



HM Prison &  
Probation Service

Action Plan: HMYOI Cookham Wood

Action Plan Submitted: 12<sup>th</sup> February 2020

A Response to the HMIP Inspection: 9<sup>th</sup> – 20<sup>th</sup> September 2019

Report Published: 18<sup>th</sup> February 2020

## 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 <b>must</b> 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 <b>must</b> 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.





		<p>Custody Support Planning (CuSP) is being rolled out, which will provide staff with the time and opportunity to develop respectful, caring and effective relationships with CYP in their care. The continuing implementation of SECURE STAIRS (a psychologically informed, whole system approach to casework and planning) onto residential units, will see:</p> <ul style="list-style-type: none"> <li>• Increased training for staff</li> <li>• Opportunities for reflection on CYP's behaviour through guided reflective practice</li> <li>• Greater understanding of the backgrounds of CYP in their care through Multi-Disciplinary Formulations and meetings.</li> </ul> <p>This will give staff the space, tools and knowledge to develop effective and caring relationships with the CYP in their care.</p>	Governor	June 2020
		<p>Expected standards of behaviour are also clearly set out within the induction process for all CYP. Low level poor behaviour is managed via the yellow card process. Details of the yellow and green card system are published on each landing to raise awareness among CYP.</p>	Governor	February 2020
		<p>In addition to the formal induction process, the expected standards of behaviour have been formatted and issued to new staff as part of their induction to advise them of these expectations. This will be monitored by unit managers who will also support them in encouraging positive behaviour, and challenging poor behaviour where appropriate.</p>	Governor	February 2020



S46	<p>Concern: The number of violent incidents remained too high and the need to keep children apart from each other had a negative impact on their regime. Staffing shortages and redeployment of specialist conflict resolution staff to support the regime compounded the problem. Violence was less prevalent on B3 and Cedar units, but this was not being used to inform the approach to violence reduction across the establishment.</p> <p><b>Recommendation: Managers should ensure that conflict resolution work is prioritised to reduce levels of violence at Cookham Wood.</b></p>	Agreed	<p>All intelligence reports regarding violence and conflict will be immediately referred to the Safety and Conflict Resolution (CR) teams, so that they can be investigated in a timely manner. Positive reinforcement of working through conflict will be supported by Safety and Community managers and staff.</p>	Governor	Completed
			<p>The CR team will continue to consult with CYP to better understand, and respond to, the causes of and drivers of violence within the establishment, and how this is impacted by events outside of the establishment.</p>	Governor	Completed
			<p>The Restorative Play Programme is in the early stages of development and has recently been expanded, and is now a joint venture with the education department and K-Sport (an offending behaviour programme using football to develop team and individual skills, cooperation and to help in reducing conflict).</p>	Governor	March 2020
			<p>The implementation of Secure Stairs is ongoing; it is anticipated that one benefit of this will be a decrease in the number of violent incidents across the establishment.</p>	Governor	June 2020
			<p>Violence data will be monitored for emerging trends and patterns, which will be reviewed at both the monthly and quarterly Safety meetings, and the establishment responses to any emergent trend will be developed by the attendees.</p>	Governor	June 2020
			<p>The Head of Safety will review current processes in relation to Risk Assessments, and will ensure that the focus is on activity attendance rather than activity restrictions. The Security department will work with Heads of Communities and the safety department to ensure that CYP can access a full regime as soon as possible.</p>	Governor	June 2020
			<p>It is anticipated that staffing levels will increase when Medway STC (Secure training centre) closes, allowing for increased supervision and meaningful interactions with the CYP and helping to manage any violence and conflict issues in a timely manner. It will also enable increased provision of regime delivery, and timely activity attendance will improve.</p>	Governor	March 2020



S47	<p>Concern: The lack of a full complement of staff in minimising and managing physical restraint (MMPR) had resulted in a significant backlog of paperwork, inadequate quality assurance and a reduction in staff training. It was unclear if all staff using MMPR techniques were competent to do so or that child safeguarding issues were always identified.</p> <p><b>Recommendation: Oversight of use of force should ensure that staff using MMPR are trained to do so and all safeguarding concerns are identified.</b></p>	Agreed	Staffing levels within the MMPR team have been increased, and the team will be fully staffed by the end of February. This will allow for a greater focus to be placed on reducing the backlog of use of force paperwork, through ongoing and targeted performance management approaches.	Governor	February 2020
			The introduction of a tiered quality assurance (QA) process has led to a significant reduction in the number of outstanding incidents requiring QA by MMPR co-ordinators. This will continue until all such QAs have been completed.	Governor	June 2020
			Debriefs with CYP who have been restrained are completed within 48 hours by a member of the MMPR or Safeguarding team. This will capture views and identify any safeguarding concerns, which are referred to the designated officer who attends the prison weekly, and offers any necessary support and advice. A YCS (Youth Custody Service) Regional MMPR lead will also provide support and assurance, supported by the Standards Coaching Team	Governor	February 2020
			<p>HMYOI Cookham Wood will quality assure all incidents by:</p> <ul style="list-style-type: none"> <li>• Reviewing all incidents where force is used, ensuring lessons are learned to reduce the probability of force being required in future.</li> <li>• Ensure procedures are sustained to maintain accurate records, including fully completed documentation for all incidents.</li> <li>• Maintain Strategic oversight of Use of Force Governance, including the identification of trends which will be discussed at the weekly safety meeting.</li> </ul>	Governor	June 2020
			The weekly safety meeting will incorporate the Restraint Minimisation Meeting (RMM), which will link in with the weekly Behaviour Management Meetings (BMM), to review reasons for restraints and identify any issues and learning points. The focus will be on reducing risk and working with CYP, to support them in custody and improve behaviour.	Governor	March 2020
HMYOI Cookham Wood will ensure that a continuous training programme is embedded, which will allow for at least an 80%	Governor	March 2020			



			<p>compliance rate in MMPR is sustained, and that part of this training will emphasise the importance of producing quality and timely paperwork following any incidents within set timescales.</p> <p>The Medway Children Safeguarding Board completes an annual review of all use of force, utilising data and commentary from the prison. The review reports on the previous year, and any learning points identified by the Head of Safety are utilised locally.</p>	Governor	March 2020
S48	<p>Concern: Despite in principle having different purposes, Phoenix and Bridge units each held children who were separated on rule 49, some for lengthy periods. In practice there was no clear reason why a child would be placed on one unit rather than the other or remain on normal location while on rule 49. The regimes and contributions by other agencies were similarly poor on both units and some children alternated between the two without appearing to make much progress.</p> <p><b>Recommendation: Children separated on rule 49 should have their needs identified and met.</b></p>	Agreed	<p>HMYOI Cookham Wood has reviewed the Rule 49 processes, including the following changes;</p> <ul style="list-style-type: none"> <li>• CYP located in the Phoenix unit are only placed there if they pose a significant risk to others, while the Bridge landing houses children who are either more vulnerable or refuse to mix with their peers.</li> <li>• All CYP subject to Rule 49, regardless of the reason, are subject to a multi-disciplinary review board, on at least a weekly-basis, where their needs are discussed and actioned.</li> <li>• All CYP subject to Rule 49 receive a Short-Term Assessment of Risk and Need (STARN) regardless of the reasons for being subject to Rule 49. The assessment aims to identify the underlying reasons of their current behaviour, and make recommendations to reduce and/or manage the CYP's risk to self and others and assist prompt and effective reintegration.</li> <li>• An operational manager will oversee the separation process supported by a CM, for all CYP on Rule 49 regardless of their location. This will change the support structure given to those CYP on Phoenix and Bridge Units or if separated on normal location, ensuring access to Enhanced Support Services more quickly to meet their identified needs.</li> <li>• Managers will work with core daily visitors to support a culture of meaningful visits (moving away from visits through a closed door). Healthcare will ensure that a meeting takes place to discuss wellbeing, where safe to do so, and chaplaincy staff will be encouraged to do the same. Duty Governors are advised to undertake meaningful dialogue on daily visits to check if Rule 49 is still required, and determine whether an early review would be appropriate. This will be updated on the daily sign in</li> </ul>	Governor	June 2020



			<p>sheet. A daily administrative check of visitors will be completed and issues escalated to the Deputy Governor.</p> <p>Quality Assurance processes for R49, Special accommodation and Dirty Protest are in place, including a protocol sheet for Quality Assurance (QA) following Band 4, 5 and Head of Function checks each month.</p> <p>It is agreed that separated children should spend more time out of their cell. The additional staff through workforce reform, and the roll out and implementation of the CuSP through the BMS will ensure multidisciplinary teams are engaging with, and encouraging separated CYP, especially those that have chosen to self-isolate. The CuSP officer (through weekly visits) will also have oversight to build a level of trust and consistency with the CYP, creating a positive environment where there is encouragement to engage with others. As part of this oversight, the officer will help identify if any of the CYP needs are not being met, this will include spending time outside of their cell and mixing with others. If their needs are not being met, goals will be set together for the forthcoming week to help meet the identified deficit/s.</p>	<p>Governor</p> <p>Governor</p>	<p>June 2020</p> <p>June 2020</p>
S49	<p>Concern: Positive relationships between staff and children were stifled by the poor regime and limited time out of cell. Staff were unable to spend sufficient time with children to develop.</p> <p><b>Recommendation: Staff should have the time to develop meaningful relationships with the children in their care.</b></p>	Agreed	<p>HMYOI Cookham Wood is committed to developing meaningful relationships between staff and CYP. The staffing levels will increase with the closure of Medway STC, this will allow the delivery of a more consistent and predictable regime. CYP's time out of cell will increase because of this, allowing staff more time to develop meaningful relationships.</p> <p>Custody Support Planning (CuSP) is being rolled out at Cookham Wood, which will provide staff with the time and opportunity to develop respectful, caring and effective relationships with CYP in their care. The continuing implementation of SECURE STAIRS (a psychologically informed, whole system approach to casework and planning) onto residential units, will see:</p> <ul style="list-style-type: none"> <li>• Increased training for staff</li> <li>• Opportunities for reflection on CYP's behaviour through guided reflective practice</li> <li>• Greater understanding of the backgrounds of CYP in their care through Multi-Disciplinary Formulations and meetings.</li> </ul> <p>This will give staff the space, tools and knowledge to develop effective and caring relationships with the CYP in their care.</p>	<p>Governor</p> <p>Governor</p>	<p>March 2020</p> <p>June 2020</p>





			Profiles will allow for weekly community meetings, which will in time link to the youth council. Actions and feedback from these meetings will help staff and SMT to improve relationships and the general care of young people.	Governor	June 2020
S50	<p>Concern: Maintenance and general repairs took too long to resolve and caused significant problems such as the inability to use the sensory room or the two-group rooms on the Bridge landing. The prison was generally quite grubby and the offensive graffiti rendered the overall environment unpleasant.</p> <p><b>Recommendation: The establishment should be well maintained, clean and graffiti free.</b></p>	Agreed	<p>HMYOI Cookham Wood will improve standards of maintenance and cleanliness by:</p> <p>The Head of Business Assurance (HoBA) and the Deputy Governor will hold weekly progress meetings with the Government Facility Services Limited (GFSL) contractor. These meetings will discuss all outstanding maintenance issues, and the timeliness for completion of all outstanding work. Identified non- delivery of services will be raised with the Service Delivery Manager, and then the Regional Estates Manager as necessary.</p> <p>The Head of Communities will be responsible for the following:</p> <ul style="list-style-type: none"> <li>Continued cell painting programmes. Cell Inspection checklists will be established on each unit, with a 'cleanest room' bonus to encourage better maintenance.</li> <li>The cell toilet descaling rolling programme will continue.</li> <li>Ensuring the cleanliness of the serveries, through quality checks by residential Custodial Managers (CM's). A bid will be submitted for the deep cleaning of all serveries in line with the programme.</li> <li>CYP will be supported by staff on how to clean their cells during the induction process, CuSP Officers will encourage and support them to continue to do so, and CYP will be given access to the necessary cleaning materials. Weekly cell inspections will incentivise CYP to keep a clean room.</li> <li>A programme for the continued removal of graffiti from cells, communal areas and exercise yards will be implemented in conjunction with the band 3 cleaning officer, and GFSL as necessary.</li> <li>Refreshing basic items and facilities available in communal areas, in consultation with CYP. This will be kept under review by residential CM's.</li> </ul>	<p>Governor</p> <p>Governor</p>	<p>February 2020</p> <p>March 2020</p>



			<ul style="list-style-type: none"> <li>• Ensure that Unit Managers complete regular checks of residential units, to ensure daily Accommodation Fabric Checks (AFCs) are completed and ensure that cells are well-equipped, clean and well maintained.</li> <li>• Establish Community expectations with guidelines for cleanliness.</li> </ul> <p>Any general repairs or maintenance issues identified through the above actions will trigger a works request for rectification. Where repeated actions are identified the head of communities will raise these issues with the HoBA and Deputy Governor for discussion at the weekly GFSL meeting.</p>		
S51	<p>Concern: The oversight of equality work was weak and no resource was dedicated to equality issues. The Public Sector Equality Duty requires public bodies to consider how their policies or decisions affect people who are protected under the Equality Act. We found managers were not meeting this duty, there was no equalities monitoring to identify differences in access to the regime or services, consultation did not take place and equality action team meetings lacked purpose and did not address key deficiencies in provision effectively.</p> <p><b>Recommendation: Managers should ensure that the diverse needs and entitlements of children are met.</b></p>	Agreed	<p>HMYOI Cookham Wood will ensure the diverse needs of CYP are met by:</p> <p>A member of the Senior Management Team (a Senior Psychologist) has been appointed to lead on Equalities. They reviewed and created a new local Equality Action Plan (EAP), and are actively liaising with Heads of Functions to ensure Equalities is incorporated into all local action plans and policies. A new local Equalities Policy has been developed, which has been shared with other establishments to create a standardised approach to the implementation of Equalities.</p> <p>A dedicated Equalities Team has been implemented, comprising of a Band 6 Equalities Manager (temporary), and two Band 3 Equalities Officers. An advert will shortly be placed for a permanent Band 6 Equalities Manager.</p> <p>Consultation is being prioritised, and information sheets have been given to all CYP in the establishment around Protected Characteristics (PC), and Discrimination Incident Report Form (DIRF) processes. Focus groups will commence from January, with each month focusing on the theme identified from analysis of the previous months data. A campaign has started to recruit Equalities Representatives, although this has produced limited interest to date we will continue to seek representation from the CYP. This is being prioritised, and work is being undertaken</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>Completed</p> <p>June 2020</p>



		<p>with CXK (youth engagement providers) to promote Equalities within the establishment.</p> <p>A new streamlined DIRF process has been implemented, this includes an increase in the assurance of any DIRF's received. To support the promotion of DIRF's, a box will be placed on each landing within the main houseblock, Cedar House, Phoenix (CSU), visits centre (for families and visitors), and the gate lodge for staff. An external scrutiny panel is currently being identified to provide quarterly scrutiny of a selection of DIRF's received. Identified actions following investigations into DIRF's will help to develop local policies, including support for those with disabilities (for both staff and CYP), liaising with CXK to offer focused work around racism, and the recruitment of young people for projects around religion.</p> <p>The diversity calendar is being used to identify and promote events to celebrate within the establishment, and by incorporating and improving relationships with all departments.</p> <p>Weekly allocation meetings within the Equalities Team review all DIRFs, and any themes identified. A monthly meeting from January 2020 will review the EAP and ensure effective data analysis. Themes and trends identified from this data review will then be actioned into projects, and feed into the Quarterly Equalities Meeting chaired by the Governor to ensure senior management support. Discussions have been held around members of the SMT taking the lead for a Protected Characteristic, and this will be finalised within the January Quarterly Meeting.</p> <p>The renewed EAP will seek to work with community groups and external providers, to reinforce the local work being completed. Stronger relationships will be built with local stakeholders and groups, to ensure a cohesive approach to work being undertaken.</p> <p>New staff awareness training will be designed and delivered monthly to ensure awareness of the PC, Equality Act, and role of staff in promoting diversity and inclusion. Awareness sessions will also be created for CYP to build positive relationships. Wing staff, the equalities team or</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>June 2020</p> <p>Completed</p> <p>June 2020</p> <p>August 2020</p> <p>August 2020</p>
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			<p>representatives will be available to advise CYP on how to complete a DIRF correctly, if they are having difficulties in doing so.</p> <p>The Casework function will lead on Foreign Nationals, an analysis of identified needs has taken place to ensure their needs are being met, and a monthly workshop will be held for Foreign Nationals to attend to discuss any issues. The Equalities Team will liaise with Reception to ensure any CYP with limited or no English are identified at the point of reception, they will then be allocated a key worker to ensure their needs are met, they are also provided with relevant materials in their first language (where available). A conference phone has been provided to Reception staff to ensure Big Word can be contacted at the point of entry into the establishment, where translated materials are not available.</p>	Governor	June 2020
S52	<p>Concern: Time out of cell was too limited at about five hours on weekdays and two hours on Saturday and Sunday, with significantly less for keep-apart children who did not have daily exercise. Regime restrictions and controlled movement affected the time available to children for education and exercise and attendance at health appointments and worship.</p> <p><b>Recommendation: The issues of controlled movement in small groups around the prison should be resolved to ensure that all children receive their entitlements and time out of cell is increased to 10 hours a day.</b></p>	Partly Agreed	<p>This recommendation is partly agreed, as within current resources and continued risk factors relating to conflict resolution, the prison is unable to currently provide 10 hours out of cell for CYP. The complexity of the ongoing conflict issues, and associated risk factors prevents Cookham Wood from removing controlled movements completely.</p> <p>Increasing time out of cell is a key priority for the Senior Management Team (SMT), as it will improve outcomes across all other healthy prison expectations. To ensure CYP have increased time out of cell, and opportunities to access all the available activities, along with minimising the amount of 'keep aparts' HMYOI Cookham Wood will:</p> <p>Improve our staffing levels with the closure of Medway STC, this will allow for the delivery of a more consistent and predictable regime.</p> <p>Provide the opportunity for all those CYP engaging with the regime to spend maximum time out of their rooms each day. This will increase time for access to education and vocational training, fresh air, showers and telephones.</p> <p>The Conflict Resolution team continue consultation with CYP to better understand, and respond to, the causes of and drivers of violence within the establishment and how this is impacted by events outside of the establishment.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>March 2020</p> <p>March 2020</p> <p>Completed</p>



			<p>The Restorative Play Programme is in the early stages of development but has recently been expanded and is now a joint venture with the education department and K-Sport.</p> <p>The implementation of Secure Stairs is ongoing; it is anticipated that one benefit of this will be a decrease of the number of violent incidents across the establishment.</p> <p>All education classrooms are to be moved to the main education block, this will reduce the number of groups having to move individually to enable more efficient start times.</p> <p>A CM has been assigned to monitor and drive the regime. They will monitor attendance and work with the SMT to review time out of room for CYP.</p> <p>The Weekend regime will focus on maximising time out of room including dining out for all meals, room and communal area cleaning, association, time in the fresh air, Gym sessions and Church services. Going forward, some CuSP sessions will also be timetabled into the weekend depending on staffing.</p> <p>The Head of Safety will review current processes in relation to Risk Assessments and ensure that the focus is on activity attendance rather than activity restrictions. The Security department will work with the head of communities and the safety department to ensure that CYP can access a full regime as soon as possible.</p> <p>All intelligence reports regarding conflict will be immediately referred to the CR team to be investigated in a timely manner. Positive reinforcement of working through conflict will be supported by Safety and Community managers and staff. This will be monitored at the monthly safeguarding meeting.</p>	Governor	March 2020
				Governor	June 2020
				Governor	April 2020
				Governor	Completed
				Governor	July 2020
				Governor	June 2020
				Governor	Completed
S53	Concern: Senior leaders had not ensured that children's movement to education and skills sessions improved. The very great majority arrived late or very late for their	Agreed	An Activities CM has been appointed that will assist in the movement to and from activities. The movement process itself will be improved to ensure that it is completed as quickly and as safely as possible so CYP arrive on time. The CM will liaise with the conflict resolution team as necessary to overcome any issues that may be slowing down the whole process.	Governor	May 2020



	<p>scheduled sessions and were not ready to learn.</p> <p><b>Recommendation: Senior leaders should implement a new system so that children arrive on time for learning and skills sessions, are ready to learn and receive at least their minimum statutory entitlement to learning.</b></p>		<p>All education classrooms are to be moved to the main education block, this will reduce the number of groups having to move individually to enable more efficient start times. Movements will be monitored on the daily operational managers' report, which will be discussed at the morning meeting for any issues.</p> <p>Custody Support Planning (CuSP) is being rolled out at Cookham Wood, this will provide staff with the time and opportunity to develop respectful, caring and effective relationships with children in their care. CuSP officers will emphasise the positive benefits of engaging with the regime, and arriving on time to education or skills sessions to maximise the available learning outcomes available to them, linking this into the Incentives Policy Framework and the additional benefits this provides them.</p> <p>Attendance will also be monitored through the monthly Performance Review Meeting (PRM). It will be incorporated into CYP's Individual Learning Plans (ILP), and where difficulties arise these will be discussed at the twice weekly pathway allocations meeting to overcome them.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>April 2020</p> <p>June 2020</p> <p>May 2020</p>
S54	<p>Concern: Children's behaviour in non-vocational sessions was frequently poor, with a minority causing violence or disturbance to lessons and others' learning. Senior leaders' initiatives to reduce violence were at an early stage.</p> <p><b>Recommendation: Senior leaders should eliminate poor behaviour in non-vocational sessions so that violence or disturbance to lessons ceases. They should deal effectively with the culture of violence and antagonism in the prison.</b></p>	Agreed	<p>The Education provider will improve the behaviour and attitudes of learners by:</p> <ul style="list-style-type: none"> <li>• Working closely with the Establishment to rapidly improve and maintain consistently high levels of attendance and punctuality, thereby improving relationships between learners and staff.</li> <li>• The provider has an Engagement and Resettlement Team (ERT) to help and support them into non- vocational sessions, and challenge negative behaviour.</li> <li>• All education staff will receive secure stairs awareness training, to help address poor behaviour.</li> <li>• Implementing an effective learning and development programme, that enhances teachers' understanding of the impact of trauma, and the behaviours that may stem from such experiences.</li> <li>• Education staff use the same behaviour management strategies to provide consistent behaviour standards supported by the SMT.</li> <li>• Referring those CYP causing violence and disturbances to CuSP officers, the Conflict Resolution Team and Security.</li> </ul> <p>The prison will support education by continuing to improve all aspects of behaviour across the prison by:</p>	<p>Governor</p> <p>Governor</p>	<p>May 2020</p> <p>June 2020</p>



			<ul style="list-style-type: none"> <li>The continued roll out of Custody Support Planning (CuSP), which will provide staff with the time and opportunity to develop respectful, caring and effective relationships with CYP in their care.</li> <li>All intelligence reports regarding conflict will be immediately referred to the CR team, so they can be investigated in a timely manner. Positive reinforcement of working through conflict will be supported by Safety and Community managers and staff. This will be monitored at the monthly safety meeting.</li> <li>The CR team will continue to consult with CYP to better understand, and respond to, the causes of and drivers of violence within the establishment and how this is impacted by events outside of the establishment.</li> </ul> <p>Weekly safety meetings will address immediate safety concerns, and analyse all available data on violence. The safeguarding report provides a breakdown of incidents so causes of violence can be explored further, and the establishment response developed.</p> <p>Departments are in discussion to provide each landing with a representative so strategies can be put in place to help reduce violence. CYP are included within this so that their thoughts, views and experiences can inform practices.</p>	Governor	March 2020
			<p>Departments are in discussion to provide each landing with a representative so strategies can be put in place to help reduce violence. CYP are included within this so that their thoughts, views and experiences can inform practices.</p>	Governor	May 2020
S55	<p>Concern: It was still the case that, on average, just under half of all children who started an accredited course in any subject completed it and gained the qualification. In functional skills only about a third completed and achieved the qualification.</p> <p><b>Recommendation: Senior leaders should find out why so few children gain their target qualification in any subject and take decisive actions to ensure that all children's attainment improves substantially.</b></p>	Agreed	<p>To increase the levels of completions in accredited courses and functional skills, HMYOI Cookham Wood will:</p> <ul style="list-style-type: none"> <li>Ensure the ERT engages with all CYP explaining the requirements of all courses, as well as investigating reasons for non-attendance at education.</li> <li>The ERT has full discussions around what course/skill would benefit the CYP most appropriately, and what would be their preferred option making them stakeholders in their own education. This includes discussions around suitability for functional skills pathways, which are then taken forward by teachers. Ensuring these discussions are recorded in the ILP.</li> <li>Scrutinise data from the at-risk register against non-completions, this will prompt discussions with the CYP, CuSP officers and the secure stairs model to determine reasons for non-attendance and target qualifications.</li> </ul>	Governor	May 2020



			<ul style="list-style-type: none"> <li>• Hold regular meetings are held with core staff to assess progress and engagement, and progress against the CYP's ILP.</li> <li>• CYP who have been moved from courses will be monitored to check if/when they can be moved back to complete. If they are moved for conflict issues, they will be referred to CR team to see if these obstacles to completion can be removed.</li> <li>• The establishment will implement a modular approach to qualifications with regular quality checks, to ensure that a greater number of CYP are able to complete qualifications.</li> <li>• Education managers will focus on target setting, specifically identifying areas for improvement, to facilitate outcomes for CYP.</li> <li>• CYP are being identified and put forward for functional skills exams based on initial and diagnostic assessments, and whether they are sentenced or on remand.</li> <li>• Lessons will be tailored to their areas for development.</li> <li>• An Activities CM has been appointed to improve attendance and outcomes for CYP.</li> <li>• Closer liaison with community staff to ensure CYP are delivered to the exam room in a timely manner, particularly during shut downs when possible.</li> <li>• A Whole team approach will be adopted to outcomes for functional skills, ensuring all departments realise the importance of attendance and gaining qualifications.</li> <li>• The Allocations Planning Board will be fully supported by all relevant parties, to ensure that CYP can successfully access planned education.</li> <li>• A Curriculum Review will be completed in February 2020 to review the current course provision.</li> <li>• Working with NCFE (an awarding-body to accredit units from qualifications) that will be valuable to those CYP on remand.</li> </ul>		
S56	Concern: A significant number of 18-year olds at Cookham Wood required a placement in the adult estate, some of whom had waited long periods. Some adult establishments refused to accept some 18-year olds, which was	Agreed	The process of transition for a CYP to the adult estate is identified two months prior to their 18 <sup>th</sup> birthday. If a transition request is refused or if potential delays are identified, this will be highlighted by the governor to the receiving establishment. Where issues cannot be resolved at this level the issue will be escalated to YCS placements team, and if	Governor	April 2020





	<p>inappropriate. These delays in sourcing a placement prevented sentence progression and had a negative impact on outcomes for children at Cookham Wood. The process in place to escalate concerns about transitions to the adult estate was ineffective and did not ensure timely transitions.</p> <p><b>Recommendation: All 18-year olds held in children's establishments should be able to transition to the adult estate in a safe and timely manner.</b></p>		necessary to YCS director. All transition requests will be logged and tracked by the head of services.		
S57	<p>Concern: The casework department was not well integrated across the prison. Some initial planning meetings were not timely and some records were inconsistent. Poor use was made of information recording systems to share progress with youth offending teams and community partners. Training and remand plans were not always central to children's progression and targets did not always focus on resettlement. Caseworkers lacked the necessary training and supervision to be fully effective in their roles. Some resettlement work that had been completed with children was not always shared with other departments in the prison to ensure a coordinated approach before release.</p> <p><b>Recommendation: The casework department should deliver a coordinated approach to</b></p>	Agreed	<p>The continued roll out of secure stairs, which will be driven by the Head of Services, will deliver a co-ordinated approach to ensure training and remand plans are completed on time, involving all relevant stakeholders and that they are written in CYP focused language so they understand their plans. The plans will be shared with all relevant departments and external agencies in a timely manner, to ensure their needs are addressed appropriately.</p> <p>Caseworkers will generate two separate screening processes, one for remands and another for sentenced CYP, both of which will be sent to the interventions team. These will be discussed by various stakeholders at the weekly interventions meeting, to ensure the correct allocation and most appropriate allocation for each CYP.</p> <p>The Resettlement Team will look at three key areas; those young people who are on remand, those on short sentences and released from our care, and those on long term sentences who will transition to the adult estate, ensuring a focus on the young person's needs and risk to community. The Interdepartmental Risk Management Meeting which is now called the Public Protection Meeting (PPM) has been reviewed to look at Public protection as well as needs in custody and in the community.</p>	Governor	August 2020
				Governor	August 2020
				Governor	August 2020



<p><b>resettlement to meet children's needs before release.</b></p>	<p>An evidenced based care plan approach (Cusp) is being rolled out in Cookham Wood, providing every young person with an allocated support officer who they will work with on a weekly basis to build trust and consistency. Caseworkers will be allocated to the same location as the CYP they work with. Under the model they will spend more time on the residential unit, and will form a central part of the multi-disciplinary team who carry out formulation meetings, who will in turn inform and facilitate sentence plans, and become more involved in the interventions team's work, through the Secure Stairs model.</p>	Governor	June 2020
	<p>A quality assurance process is in place to ensure sentence plans are bespoke and focused on the individual resettlement needs, reviewed by case work managers.</p>	Governor	Completed
	<p>Relationships will be built and sustained to facilitate better sharing of information with Youth Offending Teams (YOT). Clear escalation processes have been developed with the YOT's if required, to ensure that all necessary information is shared and actions progressed.</p>	Governor	June 2020
	<p>Each Resettlement meeting with the CYP now has a standardised structure that covers the seven pathways to reducing reoffending, behaviour is not discussed in the meeting unless it impacts on their Resettlement. The focus is on their Resettlement in the community and how to best support desistance from offending behaviour. The targets set will follow the pathways and the practitioners have been briefed to set specific resettlement focused targets, with documentation been revised for external partners that is CYP friendly.</p>	Governor	Completed
	<p>The Resettlement team will provide a daily duty caseworker, who provides daily support for CYP and staff, addressing any immediate issues or concerns and linking to appropriate functions.</p>	Governor	Completed
	<p>The Youth Justice Reform programme includes a review of casework that will consider the role and task of casework teams alongside the introduction of the youth justice specialist role and the joint behaviour management model with NHS England. Under the casework review the '<i>How to make resettlement constructive</i>' Youth Justice Board report will be considered in addition to the findings from the Youth Resettlement thematic report.</p>	Governor	August 2020



S58	<p>Concern: Public protection arrangements were still not sufficiently robust and the interdepartmental risk management team meeting did not function well. There was inadequate oversight of high-risk cases, and some children had outstanding MAPPA levels that required confirmation before release. There was no escalation process to manage this. Some resettlement plans lacked detail on the management of serious risk of harm in the community, and ROTL risk assessments required improvement.</p> <p><b>Recommendation: Risk management and public protection processes should ensure safe release planning for children leaving custody.</b></p>	Partly Agreed	<p>This recommendation is partly agreed, this is due to factors beyond our control in relation to confirmation of MAPPA levels from external partners/ organisations. To manage any risk factors to ensure safe release planning we will:</p> <p>The PPM held monthly, will be given greater strategic focus to drive improved attendance, which will be monitored by the Governor/Deputy Governor to ensure effective and appropriate controls are in place, to manage the risk of CYP being released into the community. All identified high risk cases will be discussed during this meeting, with priority cases being determined by the CYP's release date. The necessary arrangements and referrals to community partners will be identified and raised through this meeting.</p> <p>The PPM will identify all Multi Agency Public Protection Arrangements (MAPPA) cases 6 months prior to release, for confirmation of their MAPPA level. If the level is still unconfirmed at the 3-month point, the case will be escalated to the MAPPA board for confirmation. Caseworkers will improve the quality of sentence plans and include more detail on how risk will be managed in the community. This will be monitored by the introduction of a more robust quality assurance system to be completed by managers within the casework function.</p> <p>Processes laid out in PSO 6300 on ROTL are followed, which are those appropriate for children held in a YOI. National policy and framework for CYP in a YOI guidelines are followed, in line with RoTL risk assessments. To help reduce the risk, more accompanied RoTL prior to unaccompanied RoTL will take place to assess any risks to the community. These will also be discussed at the monthly PPM.</p>	Governor	June 2020
	<b>General Recommendations</b>				
	<b>Directed to the Governor</b>				
1.6	Children should have an induction that keeps them fully occupied and provides them with all they need to know about life at Cookham Wood.	Agreed	The induction programme has been revised with a greater level of participation from partner agencies, it has also been formatted onto an MP3 to assist in delivery. The revised programme will incorporate a programme to fully occupy the CYP when not involved in the induction process, to include the gym, exercise and association.	Governor	May 2020



			<p>The Equalities Team will liaise with Reception to ensure any CYP with limited or no English are identified at the point of reception, they will then be allocated a key worker to ensure their needs are met. The appropriate translated materials in their first language will be provided, where this is unavailable locally the 'Big Word' (A translation telephone service) will be used to inform the individual. A conference phone has been provided to Reception staff to ensure the 'Big Word' can be contacted at the point of entry into the establishment where translated materials are not available.</p> <p>To improve on the current induction provision, feedback from the student council and surveys will be incorporated into the package.</p>	Governor	June 2020
				Governor	June 2020
1.29	Good behaviour should be incentivised regardless of the child's location.	Agreed	Improved staffing levels with the closure of Medway STC will allow for the delivery of a more consistent and predictable regime. This will allow for all aspects of the Incentives Policy Framework to be consistently applied across the whole prison. It will also allow all CYP engaging with the regime to access the facilities and opportunities available to them, dependent upon their behaviour and not their location.	Governor	March 2020
1.55	Separated children should receive a regime that is equivalent to their non-separated peers.	Partly agreed	<p>This recommendation is only partly agreed because, providing separated CYP with an equivalent regime will be dependent upon the reasons and location of their separation. However, we will start Reintegration planning processes as soon as a CYP is separated, this will help them return to a full regime as swiftly as possible.</p> <p>Through the Behaviour Management Strategy (BMS), and in conjunction with the roll out of CuSP we will ensure CuSP officers are engaging with separated CYP, including those who have chosen to self-isolate, preparing them for reintegration into normal regime. This will be supported by the local manager who will visit all separated CYP. Further, facilitated through workforce reform, YOIs will have the additional staff to ensure the delivery of SECURE STAIRS principles though the BMS is being delivered. Each CYP will have a multi-disciplinary team supporting and creating a space where they can be part of any reintegration planning. The provision of CuSP will be monitored on a CuSP database and the allocated officer will help inform the reintegration planning steps for the respective CYP.</p>	Governor	June 2020



			<p>All time out of room is recorded within an individual CYP's Rule 49 booklet, however, if they are located on a houseblock, the time out of room is reduced as they have access to in room showers and phones.</p> <p>An operational manager will oversee the separation process supported by a CM, for all CYP on Rule 49 regardless of their location. This will change the support structure given to those on Phoenix and Bridge Units or if they are separated on normal location, ensuring access to Enhanced Support Services more quickly to ensure their identified needs are met.</p>	Governor	March 2020
				Governor	March 2020
2.16	All areas of the prison should be consistently cleaned and all graffiti removed.	Agreed	<p>The Head of Communities will be responsible for overseeing the decency agenda and levels of cleanliness by:</p> <ul style="list-style-type: none"> <li>Continued cell painting programmes. Cell Inspection checklists will be established on each unit, with a 'cleanest room' bonus to encourage better maintenance.</li> <li>The cell toilet descaling rolling programme will continue.</li> <li>Ensuring the cleanliness of the serveries, through quality checks by residential Custodial Managers (CM's). A bid will be submitted for the deep cleaning of all serveries in line with the programme.</li> <li>CYP will be supported by staff on how to clean their cells during the induction process, CuSP Officers will encourage and support them to continue to do so, and CYP will be given access to the necessary cleaning materials. Weekly cell inspections will incentivise CYP to keep a clean room.</li> <li>A programme for the continued removal of graffiti from cells, communal areas and exercise yards will be implemented in conjunction with the band 3 cleaning officer, and GFSL as necessary.</li> <li>Refreshing basic items and facilities available in communal areas, in consultation with CYP. This will be kept under review by residential CM's.</li> <li>Ensure that Unit Managers complete regular checks of residential units, to ensure daily Accommodation Fabric Checks (AFCs) are completed and ensure that cells are well-equipped, clean and well maintained.</li> </ul>	Governor	December 2020



			<ul style="list-style-type: none"> <li>Establish Community expectations with guidelines for cleanliness.</li> </ul> <p>Any general repairs or maintenance issues identified through the above actions will trigger a works request for rectification. Where repeated actions are identified the head of communities will raise these issues with the HoBA and Deputy Governor for discussion at the weekly GFSL meeting.</p>		
2.17	Delays in answering cell bells should be investigated and monitored to ensure that all cell bells are answered within five minutes.	Agreed	<p>A Custodial Manager has been tasked with monitoring priority calls, and challenging staff when excessive times have elapsed. This will be monitored to ensure that there is an improvement, where repeated issues are identified these will be escalated to the SMT.</p> <p>Further steps will be taken to ensure that Cell Bells are answered within 5 minutes by;</p> <ul style="list-style-type: none"> <li>Reminding staff of the importance of responding to cell bells within 5 minutes at wing briefings, and weekly safety team feedback at the daily morning briefings.</li> <li>Allocating officers to individual landings to drive up personal responsibility and outcomes.</li> <li>Raising awareness of cell bell usage to the monthly landing forums/secure stairs meetings forums, to understand the reasons for usage.</li> <li>Reminding residents of misuse of cell bells, by notice.</li> <li>Ensuring that a range of facilities are available before locking up, to reduce usage for non-emergency reasons.</li> </ul>	Governor  Governor	June 2020  June 2020
2.52	Emergency response arrangements should be improved and ambulances called without delay when necessary.	Agreed	The existing policy will be refreshed and issued as a Governors notice to staff, and staff will be reminded at briefings to ensure they have a full understanding, and are aware of the requirement to call an ambulance without delay as necessary. Quality assurance of this process for understanding and compliance will be completed by the safety department, following any incident requiring an ambulance to ensure understanding and compliance.	Governor	March 2020
2.53	A memorandum of understanding should be developed with the local authority and social care provider to	Agreed	A memorandum of understanding will be consulted on, developed and submitted for agreement with relevant local authorities. Once agreed any CYP requiring social care will be discussed at the partnership meetings to ensure their needs are being met.	Governor/Oxleas	September 2020



	ensure that arrangements are in place if a child requires social care.				
2.71	The transfer of patients to community mental health services under the Mental Health Act should occur within the national guideline timescale.	Partly agreed	<p>This is partly agreed as it is subject to the availability of National Health Service (NHS) bed spaces which is outside of the prison's control.</p> <p>Every effort is made to transfer patients within agreed national timescales, and we are proactive in promoting a timely transfer of prisoners. If patients are not accepted within the agreed timescales this is escalated to NHS England, and the prisoner has to remain within the prison setting. There is an embedded weekly telephone conference to discuss with NHS England any issues with transfers. Arrangements are made where appropriate to source privately funded beds where NHS beds are not available.</p> <p>It is agreed that vulnerable CYP who require specialised care should be placed in a mental health bed. However, transfer times can sometimes be delayed due to availability of appropriate secure mental health beds across NHS provision or through the extended time needed to find appropriate placements for specific children and young people who have very complex needs. A key ambition of the NHSE&amp;I Child and Adolescent Mental Health Service Review and delivery of the Accelerated Bed Programme has been to eliminate inappropriate out of area placements by providing an improved distribution of inpatient beds, addressing the urgent gaps and improving local access, to deliver more effective integrated treatment pathways.</p>	Governor/ Central and North-West London NHS Foundation Trust	September 2020
2.83	The oversight of medicines management should be strengthened by improved attendance at medicines and therapeutics committee meetings and improved audit schedules.	Agreed	<p>Kent prisons Medicines Management Group meets quarterly and all three providers Oxleas, CNWL and Forward trust are invited. Additionally, medicines with the CYP's estate has been requested as a separate agenda item. Pharmacy staff (a Pharmacist and a Technician) visit monthly to complete a CD audit and review medicines management within the unit. Any areas requiring improvement are highlighted in a written report.</p> <p>Medicines management and the attendance of these meetings will be an agenda item at the Healthcare partnership meetings, where any issues will be highlighted, discussed and actioned as appropriate.</p>	Governor/Oxleas  Governor/Oxleas	Completed  May 2020



3.15	Prison and education leaders should ensure that children's allocation to learning pathways is determined by what best matches their aspirations or previous experience.	Agreed	<p>CYP are placed at the centre of their education, with specific guidelines regarding their pathways. Upon assessment of each CYP, they will be allocated the pathway best suited to address their aspirations. This will be achieved by:</p> <p>The ERT has full discussions around what course/skill would benefit them the most, and what be their preferred option making them stakeholders in their own education. This includes discussions around suitability for functional skills pathways, which are then taken forward by teachers. Ensuring these discussions are recorded in the ILP.</p> <p>The risk assessment strategy has been reviewed, and the allocations, security and conflict resolution teams will work together to ensure each CYP is allocated the most appropriate pathway wherever possible. Reviews are held regularly with the CYP to monitor engagement with their courses, with Caseworkers and YOT's contributing to these reviews. CYP are placed at the centre of their education, with specific guidelines regarding pathways and eligibility for their pathways.</p>	Governor  Governor  Governor	May 2020  May 2020  May 2020
3.16	Prison and education leaders should ensure that the engagement and resettlement team provides comprehensive support to children during and after their time in the prison.	Partly Agreed	<p>This recommendation is partly agreed because we are not resourced to support CYP following their release. However, the resettlement team will focus on Education Training and Employability outcomes when processing release and transition plans, working with YOTs to sufficiently prioritise continuation of educational achievement upon discharge.</p> <p>The ERT will look at three key areas; those young people who are on remand, those on short sentences and released from our care, and those on long term sentences who will transition to the adult estate, ensuring a focus on the young person's needs and risk to community. The PPM has been reviewed to look at Public protection, as well as needs in custody and in the community.</p> <p>The Resettlement team will provide a daily duty Resettlement Practitioner to support CYP and staff with immediate issues or concerns and linked functions.</p> <p>Clear escalation processes have been developed with the YOT's if required, to ensure that all necessary information is shared and actions progressed</p>	Governor  Governor  Governor	June 2020  Completed  March 2020





3.17	Prison leaders should review the risk assessment process to establish how more children can take up vocational courses.	Agreed	The Head of Security will review current processes in relation to Risk Assessments and ensure that the focus is on activity attendance rather than activity restrictions. The Security department will work with Heads of Communities and Safety, ensuring that a greater number of children can access vocational courses.	Governor	June 2020
			All intelligence reports regarding conflict will be immediately referred to the CR team, so they can be investigated in a timely manner. Positive reinforcement of working through conflict will be supported by Safety and Community managers and staff. This will be monitored at the monthly safety meeting.	Governor	Completed
			Work is on-going within the YCS regarding the 'keep apart' review, with the national 'non-association' task group, to monitor those CYP identified as 'keep-apart', whilst supporting the Conflict Resolution Framework.	Governor	August 2020
3.24	Education leaders should maintain their focus on developing the skills of teaching staff, ensuring particularly that all teachers manage instances of poor behaviour or bad language well.	Agreed	The Head of Education will provide a programme of Continuous Professional Development (CPD), which will be provided to education staff to improve resilience, confidence and provide them with the skills and strategies on how to moderate learners' behaviour and language effectively. The CPD programme will also be used to further up-skill the teachers, providing them with additional strategies to engage the learners. This will be monitored via one to one sessions with teachers, observations of teaching and regular learning walks.	Governor/Novus	June 2020
			Education staff will be further supported in the management of poor behaviour and bad language by: <ul style="list-style-type: none"> <li>• Adopting the 5 pillars of behaviour as part of their CPD</li> <li>• Alarm protocols delivered by the MMPR team</li> <li>• Guidance from Operational Managers (OM) at staff briefings</li> <li>• Learning walks by OM to focus on low level poor behaviour</li> <li>• Management attendance during classes to support teachers</li> </ul>	Governor	June 2020
3.25	Prison and education leaders should improve the quality of outreach provision and extend the time that children can access it.	Agreed	Regime improvements will reduce the demand for Outreach provision. The Learning and Skills Manager and Head of Education will be accountable for the delivery and oversight of Outreach provision, ensuring the prioritisation of education on the residential units for Outreach Learners is improved and facilitated.	Governor/NOVUS	June 2020



			<p>To minimise the amount of outreach education needed, and to improve on the quality of provision NOVUS have:</p> <ul style="list-style-type: none"> <li>• Increased the provision and resources available to separated CYP, and those requiring outreach.</li> <li>• Wherever possible placing CYP into groups that can mix.</li> <li>• Continuing with our trial of moving these CYP in groups to education.</li> <li>• Concentrate on the learners needs and abilities.</li> <li>• A dedicated CM will oversee the process.</li> </ul>	Governor/NOVUS	June 2020
4.6	Appropriate resource should be allocated to ensure swift security clearance of the contact numbers of children's family members.	Agreed	This process is being transferred to the safety team, and an algorithm to meet the concerns is being implemented to improve the effectiveness of the process, to allow swifter access.	Governor	March 2020
4.18	Managers should ensure that ROTL risk assessments are comprehensive, taking full account of potential risk in the community.	Agreed	Processes laid out in PSO 6300 on ROTL are followed, which are those appropriate for CYP held in a YOI. The National policy and framework for CYP in a YOI guidelines are followed, in line with RoTL risk assessments. To help reduce the risk, more accompanied RoTL prior to un accompanied RoTL will take place to assess any risks to the community. These will also be discussed at the monthly PPM.	Governor	June 2020
	<b>Recommendation directed to: Ministry of Justice and Youth Custody Service</b>				
4.36	Children leaving custody should be provided with suitable accommodation in time for other elements of release planning to be completed.	Partly Agreed	This recommendation is partly agreed because accommodation is controlled by local authorities, with policy responsibility held by the Department of Education (DFE) primarily and the Ministry of Housing, Communities and Local Government (MHCLG). The Ministry of Justice (MoJ) and Youth Custody Service have no control over the actions of other government departments. The MoJ agree that more needs to be done to ensure that CYP leaving custody have suitable accommodation in place in good time before leaving. The MoJ will work with the DFE, the MHCLG, and the Welsh Government to develop an improved resettlement strategy, a key focus of which will be the provision of accommodation for children released from custody. The MoJ are currently investigating the feasibility of the proposed solutions with MHCLG, DFE and Local Authorities, and will be continuing conversations with Her Majesty's Treasury over the next month about the possibility of	MOJ/YCS	July 2020



			<p>piloting specific step-down provision, it is likely that a decision will be made by end of March 2020. The MoJ is also working to ensure that youth resettlement - and accommodation – is prioritised both in the future development of the justice system and in long-term plans for the care system.</p>		
	<b>Directed to the Governor</b>				
4.41	Managers should ensure that children are able to access the appropriate interventions before release to promote successful rehabilitation.	Agreed	<p>Caseworkers will generate two separate screening processes, one for remands and another for sentenced CYP, both of which will be sent to the interventions team. The Intervention Team will review and discuss the screens at the weekly allocations meeting attended by various stakeholders, to ensure correct allocations of the interventions, and allocate them to a waiting list for the appropriate intervention.</p> <p>Interventions are offered on an individual or group basis depending on risk and need. The interventions referral screens form the basis of a local needs analysis, and help ensure interventions offered are appropriate to the needs of the CYP.</p> <p>Additional intervention facilitators will be recruited to ensure the YCS interventions model can be successfully applied.</p> <p>A new intervention delivery suite is currently being completed with the creation of a new group room, which will increase the capacity to deliver interventions in an appropriate environment.</p> <p>The Local Interventions Management Team meet monthly to review allocations, intervention needs, as well as existing data. External providers are commissioned to deliver Interventions based on need, and this is proving successful in offering additional opportunities to attend interventions.</p> <p>When interventions cannot be delivered whilst in custody, due to sentence length or any factors preventing completion, these CYP will be referred to the appropriate YOT team.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>June 2020</p> <p>June 2020</p> <p>June 2020</p> <p>March 2020</p> <p>March 2020</p> <p>June 2020</p>



<b>Recommendations</b>	
Agreed	26
Partly Agreed	6
Not Agreed	0
<b>Total</b>	<b>32</b>

