



HM Prison &
Probation Service

Action Plan: HMYOI Cookham Wood

Action Plan Submitted: 8 December 2021

A Response to the HMIP Inspection: 9 – 13 August 2021

Report Published: 16 November 2021

Actions against target dates are likely to be delayed due to Covid-19 related disruptions to service delivery.

INTRODUCTION

HM Inspectorate of Prisons (HMIP) and HM Inspectorate of Probation for England and Wales are independent inspectorates which provide scrutiny of the conditions for, and treatment of prisoners and offenders. They report their findings for prisons, Young Offender Institutions and effectiveness of the work of probation, Community Rehabilitation Companies (CRCs) and youth offending services across England and Wales to Ministry of Justice (MoJ) and Her Majesty's Prison and Probation Service (HMPPS). In response to the report HMPPS / MoJ are required to draft a robust and timely action plan to address the recommendations. The action plan confirms whether recommendations are agreed, partly agreed or not agreed (see categorisations below). Where a recommendation is agreed or partly agreed, the action plans provides specific steps and actions to address these. Actions are clear, measurable, achievable and relevant with the owner and timescale of each step clearly identified. Action plans are sent to HMIP and published on the HMPPS web-based Prison Finder. Progress against the implementation and delivery of the action plans will also be monitored and reported on.

| Term | Definition | Additional comment |
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| Agreed | All of the recommendation is agreed with, can be achieved and is affordable. | The response should clearly explain how the recommendation will be achieved along with timescales. Actions should be as SMART (Specific, Measureable, Achievable, Realistic and Time-bound) as possible. Actions should be specific enough to be tracked for progress. |
| Partly Agreed | Only part of the recommendation is agreed with, is achievable, affordable and will be implemented. This might be because we cannot implement the whole recommendation because of commissioning, policy, operational or affordability reasons. | The response must state clearly which part of the recommendation will be implemented along with SMART actions and tracked for progress. There must be an explanation of why we cannot fully agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons. |
| Not Agreed | The recommendation is not agreed and will not be implemented. This might be because of commissioning, policy, operational or affordability reasons. | The response must clearly state the reasons why we have chosen this option. There must be an explanation of why we cannot agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons. |

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ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMYOI COOKHAM WOOD

| 1. Rec No | 2. Recommendation | 3. Agreed/ Partly Agreed/ Not Agreed | 4. Response Action Taken/Planned | 5. Responsible Owner | 6. Target Date |
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| | Key concerns and recommendations | | | | |
| 7.1 | <p>Key concern (1.36): The number of violent incidents was high. The response to this was invariably to keep children apart from each other, which had a negative impact on their regime and reinforced the violent behaviour. Staffing unavailability, lack of engagement and redeployment of specialist conflict resolution staff to support the regime compounded the problem.</p> <p>Key recommendation: An effective violence reduction strategy, with a robust action plan, should be implemented to reduce the incidence of violence. (To the governor)</p> | Agreed | <p>The Head of Safety along with key stakeholders and children will devise a safer community strategy that will have a clear emphasis on violence reduction, separation, anti-bullying and victim support. The strategy will be supported by an action plan that will include time bounded actions and named responsible owners. The action plan will be reviewed and updated at the monthly safety strategy meeting, utilising current data from the I2 database management information tool, and weekly safety meetings.</p> <p>HMYOI Cookham Wood will increase staff levels in the safety department, to include a full-time head of function, custodial manager, four prison officers and two analysts. The team will analyse the drivers of violence and self-harm, support staff in reducing such incidents and help to improve the recording mechanisms. They will develop Core support teams for each community who will receive input from specialist staff.</p> <p>Safer community peer representatives will be identified, trained and supported by the safety team to help with delivering the Safer Community Strategy.</p> <p>The introduction of a new community play model in line with the previous initiative of restorative play will aim to support our communities in reducing the number of violent incidents.</p> | <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> | <p>February 2022</p> <p>February 2022</p> <p>February 2022</p> <p>April 2022</p> |

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| 7.2 | <p>Key concern (1.37): Too much poor behaviour went unchallenged by staff. This included banging of doors, the blocking of observation panels and shouting out of doors and windows. Expectations about behaviour were not enforced robustly and there was an inconsistent approach to ensuring that even the most basic of standards were met. There was a lack of short- and long-term incentives to make sure that children who engaged could consistently progress and attain long-term goals, such as peer support roles, release on temporary licence (ROTL) and education outcomes.</p> <p>Key Recommendation (i): Consistent expectations of behaviour should be set and communicated to children. (To the Governor)</p> | Agreed | <p>A new Rewarding Positive Behaviour (RPB) policy will be implemented by the Head of Residence with a clear focus on promoting positive behaviour. The RPB policy will empower staff to give instant rewards for good behaviour and the ability to challenge low level poor behaviour, through an instant sanction process. Standards of behaviour will be clearly set out in the Behaviour Management Strategy (BMS), and communicated to Children through the Induction process, regular one to one meetings with a designated officer or Custody Support Plan (CuSP) officer, and through regular community meetings.</p> | Governor | February 2022 |
| | <p>Key Recommendation (ii): There should be clear pathways for children that properly incentivise education, rehabilitation work and prosocial behaviour. (To the Governor)</p> | | <p>The Safer Community Strategy will encourage participation in community living and full engagement with education and sentence planning, through clear pathways that incentivise Children to engage in these areas as they progress through their time in custody.</p> | Governor | February 2022 |

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| 7.3 | <p>Key concern (1.38): The arrangements for separating children did not safeguard children's well-being. Local managers had failed to prevent children from being subject to potentially harmful regimes for extended periods. Oversight arrangements did not enable managers to be better informed of the interactions, education or health care input that these children were receiving. Safeguards for separated children involved a large number of cursory checks, rather than meaningful and dynamic engagement.</p> <p>Key recommendation: Leaders and managers should make sure that children subject to separation can access a regime that is equivalent to that of their non-separated peers. (To the governor)</p> | Agreed | <p>The Head of Safety will implement new separation paperwork in line with national guidance, that will include assurance checks on the regime offered and delivered to Children who are separated. Assurance checks will be completed daily by the Safeguarding Team, weekly by the Governor and Deputy Governor and on a bi-monthly basis by the Central Team.</p> | Governor | February 2022 |
| | | | <p>A re-integration plan and support mechanisms will be formulated at the outset of each Child being separated, that will be shared with them. These plans include education provision and access to interventions. Children who elect to self-isolate will be offered a regime that reflects their need for self-isolation, that will support them to reintegrate within their peer group.</p> | Governor | February 2022 |
| | | | <p>Weekly meetings will be held to discuss all Children who are separated or self-isolating, that has an agenda item to discuss the level of regime each Child has received.</p> | Governor | February 2022 |
| | | | <p>Reviews of separated Children will take place based on their needs and risks, that will aim to move the Child back to a community-based regime as soon as safely possible.</p> | Governor | February 2022 |
| 7.4 | <p>Key concern (1.39, repeated recommendation S50): Extensive and offensive graffiti in cells, communal areas and exercise yards remained a significant problem and was emblematic of generally poor standards across the prison.</p> | Agreed | <p>HMYOI Cookham Wood has begun a local refurbishment of all living accommodation, one landing at a time, which will continue throughout the financial year.</p> | Governor | September 2022 |
| | | | <p>The Heads of Residence undertakes a weekly inspection of the site with our Government Facility Services Limited (GFSL) partners that identifies any issues that need attention, these findings then form part of the works action plan.</p> | Governor | February 2022 |

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| | <p>During the inspection, children told us that graffiti was a 'normal' feature of the prison. Poor standards of cleanliness in cells and communal areas were not challenged effectively by staff and managers.</p> <p>Key recommendation: The establishment should be well maintained, clean and free of graffiti. (To the governor)</p> | | <p>A system will be implemented which will improve access to cleaning materials for children in their communities. Consideration will also be given for a domestic period to be time tabled into the Children's regime.</p> <p>Monthly assurance checks will be completed by Senior Managers on the condition of Children's rooms and communal areas to ensure they are well maintained, clean and free of graffiti, with findings reported back to the Heads of Residence and added to the works action plan. Daily Accommodation Fabric Checks and room condition checks are conducted by community staff, which will address low standards of cleanliness with appropriate supportive action, and also reward Children for maintaining a clean and healthy environment. These standards are underpinned within the BMS.</p> | <p>Governor</p> <p>Governor</p> | <p>February 2022</p> <p>February 2022</p> |
| 7.5 | <p>Key concern (1.40): The promotion of equality and diversity remained weak. Equality monitoring data did not lead to actions or thorough investigations into disproportionate outcomes for some children in protected groups. Investigations into discrimination following receipt of incident report forms were poor and some did not take place at all.</p> <p>Key recommendation: Leaders should make sure that all incidences of discrimination are identified, investigated and addressed. (To the governor)</p> | Agreed | <p>All Discrimination Incident Report Forms (DIRF's) will be quality assured by the Deputy Governor to ensure that all incidents of discrimination are thoroughly investigated, within prescribed timescales, and that the person submitting the DIRF is spoken to and receives a response. HMYOI Cookham Wood will seek external Quality Assurance of the process from the local community.</p> <p>HMYOI Cookham Wood will employ a new band six Diversity and Inclusion (D&I) Lead, who will be supported by two full time D&I officers. A review of the Regime Management Plan (RMP) will ensure that D&I officers are redeployed less frequently, and only as a last resort. The D&I team will analyse local data and identify any disproportionate treatment that will be shared with the relevant functional head to address, who will report their findings or concerns back to the D&I Team. The D&I lead will implement a live action plan from these findings which will be monitored at the D&I meeting.</p> <p>HMYOI Cookham Woods Equality Strategy will be reviewed to ensure that it identifies and analyses a wide range of data, and that time bound action points are identified and allocated from this data. The strategy will outline how the needs of all groups are identified, addressed and Protected Characteristics (PC) are promoted through educational and celebratory events.</p> <p>The D&I meeting will meet monthly with reviewed Terms of Reference, supported by a new agenda and will be chaired by the Deputy Governor. Children will be</p> | <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> | <p>April 2022</p> <p>April 2022</p> <p>April 2022</p> <p>April 2022</p> |

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| | | | <p>identified as D&I peer representatives who will actively contribute findings and trends to the meeting.</p> <p>PC leads will hold forums with Children from each PC on a needs-led basis, but at least quarterly. The meetings will have a standard agenda with a supporting action plan with each PC lead evidencing how they are promoting D&I throughout the prison. Photographic notices identifying PC Leads will be published to staff and Children.</p> <p>A quarterly survey for Children and Staff will be completed with a resulting action plan with time bound actions.</p> | Governor | April 2022 |
| | | | | Governor | April 2022 |
| | | | | Governor | April 2022 |
| 7.6 | <p>Key concern (1.41): The well-resourced mental health services continued to struggle with accessing the children in confidential and therapeutic rooms with allocated officer escorts, resulting in frequently aborted appointments.</p> <p>Key recommendation: Children should be able to access planned mental health care appointments in clinically appropriate and therapeutic environments. (To the governor)</p> | Agreed | <p>A newly refurbished outreach centre will provide physical spaces and bespoke staffing to improve mental health intervention access, for those Children assessed to have the greatest need. This will be managed within the function of Enhanced Support Services.</p> <p>The ongoing refurbishment of the living accommodation will include the conversion of two living accommodation rooms on each landing into interview room. These rooms will allow core support teams to facilitate meetings, inclusive of mental health appointments, within their own communities.</p> <p>An increase in staffing numbers will reduce the need for redeployment and the impact on appropriately staffed spaces to facilitate mental health appointments. Additionally, the Regime Management Plan will be reviewed and will take into account the need to appropriately staff areas of the prison that accommodate designated intervention and health appointment rooms.</p> | Governor | February 2022 |
| | | | | Governor | September 2022 |
| | | | | Governor | February 2022 |
| 7.7 | <p>Key concern (1.42): Time out of cell was too limited, at a daily average of about four and half hours on weekdays and two hours at weekends. Regime restrictions and controlled movement were responsible for many delays affecting the time available to</p> | Agreed | <p>HMYOI Cookham Wood will review their staffing profile, Regime Management Plan, Behaviour Management Strategies and education timetables to increase the amount of time Children can spend out of their rooms engaged in education, constructive activities, physical recreation and social time, including at the weekend. As Covid-19 restrictions ease all Children will be offered 15 hours in education, 3 hours face to face community learning and 3 hours of physical activity per week.</p> | Governor | February 2022 |

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| | <p>children for education classes, work or recreation.</p> <p>Key recommendation: Opportunities for children to spend time out of their cell in education or other constructive activities, including social time together, should be increased, particularly at the weekend. (To the governor)</p> | | <p>Increasing time out of room is a key priority for the Senior Management Team, however, this is subject to available staff resources, continued behaviour management risk factors and any future National/Local Covid-19 Restrictions.</p> | | |
| 7.8 | <p>Key concern (1.43): Children were not able to access enough hours or a broad enough range of face-to-face education, and many were justifiably frustrated that they had too few in-cell learning tasks to complete.</p> <p>Key recommendation: Leaders should make sure that they maximise opportunities for children to study, including in-cell study. (To the governor)</p> | Agreed | <p>All Children will be offered 15 hours classroom-based education and 3 hours face to face community learning every week. In addition to this each Child will have weekly homework set in line with their allocated subjects. This will be time bound, marked and include feedback, that is tracked and reported on at the Quality Improvement Group (QIG) and Performance Review Meetings (PRM).</p> <p>Learning resources will made be available on the In-Room laptops. The content will be diverse and not limited to the subjects delivered in education. The focus will be on learning, although educational games and other resources will also be a feature.</p> | Governor | February 2022 |
| | | | | Governor | March 2022 |
| 7.9 | <p>Key concern (1.44): Leaders were not able to offer the subjects that they had planned as part of the curriculum because of shortages of teachers and prison officers. Too often, classes that were offered were delivered intermittently. As a result, not enough children developed</p> | Agreed | <p>A needs analysis will be completed in December 2021 to determine if the provision currently on offer meets the need of the Children at HMYOI Cookham Wood. The needs analysis will be an ongoing process/live document so need can be assessed in real time as required. The curriculum be updated on completion of the needs analysis and delivered through the existing provision, where this is not possible, HMYOI Cookham Wood will explore the possibilities of outsourcing the requirement.</p> <p>HMYOI Cookham Wood will ensure that the education provider achieves and maintains sufficient staffing to run all 21 education pathways including Maths,</p> | Governor | February 2022 |
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| | <p>their vocational, mathematics, English, and information and communications technology (ICT) skills at satisfactory rates.</p> <p>Key recommendation: Leaders should make sure that the curriculum includes sufficient opportunities for children to develop vocational, mathematics, English and ICT skills. (To the governor)</p> | | <p>English, IT and all vocational pathways. Scrutiny of this will be delivered at the Performance Review Meeting (PRM) where HMYOI Cookham Wood will continue to monitor shortfalls and escalate any identified issues to the contract manager.</p> <p>HMYOI Cookham Wood will review the Regime Management Plan to ensure there are sufficient staff available, so all Children will be offered 15 hours classroom-based education and 3 hours face to face community learning every week.</p> | Governor | February 2022 |
| 7.10 | <p>Key concern (1.45): Too many children did not attend their allocated classes or arrived late to lessons.</p> <p>Key recommendation: Leaders across the prison should make sure that they work collaboratively to prioritise education and increase children's attendance at classes. (To the governor)</p> | Agreed | <p>Residential managers will drive adherence to the regime start and finish times. This will be assured by the assurance team and reported monthly to the Senior Leadership Team (SLT) for action where required. Managers responsible for Custody Support Plans (CuSP) and Behaviour Management Strategies (BMS) attend the Activities Planning Board where issues with scheduling appointments, identified needs from CuSP, Interventions and Health and Wellbeing are discussed.</p> <p>When a Child refuses to attend education they will have a face to face visit with either an Education Engagement and Resettlement worker or personal tutor on the same day as the refusal, to explore the reasons why they did not attend and look for solutions to resolve their issue. A record of this conversation will be recorded on the National Offender Management Information System (NOMIS). Prison Officer landing staff will encourage all Children to attend education prior to any refusal being logged, to try and resolve any issues they may have preventing them from doing so. Where this is not possible the escalation process above will apply with a copy of the NOMIS entry sent to the designated CuSP Officer.</p> <p>When a Child refuses to attend education a support plan will be put in place, with an entry added to NOMIS detailing the plan. Persistent non attendees and Children not engaging with their support plans may need to be managed through the BMS.</p> | Governor Governor Governor | February 2022 March 2022 February 2022 |

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| | | | Attendance will be collaboratively driven through joined up working by all staff, and attendance at Education will be Incentivised through the Rewarding Positive Behaviour (RPB) strategy. | Governor | February 2022 |
| | | | Children will be presented with certificates for educational accreditations by a minimum of a Governor grade. This will be at designated events, where possible, families will be invited to join in the celebration. | Governor | February 2022 |
| 7.11 | <p>Key concern (1.46): Children's written work was, in many cases, of low quality. They wrote answers to theory-based questions that were partially incorrect. In a few cases, children did not take tasks seriously, and their answers to questions were of an inappropriate tone. Teachers usually marked this work as correct, without challenging the children to produce more detailed or accurate answers.</p> <p>Key recommendation: Leaders should make sure that teachers provide children with constructive feedback that helps them to improve their work. (To the governor)</p> | Agreed | <p>Teachers will provide constructive feedback to all children through a new marking Policy and Quality Assurance (QA) cycle being introduced. Teachers will highlight the child's strengths and areas of achievement to keep them motivated, whilst also identifying areas they need to work upon, and how to achieve this. Feedback will encompass the work completed, to the setting of targets in the child's book or portfolio which will be recorded on Pro-monitor (an education database). Summative feedback, at the end of a topic or course, will be used as course feedback, providing the teacher with feedback about the effectiveness of the course design, as well as an opportunity to feed forward to the next course teacher.</p> <p>The Head of Education will implement an improvement plan which consists of training, QA, learning walks and a weekly progress/data meeting to allow progress to be reviewed at management level.</p> <p>Assurance of all educational standards will be undertaken by the Learning and Skills Manager (LSM), assurance team, Youth Custody Service (YCS) LSM and the Head of Reducing Reoffending. An additional QA process will be introduced to ensure that all teachers track every Child's progress consistently and thoroughly. Any identified issues will be presented in writing to the education manager, that will be discussed at the Performance Review Meeting (PRM) and escalated to contracts managers where necessary.</p> <p>The YCS Head of Learning and Skills will supply a QA training package to the establishment LSM and Activities Manager to help them quality assure education delivery, so outcomes can be fed back and scrutinised through the PRM and Quality Improvement Group meetings. This will be followed up and under pinned with face to face meetings between YCS Head of Learning and Skills, the education provider Local LSM and the Activities manager.</p> | <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> | <p>February 2022</p> <p>February 2022</p> <p>February 2022</p> <p>February 2022</p> |

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| 7.12 | Key concern (1.47): Despite good in-person and remote visits provision, take-up was low. In addition, children faced long delays in getting telephone numbers approved and receiving letters from their family and friends. Key recommendation: Children should receive support to enable them to maintain contact with their family and friends in the community. (To the governor) | Agreed | The Personal Identification Number (PIN) policy will be reviewed to ensure that any contacts which aren't approved by Youth Offending Teams (YOT's) will be followed up by the Resettlement team, to ensure that applications are processed contemporaneously. A clear escalation process will be included, to create rigor in the system. | Governor | February 2022 |
| | | | HMYOI Cookham Wood will introduce a pin number log to ensure the submission of pin requests by Children are being monitored by the Resettlement team, so requests to YOT's can be tracked and they can be held to account where necessary. | Governor | February 2022 |
| | | | HMYOI Cookham Wood will review the correspondence processes for Children, ensuring there are adequate numbers of suitably trained staff allocated the task of processing the mail each day, so it is received promptly. Resourcing of this task will be appropriately prioritised to ensure that wherever possible, mail is delivered on the day it is received. | Governor | February 2022 |
| | | | To help improve the provision and maintain contact with families HMYOI Cookham Wood will: | | |
| | | | <ul style="list-style-type: none"> Carry out a review of visits, including a Secure Video Calls/Social Visits survey that will be sent to Children and families to establish how the service can best support the needs of children and their families. Relocate the Secure Video Calls provision to provide a more confidential space away from busier areas of the establishment. Introduce the use of the outside play area for social visits, family days and family therapy sessions. Review the local Release on Temporary Licence (ROTL) policy to enhance community visits and family ties ROTL. | Governor | February 2022 |
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| 7.13 | Key concern (1.48): We found several areas where there was an absence of adequate risk management. ROTL risk assessments were not sufficiently robust; they failed to acknowledge any potential risk of harm posed by the | Agreed | The ROTL risk assessment and local policy will be reviewed and adapted to identify risks both in the community and in custody. Quality Assurance checks for ROTL risk assessments will be completed by the Deputy Governor to ensure they are adequate, and of a good standard. | Governor | February 2022 |
| | | | Public Protection Team meetings will convene weekly with the introduction of a new local log to identify any escalation issues and ensure that 6- and 2-month checks are completed for all Multi-Agency Public Protection Arrangements | Governor | February 2022 |

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| | <p>child. MAPPA management levels were not routinely confirmed before release, and contributions to MAPPA meetings were variable. Case workers had no formal training in risk management.</p> <p>Key recommendation: Risk management processes, including ROTL and public protection, should identify and action risks adequately. (To the governor)</p> | | <p>(MAPPA) Children prior to being released. These checks will be tracked and monitored through the monthly Public Protection Strategic meeting. Caseworkers will receive training with support from the YCS central Public Protection Lead, in the absence of formal training.</p> <p>The Public Protection Meeting Terms of Reference and agenda will be reviewed, and a quorum established to improve attendance and impact, which will be driven by the meeting Chair, with any issues reported through the Monthly Performance & Assurance Report.</p> | Governor | February 2022 |
| | Recommendation | | | | |
| 7.14 | <p>Recommendation (4.52): A memorandum of understanding should be developed with the local authority and social care provider, to make sure that arrangements are in place if a child needs social care. (To the governor)</p> | Agreed | <p>A new Memorandum of Understanding (MoU) will be written and implemented in conjunction with Oxleas NHS Foundation Trust and the Local Authority Social Care provider to meet the needs of the Children within our care.</p> <p>A Local Authority Designated Social Worker will be redeployed within the establishment to ensure that the social care needs of the Children are met from the outset and throughout their stay in conjunction with the MoU.</p> | Governor Governor | February 2022 February 2022 |
| 7.15 | <p>Recommendation (4.72): Medicines should be administered in line with national standards and at times which facilitate optimum therapeutic effect.</p> | Agreed | <p>A working group has been assembled to review the Regime Management Plan (RMP). They will review resources required to administer medication at times conducive to provide optimum therapeutic effect, which will be built into the revised RMP.</p> <p>The Pharmacy lead will devise and implement a local Management of Medicine policy with a supporting assurance framework which ensures that Children's medication is administered accordingly and at the correct times.</p> | Governor Governor/Head of Integrated Care | February 2022 February 2022 |

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| Recommendations | |
|------------------------|-----------|
| Agreed | 15 |
| Partly Agreed | 0 |
| Not Agreed | 0 |
| Total | 15 |



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