induction period and will also be displayed on the residential units. All complaints will be individually reviewed and discussed at the monthly Safeguarding meeting and quarterly at the Clinical Governance meeting. | G4S Health Services UK | Complete and ongoing |

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| | | | An operational manager completes a daily assurance check of complaints forms and envelopes. This is to ensure forms and envelopes are available for young people to use. | Director of HMP & YOI Parc (G4S) | Complete and ongoing |
| 5.15 | All staff should have regular managerial and clinical supervision, underpinned by an up-to-date performance appraisal. (2.40) | Agreed | A schedule of both clinical and managerial supervision meetings has been agreed between the Head of Healthcare, G4S Health Parc and the two nursing staff involved. Individual staff supervision plans will be informed by the development needs identified in the annual appraisal. | G4S Health Services UK | June 2019 |
| | Education, learning and skills | | | | |
| 5.16 | On-line learning resources should be available to boys. (3.19) | Agreed | The Virtual Campus (VC) will be installed and will be accessible for all boys as part of their curriculum. | Director of HMP & YOI Parc (G4S) | Completed |
| | | | A comprehensive document will be available to all young people to explain the courses which are available through the VC. All Education Staff on the Unit will support the boys to use the online learning resources available. | Director of HMP & YOI Parc (G4S) | August 2019 |
| | Pre-release and resettlement | | | | |
| 5.17 | Case management should have a clear focus on resettlement so that boys are prepared for their release into the community. (4.9) | Agreed | A formal review of the case management system will be completed and will include: | Director of HMP & YOI Parc (G4S) | August 2019 |
| | | | The Needs, Engagement and Wellbeing Team (NEWT), will coordinate resettlement and release planning undertaken by internal YPU staff and external YOS partners. | Director of HMP & YOI Parc (G4S) | Completed |
| | | | Revised risk management and resettlement guidance for NEWT's and the Resettlement Manager. The guidance will inform staff practice in risk identification and management, recording of action and communication with YOS. In order to develop appropriate risk focused resettlement planning. | Director of HMP & YOI Parc (G4S) | Completed |
| | | | A training programme for NEWT's and Resettlement Manager to include: Identifying, recording, communicating and managing risk. | Director of HMP & YOI Parc (G4S) | Completed |
| | | | Coaching and mentoring by NPS Senior Probation Manager, of NEWTs case work focusing on risk identification and management, sharing good practice where appropriate. | Director of HMP & YOI Parc (G4S) | Completed |
| | | | Revised quality assurance process for case management. The process will focus on the identification and assessment of risk of harm to ensure all available information is | Director of HMP & YOI Parc (G4S) | Completed |

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| | | | considered, reviewed and incorporated into resettlement planning: Informing the management of young people, while on the unit and in resettlement work. | | |
| | | | NEWT and Resettlement Manager are scheduled to attend the community phase of HMIP thematic review of resettlement of young people. NEWTs will attend HMIP feedback to YOS, for YOTs identified as managing young people previously held at Parc. The purpose of the exercise is to share practice, identify weakness in collective systems and better inform resettlement practice and joint working. Learning from the review will be included in the final process model. | Director of HMP & YOI Parc (G4S) | June 2019 |
| | | | On completion of internal actions and allowing a period for the revised approach and processes to be incorporated into daily practice, a review of resettlement practice will be completed by, HMPPS / YCS Controllers department to assure required action taken in respect of recommendation. | Director of HMP & YOI Parc (G4S) | August 2019 |
| | Training planning and remand management | | | | |
| 5.18 | All departments which work regularly with a boy should be represented at his training or remand planning meeting to provide consistent feedback and inform resettlement planning. (4.15) | Not Agreed | This recommendation is not agreed due to the constraints of the contract. HMP/YOI Parc are not able to routinely release teachers and instructors to attend training or remand planning meetings due to teaching and activities commitments and as such, this would be a significant resourcing issue. Attendance for staff involved in education training or employment cannot be guaranteed due to the regime requirement of 25 hours activity per boy, per week. Where a staff member cannot attend due to teaching commitments, the Case Worker will represent their views at the meeting. | Director of HMP & YOI Parc (G4S) | |

| Recommendations | |
|-----------------|-----------|
| Agreed | 10 |
| Partly Agreed | 4 |
| Not Agreed | 4 |
| Total | 18 |