



HM Prison &  
Probation Service

Action Plan: HMYOI Wetherby and Keppel

Action Plan Submitted: 01 April 2022

A Response to the HMIP Inspection: 13 – 17 December 2021


Report Published: 16 March 2022

Actions with future target dates may be delayed due to Covid-19 recovery

## 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, Measurable, 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.



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ACTION PLAN: HMIP REPORT

ESTABLISHMENT: HMYOI WETHERBY and KEPPEL

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	<b>Key concerns and recommendations</b>				
	<b>To the Governor</b>				
7.1	<p>Key concern (1.42): Keppel unit had lost its identity since the previous inspection. Children and staff had experienced unstable leadership, outcomes had declined in all areas and the unit was no longer delivering a distinctive therapeutic environment. Provision was indistinguishable from Wetherby in most areas.</p> <p><b>Recommendation: Leaders and managers should better define the purpose of Keppel unit and put services in place that meet the needs of children placed there. (To the governor)</b></p>	Agreed	<p>The Youth Custody Service (YCS) central team will commission a review of the current and future most appropriate use of the Keppel Unit, to offer improved children’s services for children placed in the YCS.</p> <p>The Governor will review the Keppel Unit leadership team to ensure there is a stable team in place to deliver the intended purpose of the Unit.</p> <p>A needs analysis of the children residing at HMYOI Wetherby and Keppel will be undertaken by the psychology team to determine whether any children on the Keppel Unit have different and or more complex needs in comparison to children on the main site. Once evaluated this needs analysis will inform whether a review on the placement criteria for the Keppel Unit is required, to ensure that complex children are placed onto the Keppel Unit (rather than the main site), where they would benefit from the therapeutic and enabling environment.</p> <p>Where a clear enhanced/complex need is identified the required provisions and interventions will be sourced by the Head of the Keppel Unit. Interventions will include services from psychology, health providers and education.</p>	<p>YCS Central Team</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>May 2022</p> <p>October 2022</p> <p>May 2022</p> <p>October 2022</p>

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			Case formulation for all children on the Keppel Unit will be provided, and bespoke regimes provided for each child to meet their needs in a sequenced plan.	Governor	October 2022
7.2	<p>Key concern (1.43): The induction programme for Wetherby and Keppel was rarely completed by boys. They missed important information about life at Wetherby and Keppel and spent too long locked in their cells with little to occupy them.</p> <p><b>Recommendation: The induction programme should engage children and ensure they understand the key aspects of life at Wetherby and Keppel. (To the governor)</b></p>	Agreed	<p>The induction of children into HMYOI Wetherby and Keppel will be reviewed to ensure that all essential elements and information are provided in a caring and welcoming environment. The Induction provision will incorporate peer mentors to support children new into custody.</p> <p>The Induction Programme will be enhanced by determining the needs of every child arriving at HMYOI Wetherby and Keppel, through a case formulation created before the induction programme is completed. An exit interview following the completion of the Induction Programme will be implemented to seek feedback from each child, to assist in continuously reviewing the Induction Programme to ensure it meets the needs of the children. Children will not move from the Induction unit until the full induction programme is complete and case formulations are drafted for each child. The Head of Admissions and Care will implement a management check to provide assurance for the process.</p> <p>The Head of Admissions &amp; Care will work with stakeholders (Education and Youth workers) to provide quality time out of room during the Induction process, where information can be shared, and assessments undertaken. A dedicated area will be identified for children to attend and meet with stakeholders as part of the Induction Programme.</p> <p>A dedicated Resettlement Practitioner will be assigned to support the first night/induction process, who will assist in determining the needs of the child that will form the case formulation and inform targets for sentence planning &amp; resettlement.</p> <p>Digital technology will be utilised to provide details of the services available to children at HMYOI Wetherby and Keppel. The Induction Programme will be uploaded onto in-room laptops with information provided in a variety of formats.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>June 2022</p> <p>June 2022</p> <p>July 2022</p> <p>May 2022</p> <p>June 2022</p>

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7.3	<p>Key concern (1.44): Intelligence was processed promptly but key areas of security risk remained that were not analysed adequately. For example, leaders were aware of a significant backlog of phone monitoring, but the risks had not been recorded on any security intelligence logs. The monthly security assessments were weak and the impact of this risk on the establishment or the public had not been considered.</p> <p><b>Recommendation: Known security risks should be thoroughly analysed to enable an appropriate response to emerging concerns. (To the governor)</b></p>	Agreed	<p>The monthly Security Committee Terms of Reference will be reviewed so there are clear links to the monthly Local Tactical Assessment (LTA) and The Tactical Coordination Group (TTCG). The Security Committee Meeting will change to be more task/action focussed, based on intelligence gathered from the LTA. The monthly TTCG meeting will use competitive analysis (a strategic tactic used to identify and evaluate) to ensure that all risks are appropriately identified, documented and risk ratings determined. Actions will be tracked by the Head of Security and updated monthly.</p>	Governor	April 2022
7.4	<p>Key concern (1.45): Rates of separation had increased since our last inspection, and periods of separation were longer for children than in similar establishments. Reintegration was not always considered or implemented at the earliest opportunity. Oversight of separated children was not adequate and mandatory daily visits were not always taking place. There was less access</p>	Agreed	<p>A new Youth Custody Service (YCS) separation Pilot commenced in March 2022, which the YCS will look to implement across all Young Offender Institutions following learning from the pilot. The pilot will provide additional data and information to help track separation themes.</p> <p>Middle Managers will undertake weekly Assurance checks that will review if children have been offered a comparable regime and that they have received statutory visits from the Duty Governor, healthcare and the chaplaincy.</p> <p>All children subject to Prison Rule 49 (where children are separated from their peers) are discussed weekly at the Enhanced Support Services meeting (ESSM) and actions agreed for the following week to reduce separation.</p>	<p>YCS Central Team</p> <p>Governor</p> <p>Governor</p>	<p>June 2022</p> <p>September 2022</p> <p>September 2022</p>

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	<p>to education than for their non-separated peers.</p> <p><b>Recommendation: Leaders should improve oversight of children separated, ensuring that they can access a regime that is equivalent to that of their non-separated peers and that reintegration takes place at the earliest opportunity. (To the governor)</b></p>		<p>The Enhanced Support Team (EST) will align with Good Order or Discipline (GOoD) reviews to ensure integrated care principles are applied and that the child is the centre of the meeting.</p> <p>Plans for children's re-integration into a full regime are planned at the earliest opportunity, to help maintain relations with children and staff who will care for them.</p>	<p>Governor</p> <p>Governor</p>	<p>September 2022</p> <p>September 2022</p>
7.5	<p>Key concern (1.46): There were still weaknesses in equality work. The equality needs assessment, strategy and action plan were out of date, and there was no guidance for staff on how to support children from protected groups and data were not used adequately. There was limited consultation with children in protected groups and there was no forum for black and minority ethnic children to discuss negative perceptions with managers. There were key differences in provision and outcomes for the girls in the population.</p>	Agreed	<p>Youth Custody Services (YCS) have commissioned the YCS Psychology team to undertake a Needs Analysis to all YOI sites during 2022.</p> <p>The Head of Equalities and the Equalities advisor will review the local Equalities strategy and update the equalities action plan following monthly Equality Action Group (EAG) meetings. Children Equality Representatives will be invited to attend the EAG.</p> <p>The Equalities Analyst will collate and analyse all equalities data for discussion at the EAG meeting so any disproportionality can be identified and addressed, with appropriate actions added to the equalities action plan. Additionally, the data will be discussed at the monthly Senior Management Team meeting.</p> <p>Quarterly children consultation forums will take place for all Protected Characteristics (PC's) within the demographic of HMYOI Wetherby and Keppel. Each PC will have a nominated Senior Management Team (SMT) lead who will chair the consultation forums that will be minuted and have timebound actions. Photographs of each PC lead will be displayed on all units.</p> <p>Equalities Impact assessments will be carried out on all new and existing policies/strategies by Functional Heads to ensure no child or group is unfairly</p>	<p>YCS Psychology Team</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>September 2022</p> <p>October 2022</p> <p>May 2022</p> <p>September 2022</p> <p>May 2022</p>

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	<b>Recommendation: Leaders should use data to identify and address inequitable outcomes and provide support to children with additional needs. (To the governor)</b>		disadvantaged. This will be actioned through the monthly EAG. Guidance and learning communications will be produced following completion of the Impact Assessments, so staff can provide necessary support for all children at HMYOI Wetherby and Keppel.		
7.6	<p>Key concern (1.47): Children did not spend enough time out of cell during the day, particularly at weekends. Management information did not record time out of cell accurately.</p> <p><b>Recommendation: The time that children spend out of their cells in activity should be increased, particularly at weekends. (To the governor)</b></p>	Agreed	HMYOI Wetherby and Keppel will build on the current regime delivery to increase the offer at weekends and during the evening period. The prison will work closely with the education provider to improve the delivery and offer of education. The regime offer for children will be expanded ensuring that time out of room is engaging, purposeful, maximised and linked to learning, wellbeing and family contact.	Governor	June 2022
7.7	<p>Key concern (1.48): The regime allowed all children time outside every day, but outdoor facilities were poor, and there were no organised exercise activities. We observed children standing around in bare yards with nothing to do. Children had requested improvements to the range of activities permitted on exercise yards through the youth forum.</p>	Partly Agreed	<p>This recommendation is partly agreed, as any enhancements to outside areas will be subject to securing the necessary funding.</p> <p>Prior to submitting a bid for improvements HMYOI Wetherby and Keppel will consult with staff and children on what they would like the outdoor provision to be. The primary focus for any enhancements will be the exercise yards on Drake, Exmouth and Frobisher.</p> <p>HMYOI Wetherby and Keppel has already secured capital funding for additional outdoor gym facilities, with Collingwood exercise yard now having Astroturf as part of this funding. The Physical Education Team will be expanded so that learning and time outside can be increased, purposeful and support wellbeing.</p>	<p>Governor</p> <p>Governor</p>	<p>November 2022</p> <p>September 2022</p>

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	<b>Recommendation: Facilities for games and social interaction in outdoor areas and the supervision of outside activities should be improved so that children are enabled and encouraged to make better use of their time outside. (To the governor)</b>		Time in the fresh air will be delivered with specific themed focuses that are linked to outcomes for children. HMYOI Wetherby and Keppel has secured the services of an architect provision who will work with staff and children in re-designing the traditional exercise yards.	Governor	September 2022
7.8	Key concern (1.49): The teaching of English and mathematics on both sites was not developing the skills and knowledge that would help young children to progress and gain necessary qualifications. Teachers were not using information from initial assessments to identify the areas that children needed to work on. In mathematics teachers and managers seemed unsure of the progress children were making in the skills they had developed. In English, teachers were not using topics that engaged the children's interests. Too many children were not completing their courses and gaining qualifications.	Agreed	<p>Novus (the education provider) will improve the planning and quality of English and Mathematics by:</p> <ul style="list-style-type: none"> <li>• Implementing an overarching document that allows children, staff and leaders to have sight of the child's education progress, targets, achievements and any Special Education Needs and Disability (SEND) requirements. The document will track a child's progress from the initial assessment and throughout their time at HMYOI Wetherby.</li> <li>• Providing monthly awareness sessions for all teaching staff to continue to upskill them in target setting, that will also include peer reviews.</li> <li>• Middle and senior education managers will carry out management and assurance checks of work completed by children through learning walks and work scrutiny, to ensure targets are assessed.</li> <li>• Devising a process that enables all children to continue their learning regardless of unit location and or changes in education allocation in English and Mathematics.</li> <li>• Adding a specific agenda point to the Novus Business Data Meeting regarding English and Mathematic withdrawals, to enable constant tracking of this information to allow relevant actions to be taken to reduce the number of withdrawals.</li> <li>• Increasing the number of specific exam sessions for English and Mathematics and communicate these across the HMYOI Wetherby via the purposeful activity / activities team.</li> </ul>	Governor/Novus	September 2022

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	<p><b>Recommendation: Managers and teachers of English and mathematics should improve the planning and quality of the teaching in these subjects. They should use the information they collect through initial assessment to identify the specific skills that individual children need to develop, monitor their progress and support them to master these skills. English teachers should engage children more effectively in their lessons by using more stimulating resources. (To the governor)</b></p>		<p>The YCS central team will use contract and educational expertise within the operations portfolio to support leaders at HMYOI Wetherby and Keppel in improving the quality of community learning through the education provider.</p>	<p>YCS Central Team</p>	<p>September 2022</p>
7.9	<p>Key concern (1.50): Leaders and managers had not thought through effectively what the community learning curriculum should comprise and how to identify if the curriculum achieved the development of the children's personal and social skills.</p> <p><b>Recommendation: Leaders and managers should plan and structure the community learning curriculum so that it comprises a linked set of activities that build the</b></p>	<p>Agreed</p>	<p>HMYOI Wetherby and Keppel and Novus Managers will establish the minimum requirements and expectations expected from community learning.</p> <p>Novus will conduct learner voice across HMYOI Wetherby and Keppel to ascertain what the children would like community learning to achieve, and what they would like to learn. This will form a key part of the solution for community learning and meetings between Novus and the YCS.</p> <p>Once delivery expectations are agreed, Novus will design a community learning curriculum that meets the learning needs of children that is sequenced accordingly.</p> <p>Novus will measure the effectiveness of the community learning curriculum by; capturing each child's individual learning starting point in relation to their wider skills, including soft skills, together with a skills-based progress measurement. This will measure the development of the child's personal and social skills at the</p>	<p>Governor/Novus</p>	<p>September 2022</p>

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	<b>personal and social skills of children. They should be clear about how to measure the impact of this curriculum. (To the governor)</b>		commencement, throughout and at the end of community learning projects, groups and sessions. Progress and the effectiveness of the curriculum will be discussed and monitored at the Monthly Performance review meetings, and through the quality management framework at HMYOI Wetherby and Keppel.		
7.10	<p>Key concern (1.51): Not enough children were progressing into education, training and employment when they were released.</p> <p><b>Recommendation: Engagement and resettlement staff should work more effectively with the prison resettlement practitioners and community partners to enable more children to progress into further education, training or employment when they are released. (To the governor)</b></p>	Agreed	<p>HMYOI Wetherby and Keppel will improve effective working arrangements between Engagement and Resettlement (E&amp;R) workers, Resettlement Practitioners (RP) and Community Partners by:</p> <ul style="list-style-type: none"> <li>• E&amp;R workers will attend Initial sentence or remand meetings and share the Personal Learning and Skills Plan (written with the child) within 5 working days of a child entering custody.</li> <li>• E&amp;R workers will work in partnership with RP's by attending every sentence planning meeting, pre-release and release meeting.</li> <li>• E&amp;R workers will attend subsequent remand meetings on a bi-monthly basis and provide written feedback if unable to attend.</li> <li>• E&amp;R workers will establish Release on Temporary Licence (ROTL) opportunities for education, training and employment and work in conjunction with the resettlement practitioners to facilitate ROTL.</li> <li>• Novus and the YCS Business Engagement Manager will liaise with external organisations to identify employer groups willing to deliver bespoke talks or sessions to Education groups.</li> <li>• Ensuring every child has some form of Education Training and Employment (ETE) opportunity identified before release.</li> </ul> <p>The Engagement and Resettlement Manager will measure the effectiveness of the process through monthly meetings with Education senior managers and produce quarterly reports on ETE outcomes for the Senior Management Team.</p>	Governor/Novus	September 2022
7.11	Key concern (1.52): The restriction of visits to weekday	Agreed	HMYOI Wetherby and Keppel will expand access to social visits to include the weekend.	Governor	May 2022

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	<p>evenings resulted in a very low uptake of visits and disadvantaged those who worked, travelled long distances or had childcare responsibilities.</p> <p><b>Recommendation: Prison leaders should extend visiting hours across the weekend to provide more equitable opportunities for children to receive face-to-face visits. (To the governor)</b></p>				
7.12	<p>Key concern (1.53): The resettlement department was dysfunctional. Morale was low and many staff raised concerns about the lack of leadership and an absence of mutual support among staff.</p> <p><b>Recommendation: Prison leaders should be visible and sensitive to the needs of their staff, address their views and complaints, and make sure that all resettlement staff have clearly defined roles and receive the support and training they need to fulfil them. (To the governor)</b></p>	Agreed	<p>HMYOI Wetherby and Keppel will recruit new senior managers to the Resettlement function, and the Resettlement management team will be offered a development opportunity on the Learning Journey course. New senior managers will review the function to ensure it is operating in line with guidance and policy to deliver an efficient and professional service. A needs analysis will be completed to ensure it is relevant to the current population, to assist in providing clearer direction for the staff within the function.</p> <p>Staffing training is being developed centrally by the YCS Resettlement Lead to provide training for current and newly recruited staff in the function.</p> <p>One-to-One staff consultations have begun to look at supporting staff in their training and development needs, that will also explore issues around staff moral and workloads. Staff supervision and support will be implemented and delivered at least monthly.</p>	<p>Governor</p> <p>YCS Resettlement Lead</p> <p>Governor</p>	<p>May 2022</p> <p>March 2023</p> <p>July 2022</p>

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7.13	<p>Key concern (1.54): Telephone monitoring was in disarray. Prison staff could not keep up with call monitoring and the backlogs had become unmanageable. Some call monitoring was being routinely sanctioned by managers with no justifiable reason.</p> <p><b>Recommendation: Telephone call monitoring procedures should be reviewed to make sure that all monitoring is justified and legitimate and the backlog in call monitoring should be addressed. (To the governor)</b></p>	Agreed	<p>HMYOI Wetherby and Keppel has implemented monthly reviews of children subject to telephone monitoring with direct oversight by the Deputy Governor to ensure that decisions on monitoring are proportionate and necessary. Decisions to monitor are recommended through risk meetings, and then are considered for approval following justification by the Deputy Governor.</p> <p>Additional monitoring machines have been purchased, and a business case to YCS Workforce Planning seeking a further four Operation Support Grade's (OSG's) to undertake monitoring has been submitted.</p>	<p>Governor</p> <p>Governor</p>	<p>Complete</p> <p>May 2022</p>
7.14	<p>Key concern (1.55): The interdepartmental risk management team did not review the risk management of children and much of this work had unofficially devolved to resettlement practitioners. Leaders did not have the required assurance and oversight of the management of children's risks on arrival and in preparing for release.</p> <p><b>Recommendation: The purpose of the</b></p>	Agreed	<p>The Inter-Departmental Risk Management Team (IDRMT) meeting Terms of Reference and agenda will be reviewed to ensure it adheres to national guidance. A quorum will be established to improve attendance and its impact that will be monitored by the meeting Chair, with any issues reported back through the Monthly Performance and Assurance Report.</p> <p>IDRMT meetings will be held monthly to provide oversight of children's identified risks, with MAPPA cases discussed at their six and three-month points prior to release and depending on risk every month prior to release as required. Additional adhoc meetings will be held if any child receives a short sentence that falls outside the scheduled meetings.</p>	Governor	May 2022

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	<b>interdepartmental risk management meeting should be reviewed, and leaders should ensure that the meetings provide effective oversight of children's risk. (To the governor)</b>				
	<b>Recommendations</b>				
	<b>To the Governor</b>				
7.15	Recommendation (3.17): Child protection allegations that meet the national criteria should be forwarded to the local authority designated officer for advice or investigation. (To the governor)	Agreed	<p>The Head of Safeguards will meet with the Local Authority Designated Officer (LADO) and outline the process for submitting child protection allegations to ensure that the key concern is met.</p> <p>The referral process will be updated where decisions are recorded by the Safeguards Manager, with quarterly assurance process conducted by the Head of Safeguards and the LADO.</p>	Governor	May 2022
7.16	Recommendation (3.33): Those carrying out adjudications and minor reports should fully explore the circumstances of the alleged offence before finding guilt. (To the governor)	Agreed	<p>The Deputy Governor will undertake refresher training locally with adjudicators to outline the level of enquiry required during adjudication hearings.</p> <p>The Deputy Governor will re-enforce the requirement to fully enquire during the adjudication hearing and utilise the monthly quality assurance (10% sample management check by the Deputy Governor) process to raise with individual adjudicators any performance concerns.</p> <p>Themes and learning will be provided at the Adjudication Standardisation Meeting where learning is shared by the Deputy Governor with adjudicating governors.</p>	Governor  Governor  Governor	May 2022  May 2022  May 2022
7.17	Recommendation (4.61): A memorandum of	Agreed	HMYOI Wetherby and Keppel will engage with the local authority to implement a Memorandum of Understanding (MoU) for adult Young People (those who have	Governor	September 2022

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	understanding should be in place between the prison, local authority and social care provider to formalise arrangements for adult prisoners needing support. (To the governor)		<p>reached their 18<sup>th</sup> birthday whilst at HMYOI Wetherby and Keppel), which mirrors the MoU for children, formalising current arrangements.</p> <p>HMYOI Wetherby and Keppel and our partners will continue to work for the best interests and outcomes for children and those who have reached 18 years old to ensure their social care needs are identified, assessments carried out and necessary interventions put in place to ensure the needs of all are met.</p>	Governor	September 2022
7.18	Recommendation (4.69): Patients requiring admission to hospital under the Mental Health Act should be transferred in accordance with the contemporary Department of Health and Social Care guidelines. (To the governor)	Partly Agreed	<p>This recommendation is partly agreed, as bed space in young people’s medium and low secure services are subject to factors outside of the direct control of HMYOI Wetherby and Keppel, such as the waiting lists in suitable facilities.</p> <p>NHS England and NHS Improvement continue to focus on the pathway for transfers and remissions of any child who is sentenced to custody (in England) or who has been remanded to custody to and from mental health hospitals.</p> <p>In December 2021 NHS England and NHS Improvement published revised Transfer guidance under Mental Health Act 1983 for children detained on youth justice grounds. The updated timescales within the Guidance reflect recommendations from the Independent Review of the MHA; Modernizing the Mental Health Act; Increasing choice, reducing compulsion (2017) and subsequent White Paper – Reforming the Mental Health Act (2021)</p> <p>In terms of Children’s and Young people’s inpatient services, national and regional teams in NHS England and NHS Improvement work closely with the providers of services and NHS-led Provider Collaboratives as the vehicle for the delivery of improvement in the effectiveness and quality of children’s and young people’s medium and low secure services. The Weekly Adolescent Medium Secure Network monitors all referral timescales with a view to ensuring timescales are adhered to and troubleshooting occurs at the earliest possible opportunity. The National Case Management System is a central repository for recording of referral/assessment and admission dates allowing local and national systems to have oversight of a child’s pathway.</p>	Governor/Head of Healthcare	Complete

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			<p>In line with the Long Term Plan ambition the Provider Collaborative Programme gives local ownership to providers for the whole pathway, including the interface with the criminal justice system, and the resource for their own populations, enabling them to make commissioning decisions to improve and integrate services. In respect of high secure, a strategic commissioning plan is being developed that will describe the clinical model, pathways and capacity required for implementation.</p> <p>The overall strategic direction continues to focus on improving efficiency across the pathway, e.g. ensuring appropriate lengths of stay, and reducing transitions with better throughput</p> <p>NHS England does not commission High Secure services for Children and Young People.</p>		
7.19	<p>Recommendation (4.87): The dental suite should be maintained in a good state of repair to ensure safety and compliance with infection control standards. (To the governor)</p>	Agreed	<p>The dental suite will be redecorated, and a cleaning schedule implemented to ensure that infection control standards are met and maintained. The cleaning schedule will be displayed and endorsed as assurance that the provision is cleaned.</p> <p>The Head of Healthcare will monitor the schedule and raise with the Head of Business Assurance any deficiency in provision.</p>	Governor/Head of Healthcare	May 2022

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Recommendations	
Agreed	17
Partly Agreed	2
Not Agreed	0
<b>Total</b>	<b>19</b>



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