



UK NPM Submission: Children and Young Adults in the Secure Estate Inquiry, Justice Committee

March 2026

INTRODUCTORY REMARKS

1. The UK National Preventive Mechanism (NPM) was established in 2009 following the UK's ratification of the United Nations Optional Protocol to the Convention Against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT).
2. OPCAT establishes the duty to prevent torture or cruel, inhuman or degrading treatment from occurring in places where people are, or may be, deprived of their liberty. The prevention of ill treatment is forward-looking and primarily about encouraging continuous improvement to create environments where ill treatment is less likely. Any state that ratifies OPCAT must establish an NPM with the mandate of undertaking preventive monitoring of places where people are, or may be, deprived of their liberty.
3. OPCAT Article 19 also sets out that NPMs must have the power to make recommendations to relevant authorities to improve treatment and conditions of persons deprived of their liberty and to prevent ill treatment and submit proposals and observations concerning existing or draft legislation.
4. The UK NPM is made up of [21 statutory bodies](#) that independently monitor places of detention across the UK, including Ofsted, HM Inspectorate of Prisons, the Independent Monitoring Boards, the Care Quality Commission, Care Inspectorate Wales and the Children's Commissioner for England.
5. The bodies outlined above inspect and monitor YOIs and secure children's homes across England and Wales, as well as secure training centres and the secure school in England. The Children's Commissioner has the statutory power to enter any setting where a child is detained.
6. This submission is made in complement to the submissions of individual UK NPM bodies and is based on the NPM's [Reporting Dashboard](#), which tracks recommendations made by the NPM's 21 organisations and enables analysis through setting, location, and topic filters. It captures all the individual inspection and monitoring reports of the NPM and allows for identification of systemic issues across detention settings.
7. This submission is limited to the NPM's mandate and focusses on the treatment and conditions in detention and their compliance with OPCAT, ECHR Article 3, and a safe,

child-centred approach. It will primarily answer the Committee's questions 2, 4, 6, 8 and 10 on mental health, self-harm, violence and physical restraint.

THE APPROPRIATENESS AND SUITABILITY OF THE YOUTH ESTATE FOR CHILDREN AND YOUNG ADULTS

Question 2: Are children and young people currently able to access purposeful activity, education and healthcare (particularly mental health services) as required whilst in custody?

8. The UK NPM's Reporting Dashboard holds all recommendations from inspection and monitoring reports made by UK NPM bodies since 2020. The Dashboard shows that, throughout 2025 and early 2026, there were 19 education-related recommendations made to YOIs Parc, Werrington, Wetherby and Feltham A: they reference ineffective education, skills and work provision and very low attendance rates, with few children receiving their minimum entitlement to 15 hours of education each week.
9. Ineffective education and low attendance rates can occur due to weaknesses in allocations, whereby children are not allocated to appropriate courses that might benefit their learning or rehabilitation.
10. Inconsistencies in regime also affect access to education, as classes can be cancelled at short notice. An inconsistent regime often points to staffing issues which limit the establishment's ability to deliver a predictable and purposeful timetable.
11. The recommendations note that teaching staff do not receive sufficient training and targeted professional development. As a result, while some children may meet the expected hours of education, the provision itself remains inadequate and does not deliver an appropriate quality of learning.
12. The UK NPM's concerns regarding access to, and quality of education are compounded by concerns over the recently announced cuts to education provision in prisons, which includes YOIs.¹
13. Access to education remains an issue in other secure settings: Ofsted made recommendations relating to improving the quality of education provision at Oakhill Secure Training Centre in all inspection reports published in 2025, as well as its most recent report published in March 2026. Issues regarding access to a decent level of educational quality are evidently not isolated to one setting but reflect a broader, systemic concern.

¹ Ending the cycle of reoffending – part one: rehabilitation in prisons: [Government Response](#).

14. In Secure Children's Homes across England, children also face barriers to accessing education – challenges which are also often compounded by weaknesses in staffing, but also in the educational infrastructure.
15. One of the most significant barriers is instability and insufficiency of qualified staff. Ofsted repeatedly recommends that Secure Children's Homes must maintain a sustained and appropriate staffing structure, with enough teachers who hold relevant qualifications. When staffing gaps arise, children cannot access a full curriculum. Reliance on staff teaching outside their knowledge areas also narrows the breadth of available learning and reduces children's educational progress.
16. The practical ability of children to access education is significantly restricted when staffing levels are insufficient or when specialist roles are not adequately resourced. A lack of qualified staff reduces the range of courses that can be offered and limits the capacity to provide post-16 pathways, for example, meaning older children do not receive the education or training needed to prepare for release.
17. Many children arrive at Secure Children's Homes with disrupted educational histories and low prior attainment. When the curriculum does not respond to these profiles, children are effectively denied access to a meaningful educational offer. Poor curriculum design and quality of education therefore become an access issue: children cannot fully participate in learning that is poorly planned or structurally inaccessible.
18. Many children in Secure Children's Homes have additional learning needs, as well as mental health difficulties. When learning support is inconsistent or insufficient, children who most require additional help struggle to access the curriculum. As a result, children with SEND or mental health needs may be physically present in education but unable to engage with content that is not differentiated or supported appropriately.
- 19. Consistently, across all settings of deprivation of liberty, the NPM dashboard demonstrates that challenges in recruiting, retaining and training staff make it much harder for services to implement improvements such as in person-centred care, de-escalation, and reflective practice, all of which reduce instances of violence and use of physical restraint.**

Question 5: Following the decision to end YOI placements for girls, what are the current challenges in ensuring that Secure Children's Homes and the Secure School are sufficiently resourced, trained and meet the highly complex and trauma-driven needs of girls?

20. While the UK NPM welcomes the end of placing girls in YOIs as a significant and positive step towards therapeutic and trauma-informed support, it further recommends that all other secure settings be systematically reviewed to determine whether they also rely on service models designed primarily for boys, rather than providing tailored,

gender-specific approaches that meet the distinct needs of girls, who may still be placed in Secure Children's Homes and Oakhill Secure Training Centre.

- 21. In 2025, Ofsted twice recommended that the incentives scheme at Oakhill Secure Training Centre be improved to ensure that girls were not disadvantaged. The NPM hopes to see a bespoke, gender-sensitive approach to ensure that girls receive equal care and support to boys in secure care.**

VIOLENCE, SAFETY AND DISORDER

Question 8: What are the key drivers of the high levels of violence, self-harm and the use of restraint/force in the children and young adults secure estate and what immediate and long-term actions are required to ensure a safe environment?

Question 6: How effectively are the specific and complex needs of neurodivergent children and children who have experienced significant trauma being identified, assessed and met through tailored provision in custody?

Question 10: is the current staff training adequate to ensure staff are competent in de-escalation and only use restraint as a last resort, for the minimum duration and without excessive force?

22. High levels of violence have been reported in recent inspection and monitoring reports of YOIs Wetherby, Parc, Feltham A and Werrington. There are several underlying factors that contribute to this.
23. One of the most evident drivers of violence in the youth estate is limited time out of room for boys. Children were routinely locked in their cells for "far too long"² at YOIs Werrington, Wetherby, Parc and Feltham A, with some vulnerable or fearful boys remaining inside for days at a time. Children were also locked in their cells for long periods over weekends and bank holidays.
24. Some inspection and monitoring reports note that children remain locked in their rooms due to a lack of purposeful activity, yet others report that purposeful activity cannot be expanded or reliably delivered without increasing guaranteed time out of room. This creates a cycle in which limited programme availability and restricted unlock reinforce each other.
25. Limited time out of room, as well as an inconsistent regime, can also often be attributed to staffing constraints. When staffing falls below safe levels, establishments rely more on keeping children in their rooms.

² [Report on an unannounced inspection of HMYOI Werrington 2025](#), p4

26. Restrictive regimes contribute to increased frustration and anxiety, which exacerbate tension and levels of violence. The UK NPM wishes to see time out of room increase for all children in detention, and with it, an increase in the provision of meaningful and engaging purposeful activity.
27. Inspection and monitoring reports highlighted significant gaps in provision for children who require mental health support at the four YOIs. At Werrington, the IMB questioned why children with complex needs continue to be sent there when there are no specialist facilities available, while HMIP reported that mental health services were under-resourced at Parc. At Feltham A, there was a “lack of support” for vulnerable children.³
28. High levels of self-harm were reported at most YOIs reflecting the increasingly complex population held in custody and underscoring the urgent need for enhanced, properly resourced mental health provision across the estate. At Werrington, inspection and monitoring reports noted a decrease in self-harm incidents. Those at risk of self-harm were “well supported” by case managers, whom they saw “regularly”, demonstrating that when staffing issues are solved and mental health provision exists, the environment becomes safer and allows children to access timely support.⁴
29. High levels of self-harm in most of the youth justice estate suggests that staff may not be sufficiently equipped or supported to recognise and respond to mental-health needs or neurodivergence, or that current staffing pressures leave them without the capacity to do so.
30. Unmet mental health needs due to limited therapeutic input, and combined with staff shortages, reduce the capacity to intervene early, meaning that behaviours linked to untreated trauma or acute mental ill-health are more likely to result in violence.
31. Staff shortages and weaknesses in relationships between children in detention and staff members also undermine stability and increase violence across the youth estate. Improvements in this regard were recommended at Werrington and Wetherby. When staff are overstretched or unfamiliar to the children in their care, children are more likely to experience frustration, feel unsafe, or respond negatively to instructions, increasing the risk of conflict.
- 32. More broadly, staffing levels continue to limit the quality of care and support available to children. At Feltham A, for example, inspectors recommended additional recruitment within the wellbeing team, which would allow vulnerable boys to access more timely support. As mentioned earlier, inadequate staffing not only affects specialist services, but also hampers the overall regime.**

³ [Report on an unannounced inspection of HMYOI Feltham A 2024](#), p5

⁴ [Report on an unannounced inspection of HMYOI Werrington 2025](#), p17

33. As staffing pressures and weakened relationships collectively drive instability and violence, the likelihood that staff will resort to the use of force to manage incidents that might otherwise have been prevented through proactive engagement or de-escalation intensifies.
34. The UK NPM remains concerned about the way use of force is managed, specifically the roll-out of PAVA in YOIs. Alongside the concerns set out below, the roll-out and use of PAVA also indicates that earlier opportunities for intervention in the issues outlined above are being missed.
35. The UK NPM produced a briefing on the use of force in the prison estate in June 2025.⁵ The briefing raised concerns about the rollout of PAVA in the youth estate specifically, considering that evidence from the adult estate showed that the introduction of PAVA had not demonstrably deterred violence or improved overall safety. The UK NPM questioned the rationale for extending its use to a more vulnerable population without clear evidence of necessity or effectiveness.
36. The UK NPM's [Reporting Dashboard](#) shows that 10 recommendations were made by UK NPM bodies in 2025 referencing PAVA in the adult estate. Seven of these recommendations were made in separate reports by HM Inspectorate of Prisons and the Independent Monitoring Boards. They highlight concerns about the high frequency of PAVA use, instances where it was not deployed as a last resort as intended, inadequate recording practices, and the overrepresentation of ethnic minorities in PAVA-related incidents.
37. The remaining 3 recommendations came from the Independent Monitoring Board's thematic report on *Use of force in prisons and YOIs*, which recounted "harrowing incidents" involving the use of PAVA and highlighted concern about its roll out in the youth estate.
38. In contrast, good practice is noted in Secure Children's Homes where staff and children are routinely involved in reflective discussions after incidents, with learning used to adjust care plans. This creates "individualised, child centred" approaches to care and fosters a cycle of continuous improvement for staff.⁶
- 39. Ongoing training and professional development ensure that staff have the competence and confidence to use methods like verbal redirection to prevent escalation, as reported by multiple inspection reports. As a result, incidents of use of force are used infrequently, proportionally and only when necessary.**
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⁵ UK NPM, [Use of force in England and Wales: Justice Settings](#), 2025

⁶ [Monitoring visit of Kylloe House, May 2025](#), p3

- 40. Based on the recommendations and recorded good practice by UK NPM organisations, improved training, retention and development of staff is likely to significantly improve children's access to quality education, purposeful activity, and care that meets their complex individual needs.**
- 41. Use of force, and especially the use of PAVA spray, is unlikely to meaningfully reduce violence in YOIs, but is likely to have serious consequences for young people's relationships with staff and feelings of safety.**
- 42. Strong relationships between young people and staff are a strong indicator of good practice in other areas, particularly in addressing self-harm and incidents of violence.**