



HM Prison &
Probation Service

Action Plan: HMYOI Cookham Wood

Action Plan Submitted 23 May 2018

A Response to the HMIP Inspection of 14 – 25 August 2017

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

ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMYOI COOKHAM WOOD

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 recommendations to the governor				
5.1	Accurate data should be used to inform a clear and effective strategy to reduce levels of violence. Systems to manage violent behaviour and support the victims of bullying should be strengthened. (S40)	Agreed	<p>Violence is monitored via the monthly safeguarding meetings. Individuals with high levels of involvement in violence are referred for interventions via the Young Offenders Institution (YOI) Rule 49 process under Good Order or Discipline (GOoD) which is used to ensure the stability of the prison is maintained and will necessitate the removal from association with other young people either for disruptive behaviour or if under threat. These actions are also supported by the further actions in response to recommendations 5.10, 5.13, 5.17 & 5.18.</p> <p>A comprehensive Bullying Management Policy has been written and implemented which covers actual physical violence or threats of violence and ensures that both perpetrators and victims are offered support.</p> <p>Violence data is analysed via the Violence Diagnostic Tool (VDT) and Violence In Prisons Estimator (VIPER – which is currently being piloted across the HMPPS estate and HMYOI Cookham Wood is one of the establishments identified as part of the pilot) tools and this data will inform the revised violence reduction strategy.</p> <p>The Custodial Managers are now reporting incidents of violence appropriately via the Incident Reporting System (IRS) which is assured by the Night Orderly Officer completing a check that all reported incidents have been completed on IRS.</p>	Governor	<p>Completed</p> <p>Completed</p> <p>Completed</p>
5.2	The complex cohort units should be staffed and managed more effectively to fulfil their progressive purpose. Boys segregated within the cohort should have well communicated individual plans, with more meaningful targets, to	Partly Agreed	This recommendation is partly agreed. Additional resourcing has been identified through the Youth Custody Service reform agenda in response to the Charlie Taylor review, which highlighted the need for an increased and professionalised workforce within Youth Custody. However, timescales for the deployment of these staff which will contribute to the enhancement of staffing on the complex cohort unit is dependent on HMYOI Cookham Wood recruiting to its target staffing figure for Officers. Therefore the	Governor	November 2018



	support safe and swift reintegration. (S41)		<p>recommendation can only be partly agreed at this time. There is a current recruitment campaign and the Governor is engaged with Human Resource colleagues to ensure the pipeline for new recruits is as effective as possible.</p> <p>Improvements on identifying individual planning is captured on Good Order and Discipline (GOoD) reviews which are carried out by the Head of the Complex Care group, or by another appropriate operational manager in their absence to ensure consistent governance and quality.</p> <p>Short Term Assessment of Risk and Needs (STARN) are now completed within seven days of a young person being placed on YOI Rule 49 GOoD and targets are individualised as per the young person's needs. Young people are involved in this process, are invited to the review and confirm/agree the set targets prior to the completed STARN being circulated to all relevant departments working with the Young Person and a copy placed in their individual folder on the unit.</p> <p>A modular build at the end of the unit, which was under construction at the time of the Inspection visit is now complete and subject to available staffing will allow for the delivery of two additional education pathways and intervention sessions.</p> <p>A review and revision of the unit policy is currently being undertaken to reflect changes to the regime currently on offer.</p>		<p>Completed</p> <p>Completed</p> <p>September 2018</p> <p>June 2018</p>
5.3	All boys should be able to access 10 hours out of their cell each day. The regime should be predictable to enable boys to access punctually the services designed to support their well-being and help to reduce their risk of reoffending. (S42)	Partly Agreed	<p>This recommendation is partly agreed as whilst all young people that are on the enhanced and standard regime are scheduled to be out of their rooms for 10 hours per day, as part of the Behaviour Management Strategy, those young people on the basic regime have a reduced amount of time out of their room.</p> <p>Additional resourcing has been identified through the Youth Custody Service (YCS) reform agenda in response to the Charlie Taylor review. Timescales for the deployment of these staff, which will contribute to the enhancement of staffing at HMYOI Cookham Wood and enable the delivery of a more consistent regime, is dependent on the prison recruiting to its target staffing figure for Officers. There is a current recruitment campaign and the Governor is engaged with Human Resource colleagues to ensure the pipeline for new recruits is as effective as possible.</p>	Governor	<p>Completed</p> <p>November 2018</p>



5.4	Individual training and remand plans should be central to a boy's progression. Targets should be specific and address identified risks of reoffending and harm. Staff from all relevant departments should be represented at training planning or remand management reviews, or submit a detailed report if they cannot attend. (S43)	Agreed	<p>A review of individual training plans has been undertaken and development for staff identified. The introduction of Asset-Plus will provide the resource to create specific planning for pathways and interventions and focuses on directly considering the risks of reoffending, harm to others and self. The casework team are all receiving training to enable effective use of this system (50% complete) and this training is significantly geared towards risk-management and how it should be considered in training plans.</p> <p>HMYOI Cookham Wood has introduced a quality assurance check within the system of 100% of the initial training plans before they can be progressed. This will remain until the prison is assured the process meets the needs of the young people and will be adjusted once this assurance is evident.</p> <p>Attendance from other relevant areas will continue to be encouraged and where this is not possible there is an expectation that appropriate information will be supplied prior to a review.</p> <p>Engagement and resettlement workers are not attending reviews at this current time (see recommendation 5.56) as this is not part of the existing education contract.</p> <p>Training plans will be consistently reviewed and remain a live document which can and will be updated when necessary. The current training plan will be taken to other reviews including segregation and Assessment, Care in Custody and Teamwork (ACCT) support, allowing for a multi-discipline evaluation of the current objectives and if there are relevant changes that are needed to meet identified risk and support.</p>	Governor	<p>May 2018</p> <p>Completed</p> <p>June 2018</p> <p>June 2018</p>
	Recommendation to the Ministry of Justice and HMPPS				
5.5	Senior prison managers and Ministry of Justice staff should frequently monitor the performance and quality of all learning delivered by subcontractors to ensure that all boys make good progress. (3.13)	Agreed	<p>The management of education contracts was taken over by Ministry of Justice (MoJ) Commercial and HMPPS from the Youth Justice Board (YJB) in April 2017. Four-weekly Payment Period reports and six-weekly Management Information reports are submitted by the Education Provider on which performance and progress are recorded. However, this data is poor and (MoJ Commercial and HMPPS) are working with establishments, including the providers to improve these returns.</p> <p>Since January 2018, every six weeks, Performance Review Meetings are held on-site, attended by the HMPPS Education Lead, Education Provider and HMYOI Cookham Wood, to discuss four and six weekly reports, challenge under-performance and mitigate risks.</p>	Director MoJ Commercial / Executive Director Youth Custody Service and Transition / governors / Education Providers	Completed and ongoing

			<p>Quarterly Contract Review Meetings are also held on site and attended by MoJ Commercial, HMPPS Prison Group Director, HMYOI Cookham Wood and the Education Provider, to challenge and discuss any contractual and performance issues.</p> <p>Monthly Functional Assurance Reports are submitted to the Governor inclusive of performance data. Quality Awareness Training was delivered to the Senior Management Team, Custodial Managers, Physical Education (PE) Instructors, Supervising Officers, officers and tutors by Novus Director of Operations for Quality in December 2017 and February 2018.</p> <p>The Head of Reducing Reoffending (HoRR) and Head of Service for Substance Misuse have completed joint learning walks with the Deputy Head of Education with further learning walks planned.</p> <p>Young people's progress and achievement is discussed at six weekly Performance Review Meetings with the Deputy Governor, HoRR, Head of Education, Deputy Head of Education, Education Business Manager and YCS Education Lead.</p>		
	Recommendation to the Youth Justice Board				
5.6	The Youth Justice Board should work with relevant government departments to ensure that boys are not released from custody into bed and breakfast or hostel accommodation. (4.23, repeated recommendation 4.21)	Partly Agreed	<p>This recommendation is partly agreed as Local Authorities' have responsibility for coordinating a child's resettlement into the community and to ensure that young people are not released from custody into bed and breakfast or hostel accommodation. Following the Southwark Judgement (R(G) v London Borough of Southwark (2009), statutory guidance for local authorities for the Provision of Accommodation for 16 and 17 year old young people who may be homeless and/or require accommodation (2010), states bed and breakfast accommodation is not suitable for 16 and 17 year olds.</p> <p>Current National Standards for Youth Justice Services, set by the Secretary of State, are clear that resettlement planning should begin from the start of the sentence, and at minimum, should include arrangements for suitable accommodation on release.</p> <p>Resettlement and transition between services is a priority of the new Youth Justice Board. The YJB will work with local authorities and other government departments responsible for resettlement service delivery to address issues such as obtaining suitable accommodation on release from custody. For example, the YJB will engage with the sector via a series of</p>	Youth Justice Board	October 2018



			roundtables; specifically: engagement will take place at Youth Offending Team level, Director of Children's Services level and with the Youth Justice Sector Oversight Group in order to confirm our understanding of the barriers to successful resettlement and focus upon problem solving to unblock these, where possible. Furthermore, the YJB will work with other government departments to ensure consistency across wider guidance, operational policy and procedure concerning children's resettlement.		
	Recommendation To HMPPS				
5.7	There should be a young people's estate-wide approach to enable young offender institutions to collect data systematically to determine the resettlement and reoffending outcomes for boys released into the community. (4.8, repeated recommendation 4.8)	Partly Agreed	<p>This recommendation is partly agreed to at this stage due to commissioning and operational constraints. The YCS will continue to develop its approach to data and information. This will include the creation of a YCS Information Management Strategy that will suggest and enable establishments to collect data that enables improvements to the quality of service provided.</p> <p>YCS will shortly begin to review the data, information and intelligence it collects from secure establishments. This includes what information is collected against resettlement and reoffending outcomes for young people leaving our care.</p> <p>This work will be undertaken alongside the custody reform programme to ensure that new measures reflect changes made to the estate.</p>	Executive Director Youth Custody Service and Transition	December 2018
	Recommendations To Prisoner Escort and Custody Services (PECS)				
	Courts, escort and transfers				
5.8	Boys should not travel with adults and their arrival at the prison should not be delayed. (1.2)	Partly Agreed	<p>This recommendation is partly agreed as the current Prisoner Escort and Custody Service (PECS) contract allows different types of prisoners to be carried on the same escort vehicle with a separation capability. The Serco contract allows a 3% cap of the total number of young people escorted each month, which can be carried on vehicles without a separation facility at the same time as adult prisoners. Performance against this cap is reviewed monthly by PECS. This results in more responsive and efficient scheduling by allowing young people and female prisoners to be carried on scheduled runs, so reducing waiting times at courts. In addition to saving costs, the use of such hybrid vehicles also reduces the carbon footprint and the environmental impact. Therefore the part of the recommendation that boys should not travel with adults is not agreed with.</p> <p>The contractor is fully aware of the risks posed by late arrivals and every effort is made to ensure that their vehicles arrive within the latest reception</p>	Executive Director Prisons	Completed and ongoing

			<p>time. PECS are continually working with the escort contractors to ensure that decency is an ongoing consideration and that young people are returned to prison at the earliest time, after having being dealt with in court, regardless of the Reception closure time. When late arrivals do occur, the escorts are required to inform the receiving establishment of the delay and seek agreement in advance for the safe receipt of any late arrivals.</p> <p>Following concerns over arrival times, PECS have instigated quarterly meetings at HMYOI Cookham Wood where representatives from both escort contractors attend with prison management and PECS, to review specific instances of late arrivals and examine patterns of lateness. The PECS Contract Delivery Manager (CDM) also conducts monthly reviews of arrival times and those received very late are raised by the CDM with the contractor as official complaints through PECS. In addition, GEOAmev are also meeting weekly with HMYOI Cookham Wood to monitor discharge times.</p>		
	Recommendation To the governor				
	Child protection				
5.9	The local safeguarding children board should be notified of all significant child protection incidents. (1.18)	Agreed	<p>The procedure for notifying the Local Safeguarding Children's Board (LSCB) is laid out in the Local Child Protection policy (revised and issued to staff in March 2018) this also lists the type of significant incident that they are to be notified about that has been agreed with the LSCB business manager.</p> <p>All safeguarding staff have been given advice regarding the difference between a Local Authority Designated Officer (LADO) referral and a Child Protection referral.</p> <p>HMYOI Cookham Wood is responsible for allegations against a professional (any person who has contact with a young person other than during a social visit/event). In such instances the LADO will be notified.</p> <p>Designated Social Workers based at the prison are responsible for child protection referrals to the LSCB.</p>	Governor	Completed
	Victims of bullying and intimidation				
5.10	All incidents of bullying and intimidation should be reported, investigated and appropriately managed. Systems to identify and	Agreed	A comprehensive Bullying Management Policy has been developed and implemented. This covers actual physical violence or threats of violence, direction and guidance on appropriate reporting and investigation measures, the management of bullying incidents and ensures that both perpetrators and victims are offered support. Appropriate guidance has	Governor	Completed



	support victims of bullying should be improved. (1.23)		<p>been given to staff to ensure that this policy is embedded across HMYOI Cookham Wood.</p> <p>A trends analysis will be included in a report which will be discussed at the monthly Safeguarding meeting attended by members of the partnership Senior Management Team.</p> <p>This process will sit within the overall Behaviour Management Strategy which incorporates a number of safeguarding policies and is overseen by the Head of Safeguarding.</p>		May 2018
	Suicide and self-harm protection				
5.11	There should be a procedure for the identification of incidents of serious self-harm so that they can be investigated and learned from. (1.28)	Agreed	<p>Serious incidents of self-harm are defined under Prison Service Instruction (PSI) 11/2012 – Management and Security of the Incident Reporting System, “where a prisoners requires resuscitation and/or transfer to outside hospital”. Where such incidents occur these will be reported to National Operations Unit as required by PSI 15/2014 – Investigations and Learning following Incidents of Serious Self-harm or Serious Assault and will be investigated by the safeguarding team (using the template from issue nine of the Safer Custody Learning Bulletin). Where deemed appropriate an individual action plan will be formalised to ensure full support is offered to the Young Person and areas of concern are addressed and actioned. Those subject to constant supervision at point of discharge will be subject to a Pre Discharge ACCT Care Map.</p> <p>A Notice to Staff (NTS) will be produced that advises all staff on what constitutes serious self-harm and how to report serious incidents of self-harm.</p>	Governor	<p>Completed</p> <p>May 2018</p>
5.12	The quality of ACCT case management documents and support for boys in crisis should be improved. (1.29)	Agreed	<p>The system has now been revised with the Duty Governor of the day now conducting checks of ACCT documents in specific areas rather than a check of all ACCTs over a weekend. This has enabled the checks to be more focused and gives better assurance that correct checks of the ACCTs and procedures are being followed.</p> <p>Whilst closed ACCT cases are not discussed at the weekly safer regimes meeting, once an ACCT has been closed a Quality Assurance (QA) check is undertaken by the Safeguarding Custodial Manager and any relevant issues that have not already been identified and challenged are addressed with the case manager.</p>	Governor	Completed
	Behaviour management				

5.13	An overarching behaviour management strategy should be developed to improve oversight of the various systems in place and make them more effective in improving behaviour. (1.35)	Agreed	Development of the Behaviour Management strategy is being undertaken and is due to be issued in June 2018. This will provide a framework incorporating all local policies used at HMYOI Cookham Wood to improve and manage behaviour including Incentives and Earned Privileges, Adjudications, Anti Bullying, Rewards and Sanctions, Complex Cohort, Education and Activities. Each policy area has management oversight from members of the Senior Management Team (SMT) and is discussed at various monthly and quarterly meetings including Security and the Segregation Monitoring & Review Group (SMARG), as well as the weekly Safer Regimes meeting which are attended by various members of the partnership SMT, Custodial Managers and Supervising Officers. Where areas are identified as having weaknesses actions are assigned and reviewed.	Governor	June 2018
	Rewards and sanctions				
5.14	The removal of basic amenities, such as kettles, should not form part of the incentives and earned privileges scheme. (1.43, repeated recommendation 1.37)	Agreed	<p>The practise of routinely removing kettles as part of the IEP scheme was stopped when it was highlighted at the time of the inspection. A staff information notice was issued during August 2017 which indicated all young people regardless of IEP level would be provided with a kettle subject to appropriate risk assessment.</p> <p>A revised Incentive and Earned Privileges policy has been implemented which has removed the reference to removing kettles and isolation of cell power. Sanctions are clearly indicated, falling within the scope of those available for minor reports and will be issued at the relevant authority level under PSI 47/2011 Prisoner Discipline Procedures.</p> <p>Kettles will only be removed on the basis of an individual risk assessment where the likelihood of violence or other safety based issue specifically involving kettles is deemed probable.</p>	Governor	Completed Completed
5.15	The use of sanctions to supplement warnings for poor behaviour should be appropriately monitored to ensure proportionality and fairness and to provide assurance that sanctions are not awarded to individual boys frequently or for longer than authorised. (1.44)	Agreed	<p>The process of using sanctions to supplement warnings for poor behaviour is incorporated in the IEP policy (see 5.14 above). The issuing of different colour cards will continue, in place of minor reports, as it provides an immediate response to an incident (positive or negative) which is more appropriate to this age group.</p> <p>Monitoring and managing QA have been more clearly defined, detailing percentage checks at Custodial Manager level with oversight from the Head of Young People and Services.</p>	Governor	Completed



			Privileges available for those on enhanced status have been increased, making it more valuable to young people and easier to attain for new inductions, in an effort to encourage improved behaviour.		
	Security and disciplinary procedures				
5.16	All adjudications should be heard and adjudication review meetings should analyse trends. (1.55)	Agreed	<p>A Governor is now identified on a daily basis to conduct adjudications which has seen an improvement in the number of the adjudications being heard within the appropriate time periods and leading to a reduction to the number of adjudications not proceeded with. Remanded adjudications are now being heard in a timely manner and a system put in place to ensure that natural justice is not compromised.</p> <p>The adjudication review meetings take place quarterly and trends (including numbers of adjudication, offence, location and ethnic monitoring) are analysed as part of the adjudication report completed in readiness for this meeting.</p> <p>In addition the Governor conducts a monthly QA of 10% of adjudications highlighting any concerns with adjudicating Governors and at the adjudication review meetings.</p>	Governor	Completed
	Bullying and violence reduction				
5.17	All allegations of bullying should be recorded and investigated thoroughly and action taken where required. (1.63)	Agreed	<p>A comprehensive Bullying Management Policy has been produced and implemented which covers actual physical violence or threats of violence and ensures that both perpetrators and victims are offered support. Guidance has been issued to staff to ensure that this process is embedded across the HMYOI Cookham Wood. As part of this process the Head of Safeguarding has introduced a QA programme to ensure that the quality of investigations is improved and maintained.</p> <p>A trends analysis will be included in a report which will be discussed at the monthly Safeguarding meeting attended by members of the partnership Senior Management Team.</p> <p>This process will sit within the overall Behaviour Management Strategy which incorporates a number of safeguarding policies and is overseen by the Head of Safeguarding.</p> <p>In addition, Duty Governors check observation books to ensure all incidents are reported through the appropriate channels.</p>	Governor	<p>Completed</p> <p>May 2018</p> <p>Completed</p>

5.18	A coherent approach should be taken to the management of violence and bullying, including meaningful analysis of data and a comprehensive action plan to maintain the safety of boys. (1.64)	Agreed	A review of the Behaviour Management strategy is being undertaken and is due to be circulated in June 2018. This provides a framework incorporating all policies used to improve/manage behaviour including Incentives and Earned privileges, Adjudications, Anti Bullying, Rewards and Sanctions, Complex Cohort, Education and activities. Each policy area has management oversight from members of the SMT and is discussed at various monthly and quarterly meetings including SMARG and Security as well as the weekly safer regimes meeting which are attended by various members of the partnership SMT, Custodial Managers and Supervising Officers where areas are identified as having weaknesses actions are assigned and reviewed. Actions from these will be consolidated to inform an ongoing action plan to ensure that safety is maintained.	Governor	June 2018
	The use of force				
5.19	All use of force documents should be completed promptly and comprehensively after incidents have taken place. (1.73)	Agreed	Custodial Managers (CM), Orderly Officers are now named on the Use of Force (UoF) log as the responsible managers for the collation of all documents, including Use of Force and Injury documentation. This enables the Managing and Minimising Physical Restraint (MMPR) team to monitor and for accountability to be managed and challenged appropriately as the process continues to embed. This has improved the timely completion of UoF documentation and will be supported by an objective on every CMs Staff Performance Development Reports (SPDR) from 2018 (to ensure all staff within their hierarchy complete UoF documentation with in the specified time frame).	Governor	June 2018
	Separation/removal from normal location				
5.20	Living conditions in the segregation unit should be improved and cells and communal areas should be kept clean, free of graffiti and well maintained. (1.87, repeated recommendation 1.62)	Partly Agreed	This recommendation is partly agreed as a request for the improvement of all the rooms to incorporate resin walls and flooring was made in 2017 but was cost prohibitive. This will be revisited in 2018 along with the planned redecoration of all areas of the unit, including cells, subject to funding being available through facilities management. Other planned improvements include an upgrade to the television provision in this area. All rooms now have telephone capability and have been fitted with the provision for accessing Digital Prisons when it is implemented. Staff carry out daily Accommodation Fabric Checks (AFC's) to ensure the cleanliness and general maintenance of the Unit is being maintained.	Governor	Completed
5.21	Risks, triggers and vulnerability identified when a boy is first segregated should be clearly	Agreed	Use of existing GOoD paperwork is utilised to clearly document the individuals' specific risks, triggers and any vulnerabilities and the Duty	Governor	Completed

	documented and accessible to all staff. (1.88)		Governor conducts a daily check as part of the quality assurance process. Documents are available to all staff who visit the unit.		
5.22	The regime for boys segregated as part of the CCG should be improved and time out of cell activities should be consistently available. (1.89)	Partly Agreed	<p>This recommendation is partly agreed as whilst additional resourcing has been identified through the Youth Custody Service reform agenda in response to the Charlie Taylor review, the timescales for the deployment of these staff is dependent on HMYOI Cookham Wood recruiting to its target staffing figure for Officers. These staff will contribute to the enhancement of staffing on the complex cohort unit. There is a current recruitment campaign and the Governor is engaged with Human Resource colleagues to ensure the pipeline for new recruits is as effective as possible.</p> <p>Changes to the regime have started, with the modular build now functional and staff increased to four (subject to overall staffing availability in line with the Regime Management Plan) to facilitate delivery of a better regime in line with requirements of PSI 08/2012 - Care of Management of Young People. Where possible, HMUPI Cookham Wood has created groups of young people who can safely mix together on the unit giving greater out of room activity.</p> <p>The regime is supplemented by activities from Education outreach, Health and Wellbeing, Psychology and Kinetic Youth.</p>	Governor	<p>November 2018</p> <p>September 2018</p>
5.23	A regular meeting with appropriate attendance should analyse comprehensive data to identify trends or patterns in relation to segregation. Appropriate governance should be provided to reduce the number of boys segregated across the CCG. (1.90)	Agreed	<p>The Segregation Monitoring and Review Group (SMARG) sits quarterly and reviews the trends and data relating to the use of segregation. Analysis is now being conducted around trends including time spent in both Phoenix (the Care and Separation unit) and B1 (the Complex Cohort landing), ethnicity, time spent in these areas and frequency.</p> <p>Improvement on identifying individual planning is captured on Good Order and Discipline (GOoD) reviews which are carried out by the Head of the Complex Care group, or by another appropriate operational manager, in their absence to ensure consistent Governance and quality</p> <p>Short Term Assessment of Risk and Needs (STARN) are now completed within seven days of a young person being placed on YOI Rule 49 GOoD and targets are individualised as per the young person's needs. Young people are involved in this process and are invited to the review process and confirm/agree the set targets prior to the completed STARN being circulated to all relevant departments working with the Young Person and a copy placed in their individual folder on the unit.</p>	Governor	Completed and ongoing



			PACT documents are no longer used and entries are now made electronically on Prison NOMIS (a prisoner reporting system) for those young people on Stage 3 and 4 respectively. The numbers of the boys segregated has significantly reduced.		
	Substance misuse				
5.24	A drug strategy for the establishment should be produced which contains an action plan with performance measures which are regularly reviewed and used to inform service delivery. (1.99)	Agreed	The drug strategy will be reviewed with the new provider who has been appointed since the last inspection. The review will form part of the resettlement strategy document and consider performance measures and how these can be measured.	Governor	May 2018
	Residential units				
5.25	Cells should be clean and free of graffiti. (2.8)	Partly Agreed	<p>This recommendation is partly agreed as whilst all areas of the units, including Young People's rooms are planned to be re-decorated and a deep clean of all rooms conducted this is subject to resources being available through facilities management. The Governor is working with the facilities management team to achieve this.</p> <p>Weekly checks of rooms are completed at Custodial Management level and young people are encouraged to keep the condition of rooms to a high standard using the green cards system.</p>	Governor	<p>September 2018</p> <p>Completed</p>
5.26	There should be a range of games and activities for boys to use in association areas. (2.9)	Partly Agreed	<p>This recommendation is partly agreed as whilst young people have been consulted about activities as part of the regular monthly youth council meetings, with some suggestions being considered, a number of suggestions such as pool tables are not appropriate. Kinetic Youth are providing facilities and activities as part of their service delivery.</p> <p>Full use of association is dependent on staffing meeting the requirements of the regime management plan. Additional resourcing has been identified through the Youth Custody Service reform agenda in response to the Charlie Taylor review. Timescales for the deployment of these staff which will contribute to the enhancement of staffing on the complex cohort unit is dependent on HMYOI Cookham Wood recruiting to its target staffing figure for Officers. There is a current recruitment campaign and the Governor is engaged with Human Resource colleagues to ensure the pipeline for new recruits is as effective as possible.</p>	Governor	<p>September 2018</p> <p>November 2018</p>
	Relationships between staff and children and younger people				

5.27	Consultation with boys should be effective and lead to tangible outcomes. (2.15)	Agreed	<p>Young People have a monthly Youth Council meeting facilitated by Kinetic Youth and attended by managers and staff from relevant departments where issues are raised and discussed.</p> <p>In addition to the above, members of the council are also invited to the monthly partnership SMT meeting where they are encouraged to raise their top three issues. This ensure there is a strategic focus on addressing key issues raised by young people.</p>	Governor	Completed
	Equality and diversity				
5.28	Equality work should be given greater priority and the equality action team should ensure that an up-to-date action plan addresses all identified weaknesses in the system. (2.20)	Agreed	<p>The equalities strategy has been updated and forms the basis of the equalities meetings which are held quarterly and are used to review all appropriate protected characteristics.</p> <p>This feeds into an overarching equalities action plan that is assured by the Equalities Action Team.</p> <p>Quarterly equality meetings are held and chaired by either the Governor or Deputy Governor in his absence. The Equality Action team hold ownership of the Equality Action Plan and this again reviewed quarterly.</p> <p>The Discrimination Information Reporting Form (DIRF) process has been reviewed and the responses are more robustly managed and strict QA procedures are in place, this is supported by the Independent Monitoring Board (IMB).</p> <p>Local Equality Monitoring Team (EMT) data is analysed not only via the equalities team but also via the SMARG report and includes regular checks of the ethnicity break down of Young People submitting complaints. Complaints are analysed by the head of safeguarding and compared with the ethnicity breakdown of the population.</p>	Governor	<p>Completed</p> <p>Completed</p> <p>Completed</p>
5.29	Regular effective consultation should take place. (2.21)	Agreed	<p>Monthly consultative groups are held and focus around the appropriate protective characteristics and issues surrounding minorities in HMYOI Cookham Wood. Issues raised will feed into the Equalities Action Plan.</p> <p>The focus groups involve a cross section of young people including the young people Equalities Representatives and are led by the Equalities Officer. At each consultation, young people are given themes to discuss such as Black History Month.</p>	Governor	Completed



5.30	The promotion of tolerance and support for gay and bisexual boys should be strengthened. (2.29)	Agreed	<p>Awareness and available support is raised and discussed during induction. Monthly newsletters are delivered to all YPs highlighting the minutes from focus groups and advising on tolerance surrounding the protective characteristics potentially appropriate for HMYOI Cookham Wood.</p> <p>In addition a guest speaker attended the establishment and delivered a talk to a selected number of YPs with regards to LGBT awareness and further talks are planned with the view to inviting a wider scope of YP's.</p> <p>The national transgender policy, PSI 16/2017 (The Care and Management of Transgender Prisoners) and its associated guidance has recently been issued to further promote and support this area of work.</p>	Governor	Completed
	Faith and religious activity				
5.31	The establishment should investigate why boys feel it is not easy to attend faith services and address any issues identified. (2.33)	Agreed	<p>This has been raised through the youth council to establish what aspect of religious service young people feel they cannot access and the issues identified are being addressed through the monthly safeguarding meeting.</p> <p>All incidents occurring during religious services are investigated to see if these impact on the attendance of Young People and where appropriate, in consultation with the religious advisors, appropriate action taken against individuals.</p> <p>Additionally any occurrence of young people declining to attend will be investigated by the chaplaincy team.</p>	Governor	Completed
	Complaints				
5.32	All complaints should be thoroughly investigated and quality assurance procedures should ensure that replies to boys' complaints cover fully all issues raised. (2.37)	Agreed	<p>10% of complaints are Quality Assured by the Deputy Governor; these are randomly selected from all of those submitted. Due to the delay in the roll-out of digital prison technology these complaints are selected manually.</p> <p>Blank complaint forms are now available in all areas of the establishment.</p> <p>Training will be delivered by Functional Heads to improve the quality of investigation and responses provided by all grades.</p>	Governor	Completed May 2018
	Legal rights				
5.33	The establishment should review legal visits provision in the light of demand. (2.40)	Agreed	<p>A review of legal visits provision has already taken place and provision has been increased by two sessions per week.</p> <p>Video link facilities are also available to increase capacity.</p>	Governor	Completed

	Health services				
5.34	Clinical incidents should be reported and monitored effectively so that lessons can be learned. (2.58)	Agreed	DATIX (the system of reporting clinical incidents in health) training has been developed and delivered to all healthcare staff to improve reporting and monitoring. This will also form part of induction for staff to ensure knowledge and improved reporting. Reporting and monitoring takes place via both the Quality Board and Contract review to ensure action and learning.	NHS England South (South East) Commissioning	Completed
5.35	All automated external defibrillators should be in good working order with a clear audit trail to ensure they are regularly checked and maintained. Monitoring processes for other emergency equipment should be more robust. (2.59)	Agreed	A weekly auditable check is now carried out by the Night Orderly Officer. The equipment is assessed and where necessary replaced in line with service schedules. Healthcare equipment is checked regularly by Healthcare. Lists have now been updated to ensure they reflect the contents of bags and dates checks having taken place.	Governor	Completed
5.36	The reception health treatment room should provide a safe environment for health staff and better visibility for prison staff. (2.68, repeated recommendation 2.53)	Not Agreed	The recommendation is not agreed with as the existing process allows for continued medical confidentiality which the recommendation may otherwise compromise. The door to the treatment room in reception has an observation panel to provide visibility to staff and there have been no incidents in the room. The room contains a General Alarm bell to alert staff and on the occasion that concerns are raised by reception or nursing staff, further operational staff are deployed to ensure safety in line with the risk assessments and safe systems of work. Whilst nursing staff do not carry body worn video cameras, the staff in reception do and the area is covered by CCTV. In addition nursing staff are trained in personal protection techniques.	Governor	
5.37	Boys should have timely access to dental care and treatment. (2.80)	Agreed	Additional clinics have been commissioned to address the concerns over waiting times and the movement process has been modified to improve efficiency.	NHS England South (South East) Commissioning	Completed
5.38	Maintenance schedules and contemporary safety certification should be readily available to demonstrate compliance. (2.81)	Agreed	Maintenance schedules and contemporary safety certification are now readily available and an assurance process is in place to ensure compliance. All testing certificates are now held by the Head of Healthcare.	NHS England South (South East) Commissioning	Completed
5.39	The regime should support sustained attendance by boys at	Partly Agreed	This recommendation is partly agreed. Additional resourcing has been identified through the Youth Custody Service reform agenda in response to	Governor	November 2018

	therapeutic group sessions. (2.89, repeated recommendation 2.74)		<p>the Charlie Taylor review. However, timescales for the deployment of these staff which will contribute to the enhancement of staffing in this area is dependent on HMYOI Cookham Wood recruiting to its target staffing figure for Officers. Therefore the recommendation can only be partly agreed at this time. There is a current recruitment campaign and the Governor is engaged with Human Resource colleagues to ensure the pipeline for new recruits is as effective as possible</p> <p>Subject to the regime management plan, the regime has been developed to support young people's attendance at therapeutic group sessions as well as all other interventions. Attendance can be compromised by restrictions on resources and incidents.</p> <p>HMYOI Cookham Wood also now has a full time speech and language therapist which will increased opportunities for enrolment and attendance at group sessions.</p>		
5.40	Boys who need a secure mental health bed should be transferred as soon as possible. (2.90, repeated recommendation 2.75)	Agreed	<p>A mental health bed is requested as soon as identified by the relevant practitioners and the transfer is completed as soon as the appropriate warrant has been issued to HMYOI Cookham Wood.</p> <p>A transfer can't be completed until an appropriate bed has been identified and warrant for transfer issued which is not under the control of the Governor.</p> <p>NHS England continues to work with partners across the criminal justice system to improve services for offenders with mental health difficulties. At times there is pressure on some categories of secure beds in certain parts of the country, which is why NHS England are currently undertaking a service review across all medium and low secure services to help ensure high quality care is available when needed. The review commenced in 2016 and is due for completion in 2017/18. The outcome of the review will lead to commissioning service developments.</p>	Governor/ NHS England South (South East) Commissioning	Completed
	Catering				
5.41	Boys should be employed to prepare food so that they can achieve related qualifications. (2.95, repeated recommendation 2.80)	Partly Agreed	This recommendation is partly agreed as the current requirements on education preclude this option. However HMYOI Cookham Wood is currently exploring the option of a barista training but this is subject to a successful bid for funding in the new financial year.	Governor	November 2018
5.42	Food should not be left in heated trolleys or on serveries for	Agreed	Kitchen staff now take the meals to the units which ensures that the food does not leave the kitchen more than 45 minutes prior to the meal service. This is monitored by the Catering Manager.	Governor	Completed

	extended periods before being served. (2.96)				
5.43	All meals should be issued at the servery and eaten in association. (2.97, repeated recommendation 2.79)	Not Agreed	This recommendation is not agreed due to time restrictions as the lunch meal cannot be collected from the server. Instead it is placed in each Young Persons room for their return from activities. Breakfast and the evening meal can be eaten in association with other young people, subject to behaviour and sufficient staffing identified under the regime management plan.	Governor	
	Purchases				
5.44	Boys should be able to place a canteen order within 24 hours of their arrival. (2.100, repeated recommendation 2.83)	Not Agreed	This recommendation is not agreed as HMYOI Cookham Wood has one set ordering day in the week for retail purchases, and one corresponding delivery day. To provide the opportunity to make orders at other times is not deliverable within current operational resources and extra deliveries for new arrivals would be cost prohibitive. New receptions are offered a reception pack on arrival, and a first canteen order can then be placed on the next usual ordering day.	Governor	
	Education, learning and skills				
5.45	Senior prison managers should ensure that regimes are managed better to ensure that all boys arrive at activities on time. Education staff should be informed promptly when boys are not going to attend and given the reasons for non-attendance. (3.12)	Partly Agreed	This recommendation is partly agreed as the timely movement of young people is impacted by the operational resources available, as identified under the regime management plan. The timescales for the deployment of these staff is dependent on HMYOI Cookham Wood recruiting to its target staffing figure for Officers which cannot be committed to at this time. The Education manager will investigate issues around non-attendance at education and work with Residential Managers to establish effective movement procedures and recording of data to identify the issues which impact on time out of cell and punctuality. This will then be communicated daily to education department. Photographic ID cards are being issued to all Young People which will ensure the correct Young People are in the correct activity location and would assist the timely movement of young people to the correct areas as identified on their timetable. The timely movement of young people is also impacted by the resources available as identified under the regime management plan. Additional resourcing has been identified through the Youth Custody Service reform agenda in response to the Charlie Taylor review. Timescales for the deployment of these staff which will contribute to the enhancement of staffing in this area is dependent on HMYOI Cookham Wood recruiting to its target staffing figure for Officers. There is a current recruitment	Governor	June 2018 June 2018 November 2018

			campaign and the Governor is engaged with Human Resource colleagues to ensure the pipeline for new recruits is as effective as possible.		
5.46	Prison managers should provide more work opportunities in the establishment to enhance vocational training and provide boys with work experience. (3.17)	Partly Agreed	This recommendation is partly agreed due to contract restrictions. HMYOI Cookham Wood will look to introduce and promote additional level 2 vocational training awards by working with the Education Provider to consider working parties around horticulture, painting and decorating and sports. This is ongoing work and will be subject to the ability to change the current education contract with the provider.	Governor	July 2018
5.47	The good standard of teaching and learning in education and vocational training should be improved further to ensure that the pace of sessions challenges all boys and helps them progress. (3.24)	Partly Agreed	<p>This recommendation is partly agreed due to suitable physical location needing to be identified and funding availability. Initial assessment and diagnostic assessment process have been reviewed and HMYOI Cookham Wood allow longer (up to 10 days) for completion of diagnostic assessments in English, Maths and ICT in the young peoples' first pathway. This helps young people settle in the new environment and be confident when taking the tests.</p> <p>Higher level course are being prepared for English and Maths, Vocational Training, Life Skills and Art. HMYOI Cookham Wood has recruited a new teacher for a new Induction pathway which will be operational by June 2018. This will help to provide good starting points, behaviour expectations and identify learning issues for new young people before they are allocated to subsequent pathways.</p> <p>HMYOI Cookham Wood will look to introduce level 2 in vocational provision where appropriate and subject to suitable physical location dependant on alterations and funding availability.</p> <p>The establishment will also differentiate for higher level ability in English and Maths sessions in classrooms with a wide range of young people abilities where possible, which will assist in the identification of setting appropriate pace for each student.</p>	Governor	June 2018
5.48	Prison managers should provide more peer mentoring opportunities for boys who have achieved the qualification. (3.28)	Agreed	HMYOI Cookham Wood will use the Quality Improvement Group to identify the areas where peer mentors are required, and consider how this will work alongside the commitment to provide education.	Governor	June 2018
	Physical education and healthy living				
5.49	The number of PE staff should be increased to ensure that boys	Agreed	HMYOI Cookham Wood has actively recruited Physical Education Instructors (PEI) and has now reached the profile target of seven which provides three hours of PE to each young person per week.	Governor	Completed

	have appropriate access to the gym. (3.39)				
5.50	PE staff should reintroduce appropriate accredited training courses. (3.40, repeated recommendation 3.33)	Partly Agreed	This recommendation is partly agreed due to the restrictions through the Transforming Youth Custody Agenda which limits the hours for PE per week. However, accredited courses have been identified to be delivered alongside generic education provision.	Governor	August 2018
5.51	There should be urgent maintenance and repair work to the all-weather sports facilities. (3.41, repeated recommendation 3.34)	Agreed	The five a side pitch at the back of the gym has been repaired and is available to be used.	Governor	Completed
	Pre-release and resettlement				
5.52	All boys should receive regular meaningful contact with their caseworker. (4.7)	Agreed	<p>Following recruitment the casework resource is now at full strength. The changes in our casework model with the introduction of Asset-Plus will reduce the current level of administrative work with cases, providing additional time for caseworkers to engage with young people and focus on meaningful contact rather than supplementary work. This engagement will be in various forms including one to one work and direct interaction.</p> <p>The introduction of the digital prisons system has provided the opportunity for a young person to make an application directly to their caseworker and also the provision of dedicated phone-lines in the department to directly call a young person, allowing immediate timely interventions, with fortnightly face to face meetings.</p>	Governor	May 2018
	Training planning and remand management				
5.53	There should be a case management system in place to record a boy's progress in custody and facilitate information sharing with community agencies. (4.12)	Agreed	<p>The Asset-Plus case management system has been implemented at HMYOI Cookham Wood but will require a period of time to fully embed. The system is already utilised nationally by Youth Offending Teams and is to be used by the Youth Custody Service estate. The system will allow for consistent case management built around identifying and managing risk.</p> <p>All relevant establishment staff will be provided with the relevant training required and have access to this system. This will include the Designated Social-Workers team.</p> <p>As the system is already used by Youth Offending Teams, all relevant back-ground and community information will be available to the establishment electronically and in turn, all information uploaded by the</p>	Governor	May 2018

			<p>establishment will be visible to Youth Offending Services. This will speed up many processes and greatly improve information sharing.</p> <p>The establishment has the understanding that this case management system is only intended for use for those involved in the Youth Custody Service and is currently not available to Probation Services. However, Youth Offending Teams have a seconded probation resource and this should allow for appropriate sharing of information necessary when a young person is being transitioned to adult status.</p>		
5.54	The role of the interdepartmental risk management board should be reviewed to ensure that it is a forum which consistently identifies and manages risk. (4.15)	Agreed	<p>A review of the agenda and terms of reference has taken place. This has established a more specific attendance and the requirement for key information to be submitted prior to the meeting.</p> <p>The attendance of key representation has improved, however further work is to be developed to ensure that HMYOI Cookham Wood and community partners are working effectively to manage risk. This will include a greater involvement in Multi Agency Public Protection Arrangements (MAPP) collaboration, with a quality assurance management process now in place to help improve the quality of risk relevant information and a provision for our partners to be periodically asked for feed-back.</p>	Governor	<p>Completed</p> <p>June 2018</p>
5.55	Systems should be put in place to ensure that all looked-after children promptly receive the support they are entitled to on arrival at Cookham Wood. (4.19)	Agreed	<p>All young people have a Welfare Screening carried out by the Designated Social Workers (DSW) whereupon the young person's Looked After Child (LAC) status is identified. This is recorded on the YJB spreadsheet.</p> <p>All new receptions are seen during their Induction week and their rights on being a LAC are explained to them.</p> <p>Designated Social Workers periodically go onto the landings and hand out leaflets in regard to a young person's LAC status. These leaflets have also been given to Caseworkers.</p> <p>HMYOI Cookham Wood has no control if those Young People who come under the LAC umbrella receive their regular subsistence allowance from their home authority. However, the DSW contact those that have been subjected to a financial needs assessment and encourage the home Social worker to forward regular payments.</p>	Governor	Completed
	Reintegration planning				
5.56	Engagement and resettlement workers should attend boys' review meetings to ensure that all aspects of their progress are	Not Agreed	It is not currently within the education contract for engagement & resettlement workers to attend reviews and as such are not resourced for this work. As part of the education reform agenda HMYOI Cookham Wood will highlight the need for additional resource to facilitate this.	Governor	

	considered when planning their time in the establishment. (4.27)				
5.57	Managers should maintain effective records to monitor the destinations and sustained employment or training of boys who leave. (4.28, repeated recommendation 4.25)	Partly Agreed	<p>This recommendation is partly agreed as while processes are currently in place to request resettlement and progress data, there is currently no statutory responsibility for Youth Offending Teams to supply resettlement data back to establishments, and YCS currently have a 66% return rate.</p> <p>YCS will continue to develop its approach to data collection and information sharing and HMYOI Cookham Wood is confident that there will be far greater access to monitoring progress for the young people released from our care, once Asset-Plus is fully implemented. Youth Offending Teams will continue to use this case management tool to record a young person's progress in the community and the establishment will also be able to access this information directly without additional work for the Youth Offending Team.</p>	Governor	<p>Completed</p> <p>December 2018</p>
5.58	Boys should receive comprehensive advice and guidance on finance, benefit and debt. (4.32, Repeated recommendation 4.31)	Agreed	<p>The Department for Work and Pensions (DWP) has been asked to confirm what advice and guidance they can give and assist by starting claims for over 18 year old leavers who require benefits prior to release – this process will form part of the overarching resettlement strategy.</p> <p>Finance advice is provided through life skills and bank accounts are offered to all YP on reception and again when being considered for ROTL.</p>	Governor	July 2018
5.59	The area in which the visitors' centre is located should be made more welcoming and appropriate signage should be installed to identify the location of the centre clearly. (4.39)	Partly Agreed	HMYOI Cookham Wood is currently undertaking a full review of the visitors centre service provision which will include an update of the signage and facilities. The depth of remedial work that will be undertaken to improve the surrounding area and signage will be subject to cost and the available funding.	Governor	July 2018
5.60	Learning from programmes should be reinforced by staff across the establishment. (4.44, Repeated recommendation 4.44)	Agreed	Staff awareness training will be scheduled for the monthly staff training events. This will ensure that all staff working with young people will have an understanding of promoting the learning delivered through interventions. All young people will have regular updates entered onto NOMIS focusing around progress on intervention. Facilitators have responsibility for updating and attending other function briefings and are doing so.	Governor	July 2018
5.61	Staff who deliver interventions should be trained promptly to maximise the number of boys who can benefit from the programmes offered. (4.45, Repeated recommendation 4.43)	Partly Agreed	<p>This recommendation is partly agreed due to the availability of training within operational constraints. However, staff have been identified for the relevant training at the earliest opportunity.</p> <p>The majority of training for Interventions delivered within YCS, will now be provided internally rather than relying solely on Intervention Services which</p>	Governor	Completed and ongoing

			will ensure quicker access to training events where required. As training needs are identified quicker this will direct what training is to be delivered and provide greater assurance with regards to individuals accessing training places at the earliest opportunity.		
--	--	--	---	--	--

Recommendations	
Agreed	39
Partly Agreed	18
Not Agreed	4
Total	61

