



An updated response to: A thematic review of Separation of Children in Young Offender Institutions

Report Published: 21st January 2020

Original Action Plan Submitted: 14th February 2020

Updated Action Plan Submitted: 20th January 2021

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 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.

Within this Action Plan Children and Young People (CYP) refers to all individuals placed within the Youth Custody Estate.

Context

In January 2020 HMIP published a report following their thematic inspection of the 'Separation of Children in Young Offender Institutions'. The report stated, '*The weaknesses of current practice and oversight are of such a magnitude that we recommend an entirely new approach, and that current practice be replaced*'. Consequently, HMIP made 10 recommendations in total; to the Secretary of State of Justice (1), HM Prison and Probation Service/Youth Custody Service (7) and NHS England and NHS Wales (2) to improve the service delivered to this cohort.

Of the 10 recommendations, 6 were agreed, and 4 partly agreed, an action plan was produced in response to these and collectively we are rising to the challenge of responding effectively to HMIP's findings. Since February 2020 we have been working towards achieving the objectives in the action plan and this document summarises the progress made to date. For ease of reference, an overview has been provided. This is followed by a table showing the original action plan against each recommendation in shaded fields, and an update of progress in plain cells. Actions have been implemented in the interests of short and longer-term improvement and in many cases, it will take time before the benefits for children are fully realised. **The projected completion dates outlined will be reviewed in the light of Covid-19 and may be delayed.** Nevertheless, this action plan is a priority for all staff involved in the implementation of improvements and for their Senior Leaders at all levels in HMPPS, who will continue to work towards the objectives in the future, driving improved confidence and performance.

Introduction

HMIP found that children's experience of separation differed dramatically depending on the establishment they were held in, and even between different units in the same Young Offender Institution. In such a small estate holding just 606 children, it was inexplicable that there were so many different models of separation. The regime that was offered to most separated children was inadequate. While it tended to be better on designated segregation units, nearly all separated children spent long periods of time in their cell without any meaningful human interaction. HMIP found children who were unable to access the very basics of everyday life, including a daily shower and telephone call. They found significant failures of oversight both locally and nationally. This meant that leaders and managers did not have the basic information needed to identify these problems and address them. The current system of daily checks by managers, nurses and chaplains gave an illusion of oversight. However, these checks were cursory, often took place through a locked door and sometimes did not happen at all. This was compounded by weak or non-existent reintegration planning which meant that some children were separated for far too long. The report did identify some areas of better practice, particularly at HMYOI Parc, where reintegration planning took place swiftly and children were separated for shorter periods of time. However, HMIP found multiple and widespread failings. As a consequence of these failings most separated children experienced a regime that amounted to the widely accepted definition of solitary confinement. The weaknesses of current practice and oversight are of such a magnitude that they recommended an entirely new approach, and that current practice be replaced. A new model of separation should be implemented that enables managers to use separation to protect children from harm, and prevents separated children being subjected to impoverished regimes.

ACTION PLAN: A thematic inspection of Separation of Children in Young Offender Institutions

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner (including named individuals and their functional role or department)	6. Target Date
	Key Concern and Recommendation				
	Directed to: The Secretary of State for Justice				
1	Key Concern: The current arrangements for separating children in YOIs do not safeguard children's well-being. Local and national leaders and managers have failed to prevent children from being subject to harmful regimes for extended periods of time. Oversight arrangements do not enable	Partly Agreed	<p><u>Original Action Plan (February 2020)</u></p> <p>This recommendation is partly agreed as the Youth Custody Service is urgently reviewing the current model of separation across the whole youth secure estate to determine how the current model can be improved upon; this oversight will include our Welsh secure establishment.</p> <p>The Chief Executive Officer (CEO) of HM Prison and Probation Service has commissioned a taskforce to be independently chaired by a senior member of the Youth Justice Board (YJB) and led by a senior governor from within the YCS (Youth Custody Service). This action focused piece of work began in November 2019 and will be completed in January 2020. It will include representation from psychology and safeguarding colleagues and will be informed by external partners from health and education. We will also consider relevant internal and external reports and reviews to provide a holistic approach.</p> <p>We are committed to ensuring separated children receive a fuller regime than is currently provided to them. This is an area which the taskforce is</p>	YCS Prison Group Directorate Team (PGD)	<p>March 2020</p> <p>Completed</p>

<p>managers to know how many children are separated or for how long, or what interactions, education or health care input they have received. Safeguards for separated children involve a large number of cursory checks rather than meaningful and dynamic management.</p> <p>Recommendation: The current models of separating children in young offender institutions should be replaced with a new system that ensures a regime that is equivalent to their non-separated peers.</p>		<p>urgently looking at ahead of making their final recommendations, and following consideration will take the necessary and appropriate actions in order to address them, in line with operational and logistical considerations.</p> <p>It is expected that the taskforce will make immediate, medium and long-term recommendations about operational practices, policy and information gathering requirements.</p> <p>Immediate action includes; the introduction of additional resources to ensure robust management and improve national and local oversight. This bespoke resource has been created with local managers at each establishment responsible for scrutinising local arrangements, including reintegration planning and decision making. We have also introduced a national single point of contact (SPOC) reviewing oversight arrangements for separation, ensuring local accountability is in place across establishments and feeding in centrally to ensure consistency across the estate.</p> <p>More broadly, we have continued to make progress on our workforce reform programme. We have increased the number of operational staff across all Young Offender Institutions (YOIs), with all sites at or near full staffing complement. Whilst this increase will support the new provisions being rolled out at establishment level it has resulted in a high proportion of new or inexperienced staff. We are mitigating this by ensuring training is delivered to up-skill these staff, so they gain the necessary skills and experience required to be effective in their roles.</p> <p>The staff increase ensures the current model of separation is being improved, as we are able to ensure the delivery of key components of the YCS NHSE&I Behavioural Management strategy, such as the Custody Support Plan (CuSP) and the Framework for Integrated Care (SECURE STAIRS) where the vision of care through a cross governmental approach is to provide stable, integrated, therapeutic care for Children and Young People (CYP) across the children and young people secure estate. Implementation of SECURE STAIRS also includes improved training for staff to help them further understand adolescent development, principles of attachment and trauma, formulation development and consequentially the needs of, and appropriate interventions for these children and young</p>		<p>Commencing January 2020</p>
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		<p>people. Consideration of devolved area is being taken forward with our Welsh partners to ensure children and young people receive the same type of care irrespective of location in England and Wales.</p> <p>In addition, the roll out of the new Youth Justice Worker Specialist (YJWS) role continues to progress with 30 trained specialists confirmed in post, and at the end of October 436 more staff are currently enrolled on the foundation degree training. The YCS will now focus on how we can use these staff and specialists to promote a cultural change in areas such as separation.</p>		
		<p><u>Update (January 2021)</u></p> <p>Work is underway to develop a new Strategy and Framework on separation, that will establish a new approach for secure justice settings which hold children. This policy will aim to deliver consistent principles across settings and safeguard the interests of children by clearly establishing the principle that separation is only used where it is a necessary, reasonable, and a proportionate intervention to manage the risk that Children and Young People (CYP) present to themselves or others. We expect work on the new Framework to be completed by Summer 2021.</p> <p>Findings from the HM Prison and Probation Service (HMPPS) commissioned 'Separation Taskforce' were published in June 2020 and included fourteen wide-ranging recommendations. All the recommendations were accepted by the Youth Custody Service (YCS) and are being taken forward as part of the development of the new policy for separation in the Children and Young Person's Secure Estate. (CYPSE).</p> <p>Work has been completed across YCS Young Offender Institutions (YOI's) to ensure that each separated CYP has a bespoke, integrated and needs-led plan, designed to reintegrate them back into the normal regime as early as possible. This plan includes an individualised regime, with monitored</p>	YCS Prison Group Directorate (PGD)	<p>August 2021</p> <p>December 2021</p> <p>Completed</p>

		<p>regime hours. Bespoke plans are linked into multidisciplinary teams, who ensure that an integrated care approach is delivered to the cohort.</p> <p>Ministerial approval was received in September 2019 to undertake pilots at Wetherby and Werrington YOI's, to empower local Governors by granting flexibility to make changes to education services to better meet the needs of their cohort. These pilots were paused as a result of COVID. During the pause, work has taken place to 'build back better' and use the lessons learned to embed in 'business as usual' as the YCS recover from COVID, with a longstanding desire to expand the definition of education and work in a more flexible and innovative manner. As such, a decision was taken not to restart the pilots, but instead use the key principles as part of wider education reform and COVID recovery.</p> <p>YCS' use of 'Custody Support Plans' (CuSP), and the relationships fostered in this methodology between CYP and CuSP Officers, are a critical part of the support to separated CYP. During the Covid-19 pandemic, YCS has ensured that CuSP is continually provided to all CYP in sites where the model is live, though where resources have been heavily impacted through lockdowns/community restrictions and establishment Covid-19 outbreaks, 'Covid Support Plans' (CoSP), a less intensive version of CuSP, have been delivered to those children assessed through the multiagency approach as needing less intervention than some of their peers. This has allowed YCS to maintain key relationships between staff and CYP, whilst ensuring that those with the most significant needs still get the support they require.</p> <p>Additional resources aligned to the local and national oversight of separation practice and process include the YCS' National Operational Separation Lead, who supports and assures local initiatives which are delivered by on site Specified Points of Contacts (SPOCs). The SPOCs are senior managers who oversee a small team of separation staff. They are responsible for ensuring that:</p>	<p>YCS Reform Programme Director</p> <p>YCS Reform Programme Director</p> <p>YCS Prison Group Directorate (PGD)</p>	<p>Completed and Ongoing</p> <p>Ongoing</p> <p>Completed</p>
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	Recommendations to HM Prison and Probation Service/Youth Custody Service				
2	Reintegration planning should start from the day a child is separated and contain practical, timebound targets that are focused on enabling the child to return to a normal regime at the first opportunity.	Agreed	<p><u>Original Action Plan (February 2020)</u></p> <p>It is accepted that reintegration planning for children separated under Rule 49 should take place sooner. As such, we have put reintegration planning processes in place at the start of a CYP being separated.</p> <p>The work undertaken through the YCS NHSE&I Behavioural Management Strategy (BMS) will provide a framework for effectively managing the behaviour of separated children and young people in our public YOIs, with Parc YOI developing core elements of this strategy.</p> <p>Through the BMS, the roll out of CuSP 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 role will be supported by the local manager who will visit all separated CYP.</p> <p>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>	YCS PGD Team	Completed
			<p><u>Update (January 2021)</u></p> <p>An initial reintegration plan is put in place on the first day a CYP is separated to mitigate the immediate risk, and so the duration of separation can be minimised. Where separation needs to continue, the plan will be</p>	YCS PGD Team	Completed

		<p>dynamically evolved and informed by a Short-Term Assessment of Risk and Needs (STARN), provided by Psychological services. This will ensure the complex needs of the CYP are understood, and that appropriate support is provided to both the CYP and staff to enable separation to be minimised and prevented.</p> <p>Separation SPOCs and staff resources are in place across YOI's to ensure that effective reintegration plans are made for every separated CYP. Data collected since December 2019 indicates that the use of separation, and the duration of incidents are both reducing. Whilst positive reductions were seen at both the end of the 2019 calendar year, and at the beginning of 2020, it is recognised that reductions since March 2020 have been influenced by the impact of Covid-19 on regimes and Time Out of Room (TOOR).</p> <p>YOI's hold weekly separation meetings to review reintegration plans and provide senior manager oversight and direction, to enable separation cases to safely close. Each CYP has a bespoke integrated need led plan, designed to reintegrate them at the earliest point. This plan includes an individualised regime, with monitored regime hours. Bespoke plans are linked into multidisciplinary teams, who ensure that an integrated care approach is delivered to CYP who require additional support.</p> <p>The Behaviour Management Strategy (BMS) continues to be implemented across YOI sites, with some elements adapted, such as the introduction of the Enhanced SECURE STAIRS team due to the ongoing pandemic. The team comprises of colleagues from across NHS England, NHS Improvement and YCS Psychology providing a blanket level of support and advice to sites during the COVID-19 period. Other elements of the strategy have continued to be implemented but at a slower pace with initial priority given to reducing the transmission of the virus in custodial settings.</p>	YCS Reform Programme Director	<p>Completed</p> <p>Completed</p> <p>Ongoing</p>
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3	Separated children should have access to an equivalent education day to their non-separated peers. This should include meaningful face-to-face interaction with teachers.	Partly Agreed	<p><u>Original Action Plan (February 2020)</u></p> <p>This recommendation is partly agreed. It is acknowledged that more should be done to ensure CYP have consistent access to education whilst separated, however it is not practicable for separated CYP to have equivalent regimes, although we will ensure that they have similar regimes to those in the general population.</p> <p>We have begun reforming our education services and are developing a vision for learning. This vision will include a Target Operating Model (TOM) for learning services within establishments, providing guidelines for learning. The vision for learning is expected to bring about flexibility which is tailored to the needs of the child. In November we commenced the trialling of flexibility of the core regime at Wetherby and Werrington. The oversight will be establishment wide enabling Governors to tailor activities to the needs of separated children and young people, eventually creating a consistent approach across all establishment.</p>	YCS PGD Team	November 2020
			<p><u>Update (January 2021)</u></p> <p>Part of the YCS commitment to Build Back Better is having sites use the initial learning from the education pilot mentioned in recommendation 1, to build in the benefits, such as smaller working groups to aid recovery and future planning work and produce education more innovatively and flexibly. This will apply to all CYP in the CYPSE including those separated, enabling a bespoke localised approach to CYP's learning in custody, and providing educational opportunities outside of the standardised classroom environment.</p> <p>As mentioned in the initial action plan separated CYP will have access to education, but this will not be equivalent to their non separated peers. However, CYP will be given the opportunity to engage in education based on their presented risks and will have access to face-to-face or outreach 1-</p>	YCS PGD Team	<p>Ongoing</p> <p>Ongoing</p>

			<p>1 education provisions based on their bespoke individualised needs led plan. Sites will continue to strive for CYP to attend education classes in person where possible.</p> <p>Our revised framework will place the needs of CYP at the centre of what we do, with separation prevention being key. Our regimes will follow the six principles of the National Preventative Mechanism.</p> <p>YCS continually monitors data weekly, including child level plans and associated documentation, to ensure that regimes and the learning offer to separated CYP are as full as possible. Whilst TOOR data can't provide case level information, analysis of certain YOI units suggests that separated CYP are receiving comparable TOOR to the wider cohort. However, YCS recognise that the quality of individualised plans for CYP, and the quality of regime delivery to those separated can be improved. A key part of YCS's approach to improve the provision is through staff training, and work continues to provide a well-trained and dedicated workforce, who have the required ethos and cultural approach to working effectively with CYP, and are best equipped to prevent separation where possible, and to ensure swift reintegration where separation is unavoidable.</p>		<p>August 2021</p> <p>Ongoing</p>
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4	Separated children should be able to and encouraged to spend time out of their cell interacting with staff and peers.	Agreed	<p><u>Original Action Plan (February 2020)</u></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</p>	YCS PGD Team	August 2020
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			<p>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.</p> <p>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><u>Update (January 2021)</u></p> <p>YCS is committed to encouraging CYP to spend as much time engaged in meaningful activity, outside of their rooms, as possible. From March 2020, individualised plans include staff assessments outlining suitable peers with whom separated CYP can associate with, in a risk assessed manner.</p> <p>CYP's interaction with staff are recorded on their individual regime plans. This is designed to lower risk and reduce the use of separation. Separated CYP also spend time with staff as part of their regimes. Regimes for separated CYP are bespoke, and based on their individual needs, but include education and interventional activity as part of an integrated care approach.</p> <p>Staff play an important part in supporting separated CYP and will take part in games and activities to further enrich the core day, or to provide interaction for those CYP whose peer contact is limited following the assessment of risk.</p>	YCS PGD Team	<p>Completed</p> <p>Ongoing</p> <p>Ongoing</p>

			<p>As in the update for Recommendation 1, CuSP Officers have an important role to play in meaningful engagement with CYP. Staff are being developed locally around the new ways of working with separated CYP, and National training via WYPC is being developed that will be delivered throughout 2021 to legacy staff, and to Prison Officer Entry Level Training (POELTs) as part of their initial training.</p> <p>YCS, Psychology and NHS England and NHS Improvement colleagues have developed plans for delivering COVID Support Plan (CoSP) at sites during the Covid-19 pandemic. The CuSP provision has been adapted, providing secure CoSP sessions taking into consideration regime, staffing structures and numbers in accordance with the Exceptional Delivery Models. Initial priority was given to CYP identified as vulnerable or struggling to cope.</p>		<p>Ongoing</p> <p>Ongoing</p>
5	Separated children should be able to spend an hour exercising in the open air every day.	Agreed	<p><u>Original Action Plan (February 2020)</u></p> <p>The YCS accepts this recommendation and will provide all children separated under Rule 49 an hour in fresh air daily.</p>	YCS PGD Team	Completed
			<p><u>Update (January 2021)</u></p> <p>Delivery of time out in fresh air is built into individualised regimes that are recorded, which are monitored locally by the SPOC.</p>	YCS PGD Team	Completed
6	Separated children should be able to have a shower and a	Agreed	<p><u>Original Action Plan (February 2020)</u></p> <p>This recommendation is agreed, and all separated children will have access to a shower and phone call every day.</p>	YCS PGD Team	Completed

Within this Action Plan Children and Young People (CYP) refers to all individuals placed within the Youth Custody Estate.

		<p><u>Update (January 2021)</u></p> <p>A separation data capture has been created accounting for the needs of the organisation and includes the ability to capture a range of information. The data processes are designed to capture details linked to all instances of CYP separation across a YOI, including the length of each separation, and whether key review periods have been met.</p> <p>As well as facilitating a local understanding of separation, the information capture is presented in a monthly management information toolkit, which facilitates the central understanding of how separation is being used across the CYPSE. Data captured is assured both via the central collation of information, and through the on-site separation SPOCs and the National Operational Separation Lead.</p> <p>Data indicates that the use of separation and the period of separation are both reducing, although conclusions are difficult to draw from current data given the impact that Covid-19 has had on regimes and resulting TOOR. However, the use of rule 49 for long term cases has reduced significantly and we are seeing the 3 to 9-day cohort as being more prevalent. We are focusing on this cohort to understand the factors involved in the short-term use of rule 49, ultimately with the goal of reducing the rule's use in this way. Data is also facilitating a nuanced understanding of the CYP who are being separated more often, which in turn is assisting work to prevent the use of separation in the first instance.</p> <p>Many of the CYP separated in YOI's have very high risks and needs, and as such many of them are overseen by the Critical Case Panel (CCP), which is a central multi-agency group designed to allocate additional resources and support to CYP and the sites managing</p>	<p>YCS Information Development Team</p> <p>YCS PGD Team</p> <p>YCS PGD Team</p> <p>YCS PGD Team</p>	<p>Completed and Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>
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			them. The YCS continue to work towards capturing the content of the regime offer for each CYP and build this into the oversight arrangement for national managers.		
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8	Safeguards for separated children should involve regular meaningful contact with a manager who has the authority to make changes to the child's situation.	Agreed	<p><u>Original Action Plan (February 2020)</u></p> <p>We agree that every separated child should have meaningful contact. As mentioned in recommendation 1, to help improve safeguards will be the introduction of a local manager at each establishment overseeing the CYP separated under Rule 49. This will ensure CYP are receiving meaningful contact from an appropriate member of staff. The manager will also have the authority to change the CYP situation whilst separated. In the absence of the local manager will be a duty governor who will have the same or similar oversight over the separated child to include making changes to their situation.</p> <p>Further, as part of the BMS and SECURE STAIRS each child will have an allocated multidisciplinary support team, and in addition the CuSP officer will have regular contact with the child.</p> <p>Currently, a Short-Term Assessment of Risk and Need (STARN) which identifies short term targets associated with risk and need is initiated by a Psychologist at the 7-day point of separation. We will now ensure that engagement with a multidisciplinary group of professionals occurs earlier in the separation process. This is likely to be at the 72-hour review point.</p>	YCS PGD Team	Completed
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			<p><u>Update (January 2021)</u></p> <p>Managers have daily meaningful contact with CYP, with the focus of changing the CYP's situation. Steps are being taken to improve the recording of such interactions which were previously not recorded consistently.</p> <p>In addition to managers, further safeguards are provided by local SPOC's who can provide a change of direction and support CYP as part of an integrated care approach to CYP. Governing Governors also conduct weekly visits to CYP and are part of weekly oversight meetings where plans are reviewed and amended in a multi-disciplinary manner, giving Governors further opportunity to influence cases of separation.</p> <p>Multi-disciplinary support is being provided to CYP who are separated as part of an individualised plan and regime. These plans are informed by the STARN which is usually provided at the 72-hour point (Pre, COVID-19), so that updates to plans are as informed as possible and are delivered earlier in the process. This is vital information for managers in their oversight role, and in enabling them to make decisions that impact separated CYP's regime and reintegration plans.</p>	YCS PGD Team	Ongoing
				YCS PGD Team	Ongoing
				YCS PGD Team	Ongoing

	Recommendations to NHS England and NHS Wales				
9	Children who require a mental health assessment should receive one without delay.	Agreed	<p><u>Original Action Plan (February 2020)</u></p> <p>It is agreed that, where necessary, children should have access to a mental health assessment without delay.</p> <p>Adherence to the relevant operating policies is included in healthcare specifications for children and young people in secure settings and monitored via the contract monitoring process. Any difficulties are addressed via additional monitoring and joint working in the first instance, then via the NHSE&I Quality Surveillance Group process, and ultimately via an improvement Board and / or contract performance notices / contract termination if required.</p> <p>NHSE&I core specifications are underpinned by the Healthcare Standards for Children and Young People in Secure Settings (RCPCH 2019) which specifically reference separation.</p> <p>NHSE&I collect data via a set of indicators which provide information on care and separation from healthcare, this data is for internal use by commissioners for the purpose of contract monitoring. Children and Young People Indicators of Performance (CYPIPs) from the four public YOIs and from Rainsbrook and Medway STCs show the percentage of CYP separated from their main location who have had a healthcare plan within 24 hours of admission.</p> <p>NHSE&I has also set up a new taskforce to improve current specialist CYP inpatient mental health, amongst other services, which will incorporate coverage of use of separation/segregation in England. Anne Longfield OBE, Children's Commissioner for England, will chair an independent oversight board to scrutinise and support the work of the taskforce. The Children's Commissioner and her board will be given</p>	Local NHS Provider	Completed

			<p>wide-ranging scope to track progress and propose rapid improvements in existing services, examine the best approach to complex issues such as inappropriate care, out of area placements, length of stays and oversee the development of genuine alternatives to care, closer to home.</p> <p>Specialist taskforce delivery teams will be made up of doctors, nurses, psychologists, psychiatrists and other medical professionals. The group will be asked to consider the best way to deliver compassionate care for acute need – including reviewing independent sector and NHS provision – including giving nurses and other staff the right clinical expertise and managing issues like seclusion and separation in inpatient settings. This taskforce will have oversight on those CYP who require a mental health assessment.</p>		
			<p><u>Update (January 2021)</u></p> <p>Adherence to the relevant operating policies is included in healthcare specifications for CYP in secure settings and continues to be monitored via the contract monitoring process. Any difficulties are addressed via additional monitoring and joint working in the first instance, then via the NHSE&I Quality Surveillance Group process, and ultimately via an improvement Board and or contract performance notices, or contract termination if required.</p> <p>NHSE&I will be introducing a performance indicator from April 2021 into their CYP indicators of performance, with the first data available from July 2021. This will help assure that urgent holistic healthcare checks on separation of CYP (these would include mental health) are taking place in timely way.</p>	Local NHS Provider	<p>Completed</p> <p>July 2021</p>

10	Children assessed as needing a mental health bed should be transferred within two weeks, in line with national NHS guidelines.	Partly Agreed	<p><u>Original Action Plan (February 2020)</u></p> <p>This recommendation is partly agreed.</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&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> <p>Thirteen Community Forensic Children and Young People Mental Health Services (known as FCAMHS) have now been commissioned to meet the needs of young people with high risk behaviours who are presenting with severe disorders of conduct and emotion, neurodevelopmental or serious mental health problems or where there are legitimate concerns about the existence of such disorders. The services cover all NHS England & NHS Improvement regions, ensuring equitable access to all who need these services.</p> <p>Further, NHSE&I is implementing a national Clinical Assurance and Individual Review Panel which will complement and strengthen the existing escalation arrangements that are in place locally and regionally. Referral to the Review Panel is part of an exceptional escalation process for complex cases and will recommend actions to address concerns where it has not been possible to fully address at a local or regional level.</p>	<p>YCS/ Local NHS Provider</p> <p>March 2021</p> <p>NHSE&I</p> <p>April 2020</p>
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		<p>young people with specific needs. Due to the nature of the cohort, Keppel staff have experience with orchestrating assessments and the process of transferring a young person to a secure mental health hospital.</p> <p>SECURE STAIRS is a trauma informed, formulation driven framework for integrated care inclusive of the principle of ‘every interaction matters’ and that a multi-disciplinary approach to formulation-based care is fundamental, focusing on the child’s formulation, ‘my story’, rather than their diagnosis, offence or other label. Led by NHS England and NHS Improvement this is being delivered in partnership with the Department for Education, Youth Custody Service, HMPPS Psychology Services and Ministry of Justice across the whole children and young people secure estate in England and is expected to be fully mobilised by 2021. Implementation of SECURE STAIRS also includes improved training for staff to better support these complex children; this includes ongoing staff supervision and reflective practice.</p> <p>NHSE&I have identified that there is a cohort of children within the children and young people secure estate who present significant risks and cause systems to fail. These children are sometimes considered for placement in the children’s secure mental health hospital estate. A report due in spring 2020 will consider how and why current services do not meet their needs and what placement options could be available.</p> <p>In the meantime, mental health transfer protocols have been developed by NHSE&I for both youth justice and welfare settings in the CYPSE. These protocols are due for publication in winter 2020 and will replace the existing Department of Health and Social Care (DHSC) guidance.</p> <p>YCS Wales acknowledge that vulnerable CYP who require specialised care should be placed in a mental health bed. Transfer times can</p>	NHSE&I	March 2021
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		<p>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. Recognising the devolved responsibility for healthcare and mental health services in Wales – HMPPS, YCS and Parc YOI will work with NHS Wales and the Welsh Government to consider the recommendations further, with the view to then developing any proposals in collaboration with partners. Consideration of the recommendations will be built into our work plan which will begin in early 2020</p> <p>The Welsh Government has recently revised and republished the Together for Mental Health Delivery Plan in response to the impact of Covid-19. The revised plan includes an audit of current secure in-patient provision and to develop a secure in-patient strategy for Wales. The audit will take place in 2020 with the strategy being developed in 2021.</p> <p>In terms of recommendations which relate specifically to health, this response reflects the actions agreed between the Ministry of Justice, HMPPS and NHS England. Recognising that responsibility for health is devolved, further consideration will be given to all recommendations that relate to healthcare and mental health services by Welsh Government and NHS Wales, in partnership with key stakeholders.</p>	NHS Wales/Welsh Government/YCS	Commencing early 2020
		<p><u>Update (January 2021)</u></p> <p>The key ambition of the NHSE&I Child and Adolescent Mental Health Service Review to deliver an Accelerated Bed Programme has been impacted by a very challenging period following the first wave of COVID-19, with significantly increased demands for inpatient provision and increasing levels of acuity. Service closures due to quality concerns have also impacted, plus one medium secure service closed</p>	NHSE&I	December 2021

		<p>as the provider no longer wanted to provide the service. Due to the difficulties encountered, and the pressures from the ongoing issues associated with the pandemic this will take longer to implement than was first envisaged.</p> <p>The Thirteen Community Forensic Children and Young People Mental Health Services (known as FCAMHS) teams continue to support timely access to specialist consultation and advice, alongside maintaining oversight of the CYP's care both in community, hospital and custodial settings.</p> <p>The Critical Case Pathway supports local multi-agency systems in their management of complex and critical cases, and to provide a mechanism for escalating those cases that may either need additional resource in order to be managed locally, or an alternative pathway. In 2019 the meeting altered to being jointly chaired by YCS and NHSE&I. The Critical Case Panel became the Critical Case Pathway (CCP) in September 2020. During the COVID-19 pandemic and with the implementation of the Enhanced SECURE STAIRS team, this opened an opportunity for dramatic change and a move towards a whole pathway approach. Governance follows a Critical Case Group (weekly), Critical Case Panel (monthly) and CCP Governance Board (quarterly) flow.</p> <p>The NHSE&I Clinical Assurance and Independent Review (CAIR) Panel was launched as a pilot in CAMHS in October 2020 for six months. CAIR Panels for specialised mental health, learning disability and autism services are commissioned by NHS England for CYP and adults. The purpose of the CAIR is to provide independent clinical and expert advice in order to determine the appropriate care in those exceptional cases where this has not been possible via any other route or process, and all other avenues of escalation have been exhausted.</p>	<p>YCS Critical Case Pathway</p> <p>CAMHS</p>	<p>Ongoing</p> <p>Ongoing</p> <p>April 2021</p>
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		<p>This is the final step in the exceptional escalation process for all specialised mental health, learning disability and autism services. It can only be used when all other steps in routine escalation processes (local and regional) have been unable to deliver an acceptable outcome and the patient, their family/carers, provider, case manager (where relevant to service type) and commissioner remain concerned about the current placement, treatment plan and or level of restriction afforded to the patient.</p> <p>In early 2020, the Enhance Support Unit (ESU) at Feltham YOI was refurbished and opened as a national resource. It now has its own dedicated, multi-disciplinary resource of managers and staff. Where needed, the team have been selected and up-skilled to better support the CYP located there.</p> <p>The initial SECURE STAIRS project ends in 2021 and will then become part of the NHS Long Term Plan commitment to support vulnerable CYP with complex needs. This is a long-term ongoing culture change that will take time to embed.</p> <p>Bespoke training for each YCS site, specifically for SECURE STAIRS continues to be delivered, especially for new staff joining the estate. The report due in spring 2020 about CYP who present significant risks that can cause systems to fail was delayed, due to difficulties with approvals. A final draft report produced in December 2020 will have an action plan to respond to the report's recommendations.</p> <p>Welsh Government has recently revised and republished the Together for Mental Health Delivery Plan in response to the impact of Covid-19. The revised plan includes the commitment to undertake an audit of current secure in-patient provision, and to develop a secure in-patient strategy for Wales. The National Collaborative Commissioning Unit will</p>	<p>YCS PGD Team</p> <p>NHSE&I</p> <p>NHS Wales/Welsh Government/YCS</p>	<p>Completed</p> <p>March 2021</p> <p>Ongoing</p> <p>May 2021</p>
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			support health boards to undertake the audit with the strategy being developed by May 2021.		
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Recommendations	
Agreed	6
Partly Agreed	4
Not Agreed	0
Total	10

Within this Action Plan Children and Young People (CYP) refers to all individuals placed within the Youth Custody Estate.