



HM Prison &  
Probation Service

Action Plan: HMYOI Feltham

Action Plan Submitted 13 July 2018

A Response to the HMIP Inspection 20-21 December 2017, 8-12 January 2018

Report Published 9 May 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 <b>must</b> be an explanation of why we cannot fully agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.
Not Agreed	The recommendation is not agreed and will not be implemented. This might be because of commissioning, policy, operational or affordability reasons.	The response must clearly state the reasons why we have chosen this option. There <b>must</b> be an explanation of why we cannot agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.



**ACTION PLAN: HMCIP REPORT  
ESTABLISHMENT: HMYOI FELTHAM**

1. Rec No	2. Recommendation	3. Agreed / Partly Agreed / Not Agreed	4. Response Action Taken/Planned	5. Function Responsible /Policy Lead	6. Target Date
	<b>Main recommendations</b>				
	<b>To the Governor</b>				
5.1	Boys should not be held in the segregation unit in Feltham B. Those who need to be separated for their own or others' safety should experience a full regime and intensive intervention to address their behaviour in a suitable setting. (S42, repeated recommendation 1.77)	Partly agreed	<p>This recommendation is partly agreed as young people who cannot remain on normal location due to a serious breach of Prison Rules have to reside on the Care, Separation and Reintegration Unit (CSRU). This Unit is located on Feltham B side for over 18s in the absence of a young person specific CSRU on the Feltham A side (under 18s). Capital Investment is required if it is agreed to plan and develop a young person specific CSRU on Feltham A with the support of the Youth Custody Service (YCS) and their Safeguarding channels.</p> <p>It is agreed young people that are separated should experience a full regime and intensive intervention wherever they are based including telephone calls, showers and exercise. For young people on normal location this is provided by Behaviour Management meeting planning interventions, for those subject to isolation / Rule 49 through an Enhanced Support provision.</p> <p>For young people located on CSRU a request for Capital Investment has been agreed for a classroom and building work to alter the existing provision in order to provide as full a regime on the existing CSRU as possible. Currently waiting for Government Facilities Services Limited (GFSL) to commence the building work.</p> <p>In the interim period a review of CSRU regime will be undertaken by the Head of Safeguarding and Head of Safer Custody to ensure timetables of residents are within Casework Sequencing plans and meeting individual needs.</p>	Governor	<p>October 2018</p> <p>October 2018</p>
5.2	Leaders and managers should focus strongly on improving poor behaviour in classrooms and implement practical initiatives which encourage willing engagement in education. (S43)	Agreed	<p>HMYOI Feltham will improve the learning environment for young people by undertaking the following:</p> <ul style="list-style-type: none"> <li>• Replace all furniture that contains graffiti with new, plain black chairs which will prevent young people from being able to graffiti the furniture.</li> <li>• To react swiftly and consistently by using the alarm system when behaviour has become in any way physical, to trigger additional support thus reducing potential risks to safety.</li> <li>• An Operational Manager will drop into classes throughout the day to ensure students are on task and behaving appropriately. They will deal with concerns</li> </ul>	Governor	October 2018



			<p>where necessary, including offering time-out if young people need to get back on track.</p> <ul style="list-style-type: none"> <li>• Appoint specified Education Officers so that the Prison Staff can work more closely with Education Staff, both in class and on the wings, to embed the importance of education.</li> <li>• Introduce a two week Induction Pathway for new arrivals to Feltham A, and ensure they are provided with the skills to learn in the classroom. This includes: how to enter and exit a room, how to speak to adults and fellow learners, and how to prepare / present their work.</li> <li>• See <b>Recommendation 5.38</b> for information on new pathways being introduced to engage learners.</li> </ul> <p>The impact of these changes can be measured by comparing the number of young people removed from education for behaviour issues over the year. There will initially be a spike in numbers of young people being temporarily removed and placed on Reflective Learning as the new regime is embedded and the higher expectations are challenged. However over time the numbers on Outreach (including Reflective Learning) will reduce as consistency is obtained and behaviour improves.</p> <p>The measures will be recorded and reviewed at monthly Quality Improvement Group meeting and led by the Head of Education.</p>		
5.3	Individual training and remand plans should be central to a boy's progress and other plans and targets should be consistent with and reflected in training and remand plans. Staff from all relevant departments should be represented at training planning or remand management reviews, or submit a detailed report if they cannot attend. Training plans should demonstrate multidisciplinary input to targets to be achieved both in custody and in the community, with necessary support identified. (S44)	Agreed	<p>With the introduction of AssetPlus, a new assessment and planning interventions framework, the staff including Personal Officers should be updating the progress of young people within their respective function areas, also setting specific targets and objectives. Until this process is embedded, the casework will continue to attach meeting contribution forms to the meeting invitations that are send out. The stakeholders can complete the contribution forms if they are unable to attend. If attendance at meetings or written contribution are not received, the Head of Casework will monitor these instances and then raise them with the Functional Head of relevant areas.</p> <p>With AssetPlus now live, the objectives will be set for professionals based outside of custody to complete, if such objectives cannot be met in custody by Caseworkers.</p>	Governor	October 2018
	<b>Recommendations</b>				
	<b>To the Youth Custody Service and Ministry of Justice</b>				



5.4	The statutory entitlements of looked-after children should be met promptly and suitable release addresses identified at the earliest opportunity. (4.18)	Partly agreed	<p>This recommendation is partly agreed because the Statutory entitlements of looked after children upon release are the responsibility of the local authority.</p> <p><i>PSI 08/2012 – Care and Management of young people:</i></p> <ul style="list-style-type: none"> <li>• Safeguarding managers in Youth Offender Institutes (YOIs) are required to engage with local authorities to ensure Looked After Children (LAC) young people are in receipt of their statutory entitlements.</li> <li>• Governors will ensure that every LAC's home local authority can be fully involved in the development of their individual resettlement plan.</li> <li>• YOI Governors will encourage the responsible local authority to nominate a representative to attend and support the young person in custody by inviting them to attend all relevant sentence planning meetings and enabled to conduct their statutory LAC reviews.</li> </ul> <p>The Feltham A Casework team highlights accommodation at the earliest opportunity with the Youth Offending Team (YOT) and Social Services. However they continue to receive late notifications for appropriate accommodation. It is for young people's local authorities to identify suitable release addresses at the earliest possible date for young people. It is for the responsible local authority to make arrangements for regular contact with the LAC young person and continue to review their care or pathway plan and make appropriate plans for living arrangements in advance of the end of the sentence.</p>	Executive Director	Completed and Ongoing
5.5	A strategy should be developed to ensure that boys leaving custody are provided with suitable accommodation in time for other elements of release planning to be completed. (4.22)	Not agreed	<p>This recommendation is not agreed as the statutory entitlements of looked after children upon release are the responsibility of the local authority. HMYOI Feltham will seek to further develop relationships with the local community as well as the community which the young person will be resettled.</p> <p>Caseworkers and Social Workers have now received training and guidance packs from the Howard League on how to escalate and challenge YOTs when these matters occur. There is also now a working protocol that will enable the Howard League to take up these cases on the Child's behalf in a timely manner to influence this outcome.</p>	Executive Director	
	<b>Recommendations to the Governor</b>				
	<b>Courts, escort and transfers</b>				
5.6	Boys should be transported from court to the establishment as soon as possible after their hearing ends to enable them to settle on their first night. (1.4, repeated recommendation 1.3)	Partly Agreed	<p>This recommendation is partly agreed as Prison Escort and Custody Service (PECS) are not contracted to transport young people one at a time to and from their establishments. This means that by default, young people will have to wait for each other to finish their court hearings before being transported back to HMYOI Feltham in the event they are at the same court on different matters. However</p>	Prisoner Escort and Custody Service (PECS)	Ongoing



			<p>where possible, PECS state they prioritise the return of young people to HMYOI Feltham, however;</p> <ul style="list-style-type: none"> <li>• Early departure times from courts to HMYOI Feltham is dependent on when young people are seen by the court and the time the Youth Custody Service (YCS) Placement Confirmation Form (or verbal confirmations) are received by the PECS contractors. PECS contractors cannot start the escort without confirmation from the YCS Placements team.</li> <li>• HMYOI Feltham services a very large court catchment area, meaning journey times can often be between two to three hours for young people placed there.</li> </ul> <p>HMYOI Feltham takes a pro-active approach in this area and the return times are recorded and reviewed at quarterly Escort Contractor review meetings. A review of Prisoner Escort and Custody Service (PECS) arrangements for young people is taking place. HMYOI Feltham have participated in discussions and attended stakeholder events. They have also obtained the views of their young people regarding their court experiences.</p>		
	<b>Early days in custody</b>				
5.7	Private assessments by health care professionals should be conducted on the day of arrival. (1.11)	Agreed	<p>All young people are screened on first night unless access has been restricted for operational reasons or if the young person arrives late from court and declines to be seen. If this occurs, the Healthcare Staff would contact the Duty Governor and On-call Manager and record the incident on Datix.</p> <p>Young people are to be seen at the earliest opportunity the following morning if they cannot be seen on the night of arrival by the Head of Healthcare and Head of Care and Admissions monitor.</p>	Governor	Completed
5.8	All boys should be given the opportunity to shower on their first night and have access to a kettle during their time on the induction unit. (1.12)	Partly Agreed	<p>This recommendation is partly agreed because whilst HMP Feltham aim to offer all young people a shower in Reception or on Bittern Unit, this is dependent on operational factors and the prison's Regime Management Plan. The Head of Admissions and Care will review the current recording and monitoring for how many young people take up the opportunity to shower on the first night of arrival. This will be monitored by monthly management meetings where data will be analysed and actions taken to address any issues.</p> <p>Kettles will be introduced to the Bittern Unit on first Reception and will be included in rooms, unless any Security information or risks are flagged up during the induction process, admissions paperwork and AssetPlus documents. Decisions will be made and reviewed by Admissions and Care Managers and Duty Managers in their absence.</p>	Governor	Oct 2018



	<b>Victims of bullying and intimidation</b>				
5.9	Managers should ensure that meaningful care plans are in place for victims of bullying and violence. Monitoring of victims and perpetrators should take place on residential units and should be recorded. (1.28)	Agreed	<p>A review of the behaviour management strategy has taken place to streamline existing policies to manage:</p> <ul style="list-style-type: none"> <li>• antisocial behaviour</li> <li>• bullying behaviour</li> <li>• restraint minimisation</li> <li>• gang recognition</li> <li>• conflict resolution</li> <li>• behaviour intervention</li> <li>• strategic monitoring of perpetrators</li> </ul> <p>Victims and perpetrators of bullying are supported and receive meaningful care plans which are reviewed and discussed at weekly Behaviour Management Meeting. These plans will be monitored and managed by Unit staff and Managers on a day to day basis on residential units.</p>	Governor	Completed
	<b>Suicide and self-harm protection</b>				
	Daily entries in ACCT documents should record all important conversations and observations to assist in future case management. (1.34)	Agreed	A full review of the Quality Assurance Process has taken place, led by Head of Safeguarding to ensure accountability and responsibilities of Stakeholders, all who have contact with a young person on an Assessment, Care in Custody & Teamwork (ACCT) document, in line with the revised Suicide and Self Harm (SASH) training. This will further include accountability of stakeholders at review meetings. Daily entries are made recording all important conversations and observations.	Governor	Completed
	<b>Behaviour management</b>				
5.11	Procedures and routines for placing boys on the enhanced support unit and managing them while there should be clarified to improve consistency and ensure staff and boys understand what is expected of them. The population on the unit should not increase until these measures are in place. (1.40)	Agreed	<p>A referral process is now in place with clear criteria and structure for identification and movement plans both on and off the Enhanced Support Units (ESUs). The operational specification is being written with the YCS Central team to deliver the ESUs, as well as acting as guidance for staff on site. Enhanced Support Team (EST) meetings and formulation plans are shared appropriately with key staff and young people. The Head of ESU is responsible for ongoing review.</p> <p>As all measures are in place, the population has increased and naturally fluctuated as young people have been released. A maximum of 4 residents will reside on the unit until phase two of the project is complete and more rooms are on line.</p>	Governor	Completed
	<b>Rewards and sanctions</b>				
5.12	The incentives and earned privileges scheme should be fully implemented to	Agreed	The new Incentives and Earned Privileges (IEP) system for young people on Gold, Silver and Bronze levels has been introduced and includes inter-unit competitions and sporting elements. A Merit system is on offer where young people can also	Governor	Completed



	embed a rewards-led culture at Feltham. (1.44)		gain credits for tuck shop items or phone credit. Quarterly reviews of the IEP scheme take place with feedback from Youth Council through Kinetic forums.		
	<b>Security and disciplinary procedures</b>				
5.13	All security actions, including targeted searching and drug testing, should take place. (1.51)	Agreed	All security actions are assessed through Mercury Intelligence Systems and given a risk rating and actions take place in accordance with that risk rating and resources available within Daily Regime Management Plan.  The Head of Security reminds all functional heads through monthly Security committee meeting of the need to act on intelligence in a timely manner, for example reporting the smell of Cannabis requires approval for immediate action rather than awaiting dissemination of an Incident Report (IR) potentially a few days later. This is reiterated through monthly functional meetings by all heads of function.	Governor	Completed
	<b>The use of force</b>				
5.14	All use of force documentation should be completed promptly following any incident of force. (1.61)	Agreed	It is accepted that staff should be afforded the time to complete their Use of Force documentation at the earliest opportunity after an incident. They will be supported by the Staff Care and Welfare Team, Line Managers and Minimising and Managing Physical Restraint (MMPR) coordinators where necessary, to ensure such completion will cause no disruption to the regime.  There is ongoing development of the Use of Force Checklist to ensure a person is assigned to the completion of paperwork post incident by the Incident Managers, led by the Head of Safeguarding.	Governor	October 2018
	<b>Separation/removal from normal location</b>				
5.15	Special accommodation should not be used for boys unless the circumstances are exceptional and it is fully justified by the manager authorising its use. (1.65)	Agreed	The use of special accommodation is always in exceptional circumstances and is closely monitored through the monthly Segregation Monitoring and Review Group (SMARG) meeting. All of the special accommodation paperwork is quality checked by the CSRU managers.  HMYOI Feltham are currently in the process of having two cells renovated as relocation cells on CSRU. This will ensure the prison will have somewhere more appropriate to locate the most difficult and violent of young people.	Governor  Governor	Completed  October 2018
	<b>Substance misuse</b>				
5.16	Boys should be able to access substance misuse interventions promptly. (1.70)	Agreed	The Head of Care and Admissions oversees the Operational Staff ensuring the Substance Misuse Team can access new receptions to conduct an initial	Governor	Completed



			<p>assessment within 5 working days and that any booked appointment for an intervention is facilitated at the location and time indicated.</p> <p>The Substance Misuse Practitioner ensures boys arrive promptly for their booked appointment and that this is facilitated by Operational Staff. This is monitored by Head of Healthcare.</p>		
	<b>Residential units</b>				
5.17	All cells, showers and communal areas on residential units should be clean and well maintained. (2.10)	Agreed	<p>Room cleanliness inspections take place regularly and are linked to the Incentives scheme and are led by Unit Managers and the Head of Residence and Services. The painting programme has also commenced at Feltham.</p> <p>A Cleaning programme is to be introduced with British Industrial Cleaning Services (BICS) team for showers and communal areas.</p> <p>Monitoring will take place with monthly meetings and feedback from Unit Managers to Functional Head, Industries Manager and Deputy Governor.</p>	Governor	October 2018
5.18	Boys should be able to shower and make a telephone call each day. (2.11)	Partly Agreed	<p>This recommendation is partly agreed because the policy does not require a daily shower or telephone phone call.</p> <p>From PSI 75/2011 Residential Services:</p> <ul style="list-style-type: none"> <li>The frequency of access to ablutions and the type and quantity of toiletries provided is not specified, although prisons must meet the minimum requirement of Prison Rule 28(2) that prisoners have a bath or shower at least weekly. Governors must determine what is reasonable having regard to all the individual circumstances including whether the prisoner is engaged in energetic and dirty work and any individual health, religious or other needs. Prisoners should have access to a shower at least weekly.</li> <li>Establishments must ensure that prisoners have access to the telephone at times when their families, friends etc. are available to speak to them, at reasonably frequent intervals and having regard to specific events in their lives. Where evening association is not provided, alternative local arrangements must be made to give prisoners access to the telephone during the evening to maintain contact with family and friends.</li> </ul> <p>Where the Regime Management Plans (RMP) allows, showers will be available more frequently and access to make a telephone call will be made daily.</p>	Governor	



5.19	The application process should be managed consistently. (2.12, repeated recommendation 2.11)	Agreed	<p>The Application Policy has been reviewed and will be fully embedded and supported by peer workers. The updated unit information and notices to young people on the process and how they can access. Engagement and feedback for ongoing review will be sought through Youth Council via Kinetic Youth.</p> <p>The Quality Assurance processes will form part of the Policy and will be led by Head of Residence and Services.</p>	Governor	October 2018
	<b>Relationships between staff and children and younger people</b>				
5.20	The personal officer scheme should be developed and personal officers should play an active part in sentence progression and case work. (2.16, repeated recommendation 2.15)	Agreed	<p>The staffing resources within the Reform programme and an establishment re-profile will detail facility time for Personal Officers to attend Young People reviews for Good Order or Discipline (GOoD), Initial / Review and Release sentence plans. Further training under the Reform programme will see personal officers improve their skill set.</p> <p>The Reform programme is managed by a Reform Lead and driven by the central YCS team with a locally appointed Reform Implementation Manager and Head of Residence and Services.</p>	Governor	March 2019
	<b>Equality and diversity</b>				
5.21	Equality and diversity policies should recognise and respond to the specific issues of gang-related discrimination. (2.22)	Partly Agreed	<p>This recommendation is partly agreed because the Prison works in accordance to the PSI 32/2011 and the Equalities Act of 2010 and the defined Protected Characteristics. There is no definition for gang-related discrimination.</p> <p>Direction is required centrally to determine how gang-related discrimination is to be identified and addressed. This will be reviewed by Head of Regimes and Equalities with YCS Policy leads.</p> <p>Regular checks will be made with the interventions team to ensure gang related programs are up to date. Where necessary, work will link with the Lammy Review recommendations.</p>	Governor / Youth Custody Service	October 2018
5.22	Residential staff should be aware of and support boys with identified disabilities. (2.31)	Partly Agreed	<p>This recommendation is partly agreed because processes are in place to ensure residential staff are aware of boys with disabilities, but training is required for Residential staff to be more aware of how to identify and support young people with identified disabilities. This will always be subject to the disclosures a young person makes or information available to the prison.</p> <p>Personal Emergency Evacuation Plans (PEEP's) are in place. A database of PEEP's are held to ensure additional needs are considered and reviewed, however, not all young adults / young people disclose this information. The</p>	Governor	Completed





			<p>Operational Staff are responsible for ensuring timely arrival at medication hubs. This may be dependent on the prison Regime Management Plan and cannot always be guaranteed. The healthcare team have purchased and installed a new drug cabinet therefore young people would no longer be required to be escorted through the B-side corridors.</p> <p>The of Head healthcare met directly with the Acting Governor highlighting concerns about the lack of consistency regarding the young people receiving their medication in a timely manner and was given an assurance the matter was being dealt with by the Governor for the A-side and can confirm the situation has significantly improved.</p> <p>The Head of Healthcare has ongoing access to raising and improving any issues arising around this matter at a monthly SMT meeting and an improvement plan is in place so that each unit is aware of the time frames in which medication is dispensed led by the Head of Regimes. Any issues including those surrounding timing and delivery of medication are raised with Residential Functional Heads by Head of Health care or at SMT or Health Partnership board meeting if not successfully addressed.</p>		October 2018
5.27	Boys in shared cells should have secure storage for in-possession medicines. (2.71)	Agreed	Young people in shared rooms will have appropriate secure storage. Cabinets will be procured and installed by Head of Residence and Services in line with Security specification for in-possession medicines and Health care advice.	Governor	October 2018
	<b>Catering</b>				
5.28	Serveries should be kept clean. (2.87)	Agreed	Serveries will be cleaned following planned cleaning schedules with support from Kitchen and Catering Manager and BICS teams with Industries Manager, led by Head of Residence and Services including deep clean schedule through external contractors.	Governor	October 2018
5.29	The size of breakfast portions should be increased and always served on the day they are to be eaten. (2.88)	Not agreed	<p>This recommendation is not agreed as the breakfast cereal pack in the prison is the largest one available through the food packing service and was developed specifically for the Young People's Estate. This was done in conjunction with the Children's Food Trust. It has a 52g packet of cereal rather than a 30g packet in the Adult Estate. The cereal bars are small to be in line with the 100 calorie snack (max 2) government initiative and the packs offer 4 drink choices against 1 in the Adult Estate.</p> <p>There is no specification for Breakfast to be provided on the day it is to be eaten although on most occasions this is the case to avoid young people eating it the night before and in a bid to get them into a routine of being up and ready activities by coming out for breakfast.</p>	Governor	



			Breakfast pack issue is the responsibility of the establishment locally and guidance on this is contained within the Catering for prisoners PSI 44/2010. It is commonplace for breakfast packs to be issued the night before usually with the evening meal to fit with the local regime. Suggested time for serving breakfast is contained in the PSI 44/2010 which states that where possible establishments should issue the pack on the morning of consumption.		
	<b>Purchases</b>				
5.30	Boys should be able to place a canteen order within 24 hours of their arrival. (2.91, repeated recommendation 2.100)	Not agreed	<p>This recommendation is not agreed as it is not possible to be able to guarantee that boys can place a canteen order within 24 hours of arrival, Canteen orders are taken within the agreed national contract arrangements therefore orders can only be taken on set day. Each prison has one set ordering day in the week for retail purchases, and one corresponding delivery day. To provide extra deliveries outside of this for new arrivals would be cost prohibitive. Their first full order can then be placed on the next usual ordering day. Interim arrangements include induction/reception packs which include essential items. .</p> <ul style="list-style-type: none"> <li>• Prisoners new to a prison should be given the opportunity to purchase a reception pack. This is to provide prisoners access to retail products until they can place an order from the full local range on the next usual weekly ordering day for that establishment.</li> <li>• A range of reception packs, catering for different needs and budgets, are available from the agreed contractor including options for smokers and non-smokers. The contents of the packs are set nationally, and establishments cannot select unique reception packs. Establishments choose from the selection available, which types of pack they want to offer.</li> <li>• Each establishment should hold a stock of reception packs. Items stocked locally must be stored securely and accounted for. Prisoners must be recharged for the pack, if necessary by means of an advance.</li> <li>• Prisoners should be offered reception packs as soon as practicable after they are received into an establishment, taking into account safety, security, and local processes, but no later than 24 hours after arrival. Good practice would be to offer reception packs as part of reception or first night procedures.</li> </ul>	Governor	
5.31	Prohibition of items on the canteen list should be regularly reviewed and supported by up-to-date intelligence. (2.92, repeated recommendation 2.102)	Agreed	A review is required of prohibited items to source alternatives to tins. The national and regional Intelligence has informed the local decision regarding prohibiting certain items, where risks had been identified in other prisons. The Business Hub led by Head of Business Assurance will arrange Focus groups with young people	Governor	October 2018



			to discuss items on the Canteen list, amendments and requests. Kinetic Youth will assist through Youth Council arrangements.		
	<b>Time out of cell</b>				
5.32	All boys should have enough time to make a telephone call, shower, and spend at least an hour outside every day. (3.4)	Partly Agreed	<p>This recommendation is partly agreed as Residential Services PSI 75/2011 notes that prisoners are afforded a minimum of 30 minutes in the open air daily, as defined in the SLA/Contract.</p> <p>PSI 75/2011 Residential Services also states the frequency of access to ablutions and the type and quantity of toiletries provided is not specified, although prisons must meet the minimum requirement of Prison Rule 28(2) that prisoners have a bath or shower at least weekly. Governors must determine what is reasonable having regard to all the individual circumstances including whether the prisoner is engaged in energetic and dirty work and any individual health, religious or other needs. Prisoners should have access to a shower at least weekly.</p> <p>Establishments must ensure that prisoners have access to the telephone at times when their families, friends etc. are available to speak to them, at reasonably frequent intervals and having regard to specific events in their lives. Where evening association is not provided, alternative local arrangements must be made to give prisoners access to the telephone during the evening to maintain contact with family and friends.</p> <p>There is scope within HMYOI Feltham's regime to allow for these activities, however this depends on the young person's Regime Management Plan of the day to allow for activities.</p>	Governor / Youth Custody Service	Completed
5.33	Attendance at all important scheduled appointments should be facilitated. (3.5)	Partly Agreed	This recommendation is partly agreed because there is a reasonable expectation that scheduled appointments should be facilitated by Operational Staff. The ability to deliver is dependent on daily the Regime Management Plan and resources available to accommodate this.	Governor	Completed
	<b>Education, learning and skills</b>				
5.34	Leaders and managers should ensure that boys' attendance at education is consistently high. (3.13)	Agreed	<p>The attendance at activities and education is monitored and recorded daily. This forms part of Sentence Planning with the Caseworker.</p> <p>Attendance data is reported daily and reviewed at monthly Quality Improvement Group (QIG) meeting led by the Head of Education. Any dip in attendance will be reviewed by the Head of Education and Head of Regimes and Equalities.</p>	Governor	Completed
5.35	Leaders and managers should further speed up movement from accommodation units to education to	Agreed	The movement times have improved and efforts continue from all staff and managers to monitor and maintain improvements. The prison Regime Management Plan affects daily delivery but the priority remains to facilitate moves	Governor	October 2018



	improve punctuality at sessions and increase the time boys spend in learning. (3.14)		in the quickest way possible. A review of the core day will further review the movement timings and processes which will be by the Head of Residence and Services.		
5.36	Leaders and managers should ensure that the virtual campus is fully functional and routinely available to boys for job search and to support their learning. (3.15)	Agreed	<p>The contract for the Virtual Campus (VC) is due for imminent renewal, however it has not been possible, for a variety of operational reasons, to get VC working in HMYOI Feltham for young people.</p> <p>The prison is reviewing alternative options, including a bespoke Feltham specific provision that will include links to job searches and additional learning. The current education provider has set up a virtual media library on the stand-alone server, and content will be reviewed and authorised by the prison, in order to be regularly uploaded. Options for accessing this content include local network access using tablets and/or laptops within classrooms, with WIFI routing, subject to security clearance.</p>	Governor	October 2018
5.37	Leaders and managers should identify and use the datasets required to monitor and manage the effectiveness of purposeful activities in the prison. (3.16)	Agreed	The Learning, Skills and Employment Manager oversees the Dashboard database, which records the numbers of young people attending purposeful activities and what class they are allocated to. The Dashboard also monitors the reason for non-attendance. Systems are in place to analyse and manage the effectiveness of purposeful activities.	Governor	Completed
5.38	Leaders should restructure the quality improvement group to ensure that it focuses tightly on aspects for improvement, including teaching and learning. (3.17)	Agreed	HMYOI Feltham have restructured the Quality Improvement Group (QIG) terms of reference to ensure that learner progress is a core theme. The Education Provider's Self-Assessment Report (SAR) will be the majority of the primary agenda, with specific actions highlighted and strategies identified to improve outcomes.	Governor	Completed
5.39	Leaders and managers should review and substantially reorganise the curriculum to meet the widely varying backgrounds, needs and interests of boys. (3.24)	Agreed	<p>HMYOI Feltham will be introducing a wider variety of pathways led by Head of Education to provide a more engaging curriculum, with improved outcomes, including:</p> <ul style="list-style-type: none"> <li>• Chelsea FC delivering Sports Leader and Coaching Awards</li> <li>• Roadlight delivering Therapeutic Urban Intervention</li> <li>• Richmond Rugby Club delivering an Introduction to Rugby</li> <li>• Barbering pathway</li> <li>• Science, Technology, Engineering and Math (STEM) pathway which is a focused learning environment, for our more able young people.</li> </ul>	Governor	October 2018
5.40	Prison managers should ensure that risk assessments are timely. (3.25)	Agreed	Some job roles and areas of education require more in depth risk assessments due to the nature of the environment e.g. workshops, which can take longer than others. A review of the current applications system will take place to improve timeliness and feedback to the young person while awaiting an outcome. This will be led by Head of Regimes and Equalities and Head of Security.	Governor	October 2018



5.41	Leaders and managers should provide further training and development to teaching staff so that teaching, learning and assessment are consistently effective. (3.34)	Agreed	<p>The Head of Education will lead the introduction of more bespoke Continued Professional Development (CPD) to education colleagues, including:</p> <ul style="list-style-type: none"> <li>Working in partnership with local Academies (including Reach Academy) to enable Feltham Education Staff to visit Good/Outstanding schools to see what excellent teaching and learning looks like.</li> <li>Sharing the hiring of staff with local Academy so staff work both in mainstream and then bring good practice into HMYOI Feltham.</li> </ul> <p>Senior leaders colleagues will be trained in effective observation of learning to ensure reviews of teaching and learning practice are accurate, and feedback is appropriate and meaningful to improve outcomes for young people.</p>	Governor	October 2018
5.42	Leaders and managers should ensure that sufficient learning support assistants are available to support boys in classroom sessions and that they are used well. (3.35)	Agreed	<p>HMYOI Feltham is actively recruiting additional Learning Support Assistants (LSA's) which should improve behaviour in classrooms and ensure higher staff retention.</p> <p>LSA's will receive bespoke CPD linked directly to behaviour management of complex needs and also differentiation skills to improve outcomes for learners. This will be led by the Head of Education.</p>	Governor	October 2018
5.43	Leaders and managers should ensure that boys' achievement of qualifications is high on all courses and at levels which are meaningful and of practical value. (3.47)	Agreed	<p>New procedures are being investigated to ensure that all progress is being measured, including progress in terms of social improvements, for example, identifying improvements in a young person's resilience. New pathways are being introduced which will facilitate improved outcomes in more practical aspects, such as coaching, barbering etc.</p>	Governor	October 2018
5.44	Leaders and managers should introduce library provision which is accessible, attractive and useful to boys. (3.52)	Agreed	<p>Library provision will be reviewed in line with comparable school and community library provision led by the Head of Education.</p>	Governor	October 2018
	Pre-release and resettlement				
5.45	Feltham A should identify key actions to be taken in their strategic approach to reducing reoffending work and progress against these actions should be regularly monitored. (4.7, repeated recommendation 4.9)	Agreed	<p>There will be a review of the strategic aims and objectives of the Reducing Reoffending Meeting led by the Head of Reducing Reoffending to ensure best outcomes for young people are developed and monitored. Key themes and actions will be identified and monitored against the strategic objectives set. Shared best practice with other YCS sites will included.</p>	Governor	October 2018
	<b>Training planning and remand management</b>				
5.46	Boys with, or facing, indeterminate sentences should be provided with	Partly Agreed	<p>This recommendation is partly agreed because casework is not currently resourced for specific interventions for working with those with Indeterminate</p>	Governor /	Completed



	support and a regime that meets their specific needs. (4.14)		<p>Sentences. They are managed under the current casework format which identifies and supports individual needs.</p> <p>There is no long term offending behaviour courses or long-term unit currently at HMYOI Feltham. Young people would have to be transferred elsewhere to other establishments within the youth secure estate to provide them with a regime suitable specific to their needs. Where appropriate, this undertaken promptly and in the prisoner's best interests.</p>	Youth Custody Service	
	<b>Reintegration planning</b>				
5.47	Work to address gambling should be developed. (4.29)	Agreed	<p>All young people are screened on reception and asked about gambling or addiction problems. Where offending is linked to a gambling problem or addiction, the Casework Team will make a referral to Gamblers Anonymous to work with the young person. If a concern subsequently comes to light, a referral will be made to Casework to offer support as part of the young person's individual sentence plan.</p> <p>The Programmes Manager is liaising with Psychology Services to establish what (if any) programmes are available within the Service. As an interim measure Kinetic Youth are running a Debt management and Gambling module which Young people can be referred to or self-refer.</p> <p>If it is identified that young people have got into debt through gambling activity on the unit i.e. betting on sporting matches or playing cards, this is referred via Behavioural Management Meeting to Conflict Resolution practitioners and Safeguards Officers to discuss and address and make appropriate bullying referrals and implement a support plan.</p>	Governor / Youth Custody Service / Psychology Services	<p>October 2018</p> <p>Completed</p>
5.48	There should be a clear strategy and implementation plan for family work based on the needs of boys. (4.36)	Agreed	A Children and Family policy will be developed to outline the services available to embed family work based upon need. This will include systems to identify young people who are fathers, to provide parenting support.	Governor	October 2018
5.49	Access to visits should not be restricted because of the boys' level on the incentives and earned privileges scheme. (4.37)	Agreed	<p>PSI 16/2011 sets out the statutory entitlement for social visits. Convicted prisoners are entitled to two visits in every four-week period. The policy allows for a visit on reception and every two weeks thereafter. Extra visits may be earned under local Incentives and Earned Privileges (IEP) schemes. Un-convicted prisoners must be allowed visits on at least three days a week, which includes weekends. All visits should last at least one hour.</p> <p>Access to visits is not restricted because of the IEP level. Visits are available in line with agreed policy arrangements. Additional visits are offered to young people with gold status in line with the prison rewards and recognition scheme.</p>	Governor	Completed



5.50	Learning from programmes should be reinforced by staff across the establishment. (4.43)	Agreed	<p>Learning from programmes is being shared by the Programmes Manager at monthly functional meetings and regular staff awareness sessions are delivered identifying the benefits of the Juvenile Estate Thinking Skills (JETS), Starving the Anger Gremlin (STAG), Anger Replacement Therapy (ART) and A-Z. The focus of these sessions will be to improve the support that is offered to young people who partake in these interventions and promote a rehabilitative culture across all disciplines and an understanding of the course content and how it can be further developed in other environments.</p> <p>The caseworker is included in post-course report feedback and information is shared with YOT Worker to better inform and develop release planning and plan any further work that is required. Promotional material for programmes is also made available to staff and included in local Person Prison Officer Entry Level Training (POELT) Induction.</p>	Governor	Completed
5.51	Appropriate interventions should be consistently available to help boys to address sexually harmful behaviour. (4.44)	Agreed	<p>The Healthcare department have recently recruited a Senior Psychologist to continue the development of the sexually harmful behaviour service. A process has now begun to establish the service across the prison.</p> <p>The pathway will be reviewed by the Wellbeing Team led by the Head of Healthcare to ensure there is a level of consistency in terms of access. Reference will be made through the Attitudes, Thinking and Behaviour Pathway through the Reducing Reoffending committee.</p>	Governor	October 2018

<i>Recommendations</i>	
Agreed	37
Partly agreed	11
Not agreed	3
<b>Total</b>	<b>51</b>

