



HM Prison &
Probation Service

Action Plan: HMYOI Feltham (A) Children's Unit

Action Plan Submitted 4th June 2019

A Response to the HMIP Inspection report on an unannounced inspection at
HMYOI Feltham A Children's Unit.

Report Published 4th June 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.



ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMYOI Feltham A

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	Main recommendations				
5.1	All aspects of the behaviour management strategy should be reviewed regularly and managed more robustly to ensure that the strategy is delivered and effective in ensuring measurable improvements in good behaviour amongst children. (S41)	Agreed	<p>HMYOI Feltham A will introduce PRISM (Promoting Risk Intervention by Situation Management), a comprehensive violence reduction and management tool. Implementation will be supported by Youth Custody Service psychology leads, informed by performance data and consultation with staff and young people. The use of PRISM will be overseen by the Deputy Governor.</p> <p>The Head of Residence will conduct a review of all aspects of the behaviour management strategy, including Incentives and Earned Privileges (IEP), which will take place in consultation with staff and Young People. This review will include improvements to the rewards scheme, to motivate positive behaviour.</p> <p>HMYOI Feltham A will manage the behaviour management strategy robustly to ensure effective delivery, including through the following actions;</p> <ul style="list-style-type: none"> • Awareness/training sessions to staff and partners, embedding the rewards-based culture and ensuring consistency between staffing groups. • New community rules will be published, following consultation with Young People and staff, to include standards of behaviour. • The Falcon Adjudication Liaison Officer will discuss all adjudications referred to Falcon and advise on other possible options where suitable, such as use of IEP. • Information in relation to behaviour management will be discussed weekly at the Minimising and Managing Physical Restraint (MMPR)/ Use of Force meeting. This will be shared with the conflict resolution team to immediately resolve issues. <p>Trends will be monitored through monthly safeguarding meetings, to identify measurable improvements in good behaviour amongst Young People (YP) and/or to agree actions to overcome obstacles and concerns.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>July 2019</p> <p>July 2019</p> <p>November 2019</p> <p>July 2019 and Ongoing</p>



5.2	A robust action plan setting out clear objectives to reduce violence should be delivered. Support for the victims of bullying should be strengthened and perpetrators should be challenged and helped to address their violent behaviour. (S42)	Agreed	HMYOI Feltham will introduce PRISM, a comprehensive violence reduction strategy supported by Youth Custody Service (YCS) psychology leads and informed by performance data and consultation with staff and young people. This will drive an improved understanding of the root causes of violence at HMYOI Feltham, challenging perpetrators of bullying and helping them address their violent behaviour.	Governor	July 2019
			The Head of Safeguards will undertake a further review of the behaviour management strategy, to clarify the challenge, help and support provided to perpetrators and victims of violent behaviour. This review will ensure; <ul style="list-style-type: none"> • Structured monitoring of alleged perpetrators. • Victims of bullying will be supported and receive meaningful care plans. 	Governor	September 2019
			A Quality Assurance process, led by a Safeguards Custodial Manager will be introduced. This process will ensure accountability and responsibilities of stakeholders who have contact with a young person subject to a Bullying Reduction plan and/or a Victim support plan.	Governor	August 2019
5.3	The role of the prison officer should be developed to ensure that staff understand their responsibility to form respectful, caring and effective relationships with the children in their care. (S43)	Agreed	YCS continues with its commitment to professionalise the workforce over the next four years. The Foundation Degree in Youth Justice is offered to all operational staff working with Young People and aims to further develop officers understanding of the Young People in their care.	Governor and Director of YCS	Completed and ongoing
			In in order to help staff fully understand their responsibility to form caring, mutually respectful and effective relationships with young people at HMYOI Feltham A, the Head of Business Assurance will undertake the following actions; <ul style="list-style-type: none"> • Circulate HMYOI Feltham's new professional expectations framework to all staff, to clearly set out the standards of professional relationship between staff and young people. • Continue to provide dedicated professional support for POELT Prison Officer Entry Level Training (POELT) staff. • Create a revised induction package, including shadowing opportunities, for new officers, focussed on the importance of building positive relationships. • Deliver the recently launched band 5 training package, supplemented with team building days. 	Governor	July 2019
			To support the development of mutually respectful, caring and effective relationships between staff and young people, HMYOI Feltham A will;	Governor	July 2019



			<ul style="list-style-type: none"> • Publish community meetings on each unit to set clear expectations for staff and young people. • Publish a regular community newsletter aimed jointly at staff and young people which highlights good practice, celebrates success and shares positive stories. • Extend support for staff, including informal discussions with managers at all levels and the structured support sessions through PAM Assist (confidential employee assistance programme). • Respond to feedback from a recent culture web exercise, to drive a rehabilitative culture. <p>New staffing profiles will be launched in July 2019 to make better use of the increased staffing levels at HMYOI Feltham A; this will allow staff time for '<i>personal officer</i>' work which will be formalised through the national roll out of Custody Support Planning (CuSP) and SECURE STAIRS (a psychologically informed, whole system approach to casework and planning). Staffing profiles will be reviewed in September 2019 to ensure that they are fully embedded.</p> <p>A pilot project is under way to establish an Enabling Environment on Bittern, to explore ways in which a positive and effective social environment can be created to support healthy relationships between staff and Young People.</p>	Governor	September 2019
				Governor	July 2019
5.4	Accommodation should be decent, clean and adequately equipped. It should be suitable for children. (S44)	Partly Agreed	<p>This recommendation is partly agreed; HMYOI Feltham A will ensure that existing accommodation is decent, clean, adequately equipped and suitable for children. However, capital investment is not available to make substantial physical changes to residential accommodation.</p> <p>The Ministry of Justice (MoJ) Estates Directorate are developing a programme of refurbishment for HMYOI Feltham A which includes showers, fire safety measures, roof works, Grebe unit, windows and external lighting. This is scheduled to begin on site in 2020/21, subject to governance and funding. Projects are subject to regular review depending on the priorities of the estate and confirmed funding.</p> <p>The Head of Residence will:</p> <ul style="list-style-type: none"> • Establish room inspections and staff feedback to Young People, with incentives to encourage cleaning. • Review equipment available for all rooms and establish an ordering schedule. 	Estates Director, MoJ	April 2021
				Governor	June 2019



			<ul style="list-style-type: none"> • Paint will be available on all units to maintain rooms. Young People on enhanced units will be provided the opportunity to choose paint colours for their rooms. • Explore options for Young People to further personalise rooms, including having more personalised items available through the catalogues. • Cleaning schedules are in place and new sofas have been purchased for communal areas. <p>A pilot project is under way to establish an Enabling Environment on Bittern, which will support staff in setting high standards for communal areas.</p>	Governor	July 2019
5.5	Prison managers should do more to understand children's propensity to fight and actively seek alternatives to the extensive use of keep-apart protocols. (S45)	Agreed	<p>HMYOI Feltham will introduce PRISM, a comprehensive violence reduction strategy supported by YCS psychology leads and informed by performance data and consultation with staff and young people. This will drive an improved understanding of the root causes of violence at HMYOI Feltham. The introduction of PRISM, the review of behaviour management and the comprehensive audit of Feltham's Conflict Resolution model will allow the senior management team to better understand the reasons behind Young People fighting and provide alternatives to the 'keep apart' approach.</p> <p>The Head of Safeguards will:</p> <ul style="list-style-type: none"> • Oversee 'keep-apart' protocols • Participate in the national 'non-association' task group review, to monitor those Young People identified as 'keep-apart', whilst supporting the Conflict Resolution Framework. • Review intervention provision and utilise regular education slots for intervention delivery, to build on the success of more active mixing in education. <p>HMYOI Feltham has opened a second enhanced unit, Jay, to encourage further mixing of Young people and to offer a positive alternative to 'keep apart' protocols.</p>	Governor	July 2019
				Governor	September 2019
				Governor	Completed



5.6	Comprehensive assessments of risk of harm should be used to inform sentence plan targets that address risk and reduce the likelihood of future offending. (S46)	Partly Agreed	<p>This recommendation is partly agreed because YOT Case Managers hold overarching responsibility and accountability for the sentence, and is responsible for approving the sentence plan and any subsequent changes that are made to it throughout the delivery. The YOT case manager is responsible for completing and updating risk of serious harm on the ASSET structured assessment tool; this will include additional information identified by the Establishment. This should be used by the YOT case manager to facilitate a discussion during review meetings on risk both within the Establishment but also in the community. The sentence plan should be used to address these identified risks and direct internal and external actions to reduce risk and enable successful resettlement.</p> <p>The Head of casework will seek to access training for caseworkers, to enable them to fully understand risk of harm assessment and challenge YOT's appropriately when the above is not adhered to.</p>	Governor	November 2019
Recommendation to the Ministry of Justice (MoJ) and Youth Custody Service (YCS)					
5.7	A strategy should be developed to ensure that children leaving custody are provided with suitable accommodation in time for other elements of release planning to be completed. (4.28)	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>MoJ will work with the LAs, Youth Justice Board (YJB), YCS and other partners to ensure the process for finding and securing accommodation starts as soon as is appropriate for the YP and to support the identification of accommodation needs.</p> <p>HMYOI Feltham will further develop relationships with the local community and the communities to which YP are released. Case Managers will continue to support Local Authorities by escalating accommodation issues with the Youth Offending Team (YOT) Manager, YCS, YJB and Social Services, as outlined in Section 7 of the Custody and Resettlement Case Management Guidance 2014.</p> <p>Caseworkers and Social Workers have previously received training and guidance packs from external bodies to support escalation and to challenge YOTs when appropriate. A working protocol is in place, to enable external bodies such as the Howard League to take up these cases on the YP's behalf in a timely manner to influence a positive outcome.</p>	<p>Head of Youth Custody Policy Team, Director of YCS and Governor</p> <p>Governor</p> <p>Governor and Director of YCS</p>	<p>September 2019</p> <p>October 2019</p> <p>Completed</p>



	Recommendation to the Youth Custody Service and HMPPS				
5.8	Children's progress after release should be followed up to measure the effectiveness of resettlement work across the Youth Custody Service. The findings should be used to inform future provision at local and national level. (4.16)	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>In order to address problems around accommodation the MoJ will continue to work constructively with other government departments, particularly Department for Education (DfE) and <i>Ministry of Housing, Communities and Local Government</i> (MHCLG).</p> <p>Resettlement and transitions between services is currently a priority for the 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 undertaking a retrospective data harvesting exercise with a number of YOTs to better understand the exact nature of issues and prevalence which informed a paper to the Cabinet Office in April this year. Meanwhile they are reviewing the data routinely requested from YOTs to ensure that this presents an accurate picture of issues and to chart progress.</p> <p>The YCS have a vision for 2020 to develop a cross government approach to support and oversight of Children and Young People (CYP) across all sectors (Justice, Welfare, Health and Community YOTs). The YCS will look at the effectiveness of interventions and resettlement planning in collaboration with stakeholders to support appropriate focus of resources.</p>	<p>Youth Justice Board and Director of YCS</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>Completed and Ongoing</p> <p>April 2020 to April 2021</p>
	Recommendation to HMPPS				
5.9	YOI caseworkers should be trained to assess needs and risks of harm, and to formulate plans that take account of both the custodial and community elements of the sentence. (4.14)	Partly Agreed	<p>This recommendation is partly agreed because community based YOT Case Managers hold overarching responsibility for the assessment of need, risk of harm analysis and formulation of sentence plans.</p> <p>YCS agree that training should take place to enable YOI caseworkers to provide effective support to the formulation of plans that take account of both the custodial and community elements of the sentence. YCS will look to commission a wider piece of work to</p>	<p>Director of YCS</p>	<p>September 2019</p>



			determine how this action can be achieved, through the YCS Casework Review team, as part of the Youth Justice Reform programme.		
	Recommendations to the Governor				
	Early days in custody				
5.10	Children should be transported from court to the establishment as soon as possible after their hearing ends to enable them to settle on their first night. (1.6)	Agreed	<p>The objective of minimising the time prisoners spend waiting in court cells is reflected in the Prison Escort and Custody Service (PECS) contract, with contractors fully aware of their obligations to escort prisoners from court at the earliest opportunity. The current contract established the use of escort vehicles with a separation capability, which allows different types of prisoners (male/female, adult/young people) to be carried on the same vehicle. This results in more efficient scheduling, with a reduction in prisoner waiting times in addition to significant savings to the Service. However, reducing waiting time is also dependent upon the assistance of other stakeholders, notably HM Courts & Tribunals Service and on the times that the prisoners' cases have been dealt with by the courts. PECS continue to monitor all aspects of the contractors' performance and on occasions where it fails to meet the agreed levels will be raised with the contractor for improvement.</p> <p>Feltham will ensure that all young people arriving, are settled into first nights. They are offered showers to prepare and phones calls to make them feel welcome and have family contact. Staff will complete an induction and any worries or concerns can be raised and managed on the first night.</p>	PECS	Complete and ongoing
5.11	The induction should be coordinated to ensure children receive important information without delay. (1.7)	Agreed	<p>A review of the risk assessment process has been completed, resulting in changes in education to mix young people from different units. The Head of Care and Admissions will implement an improved induction programme for all YP, to ensure that important information and key components of the induction are completed within five working days through the following actions;</p> <ul style="list-style-type: none"> • Induction booklets and compact will be available to all young people on their first night in custody, which is also available via television loops. This information is then reviewed in detail in induction modules. • The Induction timetable will contain clear timeslots for sessions, including those delivered by partner agencies. This will be recirculated to staff and YP to ensure they have the most up to date version and that staff know when their slots are. 	Governor	July 2019



			<ul style="list-style-type: none"> • Induction passports will be consistently signed by staff delivering induction sessions and signed by CMs before young people leave units. These will be kept as an audit trail. • YP will be able to attend activities as soon as allocations have taken place, after a week in custody. <p>Induction processes in Wetherby are being considered, to identify best practice and consider application at HMYOI Feltham, including the potential use of audio inductions.</p>	Governor	December 2019
	Suicide and self-harm prevention				
5.12	Children at risk of self-harm should receive consistently good care from staff, including access to activity and education. (1.17)	Agreed	<p>The Head of Safeguards will ensure that children at HMYOI Feltham at risk of self-harm receive consistently good care from staff by;</p> <ul style="list-style-type: none"> • Working with YCS colleagues to support staff to better understand the Assessment and Care in Custody Teamwork (ACCT) process. • Working with non-operational managers to complete training in ACCT Case Management. • Creating a rota for ACCT quality assurance. • Retaining an additional Safeguards Custodial Manager, to provide ACCT Management and Quality Assurance. <p>In line with national policy expectations, the following actions will ensure that children at risk of self-harm are able to access activity and education appropriately;</p> <ul style="list-style-type: none"> • ACCT plans will consistently identify actions to support the YP in engaging appropriately with the full regime. • Residential Custodial Managers will monitor engagement with regime and ensure that appropriate plans are always in place. • ACCT Quality Assurance will record and monitor an individual's access to the regime. • The regime allocation meeting will monitor Young People on ACCTs engagement with the regime and attendance at education. 	Governor	September 2019
				Governor	May 2019
	Security				
5.13	Keep-apart protocols should be overseen by a senior manager to ensure there is a focus on mediation to increase time out of cell and participation in purposeful	Agreed	<p>A comprehensive audit of HMYOI Feltham's Conflict Resolution has been conducted by YCS and an action plan is now in place.</p> <p>With oversight from the Deputy Governor, the Head of Safeguards will work with Heads of Residence and Security to ensure proportionate implementation of Non-Association protocols. This will include participation in the national "<i>non-association</i>" task group</p>	Governor	Complete
				Governor	September 2019



	activity. Reviews should be timely. (1.25)		<p>review to monitor those Young People identified, whilst supporting the Conflict Resolution Framework.</p> <p>The Head of Residence will work with Head of Safeguards and Security to reduce the impact of Non-Association protocols on time spent out of cells and participation in purposeful activity by;</p> <ul style="list-style-type: none"> Producing a cohesive framework to improve regime and out of cell activity, whilst managing those Young People unable to associate together safely. Supporting Platinum units to encourage Young People to mix and reward those not on Non-Association lists. Coordinating the roll out of <i>immediate resolution</i>, a conflict resolution technique, for residential officers. <p>Delivery of Conflict Resolution will ensure reviews are completed in a timely manner, which will commence by September 2019.</p>	Governor	September 2019
				Governor	September 2019
5.14	A child should have access to advocacy support following authorisation of a strip-search. (1.26)	Agreed	<p>The Head of Safeguards and the Head of Residence will:</p> <ul style="list-style-type: none"> Ensure that a robust reporting system is in place which will enable access to advocacy support following the use of full searches Work with the prison's Wellbeing Team to offer advocacy support to all those for whom a full search has been authorised. 	The Governor	June 2019
	Bullying and violence reduction				
5.15	Analysis of violent incidents should inform the violence reduction strategy which should include clear actions to reduce the high levels of violence. (1.45)	Agreed	<p>PRISM (Promoting Risk Intervention by Situation Management) will form the basis for HMYOI Feltham's violence reduction strategy, implementing a structured evidence based approach to the situational management of violence. This will enable consistent appraisal of the situational risk of violence, undertaken against five key domains, covering History of Institutional Violence; Physical & Security Factors; Staff Features and Case Management.</p> <p>PRISM implementation will be monitored at the monthly Safety Meeting, and progress will be Red Amber Green (RAG) rated using structured clinical judgement, drawing on existing data sets, quality assurance frameworks and Inspection reports. This will take account of consultation with sites, relevant stakeholders and Young People.</p>	Governor	July 2019
				Governor	July 2019 and Ongoing
	The use of force				



5.16	Pain-inducing techniques should not be used on children. (1.53)	Not Agreed	<p>This recommendation is not agreed as 'Minimising and Managing Physical Restraint' (MMPR) guidance sets out both the circumstances in which restraint can be used and the techniques permitted. This includes pain inducing techniques.</p> <p>Pain inducing restraint techniques are only used as a last resort and HMYOI Feltham have robust systems in place where instances of restraint are reviewed weekly at the Use of Force MMPR Review meeting (Chaired by the Governing Governor) and scrutinised by National MMPR Instructors. Data analysis is undertaken with the Local Authority and within the local Safeguarding Team Meeting. The Head of Safeguards will ensure that MMPR co-coordinators quality assure all Use of Force.</p>		-
5.17	Governance of use of force should be improved to ensure that all incidents are recorded, written statements are completed by staff and all incidents are reviewed by MMPR coordinators. (1.54)	Agreed	<p>The Head of Safeguards will improve governance of use of force, ensuring that all incidents are recorded and written statements are completed, through the following actions;</p> <ul style="list-style-type: none"> • Carry out a review of the staffing structure with Safer Custody • Recruitment to HMYOI Feltham's full complement of four MMPR co-ordinators. • Circulate a weekly list detailing outstanding paperwork and hold staff and managers to account. • Ensure a good balance of practical scenarios in MMPR training sessions to build confidence in its use • Ensure MMPR co-ordinators investigate all uses of force locally, utilising video footage where possible, recommend any actions that may be required and ensure they are taken. These might be, for example, in the form of addressing staff training needs, offering guidance or taking disciplinary measures. <p>Review of larger or more serious incidents will continue to take place at the weekly Use of Force meeting, which will also provide the forum to monitor of trends and set actions to address emerging issues.</p>	Governor Governor	August 2019 Complete and ongoing.
	Separation/removal from normal location				
5.18	Special accommodation should not be used for children unless the circumstances are exceptional and it is fully justified by the manager authorising its use. (1.60,	Agreed	<p>HMYOI Feltham has transitioned away from use of a traditional segregation unit to a model focussed on better use of on-unit de-escalation, dedicated 'calm down' rooms and Falcon Unit as a 'Reintegration Day Centre'. To support the implementation of this approach, the Head of Behaviour management will:</p> <ul style="list-style-type: none"> • Make sure that all use of special accommodation is approved by the duty Governor, who will ensure that it is authorised only in exceptional circumstances and when they can fully justify its use. 	Governor	May 2019



	repeated recommendation 1.65)		<ul style="list-style-type: none"> Scrutinise use of special accommodation through monthly review meetings. Ensure that paperwork in relation to the use of special accommodation is quality assured and challenged where necessary 		
	Living conditions				
5.19	All cells, showers and communal areas on residential units should be clean and well maintained. (2.13)	Partly Agreed	<p>As outlined below, a bid to enable physical improvements to support the completion of the recommendation has been submitted. This recommendation is partly agreed because funding for these physical improvements has not been approved.</p> <p>The MoJ Estates Directorate are developing a programme of refurbishment for HMYOI Feltham A which includes showers, fire safety measures, roof works, Grebe unit, windows and external lighting. This is scheduled to begin on site in 2020/21, subject to governance and funding. Projects are subject to regular review depending on the priorities of the estate and confirmed funding.</p> <p>The Head of Residence will:</p> <ul style="list-style-type: none"> Refresh basic items and facilities available in communal areas in consultation with Young People. This will be kept under review by Residential CMs. Implement a management assurance process to ensure that cells are well-equipped, clean and well maintained. Establish Community rules with guidelines for cleanliness in communal areas. 	Governor Estates Director, MoJ Governor	Completed April 2021 July 2019
5.20	Children should be able and encouraged to take a shower every day. (2.14)	Agreed	HMYOI Feltham aims to provide daily access to showers for YP, providing the Regime Management Plan in operation on the day allows this to be carried out safely. New profiles to be launched in Summer 2019 will continue to allocate appropriate time for showers. The actions outlined against recommendation 5.13 will reduce the impact of Non-Association protocols and maximise access to the regime, including time for showers.	Governor	September 2019
5.21	Children should be able to make a telephone call every day. (2.15)	Agreed	HMYOI Feltham aims to provide daily opportunities for YPs to make a telephone call, providing the Regime Management Plan in operation on the day allows this to be carried out safely. New profiles to be launched in Summer 2019 will continue to allocate appropriate time for phone calls. The actions outlined against recommendation 5.13 will reduce the impact of Non-Association protocols and maximise access to the regime, including time for showers.	Governor	September 2019
	Residential services				



5.22	The food portions available to children at breakfast should be increased. (2.21)	Not Agreed	This recommendation is not agreed as the breakfast cereal pack offered by the prison, and other sites in the Youth People's Estate, is the largest one available through the food packing service and was developed specifically for young people. This was done in conjunction with the Children's Food Trust. It has a 52g packet of cereal rather than a 30g packet available in the Adult Estate, the cereal bars are small to be in line with the 100-calorie snack (max two) government initiative and the packs offer four drink choices in comparison to only one in the Adult Estate.		-
5.23	Advice to children on nutritionally balanced diets should be available, and regularly repeated. (2.22)	Agreed	The Catering Manager and Head of Education will: <ul style="list-style-type: none"> Review the Personal, Social Health and Economic (PSHE) curriculum and include sessions on nutrition. Continue to highlight healthy options on menus and provide balanced options for all dietary needs. 	Governor	October 2019
5.24	Serveries should be supervised and contemporary standards of health and safety should be enforced. (2.23)	Agreed	The Head of Residence will: <ul style="list-style-type: none"> Work with the Head of Education to ensure all servery workers attend level 1 food hygiene courses. Ensure kitchen staff attend units to assist in supervising serveries Catering manager will undertake regular cleanliness management checks, to ensure that contemporary standards of health and safety are enforced. 	Governor	July 2019
	Consultation, application and redress				
5.25	Feedback from consultation groups should be addressed by a senior member of staff at a suitable forum, separate to the equality action team. (2.29)	Agreed	The Head of Residence will: <ul style="list-style-type: none"> Build Community meetings into new profiles and ensure that they take place on each unit weekly. Schedule monthly Youth Council meetings, to be attended by Young People unit representatives and relevant Heads of Functions. Minutes will be taken, actions recorded and progress monitored. 	Governor	July 2019
5.26	Tracking processes should be introduced to determine the progress of applications. (2.30)	Agreed	Unit audit trails will be embedded to ensure that applications are logged and signed for once a full response has been provided. The Head of Residence will implement a process to ensure a management check of this tracking process.	Governor	June 2019



5.27	A procedure for systematic analysis of complaints should be introduced so that patterns and trends can be identified and, where necessary, lessons learned. (2.31)	Agreed	<p>HMYOI Feltham has introduced a new complaints database to enable systematic analysis of complaints. High level data from this database is reviewed monthly at the prison's Equalities Action Team (EAT) meeting and distributed to managers.</p> <p>The Head of Business Assurance will:</p> <ul style="list-style-type: none"> • Conduct a 'deep dive' into complaints relating to staff, including consultation sessions with both staff and young people where necessary. • Further deep dives will be carried out throughout the year in response to any further emerging trends. • Patterns and trends from 'deep-dive' samples will be identified and issues and actions arising from this will be shared with all parties. <p>Deputy Governor will quality assure a random sample of Complaint responses and provide feedback to staff.</p>	Governor	Completed
				Governor	August 2019
				Governor	August 2019
	Protected characteristics				
5.28	Consultation arrangements for children with protected characteristics should be formalised and consistent so that children can express their distinctive views and their specific concerns can be addressed. (2.50)	Agreed	<p>The Head of Safeguards will support the Head of Equalities to identify where the greatest needs lie using SMART and local data. A schedule of consultation sessions with YP who have protected characteristics will be set-up or one to ones arranged where populations are low. An SMT member is assigned to each protected characteristic to provide oversight of consultation opportunities.</p> <p>Community meetings have been set up to provide an ongoing opportunity for YP to express their views, including those linked to protected characteristics.</p>	Governor	June 2019
				Governor	Completed
	Strategy, clinical governance and partnerships				
5.29	Clinical governance processes should involve the routine collection and analysis of relevant clinical performance data to hold practitioners to account and to drive service improvement. This should include environmental	Agreed	<p>The governance structure and supporting meetings will be reviewed and are to include a joint healthcare Local Delivery Board as well as regular clinical governance meetings.</p> <p>An updated cleaning schedule and supporting documentation is to be agreed with the facilities management provider, with regular oversight through management checks.</p> <p>A local log of issues raised by the healthcare team to the facilities management team will be held, so that outstanding works can be followed up.</p>	Governor	October 2019
				Governor	May 2019
				Director of Care UK	Complete and ongoing



	checks such as cleanliness and lighting arrangements. (2.60)				
5.30	Control room staff should phone an ambulance as soon as an emergency code is activated and then stand it down if the nurse confirms it is safe to do so. (2.61)	Agreed	In line with national policy, a clear protocol is in place to refresh the control room procedure for emergency responses, including request for an ambulance as soon as an emergency code is activated. This has been reiterated to all control room staff as a notice to staff.	Governor	Complete
5.31	Patients should be able to complain about health services through a well-advertised, quality assured, independent health complaints system. (2.62)	Agreed	<p>The healthcare administration team will be responsible for ensuring that there are adequate supplies of feedback forms and confidential envelopes readily available for Young People to record their complaints/ feedback. New post boxes will be sourced to ensure complaints are secure before being collected.</p> <p>All complaints/ feedback will be recorded on the healthcare risk management database, along with the responses, allowing timelines and responses to be audited, as well as making it easier to extract any emerging themes.</p> <p>All responses to complaints will be reviewed by a member of the healthcare management team to quality assure them.</p>	<p>Director of Care UK</p> <p>Director of Care UK</p> <p>Director of Care UK</p>	<p>June 2019</p> <p>Complete and ongoing</p> <p>Complete and ongoing</p>
	Primary care and inpatient services				
5.32	Reasons for failing to attend medical appointments should be analysed and addressed by senior managers to reduce the costs of wasted public resource. (2.69)	Agreed	<p>The location of General Practitioner (GP) and other clinics will be reviewed with a view to improving access.</p> <p>A healthcare assistant will be recruited, who will visit units to follow up on missed appointments and ensure that outstanding medical needs are identified and met.</p> <p>Reasons for non-attendance will be distributed to all heads of functions and analysed at the monthly Local Delivery Board.</p>	<p>Governor</p> <p>Director of Care UK</p> <p>Governor</p>	<p>August 2019</p> <p>July 2019</p> <p>July 2019</p>
5.33	The inpatient unit should only be used for health and therapeutic purposes. Children should not be	Agreed	All admissions to the inpatient unit will be to meet the immediate needs of a young person who is experiencing some level of crisis.	Governor	August 2019



	located on the inpatient unit to address operational issues. (2.70)		A formal review of the inpatients facility, commissioned by NHS England to set out its future role at HMYOI Feltham is expected to report in the summer of 2019.	NHS England	September 2019
	Mental health				
5.34	All frontline officers should complete mental health awareness training commensurate with the needs of the population. (2.78)	Agreed	<p>YCS continues with its commitment to professionalise the workforce over the next four years. The Foundation Degree Youth Justice is offered to all operational staff working with Young People and aims to further develop officers understanding of the Young People in their care.</p> <p>All new officers complete the Youth Custody Service specific Prison Officer Entry Level Training course (POELT). This includes <i>Working with Young People in Custody (WYPC)</i> modules on <i>Adolescent Development, Emotional & Mental Well Being</i> and <i>Speech, Language & Communication Needs</i>. The Head of Business Assurance will continue to ensure all new starters complete the YCS specific POELTS course. A training plan is in place to ensure that all existing staff complete the WYPC modules.</p>	<p>Executive Director of Youth Custody Service</p> <p>Governor</p>	<p>March 2020</p> <p>Complete and ongoing</p>
	Substance misuse				
5.35	Substance misuse staff should have access to a range of training activities to enable them to deliver a full range of services to children with drug or alcohol problems. (2.84)	Agreed	Training need analyses will ensure that substance misuse staff are offered an appropriate range of training to fulfil their role.	Director of Care UK	September 2019
	Medicines optimisation and pharmacy services				
5.36	All children should receive their prescribed medicines consistently and at clinically appropriate times. (2.91, repeated recommendation 2.70)	Agreed	<p>The location of services is being reviewed with an aim of improving access and the new profile includes an additional officer to support the movement of YP to receive their medicines at the appropriate times.</p> <p>A report will be created on the healthcare system that is run during the week, identifying any young person that has missed doses of medicines and this is reviewed by the</p>	<p>Governor</p> <p>Director of Care UK</p>	<p>August 2019</p> <p>Completed and ongoing</p>



			pharmacist to ensure that critical medicines are not being missed and/ or alerting the prescriber to YP that are declining their medicines.		
5.37	Medicines administration should be well co-ordinated with therapeutic and safe outcomes for patients, including appropriate administration of all controlled drugs. (2.92)	Agreed	Additional training will be provided to nursing staff along with a critical debrief of the inspection findings so staff are clear on how to administer medicines safely, including controlled medicines. Pharmacy technicians will be recruited to support the administration of medicines as well as pharmacy services, improving the skill mix of staff delivering medicines related services.	Director of Care UK Director of Care UK	Completed and ongoing June 2019
	Dental services and oral health				
5.38	Waiting times to see the dentist should be equivalent to those in the community. (2.96)	Agreed	The dental team will visit units monthly to deliver a triage session, to prioritise future workload and deliver advice where that is all that is required. At least 2 sessions each week on the healthcare unit are dedicated to YP, to encourage more young people to come to healthcare and allow MMPR trained officers to be detailed to facilitate their appointments. Waiting lists and times will be monitored by the Healthcare local Delivery Board.	Dental provider Dental provider and Governor Dental provider and Governor	May 2019 July 2019 September 2019
	Time out of cell				
5.39	All children should have enough time to make a telephone call, shower, and spend at least an hour outside every day. (3.14, repeated recommendation, 3.4)	Partly Agreed	This recommendation is partly agreed as Residential Services PSI 75/2011 notes that prisoners are afforded a minimum of 30 minutes in the open-air daily, as defined in the SLA/Contract and HMYOI Feltham's core day is setup to reflect this. HMYOI Feltham aims to provide daily opportunities for YPs to make a telephone call, shower and spend time outside, providing the Regime Management Plan in operation on the day allows this to be carried out safely. New profiles to be launched in Summer 2019 will continue to allocate appropriate time for a shower, exercise, phone calls and time outside. The actions outlined against recommendation 5.13 will reduce the impact of Non-Association protocols and maximise access to the regime, including to meet their basic needs and spend time outside.	Governor	September 2019
	Education, skills and work activities (Ofsted)				



5.40	Prison managers should ensure that risk assessments are conducted promptly to facilitate allocation to activity in a timely manner. (3.27)	Agreed	The Head of Security will; <ul style="list-style-type: none"> • Adopt a '<i>presumed eligible</i>' position for all YP being risk assessed for activity spaces, only limiting allocations based on clear, up to date evidence based risk assessment. • Ensure a representative from security attends allocation boards to feedback on risk assessments 	Governor	June 2019
			Risk assessment timeliness will be monitored at allocation boards on an ongoing basis.	Governor	May 2019 and ongoing.
5.41	Leaders and managers should ensure that children's attendance at education is consistently high. (3.28)	Agreed	The Head of Reducing Reoffending, Learning & Skills Manager and Head of Residence will continue to work together to maximise attendance at education. This will include; <ul style="list-style-type: none"> • Active challenge of non-attendance by Learning & Skills and Residential staff. If a YP refuses to attend, residential staff will ensure that their decision is documented and that they are aware of the consequences of their refusal. • Analysis of the reasons for non-attendance in the morning meeting, where actions will be set to overcome obstacles as appropriate. • Delivery of staff awareness sessions on the importance of education, reiterating procedures to be applied when young people do not attend. 	Governor and Prospects (Learning and Skills Provider)	September 2019
5.42	Leaders and managers should ensure that children move quickly from accommodation units to education to improve punctuality at sessions and increase the time children spend in learning. (3.29)	Agreed	A new core day has been reviewed and introduced, and early analysis shows that this change has improved punctuality. The Head of Regimes will continue to monitor the impact of the new core day on movement times at the SMT morning meeting and residential morning meeting. This will be reviewed at the Quality Improvement Group (QIG) and Performance Review Meetings (PRM) with the education provider.	Governor	October 2019
5.43	Leaders and managers should ensure that unit staff fully understand and prioritise scheduled outreach education sessions. (3.30)	Agreed	HMYOI Feltham A has successfully reduced the number of young people receiving outreach education on the units, as opposed to in classrooms by ensuring appropriate prioritisation. A <i>Reintegration Coordinator</i> has been recruited by education to improve the ongoing management of outreach education.	Governor and Prospects (Learning and Skills Provider)	Complete
			To improve this further, the Head of Education will; <ul style="list-style-type: none"> • Draft a communication to be circulated to all staff to improve understanding around outreach. • Attend unit briefings to further build staff awareness. • Circulate an outreach schedule to ensure all units are clear on when and where outreach delivery is taking place across the establishment. 	Governor and Prospects (Learning and Skills Provider)	June 2019



5.44	Leaders and managers should ensure that the virtual campus is fully functional and routinely available to children for job search and to support their learning. (3.31)	Agreed	<p>Virtual Campus (VC) computers have been fixed and measures taken to reduce the risk of further service outages. 90% of all learners now have active VC accounts.</p> <p>The Head of Education will:</p> <ul style="list-style-type: none"> • Train teaching staff on the use of VC • Ensure all YP complete their initial assessments and diagnostics using BKSB live (A tool for assessing basic skills in literacy and numeracy and any knowledge gaps) via VC. <p>Create Lesson plans incorporating <i>General Certificate of Secondary Education (GCSE) pod</i> (Audio Visual learning aid written by expert subject teachers providing specialist knowledge on over 20 curriculum areas) and ensure they become an integral part of the delivery of GCSE subjects.</p>	<p>Governor and Prospects (Learning and Skills Provider)</p> <p>Governor and Prospects (Learning and Skills Provider)</p>	<p>Complete</p> <p>September 2019</p>
5.45	Teachers should set learning targets jointly with children and record their progress consistently so that all children, including those with special educational needs, know how much progress they have made. (3.41)	Agreed	<p>All learners will be assessed at their starting point to obtain their baseline academic levels, including for reading age, literacy and numeracy abilities.</p> <p>Targets will be set by tutors in discussion with learners during their induction process, and when they start their pathway. Targets and progress will be measured and discussed with learners by tutors at the end of every term. Those with Special Educational Needs and Disabilities (SEND) will receive specific additional support and intervention through the Learning Support Team.</p> <p>Progress will be recorded and analysed using specific software designed to track achievement, in order to identify under-performance from learners and tutors.</p>	<p>Governor and Prospects (Learning and Skills Provider)</p> <p>Governor and Prospects (Learning and Skills Provider)</p> <p>Governor and Prospects (Learning and Skills Provider)</p>	<p>June 2019</p> <p>July 2019</p> <p>October 2019</p>
5.46	Leaders and managers should provide further training and development to teaching staff so that lessons and tutorials are consistently effective and better managed. (3.42)	Agreed	Education Provider and establishment to provide opportunities for staff inset on an ongoing basis throughout the year, to facilitate time for whole staff training. Tutors will receive training to enable them to facilitate class discussions in a secure and productive environment during tutor period.	Governor and Prospects (Learning and Skills Provider)	July 2019 and ongoing



			<p>Teachers will be trained in how to create rules collaboratively with learners that they are comfortable to work within, so the process is a learner-led forum, allowing them to explore current affairs and engage effectively to develop inter-personal skills.</p> <p>The quality of lessons and tutorials will be monitored through classroom observations by the Education provider and Learning Walks by prison managers. Developmental feedback will be provided to teaching staff as appropriate and trends will be monitored through the Quality Improvement Group and Performance Review Meeting.</p>	<p>Governor and Prospects (Learning and Skills Provider)</p> <p>Governor and Prospects (Learning and Skills Provider)</p>	<p>September 2019</p> <p>Complete and ongoing</p>
5.47	Leaders and managers should ensure that children have access to good quality computer resources so that they can develop their skills in independent research and the use of digital technologies. (3.47)	Agreed	<p>MoJ Digital Team to carry out an IT audit within education, to identify gaps in provision and produce improvement strategy.</p> <p>Education Provider to submit IT improvements to YCS with a view to expanding technology resources.</p> <p>Education Provider to scope concept of a Distance Learning Computer Resource room. This is to allow those learners who are higher ability the opportunity to access Open University courses through the Virtual Campus.</p> <p>Education Provider to meet with Security to identify what technology can be accessed by those unable to attend mainstream education.</p>	<p>MOJ Digital</p> <p>Governor and Prospects (Learning and Skills Provider)</p> <p>Governor and Prospects (Learning and Skills Provider)</p> <p>Governor and Prospects (Learning and Skills Provider)</p>	<p>August 2019</p> <p>November 2019</p> <p>December 2019</p> <p>August 2019</p>
5.48	Leaders and managers should ensure that teachers receive support and training to help them manage the few incidents of poor behaviour during classroom sessions. (3.48)	Agreed	<p>Education Provider and establishment to provide opportunities for staff inset on an ongoing basis throughout the year, to facilitate time for whole staff training.</p> <p>An experienced behaviour consultant will work with Education Provider and individual teachers to develop behaviour management skills relevant to a YOI setting.</p>	<p>Governor and Prospects (Learning and Skills Provider)</p> <p>Governor and Prospects</p>	<p>June 2019 and ongoing</p> <p>August 2019 and ongoing</p>



			<p>The quality with which the few incidents of poor behaviour during classroom sessions are managed will be monitored through classroom observations by the Education provider and Learning Walks by prison managers. Developmental feedback will be provided to teaching staff as appropriate.</p> <p>Records of incidents of poor behaviour will be maintained to identify potential triggers or themes from learners, staff or the environment. Trends will be monitored through the Quality Improvement Group and Performance Review Meeting.</p>	<p>(Learning and Skills Provider)</p> <p>Governor and Prospects (Learning and Skills Provider)</p>	<p>Complete and ongoing</p> <p>Complete and ongoing</p>
5.49	Leaders and managers should ensure that qualification outcomes improve, especially in English and mathematics. (3.52)	Agreed	<p>A new curriculum has been designed and developed to offer more appropriate opportunities for long-term and higher ability learners and is now firmly embedded.</p> <p>Education Provider will implement a new timetabling system which incorporates fixed terms across the year, allowing for six-week curriculum delivery, one week of formal assessments, and an additional week for marking, moderation, upload and analysis of data. This will lead to increased teacher accountability for outcomes across all subjects, and English and maths will be a particular focus with a higher learning hour allocation per week.</p> <p>Trends in relation to qualification outcomes, including English and Mathematics will be monitored through the Quality Improvement Group, Performance Review Meeting and Educational Advisory Board.</p>	<p>Governor and Prospects (Learning and Skills Provider)</p> <p>Governor and Prospects (Learning and Skills Provider)</p> <p>Governor and Prospects (Learning and Skills Provider)</p>	<p>Complete</p> <p>May 2019</p> <p>July 2019 and ongoing</p>
	Pre-release and resettlement				
5.50	There should be a multidisciplinary approach to the delivery of an action plan focused on reducing reoffending. (4.13)	Agreed	The Head of Reducing Reoffending has developed an action plan based on the most recent resettlement needs analysis and support from psychology colleagues. This action plan forms the basis of the reducing reoffending strategy and is reviewed monthly at the Reducing Reoffending meeting. Multi-disciplinary attendance will be monitored and departments challenged where appropriate.	Governor	Complete
5.51	More use should be made of release on temporary	Agreed	The Head of Reducing Reoffending will;	Governor	November 2019



	licence for resettlement purposes. (4.15)		<ul style="list-style-type: none"> Lead a review of the prison's Release on Temporary Licence (ROTL) offer, ensuring it meets the resettlement needs of young people as identified in the prison's recent needs analysis and Sentence Plan targets. Encourage staff to set sentence planning targets focussed on addressing resettlement needs through ROTL where applicable, supporting the maintenance of family ties, attendance at focussed appointments and activities in the community to support desistance from offending. <p>Recruitment is underway for a Life Skills instructor, who will support the development of Life Skills through ROTL alongside the Business Community & Engagement Lead.</p> <p>ROTL data will be collated for monthly monitoring by SMT at the Reducing Reoffending meeting.</p>	Governor	July 2019
				Governor	June 2019
	Training planning and remand management				
5.52	Training planning and review meetings should start on time and involve all relevant staff working with a child to ensure there is a coordinated focus on identifying and meeting resettlement needs. (4.21)	Agreed	<p>The Head of Casework and Head of Reducing Reoffending will;</p> <ul style="list-style-type: none"> Reintroduce a system to record invitations sent and actual attendees at training planning and review meetings. Attendance trends will be reviewed at the monthly Reducing Reoffending meeting. Poor punctuality and/or attendance will be challenged at a senior level, escalated to the Governor as appropriate. <p>Roll out of CuSP and secure STAIRS and regime improvements will ensure that multi-disciplinary formulation meetings are prioritised.</p>	Governor	June 2019
				Governor	March 2020
	Interventions				
5.53	Support for children with finance, benefit and debt needs, including gambling, should be reintroduced. (4.35)	Agreed	<p>The Head of Reducing Reoffending will ensure that support for children with finance, benefit and debt needs, including gambling is available by;</p> <ul style="list-style-type: none"> Working to strengthen the delivery of Personal Social and Health Education sessions. Exploring potential support mechanisms for young people who have been identified as having issues with debt, in line with the 2019 resettlement needs analysis. 	Governor	October 2019



			<ul style="list-style-type: none"> Assessing the feasibility of offering young people the opportunity to receive practical support from community providers whilst on ROTL. Re-engaging with potential partner agencies, such as the Citizens Advice Bureau and Kinetic Youth to secure appropriate practical support. Working with psychological services to explore the possibility of a tailored intervention on gambling relevant to this age group. <p>Progress in relation to finance, benefit and debt provision will be monitored monthly through the Reducing Reoffending meeting and action plan.</p>	Governor	July 2019 and ongoing
5.54	Sufficient interventions should be delivered to ensure that all children who need them are able to complete interventions as a component of reducing their risk and likelihood of reoffending. (4.36)	Agreed	HMYOI Feltham A offers the interventions approved by the Youth Custody Service (YCS). Two recruitment campaigns have been run to increase intervention provision, resulting in the recruitment of an additional facilitator. A further recruitment campaign is underway to fill the one remaining facilitator vacancy.	Governor	September 2019
5.55	All children with offences related to sexually harmful behaviour should have access to suitable interventions. (4.37)	Agreed	The health service currently provides a specialist assessment of young people with offence related sexually harmful behaviour, including advising on safe systems of work. HMYOI Feltham also have provision for small group work for sexually harmful behaviour; the Head of Healthcare will work with the Mental Health provider and Commissioner to review this provision in light of the HMIP recommendation, the recent Health Needs Assessment commissioned by NHS England and relevant national standards.	Governor	October 2019
5.56	Learning from programmes should be reinforced by staff across the establishment. (4.38, repeated recommendation 4.43)	Agreed	<p>The Interventions Manager has delivered a series of awareness sessions with staff to increase understanding of the content of the interventions on offer.</p> <p>The Head of Reducing Reoffending will;</p> <ul style="list-style-type: none"> Work with the psychology team, programmes manager and chaplaincy to collate and disseminate an interventions list to further build staff's understanding of interventions applicable to the young people on their units and the learning young people might take from these. Work with the Interventions Lead to disseminate post-course feedback to a wider audience, in particular to personal officers until the introduction of SECURE STAIRS officers later in 2019. 	Governor Governor	Complete June 2019



		<ul style="list-style-type: none"> Work with Head of Business Assurance to identify a slot within staff induction for interventions team to raise awareness of the programmes available in the YCS estate. <p>Introduction of SECURE STAIRS and CuSP, will embed the use of Formulation Meetings. Reviews held after completion of key interventions will provide an opportunity to review how learning from programmes is being applied by the YP.</p>	Governor	March 2020
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Recommendations	
Agreed	47
Partly Agreed	7
Not Agreed	2
Total	56

