

Action Plan: Young Persons Unit at HMP & YOI Parc

Action Plan Submitted 20 April 2018

A Response to the HMIP Inspection 16-26 October 2017

Report Published 20 February 2018

INTRODUCTION

HM Inspectorate of Prisons (HMIP) is an independent inspectorate which provide scrutiny of the conditions for and treatment of prisoners. They report their findings for prisons and Young Offender Institutions 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, Measureable, Achievable, Realistic and Time-bound) as possible. Actions should be specific enough to be tracked for progress.
Partly Agreed	Only part of the recommendation is agreed with, is achievable, affordable and will be implemented. This might be because we cannot implement the whole recommendation because of commissioning, policy, operational or affordability reasons.	The response must state clearly which part of the recommendation will be implemented along with SMART actions and tracked for progress. There mus t 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.

ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMP & YOI PARC

1. Rec No	2. Recommendation	3. Agreed/Partly Agreed/Not Agreed	4. Response Action Taken/Planned	5. Function Responsible/Policy Lead	6. Target Date
	Main recommendation to the Youth Custody Service and Welsh Government				
5.1	The Youth Custody Service and Welsh Government should work with G4S as a matter of urgency to determine how suitable interventions will be put in place for boys who have shown sexually harmful behaviour in their offending history. (S43)	Agreed	The YCS will revisit this proposal with G4S and the Youth Justice Board (YJB) and work with stakeholders to ensure interventions for young people with sexually harmful behaviour are put in place in Parc, either directly from G4S or through a supplementary route.	Director, Youth Custody Service (YCS), HMPPS	July 2018
	Main recommendations to the Director				
5.2	Senior managers' work to identify and provide the support needed to help Parc address and reduce the consistently high levels of violence, while continuing to deliver a full,	Agreed	The Director has created and filled a new Violence Reduction Officer post specifically to support violence reduction in the Young Persons Unit. A senior member of the Young Persons Unit attends the establishment's weekly Violence Reduction Meeting. A weekly report is produced and all incidents of violence and use of force are analysed and actions identified.	Director of HMP & YOI Parc (G4S) Director of HMP & YOI Parc (G4S)	Completed
	constructive regime to the boys in its care. (S41)		A Behaviour Management Strategy is being developed in conjunction with the University of South Wales. It will incorporate the current Violence Reduction Strategy, Adjudications, Rewards and Sanctions, Employment Training & Education, Resettlement and family engagement approaches. The Prison are working with the Children's Commissioner of Wales to embed the Rights of the Child into the Strategy. The aim is to drive staff practise in respect of engaging young people and driving positive non-violent behaviours.	Director of HMP & YOI Parc (G4S)	October 2018

5.3	There should be a regular equality management meeting to ensure that policy, planning and consultation are effective, boys' perceptions and	Agreed	HMP Parc have recruited an Equalities Officer for the Young Pesons Unit (YPU). The Equalities Officer at the YPU will produce a monthly report to analyse and monitor equalities data.	Director of HMP & YOI Parc (G4S) Director of HMP & YOI Parc (G4S)	Completed April 2018
	needs are addressed, and comprehensive monitoring data are considered. (S42)		There will be a specific section of the monthly Equalities meeting focusing on the Young Persons Unit. The meeting will review data extracted from the Equalities Officer's report and ensure consultation with identified stakeholders drives planning to address identified issues and perceptions. Person(s) res-ponsible for completion of any actions will be clearly identified and progress on actions will be monitored at the meetings on a regular basis.	Director of HMP & YOI Parc (G4S)	May 2018
			An Equalities Manager for the prison will be recruited and will have specific line management and oversight responsibility of equalities for the YPU.	Director of HMP & YOI Parc (G4S)	October 2018
	Recommendation to the Youth Custody Service				
5.4	The Youth Custody Service should work with relevant government departments to ensure that all boys are provided with appropriate accommodation in good time for their release.	Agreed	This is a statutory obligation of the Local Authority. Wales has the National Pathway for Homelessness Services for children, young people and adults in the secure estate which sets out how obligations should be met. The Youth Custody Service will work with the YJB, who have oversight of Youth Offending Teams (YOTs), to ensure that young people leaving custody have suitable accommodation on release.	Director, Youth Custody Service (YCS), HMPPS	Ongoing
	(4.27)		The YCS will raise concerns over the promptness and adequacy of accommodation being arranged for boys being released with the YJB and MOJ Youth Justice Policy Unit.	Director, Youth Custody Service (YCS), HMPPS	June 2018
			The YCS will appoint a Head of YCS Wales. The post holder will engage with the Welsh Government and other relevant departments and stakeholders with regard to resettlement pathways for welsh children in custody.	Director, Youth Custody Service (YCS), HMPPS	June 2018
	Recommendation to the Youth Custody Service and PECS				
5.5	Boys should be transported to custody as soon as their case has finished. They should be transported separately from adults and arrive into custody before	Partly Agreed	This recommendation is Partly Agreed as it is not logistically possible to return prisoners/detainees to establishments as soon as their cases have finished. The contractors are aware of their obligations to escort prisoners from court at the earliest opportunity. Reducing waiting time is also dependent upon the assistance of other stakeholders, notably HM Courts and Tribunals Service, the YOT Services and the YJB Placement Team. It is critical that youth cases are listed as a priority, that YOT Services predict the likelihood of custody and	Director of Prisons (HMPPS)	

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	7pm. (1.2, repeated recommendation 1.4)		expedite their risk assessments. The YJB also need to have effective mechanisms to place young people as soon as they are notified from court. Distances between the courts and the prison establishment poses a further challenge which has a negative impact on the young person's arrival times. The Prisoner Escort and Custody Services (PECS) contract specification requires contractors to prioritise movements of young people and women over adult male prisoners. Separation from adults is an integral part of the transportation contract. The current contract established the use of escort vehicles with a separation capability, which allows diverse types of prisoners (male/female, adult/young people) to be carried on the same vehicle. The change results in more efficient scheduling, with a reduction in prisoner waiting times. The Youth Custody Service (YCS) is working closely with stakeholders to put in place the next generation of PECS contracts to ensure that the service delivery for young people is as effective as possible. However, the challenges of the dispersed young people's estate means later arrival times are a feature of youth custody. The YCS will work with the provider to ensure that late arrivals have appropriate support in place and that all young people have a positive experience of the already impressive induction process at Parc.	Director of Youth Custody Services (Contracts, Quality & Performance)	September 2018
	Recommendations to the Director				
	Safeguarding				
5.6	The monthly safeguarding meeting should accurately record follow-up actions to be taken and evidence of outcomes. (1.13)	Agreed	The safeguarding meeting will be chaired by a Young Persons Unit (YPU) Senior Manager and they will be responsible for quality assuring the minutes. Actions arising from the meeting will be concise and person(s) responsible for completion of any actions will be clearly identified. Progress on actions will be a standing agenda point and outcomes will be reported back to the meeting in a timely manner and monitored by YPU administrators.	Director of HMP & YOI Parc (G4S) Director of HMP & YOI Parc (G4S)	Completed
	Victims of bullying and intimidation				
5.7	The unit should survey boys at Parc, their families, carers and visitors about bullying concerns to inform future strategy to reduce	Agreed	The Head of the YPU will conduct a survey of the boy's families, carers and visitors in respect of concerns around bullying behaviours. This feedback will be used to identify actions required and make sure it is incorporated into the behaviour management strategy.	Director of HMP & YOI Parc (G4S)	June 2018
	the number of incidents. (1.20)		The Senior Resettlement and Safeguarding Manager at the prison will lead on a behaviour management strategy being developed in conjunction with the University of South Wales. The aim is to engage young people and drive positive	Director of HMP & YOI Parc (G4S)	October 2018

			non-violent behaviours. Structured engagement with families, guardians, carers, YOTs and young people will be at the centre of the strategy. Their views will be collected routinely and used to inform the ongoing refinement of the strategy.		
	Suicide and self-harm prevention				
5.8	The recorded frequency of observations of boys on assessment, care in custody and teamwork (ACCT) documents should	Partly Agreed	This recommendation is partly agreed as it is not possible to make the frequency of observations less predictable for boys who are on 5 observations per hour. Operational Managers conducting daily ACCT quality checks will ensure observations of boys on 1 or 2 observations per hour are unpredictable.	Director of HMP & YOI Parc (G4S)	Completed
	be less predictable. (1.28)		Senior Residential Managers have produced guidance for staff and managers in respect of the necessity to ensure that observation checks of young people at risk are unpredictable. Senior Managers have and will continue to conduct routine weekly checks of ACCT documents to ensure the recorded observation of young people on 1 or 2 observations per hour are unpredictable.	Director of HMP & YOI Parc (G4S)	Completed
5.9	The use of camera- observation cells to monitor boys at heightened risk should always be logged, with clear rationale for their	Agreed	The Senior Residential Manager of the YPU will ensure the rationale for the use of rooms with CCTV will be recorded within the ACCT care plan. Managers conducting daily ACCT quality checks will continue to ensure the reason for the use of CCTV rooms is clearly identified within the care map.	Director of HMP & YOI Parc (G4S)	Completed
	use, and the screen should not be easily visible to other boys on the unit. (1.29)		Senior Managers will continue to conduct routine weekly checks of ACCT documents to ensure the use of CCTV rooms is managed appropriately and recorded in the ACCT care map and case reviews.	Director of HMP & YOI Parc (G4S)	Completed
			A privacy screen filter for CCTV monitors has been installed to ensure on-screen data is only visible to staff that are directly in front of the screen.	Director of HMP & YOI Parc (G4S)	Completed
5.10	All staff, including night staff, should carry antiligature knives.(1.30)	Agreed	The Senior Residential Manager YPU has conducted a review and has ensured there are sufficient anti-ligature knives available.	Director of HMP & YOI Parc (G4S)	Completed
			The Senior Residential Manager YPU will review the process for storage and issuing anti-ligature Knives to ensure all YPU staff with cell key access are able to access anti-ligature knives when on duty.	Director of HMP & YOI Parc (G4S)	May 2018
	Security and disciplinary procedures				
5.11	The outcomes of all disciplinary procedures (adjudications and minor reports) should be scrutinised. There should	Agreed	The Safeguarding Operational Manager and Equalities Officer will monitor the outcomes of adjudications for trends and protected characteristics. The data will be analysed and included in the safeguarding monthly report. The data will be presented to both the safeguarding and equalities meetings monthly. The person(s) responsible for the completion of any actions will be clearly identified	Director of HMP & YOI Parc (G4S)	April 2018

	be more focus on analysing trends and protected characteristics with monitored actions to address concerns. (1.49, repeated recommendation 1.55)		and progress and outcomes of actions will be reported back to the meeting on a regular basis.		
	The use of force				
5.12	External scrutiny of the use of force should be further extended to provide continued assurance of the	Agreed	Local Childrens services, YJB, and YCS are already invited to attend the weekly Use of Force meetings. This is an internal meeting and attendance by partner agencies is not mandatory and cannot be enforced by the prison.	Director of HMP & YOI Parc (G4S)	Completed
	legality and proportionality of all incidents. (1.62)		The Youth Custody Service are currently reviewing oversight arrangements for the contract at HMP & YOI Parc. Recruitment of a Deputy Controller with specific responsibility for the Young Persons unit is underway. The successful candidate will have responsibility for external scrutiny of Use of Force and will attend the weekly meeting.	Director of Wales Prisons (HMPPS)	May 2018
5.13	Restraint minimisation strategies should reflect the introduction of minimising and managing physical restraint (MMPR). (1.63)	Agreed	The prison has updated the Restraint Minimisation policy to reflect the revised practice following Minimising and Managing Physical Restraint (MMPR) implementation.	Director of HMP & YOI Parc (G4S)	Completed
5.14	Pain-inducing techniques should not be used on children. (1.64Error! Reference source not found.)	Partly Agreed	The use of physical restraint on a young person will always be viewed as the last available option. Minimising and Managing Physical Restraint (MMPR) guidance provides secure estate staff with the ability to respond effectively to young people's challenging behaviour. This includes using de-escalation and diversion strategies to minimise the use of restraint techniques.	Director of YCS (HMPPS)	Ongoing
	Separation/removal from normal location				
5.15	Documentation for boys on separation should indicate clearly the reason for the separation, the support in place and the actions required. (1.67)	Agreed	The prison have reviewed supervision records and included indicators, which clearly identify why the young person has been placed on supervision, what support is in place and the actions required. Managers will conduct daily quality checks of supervision records to ensure there is appropriate oversight of the process and that routine reviews are completed. Senior Managers will conduct routine weekly checks of supervision documents to ensure compliance with the agreed process.	Director of HMP & YOI Parc (G4S)	Completed

	Residential units				
5.16	Cells should have fully screened toilets and a functioning lockable cupboard, and boys should have access to hot water overnight. (2.4)	Partly Agreed	This recommendation is partly agreed as the prison have been unable to source a lockable cupboard that will fit into the current fixed furniture layout. Additionally, the installation of a lockable cupboard in all cells can only be achieved in the event of a complete refurbishment and upgrade of cells which is not planned for. The prison have provided shower style curtains held in place with anti-ligature hooks to screen the toilets. The prison will source vacuum flasks which will be issued to each boy to allow the flask to be filled prior to evening return to room. Prior to flasks being issued, the fixed water boilers on each unit will be replaced with larger boilers to facilitate	Director of HMP & YOI Parc (G4S) Director of HMP & YOI Parc (G4S)	Completed September 2018
			filling of flasks.		
	Equality and diversity				
5.17	Engagement by the young persons' unit with community diversity groups should be improved to the	Agreed	The prison have recruited an Equalities Officer whose remit includes responsibility for engagement actitvies. The prison will devise and publish a programme of events and engagement with community based diversity groups.	Director of HMP & YOI Parc (G4S)	June 2018
	level achieved by the adult prison. (2.14, repeated recommendation 2.17)		The prison will recruit an Equalities Manager for the entire site and and will have specific line management and oversight responsibility for equalities issues on the YPU.	Director of HMP & YOI Parc (G4S)	June 2018
			The monthly Equalities meeting will now have a specific section focusing on the Young Persons Unit and will review engagement activivties. Any actions will be assigned accordingly and progress will be a standing agenda item.	Director of HMP & YOI Parc (G4S)	May 2018
	Health services				
5.18	There should be an up-to-date health and well-being needs assessment to identify the current and future needs of the population and inform the provision of services. (2.37)	Partly Agreed	This recommendation is partly agreed as the Local Health Board (LHB) is solely responsible for commissioning a Health Needs Assessment (HNA) and is therefore beyond the control of the establishment. The prison have however contacted the LHB, who have contacted Public Health Wales (PHW) with a request to carry out a HNA on the Young Persons Unit at Parc. The HNA has provisionally been scheduled to commence in June 2018, with a provisional date for a report to the Prison Partnership Board due in December 2018.	Director of Public Health Wales (NHS Wales) And Director at HMP & YOI Parc (G4S)	December 2018
5.19	Monitoring and analysis of the unit's health complaints and incidents should be thorough. The confidential health complaints system should be advertised and	Agreed	The designated YPU Registered General Nurse reviews all complaints and reports monthly to the YPU Safeguarding Meeting and quarterly to the Clinical Governance meetings who will analyse the complaints data and take action where appropriate.	Director of HMP & YOI Parc (G4S)	Completed

	easily accessible to all boys, and responses should fully address the issues highlighted. (2.38)		The Head of Healthcare has advertised the confidential health complaints system in the newly introduced YPU specific Healthcare Information leaflet and YPU induction booklet.	Director of HMP & YOI Parc (G4S)	Completed
5.20	Boys should receive vaccinations in a timely manner. (2.39)	Agreed	All boys will be offered vaccinations in compliance with Public Health Wales' Schedule for vaccination of men in prison Wales, UK, May 2017, however the boys will also have the option to opt-out of the process. Vaccinations will be offered and administered during completion of the Comprehensive Health Assessment Tool (CHAT) assessment and recorded on System One database.	Director of HMP & YOI Parc (G4S)	June 2018
5.21	Boys should have access to a full range of mental health interventions, including those provided by the Forensic Adolescent Consultation and Treatment Service (FACTS). (2.55)	Not Agreed	The FACTS service is funded and commissioned by the Welsh Government and as such the establishment are not in a position to influence provision. The FACTS Service is currently compiling a service offer to share with HMP & YOI Parc, which will identify the services on offer and referral routes in order to access services. The full range of current mental health services available via Primary Care are detailed in the Healthcare Information leaflet which is issued to all new arrivals. The nurses on the unit explain details of the services to all young people.	Director of HMP & YOI Parc (G4S)	
	Catering				
5.22	Food temperatures should be taken and recorded at the point of service, completion of servery checks should be monitored, and servery supervisors should accurately record the findings after each check. (2.59)	Agreed	Food temperatures are taken by staff at the point of service and recorded. Operational Managers conduct weekly compliance check of food temperature records and observe the process of checking food temperature. Additional monitoring is conducted by YPU Senior Managers via weekly compliance check of food temperature records and observation of the process. The Head of support Services ensures the catering contractor conducts random checks of the probes on the YPU servery.	Director of HMP & YOI Parc (G4S)	Completed
	Purchases				
5.23	Boys should not be charged administration fees for catalogue orders. (2.61)	Agreed	The prison ceased charging the administration fee from January 2018.	Director of HMP & YOI Parc (G4S)	Completed
	Education, learning and skills				

5.24	The day-to-day management of learning and skills and team development should be	Agreed	The establishment has restructured the Learning and Skills department and recruited two senior managers who work closely with the Head of Learning and Skills (HoLS) regarding the monitoring of both the YPU and adult education.	Director of HMP & YOI Parc (G4S)	Completed
	fully consolidated through careful monitoring by unit senior managers. (3.9)		The new Senior Managers (SM) roles allow the Curriculum Manager to concentrate on the day to day management of the unit while the SM concentrates on the more strategic and quality assurance tasks.	Director of HMP & YOI Parc (G4S)	Completed
			A monthly report will be produced for the HoLS which will be discussed and actioned at every meeting. The YPU Management Information System (MIS) personnel will be a part of a wider date collection team and will access the same monitoring tools as the adult education. This will allow a more streamlined and standardised approach to data analysis.	Director of HMP & YOI Parc (G4S)	May 2018
	Pre-release and resettlement				
5.25	The resettlement committee should drive improvements to pre-	Agreed	The establishment will carry out a needs analysis to identify the requirements of the population and drive changes to the current approach.	Director of HMP & YOI Parc (G4S)	June 2018
	release and resettlement provision based on up-to- date understanding of the needs of the population. (4.9)		The needs assessment will be reviewed by the resettlement committee and actions agreed. Person(s) responsible for the completion of any actions will be clearly identified and progress monitored.	Director of HMP & YOI Parc (G4S)	September 2018
5.26	The unit should make more use of release on temporary licence to support release planning and maintenance of family ties. (4.10, repeated recommendation 4.10)	Agreed	The prison will screen all boys for Release on Temporary Licence (ROTL) eligibility at the point of admission by their appointed case worker. Opportunities for ROTL will be developed and reviewed each month. A risk assessment will take on each young person to assess their suitability for ROTL and the potential benefit. This will be done as part of an integrated case management process.	Director of HMP & YOI Parc (G4S)	June 2018
	Training planning and remand management				
5.27	All departments that work with a boy regularly should be represented at his training or remand planning meeting to provide consistent feedback and reinforcement to help him	Partly Agreed	This recommendation is partly agreed as attendance for staff involved in education training or employment is not always possible, due to the regime requirement of 25 hours activity for each child each week. Where a staff member cannot attend due to teaching/training commitments, the case worker represents their views which are considered during the meeting and they ensure that the outcome of the meeting is relayed.	Director of HMP & YOI Parc (G4S)	Completed

	achieve his individual targets. (4.14)		The establishment has implemented a revised system of engagement, which includes a target of 75% attendance at training or remand planning meetings for residential staff.	Director of HMP & YOI Parc (G4S)	Completed
5.28	Records of review meetings should fully reflect the discussion, and how agreed targets are linked to risk and offending. (4.15)	Partly Agreed	The new AssetPlus case management system has been available for use at the establishment since 31/03/2018 and replaces current reporting procedures. This recommendation can only be partly agreed as under AssetPlus, there will not be records of each meeting as recommended, but as per the process described below. All Review meetings will be recorded within the AssetPlus framework. Entries on the database will include the date of the review meeting and the individuals in attendance. The post-review meeting stage will be opened and completed in AssetPlus and will include a review of the prior assessment and any changes to risks and any intervention(s) targets as agreed at the review meeting. This process will replace the current process of recording review meetings.	Director of HMP & YOI Parc (G4S)	Completed
5.29	There should be a case management system to record a boy's progress in custody and facilitate information sharing with community agencies. (4.16)	Agreed	The AssetPlus framework (case management system available from 31/03/2018) will be used jointly by community and custodial youth justice services to support assessment, the delivery of interventions, and report on the progress of young people. The framework is designed to be used 'end-to-end' across the youth justice system and provides an up-to-date record of assessed strengths, risks and needs, and the support and interventions planned.	Director of HMP & YOI Parc (G4S)	Completed
5.30	All boys with looked-after status should receive consistent and adequate levels of support from their local authority. (4.23, repeated recommendation 4.25)	Not Agreed	This recommendation is not agreed as HMP & YOI Parc does not have the authority to instruct/mandate local authorities to provide support to young people and as such this recommendation is outside the establishment's sphere of influence. The establishment does ensure that the Local Authorities are notified when a 'looked after' young person has been received into custody. The prison report regularly to the Western Bay Children's Safeguarding Board on local authority compliance and uses this alongside engagement with Youth Offending Teams and social Services as an escalation procedure where social services departments fail to meet statutory requirements.	Director of HMP & YOI Parc (G4S)	
	Reintegration planning				
5.31	New arrivals should have sufficient access to independent advice and guidance so that they can plan the best use of the	Not Agreed	This recommendation is not agreed. The advice available during induction is not independent. Due to the resource implications we are unable to provide independent advice.		

	learning opportunities available in the unit. (4.30)				
5.32	Boys should receive comprehensive advice and guidance on finance, benefit and debt before their release. (4.34)	Partly Agreed	This recommendation is partly agreed due to resource limitations. Some advice and guidance is already available on induction and in education as part of a Princes Trust programme, however as it is not comprehensive the recommendation can only be partly agreed. Additionally, subject to available resources, specialist advice and guidance on finance, benefit, and debt is now included as part of the release planning process. HMP & YOI Parc are currently exploring links with other organisations who may be able to enhance and extend the establishment's current processes.	Director of HMP & YOI Parc (G4S)	Completed
5.33	Evaluation of interventions should be put in place. (4.41, repeated recommendation 4.47)	Agreed	The establishment is undertaking an evaluation of interventions and developing an approach in line with the 'Good Lives and Trauma Recovery' models. The establishment has already introduced a new intervention, the Motivate to Achieve (M2A) programme, alongside Edward Debono's creative thinking tools.	Director of HMP & YOI Parc (G4S) Director of HMP & YOI Parc (G4S)	July 2018 Completed
			Utilising the AssetPlus assessment, plans will be developed to identify individual needs. The planned positive psychological approaches will be used to motivate and work with the boys tailoring the approaches and interventions based on their individual needs.	Director of HMP & YOI Parc (G4S)	June 2018

Recommendations				
Agreed	22			
Partly Agreed	8			
Not Agreed	3			
Total	33			