



Action Plan: HMYOI Cookham Wood

Action Plan Submitted 21st June 2019

A Response to the HMIP Inspection of HMYOI Cookham Wood

Report Published: 18th April 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
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.



5.2	Children should not be segregated in the Phoenix unit. Those who need to be separated for their own or others' safety should be accommodated in a positive environment which provides them with a constructive regime and motivates and supports them to address the issues that led them to segregation. (S42)	Partly Agreed	<p>This recommendation is partly agreed because physical accommodation to provide alternatives to the current use of Phoenix unit is under review and subject to funding agreement.</p> <p>HMYOI Cookham Wood will review the use of processes to remove a YP from normal association, the length of time YP spend in the Phoenix Unit and the circumstances under which the processes are used. The Head of Residence will visit other sites to look at how Children and Young People (CYP) removed from normal association can be managed differently and consider the practicalities of managing YP outside of Phoenix.</p> <p>A funding application will be considered to extend the use of Bridge Landing to manage and support complex and vulnerable YP to more individuals, including those removed from normal circulation.</p>	Governor Governor	June 2019 June 2019
5.3	Children should be able to access 10 hours out of their cell each day. The regime should be predictable to enable children to use punctually the services designed to support their wellbeing and help to reduce their risk of reoffending. (S43, repeated main recommendation S42)	Partly Agreed	<p>This recommendation is partly agreed because those on basic regime access less time out of their cell due to their behavioural constraints, in accordance with national policy (PI 30/2013 <i>Incentives and Earned Privileges</i>).</p> <p>CYP who are on <i>Standard or Enhanced Incentive</i> and <i>Enhanced Privilege (IEP)</i> status can access 10 hours per day out of their room, plus an additional 30 minutes in fresh air. The differential times out of room through different IEP levels is designed to encourage and promote good or improved behaviour and allow consistent delivery for those on the highest level.</p>	Governor	Completed and ongoing
5.4	Prison managers, in conjunction with the psychology team, should consult children to learn more about their propensity to fight and to understand why the 'rules of the game' change when they move to Cedar or the	Agreed	<p>HMYOI Cookham Wood will consult with YP to learn more about their propensity to fight, consider relevant environmental factors and to consult on measures to reduce the use of Non- Association protocols. This will include;</p> <ul style="list-style-type: none"> • Quarterly Landing Forums chaired by Residential Custodial Managers, with input from the Conflict Resolution team. • Monthly Youth Council meetings. • SECURE STAIRS Community Meetings. 	Governor	July 2019



	enhanced units. Learning from this consultation should form the basis of a review to significantly reduce the number of keep-apart protocols in place so that more children can access a full regime and receive important interventions. (S44)		<p>Minutes from the above forums will be used in Violence Reduction meetings, to plan actions to respond to the feedback and analysis provided. This will include plans to consider the positive lessons learned from Cedar Unit, to inform a rewards-based approach to IEP implementation and behaviour management across the establishment.</p> <p>Learning from the above consultation will inform the reintroduction of the PRISM model and the related action plan, to help HMYOI Cookham Wood address violence and improve safety.</p> <p>The Conflict Resolution team have launched restorative play to help CYP maintain their achieved peace. This initiative has been expanded and is now a joint venture with K-Sports and education.</p> <p>The above forums will be used to disseminate information to staff and CYP in relation to trends, the use of IEP and the use of rewards, supplemented by displays on residential units.</p>	Governor	July 2019
				Governor	July 2019
				Governor	Completed
				Governor	October 2019 and ongoing
5.5	Senior prison leaders should ensure that all children attend education. Movement times should further improve to ensure children's punctuality at activities. Working with education managers, senior prison leaders should be more challenging in their monitoring of education performance so that weaknesses are rectified at an early stage. (S45)	Agreed	<p>Obstacles to prompt movement have been identified and addressed, resulting in improved punctuality at education. For example, the landing kiosks had become a focal point for CYP during movement times, causing delays. Access times to the kiosks have been adjusted to remove this delay.</p> <p>Non-Association protocols are known to impact timeliness and work to reduce the number of YP subject to Non-Association protocols has commenced through conflict resolution initiatives and the PRISM action plan.</p> <p>A feasibility project is being scoped, to consider improvements to the logistics of movements, including creating an additional route.</p> <p>Monthly Performance Review Meetings (PRMs) provide a structured forum for the monitoring of Education contract delivery and performance, including scrutiny of attendance and punctuality data. Actions are set in the PRM to agree measures to overcome obstacles to punctuality and challenge the provider where appropriate, ensuring that weaknesses are rectified at the earliest possible stage.</p>	Governor	June 2019
				Governor	October 2019
				Governor	March 2020
				Governor	Completed and ongoing.



			The Activities team will be relocated to the education department, to support joint working, monitoring arrangements and scrutiny.	Governor	August 2019
5.6	The work of the casework team should be clearly defined and given priority. Remand and training plans should be central to a child's progression and their targets should address identified risks of offending. Caseworkers should coordinate the work of all relevant departments to support children to achieve their targets. Progress should be recorded on a central IT platform to ensure that information is communicated effectively in custody and on release. (S46)	Agreed	<p>Through the introduction of SECURE STAIRS (a psychologically informed, whole system approach to casework and planning) and Custody Support Plan (CuSP), HMYOI Cookham Wood will clearly define and prioritise the role of the casework team, including ensuring that Training Plans are central to a child's progression. Training Plan reviews will include attendance from CuSP officers. Implementation is subject to national casework review, by the Central Reform Team, in order to fully implement these changes.</p> <p>The Head of Casework will conduct a review of Training Planning reviews. This will ensure the focus of the review process specifically around preparing CYP for release and reduction of their community risk as well as their custody risks. Representation from relevant departments will be monitored and challenged as appropriate.</p> <p>Progress with Training Plans is recorded on the <i>YJ Assessment Framework</i> (YJAF), a central IT platform to record casework information. This can be accessed electronically by all community Youth Offending Service teams to ensure effective communication. Caseworkers will continue to use YJAF as the primary IT tool and will use pNomis to identify significant change in circumstances and other risk information to inform casework.</p>	Governor Governor Governor	April 2020 June 2019 Completed
	Recommendation to the Ministry of Justice				
5.7	Children's progress after release should be followed up as a measure of the effectiveness of resettlement work across the YCS and the findings used to inform future provision at local and national level. (4.15)	Partly Agreed	<p>This recommendation is partly agreed because many of the issues pertaining to accommodation are outside of the direct control of the MoJ, YJB and YCS.</p> <p>Resettlement and transitions between services is currently a priority for the Youth Justice Board (YJB) following insufficient progress made in past years. The YJB have engaged with the sector to better understand the structural barriers to resettlement and accommodation has been consistently highlighted as problematic. Consequently, the YJB are currently undertaking a retrospective data harvesting exercise with a number of Youth Offending Teams (YOTs) to</p>	Youth Justice Board and Director of YCS	Completed and Ongoing



			<p>better understand the exact nature of issues and prevalence, which has informed a paper to the Cabinet Office. Meanwhile YJB are reviewing the data routinely requested from YOTs to ensure that this presents an accurate picture of issues and to chart progress moving forwards.</p> <p>In order to address problems around accommodation the MoJ will continue to work constructively with other government departments, particularly Department for Education (DfE) and Ministry of Housing, Communities and Local Government (MHCLG).</p> <p>The YCS vision for 2020 to develop a cross government approach to have support and oversight of CYP across all sectors (Justice, Welfare, Health and Community YOS). The YCS intend to look at the effectiveness of both our interventions and resettlement planning in collaboration with our stakeholders. This will allow all of us to focus resources appropriately.</p>	<p>Youth Justice Board and Director of YCS</p> <p>Youth Justice Board and Director of YCS</p>	<p>Completed and Ongoing</p> <p>April 2020 to April 2021</p>
	Recommendation to the Ministry of Justice and Youth Custody Service				
5.8	Children leaving custody should be provided with suitable accommodation in time for other elements of release planning to be completed. (4.37)	Partly Agreed	<p>This recommendation is partly agreed because timely provision of suitable accommodation is a statutory obligation for the Local Authority (LA).</p> <p>In accordance with the Custody and Resettlement Case Management Guidance 2014, if no definite address has been identified at the point of the final review meeting 10 days before a CYP is due to be released to serve the community element of their sentence, the Case Manager at HMYOI Cookham Wood will escalate the issue to the YOT manager, who must raise this with the agencies responsible to attain a speedy resolution, escalating as necessary.</p> <p>The YCS will work with the Youth Justice Board, who have oversight of YOTs to ensure that CYP leaving custody have suitable accommodation on release. The YCS will raise concerns over the promptness and adequacy of accommodation being arranged for CYPs being released with the YJB and MoJ Youth Justice Policy Unit.</p>	<p>Governor</p> <p>YCS</p>	<p>Completed and Ongoing</p> <p>Completed and Ongoing</p>
	Recommendations to the Governor				



	Early days in custody				
5.9	The escort contractor should ensure that children are offered refreshments and comfort breaks on all long journeys to the establishment. (1.9)	Agreed	<p>All categories of prisoners will be offered a comfort break every two and a half hours of their journey. Drinking water will be available on all vehicles. If journey time goes over a mealtime, suitable refreshment will be offered by the contractor.</p> <p>HMYOI Cookham Wood will monitor, to ensure that YP have been offered appropriate refreshments and comfort breaks, through the reception process and use the agreed escalation process as necessary.</p>	PECS Governor	Completed and ongoing Completed and ongoing
5.10	The escort contractor should ensure that children arrive at the prison before 8pm. (1.10)	Agreed	<p>The contractor is fully aware of the risks posed by late arrivals and every effort is made to ensure that their vehicles arrive within the latest reception time. There may be occasions when the contractor encounters traffic issues, adverse weather or when late court sittings have an impact on arrival times. Also, the dispersed nature of the young person estate logically results in a far larger court catchment area and subsequently longer journey times. When late arrivals do occur, the escorts are required to ensure that the receiving establishment is informed of the delay and agreement is sought in advance for the safe receipt of any late arrivals. Locally, all returns after 20:00hrs are highlighted to PECS and the contractors are required to give a detailed response.</p> <p>HMYOI Cookham Wood will continue to monitor through the reception process and report instances where children arrive later than 8pm using the agreed escalation process.</p>	PECS Governor	Current and ongoing Completed and ongoing
	Safeguarding of children				
5.11	All child protection allegations should be referred to the local authority designated officer within 24 hours. (1.15)	Agreed	<p>All child protection allegations will be referred by the Duty Governor to the Local Authority designated officer within 24 hours. To ensure thorough and prompt consideration of information that may be relevant to child protection, all Senior managers (band 7 and above) will be trained in the referral process and all staff will continue to receive awareness training from the Local Authority Designated Officer on a three-yearly cycle.</p> <p>A Quality Assurance process for all referrals will be introduced and the quality of referrals will be discussed with the Local Authority every quarter.</p>	Governor Governor	June 2019 June 2019



			To ensure the identification of safeguarding children concerns, complaint processes have been moved from the Business Hub to the Safeguarding team. The Local Authority Designated Officer (LADO) will be given an opportunity to complete a QA of complaints, to ensure that safeguarding issues have been identified and referred appropriately.	Governor	June 2019
	Suicide and self-harm prevention				
5.12	Management of suicide and self-harm should be developed and improved to ensure that managers know where self-harm is taking place and why. (1.24)	Agreed	<p>HMYOI Cookham Wood will further improve processes to collect, analyse and assure the accuracy of data on suicide and self-harm by;</p> <ul style="list-style-type: none"> • Appointment of Safer Custody Hub Manager • Identification of an SMT member to co-ordinate data-integrity, alongside the Business Change Manager and relevant Head of Function. • A weekly data consolidation meeting will be held between Safeguarding, Security & Performance teams <p>Incidents of Self-Harm and Suicide, and related data, will be analysed in the monthly Safeguarding meeting to inform strategies to reduce the risk of suicide and self-harm. In addition, a weekly Safety Bulletin will be distributed to all staff, including reporting of suicide and self-harm risks.</p>	Governor	June 2019
				Governor	June 2019
5.13	Serious or repeated acts of self-harm should be investigated so that lessons learned could inform the prison safety strategy. (1.25)	Agreed	<p>HMYOI Cookham Wood have introduced a safeguarding lessons-learnt process, called “<i>Keep safe</i>”, to investigate incidents of self-harm appropriately. A local policy will be produced to formalise this process, in which investigations will be coordinated by the Head of Safeguarding following significant safeguarding concerns, repeated self-harm or Child Protection referrals.</p> <p>Trends in relation to the lessons learned during Keep Safe investigations will be considered quarterly at the Safeguarding meeting, to inform the dynamic development of the prison safety strategy.</p>	Governor	August 2019
				Governor	August 2019
5.14	The segregation unit should not routinely be used for constant supervision. (1.26)	Agreed	As soon as alternative provision is available, the segregation unit will not be routinely used for constant supervision. Funding has been agreed to relocate the constant supervision cell on Cedar Unit to the main accommodation block.	Governor	March 2020



5.15	All cell bells should be responded to within five minutes. (1.27)	Agreed	Changes to staffing arrangements for movement times, will ensure that residential unit staffing is consistently sufficient to answer emergency use of cell-bells within five minutes. Improved first line management presence on the landings and within the hub will help ensure that prompt responses are prioritised.	Governor	July 2019
			The cell call bell system provides a print out of timings of responses to call bells and triggers a priority call if a prompt response is not received. A weekly QA of cell call-bell response times will be introduced and the decency CM will analyse reasons for delays to cell-bell response, including reporting reasons for delay to the Head of Residence, to address obstacles.	Governor	June 2019
	Security				
5.16	Procedures controlling movement around the establishment should be kept under regular review to increase children's access to purposeful activity. (1.33)	Agreed	Obstacles to prompt movement have been identified and addressed, resulting in improved access to purposeful activity. For example, the landing kiosks had become a focal point for CYP during movement times, causing delays. Access times to the kiosks have been adjusted to remove this delay.	Governor	June 2019
			Non-Association protocols are known to impact timeliness and work to reduce the number of YP subject to Non-Association protocols has commenced through conflict resolution initiatives and the PRISM action plan.	Governor	October 2019
			HMYOI Cookham Wood are exploring a number of possible improvements and will be engaging with CYP to help improve movements. For example, a feasibility project is being scoped, to consider improvements to the logistics of movements, including creating an additional route.	Governor	March 2020
			Monthly Performance Review Meetings (PRMs) provide a structured forum for the monitoring of access to purposeful activity, in which actions are set to agree measures to overcome obstacles to punctuality.	Governor	Completed and ongoing.
5.17	Prison managers should ensure that a child has full	Agreed	When authorising a full search, the Duty Governor will consider the need for onsite advocacy support through Barnardo's; all children subject to Rule 49 and	Governor	Completed



	access to advocacy support following authorisation of a strip-search. (1.34)		those Phoenix Unit will be referred to Barnardo's. All other CYP have telephone access to Barnardo's through their in-room telephones. Kent residents will receive additional advocacy support from Kent Children's Services.		
	Behaviour management				
5.18	Effective quality assurance systems should be in place to ensure that sanctions are applied fairly. (1.43)	Agreed	Quality Assurance systems have been put in place, in which the residential Custodial Managers quality assures all sanctions to ensure that they have been applied fairly. The Head of Residence will quality assure 10% of IEP sanctions per month.	Governor	July 2019
5.19	Management of the police referral system should be improved to ensure that serious offences are expedited quickly and appropriately. (1.44)	Agreed	A memorandum of understanding is in place to ensure effective joint work with the police. A weekly crime clinic is now in place and weekly reviews of progress are received from the police. The Head of Security will have monthly contact with the Detective Sargent in charge of Kent prisons group. Local staff have also been trained by Police colleagues in collecting and collating evidence and statements.	Governor	Completed and ongoing
	The use of force				
5.20	All use of force documents should be completed promptly and comprehensively after incidents have taken place. (1.60, repeated recommendation 1.73)	Agreed	All use of force documentation will be completed promptly and comprehensively. This is monitored by the Managing and Minimising Physical Restraint (MMPR) coordinators. If they raise concerns about undue lateness, these are raised via the Head of Safeguarding or a senior manager. Monitoring of Use of Force documentation will be conducted at the weekly MMPR meeting. The meeting structure will be reviewed in order to prioritise attendance at key meetings, such as the MMPR meeting and to support staff in attending.	Governor Governor	Completed and ongoing October 2019
5.21	The restraint minimisation meeting should achieve its stated aims of reviewing all uses of force to improve practice and reduce the need for force to be used on children. (1.61)	Agreed	All incidents of restraint are viewed by an MMPR coordinator and an establishment summary is provided at MMPR meeting. Those that meet the threshold of concern are analysed further in the meeting. This includes incidents involving injury, Serious Injury Warning Signs, prolonged restraints, use of pain inducing techniques, planned interventions, restraint following passive non-compliance, where there is a complaint or concern raised by CYP or staff or where a restraint has been prompted by an assault on a member of staff)	Governor	June 2019



	Separation/removal from normal location				
5.22	Alternatives to segregation should be identified to reintegrate children who have been segregated for extensive periods. (1.73)	Partly Agreed	<p>This recommendation is partly agreed because physical accommodation to provide effective alternatives to segregation is under review and subject to funding agreement.</p> <p>HMYOI Cookham Wood will review the use of Rule 49 and the circumstances in which is used. The Head of Residence will visit comparator sites to look at alternative approaches to the management of CYP subject to Rule 49 and consider the feasibility of management of CYP outside of Phoenix. Alternative arrangements will also be subject to agreement for funding of changes on the Bridge Landing.</p>	Governor	July 2019
5.23	Living conditions in the segregation unit should be improved and cells and communal areas should be kept clean, free of graffiti and well maintained. (1.74, repeated recommendation 1.87)	Agreed	<p>Since the inspection, Phoenix unit has been decorated with specialist paint and flooring, which is graffiti resistant. Checks of the area, including cleanliness and general maintenance checks are conducted as part of weekly Custodial Manager checks and daily Duty Governor living condition checks. The Governing Governor visits all YP on R39 which provides a further opportunity to monitor their living conditions.</p>	Governor	Completed
5.24	Regimes for children on good order and discipline across the establishment should be improved, with more purposeful activity and time out of cell. (1.75)	Agreed	<p>Intervention for CYP subject to segregation are set, reviewed and recorded as part of the weekly Good Order and Discipline (GOoD) reviews; all CYP subject to GoOD arrangements will be assessed by a forensic psychologist. A Short-Term Assessment of Risk and Need will be created, including planned interventions to support the YP through purposeful activity and time out of cell. Access to education, activities, gym and faith services are assessed on an individual risk assessment basis. Input from the YP and other stakeholders are considered to inform this decision. Continued direct casework support and (where necessary) fifteen Outreach education is available for YP subject to GOoD.</p>	Governor	Completed
	Relationships between staff and children				
5.25	All personal officers should meet children weekly and	Agreed	<p>CuSP will be rolled out across HMYOI Cookham Wood from June 2019. This will facilitate all CYP having meaningful contact with their CuSP officer at least</p>	Governor	August 2019



	contact should be meaningful and relevant to the child's needs. (2.5)		weekly. All CuSP meetings will be documented on the bespoke CuSP booklet and recorded on a central data base.		
	Living conditions				
5.26	Graffiti should be eliminated from all cells. (2.15)	Agreed	A re-decoration program is in place and weekly room inspections, conducted by the landing Custodial Manager, have been introduced. Maintaining good room condition has been linked to IEP and CYP can now be rewarded for maintaining a graffiti free room.	Governor Governor	June 2019 June 2019
5.27	All toilets should have seats with lids and should be cleaned and descaled. (2.16)	Partly Agreed	This recommendation is partly agreed, as previous externally contracted efforts to descale the toilets have not been cost-effective and future efforts will be subject to funding agreement. HMYOI Cookham Wood are pursuing the purchase of suitable removable padded toilet seats, for individual issue to CYP.	Governor	September 2019
5.28	All children should be able to wear and wash their own clothes. (2.17)	Partly Agreed	This recommendation is partly agreed because the infrastructure to enable washing and drying of clothes for all residents would require significant capital investment. CYP on Cedar Unit are able to wear and wash their own clothes. Learning from this unit has been analysed by SMT and expansion to the wider population has been considered. Unfortunately, it has not been possible to expand this opportunity to the main population due to infrastructure constraints limiting the ability to wash and dry clothes on site. All children can access laundry offsite via regional arrangements.	Governor	Completed
	Residential services				
5.29	All meals should be issued at the servery and eaten in association. (2.20, repeated recommendation 2.97)	Not Agreed	This recommendation is not agreed as IEP and behaviour management arrangements mean that those CYP on basic regime are not able to eat their meals communally.		



5.30	Children should be able to make and receive a shop order within 24 hours of arrival. (2.21)	Not Agreed	This recommendation is not agreed as daily delivery arrangements would require significant capital investment. In the Youth Custody estate, each establishment has one set ordering day for retail purchases and one corresponding delivery day. Due to the unique needs of new arrivals, a <i>Reception Pack</i> is offered to new arrivals for purchase and follow up orders can be made on the allocated order day.		
	Consultation, application and redress				
5.31	Children should be able to make a complaint without asking officers. (2.26)	Agreed	CYP are informed of the Complaints process at induction and issued an information booklet with key information. This includes all avenues for complaint, including the kiosk system, an alternative paper-based system and the appeals process. All CYP have access to the Kiosk electronic system where they are able to submit complaints or applications without consulting with staff. In addition, CYP are able to access Barnardo's via telephone from their rooms 24 hours per day, who can raise complaints on behalf of CYP if appropriate.	Governor	Completed
5.32	All complaints should be thoroughly investigated and quality assurance procedures should ensure that replies to complaints address all the issues raised. (2.27, repeated recommendation 2.37)	Agreed	<p>HMYOI Cookham Wood will ensure that all formal complaints are thoroughly investigated by</p> <ul style="list-style-type: none"> • Re-publish a Complaints Checklist, including an outline of good practice for investigating complaints. This will be made available to all staff. • Complaints investigation and response are quality assured by the Deputy Governor or Senior Manager through a 10% monthly check. • Results of the checks are fed back to the respondent where areas of improvement have been identified. <p>The LADO will be given an opportunity to complete a QA of complaints, to ensure that safeguarding issues have been identified and addressed appropriately.</p>	Governor Governor	Completed June 2019
	Strategic management of equality and diversity				
5.33	The governor should ensure that there is regular consultation and consistent, effective	Agreed	The Equalities Strategy and Action Plan is being reviewed, in order to ensure regular consultation and consistent, effective promotion of equality and diversity. This will include;	Governor	September 2019



	promotion of equality and diversity to develop understanding, encourage tolerance and embrace difference. (2.33)		<ul style="list-style-type: none"> • A confidential survey to identify the level of need for consultative groups and protected characteristics. • Publication of an Equalities and Diversity notice to YP, to be displayed on Equalities noticeboard on each spur residential units. • Display of photographs of Equality and Diversity representatives on the lobbies on main residential units, on Phoenix and Cedar. • Introduction of equality awareness days, to take place quarterly. These will be informed by the equalities agenda, led by the Equalities Officer and CYP's representatives. 		
5.34	A local equality strategy should identify the needs of children with protected characteristics and set out how those needs will be met. (2.34)	Agreed	A confidential survey to identify the needs of YP with protected characteristics will inform a review of the Equalities Strategy. The updated strategy and Action Plan will identify the relevant characteristics and set out how those needs will be met.	Governor	September 2019
5.35	The equality officer and child equality representatives should be clear about their role and how they can contribute to the equality agenda. (2.35)	Agreed	<p>The Job Description for both the Equalities Officer and Equalities Representatives will be reviewed to ensure clarity of role.</p> <p>We will introduce a regular equalities meeting with representation from staff, CYP and other stakeholders. An ongoing action plan will ensure that equalities issues raised by the Equalities Officer and/or Equalities Representatives are considered, addressed and acted upon.</p>	Governor Governor	June 2019 June 2019
	Protected characteristics				
5.36	Residential staff should be able to identify children in their care with a disability and understand the impact of the disability on the child. Reasonable adjustments should be made to meet the child's needs. (2.46)	Agreed	The introduction of SECURE STAIRS and CuSP, will ensure that each CYP has a personalised formulation to inform their care, including to address disability needs and reasonable adjustments. Dedicated residential staff and other professionals will use these formulations to understand any disability needs and any necessary adjustments. Regular reviews of formulations will take place and will be directed by need.	Governor	September 2019
5.37	Residential staff should know which children on	Agreed	All CYP who are identified as requiring a Personal Emergency Evacuation Plan (PEEP) are highlighted within the hub office on residential units. PEEP's will be	Governor	30 June 2019



	their unit are subject to a personal emergency evacuation plan and understand what they are required to do for the child should there be an evacuation. (2.47)		included in staff briefings to ensure that all staff are aware of who is subject to a PEEP on each landing. This will be supplemented by the use of a noticeboard in a secure staff area to display all children on a PEP.		
	Strategy, clinical governance and partnerships				
5.38	Patients' access to health care should not be curtailed by prison issues and they should arrive promptly for consultations and therapy. (2.63)	Partly Agreed	<p>This recommendation is partly agreed as on rare occasions, emergency operational situations may impact prompt access to some health care appointments.</p> <p>Obstacles to prompt movement have been identified and addressed, resulting in more efficient movement times. For example, the landing kiosks had become a focal point for CYP during movement times, causing delays. Access times to the kiosks have been adjusted to remove this delay.</p> <p>Non-Association protocols are known to impact timeliness and work to reduce the number of YP subject to Non-Association protocols has commenced through conflict resolution initiatives and the PRISM action plan.</p> <p>HMYOI Cookham Wood are exploring a number of possible improvements and will be engaging with CYP to help improve movements. For example, a feasibility project is being scoped, to consider improvements to the logistics of movements, including creating an additional route.</p> <p>Performance with regards to attendance at appointments will be monitored through the Health Partnership board</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>June 2019</p> <p>October 2019</p> <p>March 2020</p> <p>June 2019</p>
5.39	All automated external defibrillators should be in good working order with a clear audit trail to ensure	Agreed	HMYOI Cookham Wood will review the process for defibrillator maintenance and checking. Regular checks and maintenance will be ensured and recorded by the Business Hub, alongside the management of first aid boxes.	Governor	June 2019



	they are regularly checked and maintained. (2.64)				
	Time out of cell				
5.40	The number of PE staff should be increased to ensure that children have appropriate access to the gym and to enable planned accredited courses and opportunities for ROTL to be provided. (3.10)	Partly Agreed	<p>This recommendation is partly agreed, because the ability to have a full complement of PE staff is subject to suitable candidates being identified and trained.</p> <p>HMYOI Cookham Wood are actively recruiting additional Physical Education (PE) staff to provide a group of nine staff. This has been profiled and will provide a full PE curriculum and access to both educational and recreational PE for young people.</p> <p>Partners (including <i>K Sports</i>) will offer sports qualifications, vocational training and Release on Temporary Licence (ROTL) opportunities in 2019/ 20 in conjunction with PE Instructors.</p>	<p>Governor</p> <p>Governor</p>	<p>August 2019</p> <p>July 2020</p>
	Education, skills and work activities (Ofsted)				
5.41	Managers should improve links between the resettlement and engagement team and the prison so that children receive appropriate support once released. (3.21)	Agreed	<p>The Head of Education (HOE) and Head of Casework will implement the Case Management aspect of PRISM, which will improve links between the Engagement & Resettlement (E&R) team and the prison.</p> <p>HMYOI Cookham Wood will undertake the following in order to consult with CYP to determine their wishes and needs in relation to support following release;</p> <ul style="list-style-type: none"> • A consultative meeting with CYPs, HOE and Head of Casework. • Appointment of Peer Mentors to support the work of the E&R team; • The E&R Team will liaise with the Community Business Engagement Manager on a weekly basis to discuss Release on Temporary License (ROTL) opportunities for CYP and to put forward any names of potential businesses willing to participate with the ROTL scheme to take forward. <p>The joint working arrangements between HMYOI Cookham Wood, the E&R Team and CYP will be embedded;</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed and ongoing</p> <p>September 2019</p> <p>September 2019</p>



			<ul style="list-style-type: none"> At initial education interview with the E&R Team, career goals and aspirations will be discussed. These will be taken into account when placing young people into pathways. Each young person will be allocated an E&R Worker to work with the young person to identify college placements, apprenticeships and work opportunities for release. CYP will be assisted by the E&R Team to attend ROTL placements when appropriate. <p>The education contract with Youth Custody Service will be reviewed to establish resource for supporting resettlement more effectively</p>	Governor	September 2019
5.42	Education managers should ensure that all teachers are competent in classroom management techniques. (3.30)	Agreed	<p>Novus have reviewed the behaviour management strategy, which was re-launched with staff in January 2019.</p> <p>On site teacher coaches host regular Teacher Effectiveness Enhancement Programme support sessions</p> <p>Behaviour walks by prison managers, Novus Learning walks, Joint Learning Walks and Observation of Teaching Learning and Assessment (OTLA) that identify issues with classroom behaviour result in clear action plans for support that are well resourced and support the individual to improve. Where necessary, timely re-observations are arranged to identify improvements.</p> <p>A training session on behaviour management techniques was delivered in April 2019</p>	<p>Novus and Governor</p> <p>Novus and Governor</p> <p>Novus and Governor</p> <p>Novus and Governor</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p> <p>Completed</p>
5.43	Teachers should routinely draw on the information held about children's individual needs to plan their teaching. (3.31)	Agreed	<p>Novus have reviewed the behaviour management strategy, which was re-launched with staff in January 2019.</p> <p>A Special Educational Needs and Disability (SEND) training session was delivered in March 2019 to support staff on planning effective differentiation strategies</p> <p>English and maths teachers will attend bespoke training to support effective differentiation across a broad range of levels.</p>	<p>Novus and Governor</p> <p>Novus and Governor</p> <p>Novus and Governor</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p>



5.44	Prison and education managers should ensure that all children are able to access practical life skills training to support their resettlement before release. (3.38)	Agreed	<p>The Activities Planning Board has re-categorised the <i>Life Skills</i> pathway, in order for CYP with any risk level to access a range of skills to support resettlement.</p> <p>The Personal & Social Development (PSD) provision has been reviewed to include employability, budgeting skills and <i>Barclays Money Skills</i>.</p>	<p>Novus and Governor</p> <p>Novus and Governor</p>	<p>Completed</p> <p>Completed</p>
5.45	Education staff should review short-course provision, especially in functional skills, to tackle very high rates of non-completion of courses. (3.44)	Agreed	A curriculum review has been conducted. This has increased the availability of short-course provision for Food Safety and Construction Skills Certification Scheme to support resettlement and transition. Access to short National Certificate of Further Education units in English and Maths has also been improved.	Novus and Governor	Completed
	Children, families and contact with the outside world				
5.46	Young fathers should be encouraged to participate in the fathers in prison and healthy relationships course in an effort to break the cycle of intergenerational offending. (4.7)	Agreed	A Family Psychologist is now in post and will be developing support and intervention courses for CYP, including in relation to fatherhood and healthy relationships. Referrals will be made by caseworkers, if needs resulting from young carer responsibilities are identified. HMYOI Cookham Wood will consider the introduction of a targeted program for young fathers in custody, including story book dads.	Governor	June 2019
	Public protection				
5.47	The role of the interdepartmental risk management board should be reviewed to ensure that it is a forum which consistently identifies and manages risk. (4.23,	Agreed	Terms of Reference for Interdepartmental Risk Management Team (IRMT) boards have been reviewed by the Head of Casework, ensuring that both custody and community risks are identified and sentence planning is conducive to addressing and reducing risk. The Terms of Reference clearly identify the core membership (including the Caseworker, a Security Intelligence representative and other essential members depending on individual circumstances). Information will be requested from relevant departments a week	Governor	June 2019



