

Consultation response

Proposed changes to joint inspections of secure training centres

August 2018



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1. Do you agree that we should apply the following judgement structure to inspections of secure training centres?

The overall experiences and progress of children and young people, taking into account

- **how well children are helped and protected**
- **the quality of education and related learning activities**
- **the quality of health care**
- **the effectiveness of leaders and managers.**

Yes, we think that the judgement structure as presented covers most of the significant areas of inspection, though we would also like to propose an additional key judgement for resettlement, taking it beyond the proposal to 'make a clear statement on the quality of resettlement work' as currently proposed.

As you will know, transition between custody and community can be a particularly vulnerable time for young people, as well as a time of heightened risk to others. It is, therefore, important that resettlement activity begins at the point a child arrives and then throughout custody, with strong links in support of this, between custody and community.

You may be interested to know that we are currently working with HM Inspectorate of Prisons to develop a set of youth resettlement standards. We are conducting fieldwork in the five Young Offender Institutions (YOIs; ending early 2019), tracking cases from custody into the community three months later. This will recognise the important part both custody and community play in resettlement activity and will produce a workable set of standards that we can apply to future inspections. We would encourage you to consider how such inspection standards might apply to the inspection of STCs.

We would also ask that you recognise in your evaluation criteria the unique nature of the custodial environment, and the risk and vulnerabilities that presents. This would provide some read across to the inspection of YOIs too. As STCs are one part of the youth custodial estate, and children and young people can move between these establishments, it would benefit the Youth Custody Service, as owners of the estate, to have some consistency in oversight.

2. Do you agree that there should be a more robust and consistent response to an inadequate judgement?

Yes. We are supportive of you taking additional action to avoid repeated poor inspections, instead pushing for immediate action and improvement.

3. Do you agree with the following proposals to strengthen arrangements following a judgement of inadequate:

- **holding an urgent review meeting with the MoJ to determine the most appropriate action.**

- **Returning promptly to a centre (either as a monitoring visit or a full inspection) to ensure that children are safe, usually within 8 weeks of an inadequate judgement.**

Yes. The proposal for an early visit and ongoing support before the next inspection is welcome. We also note that this aligns with the inspection methodology for secure children's homes.

We would recommend that where safeguarding issues are concerned, the information is also given to local safeguarding partners so they can mobilise their own intervention in any concerning practice, in support.

We would recommend monitoring and reviewing the impact of this new approach to ensure it results in the desired outcomes.

4. Do you agree that we should do a 'point-in-time' survey of the views of children at STCs, replacing the current on-site survey?

It is unclear from the consultation how this proposal would improve the current approach.

A point-in-time survey would be a useful source of evidence in a risk-based approach to inspection but on an annual cycle it is hard to see how this would be needed. It could also be used to identify lines of enquiry but this would need to be sufficiently close to the inspection to be valid; presumably, the current survey would be a better source for this purpose. Divorcing the survey from the inspection also means that the findings cannot be used as an evidence source.

We support the current approach whereby a survey is conducted just before the STC inspection. We fully support maintaining the independence of these surveys.

While we recognise that inspectors talk to as many children as possible during the inspection, we would ask you to consider seeking the views of children after their release too. It can be difficult for children to raise issues and concerns when they are in the establishment. Parents/ carers can also be a good source of feedback as you have evidenced through your school inspections.

5. Do you agree with the proposed three days' notice period for inspections of STCs?

We do not fully understand the rationale presented, but we note that HMI Prisons' inspections are generally without notice, and unannounced inspections do bring benefits. They are accepted by HM Prisons and Probation Service in relation to prisons, and governors have come to expect that. On the face of it, we do not understand why unannounced inspections appear to have been discounted altogether.