



Youth Justice Board
Bwrdd Cyfiawnder Ieuencid

A Review of Safeguarding in the Secure Estate 2008

summary of findings and action plan

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Introduction

In 2003, the Youth Justice Board for England and Wales (YJB) and the Prison Service undertook a comprehensive review of child protection and safeguarding arrangements in every young offender institution (YOI) holding children and young people under the age of 18. It resulted in the YJB's three-year Child Protection and Safeguarding Programme, which invested £10.5 million in six initiatives introduced during 2005–08.

A Review of Safeguarding in the Secure Estate was built into the Child Protection and Safeguarding Programme. In 2007, the YJB commissioned the National Children's Bureau (NCB) to work in conjunction with the YJB and secure estate to assess the impact of the Safeguarding Programme and to help us to develop a work programme for the next three years.

A Review of Safeguarding in the Secure Estate identified what more needs to be done to ensure the safety of children and young people under the age of 18 within YOIs, secure training centres (STCs) and secure children's homes in England and Wales. While there is a lot of good safeguarding work taking place across the estate, the focus of the review was to find gaps in service and areas for improvement.

This publication contains the background to the review, summarises the main findings and outlines the issues to be considered by a range of stakeholders.

Background

The Department for Education and Skills' (now the Department for Children, Schools and Families (DCSF)) publication *Working Together to Safeguard Children* describes the need for agencies to safeguard and promote children's welfare, and offers the following definition of safeguarding:

The process of protecting children from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children to have optimum life chances and enter adulthood successfully.

(Department for Education and Skills, 2006)

Within this broader definition, safeguarding is about taking steps to ensure that children and young people are kept safe from harm. The YJB takes this to mean protecting children and young people from:

- harm from self (self-harm and suicide)
- harm from peers who bully or are violent
- harm from adults.

This means that custodial establishments should make every effort to improve practice in a number of areas, including:

- child protection
- anti-bullying
- violence reduction
- suicide and self-harm prevention
- use of physical restraint.

Secure establishments, local authorities, local safeguarding children boards (LSCBs), other statutory bodies, such as inspectorates and Government, including DCSF and the Welsh Assembly Government, all have a joint responsibility to ensure that safeguarding young people in custody is a priority.

Since 2002, safeguarding has received greater prominence across Government with the developments listed below.

- In November 2002, the High Court ruled that duties placed on local authorities by the Children Act 1989 – to provide an appropriate range of services for children in need – also applied to children detained in YOIs (also known as the Munby judgement). The High Court also ruled that human rights legislation, particularly the Human Rights Act 1998, applied to children in custodial facilities.
- Section 11 of the Children Act 2004 and s 28 in Wales placed a statutory duty on key people and bodies to make arrangements to safeguard and promote the welfare of children, regardless of where they reside.

- *Staying Safe: Action Plan* (DCSF, 2007) promotes a universal, targeted and responsive approach to safeguarding.
- The *Care Matters: Time to deliver for children in care. An implementation plan* (DCSF, 2008) shares a cross-government commitment to transforming the outcomes for children and young people in care.
- The *Children's Plan: Building brighter futures* (DCSF, 2007) outlines what steps should be taken to protect the needs of young people who are in custody or leaving custody.
- *The Youth Crime Action Plan* (HM Government, 2008) commits to a set of key principles for youth custody.

The YJB has also made additional commitments to safeguarding children and young people in our response to the *Lambert Report* (Home Office, 2005) and the *The Carlile Inquiry* (The Howard League for Penal Reform, 2006).

What has been achieved so far?

The YJB's Child Protection and Safeguarding Programme (2005–08) in the secure estate consisted of the following six initiatives:

- introduction of safeguard managers who co-ordinate and champion safeguarding both in practice and strategically
- introduction of local authority social workers to meet the welfare needs of young people in custody
- introduction of an independent advocacy service to provide young people with assistance if they wish to make complaints or need advice
- development of policies and guidance that specifically address the needs of young people, such as anti-bullying and violence reduction
- greater consideration of safeguarding in building and cell design, including increasing the presence of CCTV cameras in known bullying hotspots
- introduction of child protection and safeguarding training into the Juvenile Awareness Staff Programme (JASP) that is delivered to officers working with young people in the Prison Service.

In addition, YOIs have introduced new posts into their staff group, which have helped the safeguard managers raise the profile of safeguarding in their establishments. They include:

- child protection co-ordinators
- anti-bullying co-ordinators
- suicide and self-harm prevention co-ordinators.

Secure establishments must be represented on their LSCB to comply with s 11 of the Children Act 2004, and this has helped put safeguarding in secure establishments on the agenda of local authorities, although there is some way to go on all sides to maximise partnership work between custodial and community services.

Review of Safeguarding

Built into the Child Protection and Safeguarding Programme was the review that forms the basis of this publication. Although the review cannot be categorised as independent academic research, its methodology was as rigorous as possible. All secure establishments were visited. The teams included representatives from the YJB, NCB and the Prison Service, and the data collected included:

- interviews with key internal senior staff
- interviews with key external agencies
- interviews with frontline/wing staff
- interviews with young people
- observational data from tours of the establishment
- examination of records and logs
- additional background information, including policies, inspection reports and monitoring data.

In all, 217 young people, 273 establishment staff and 85 external professionals gave their views about aspects of safeguarding.

As part of the review, the YJB also invited key stakeholders from Government departments, agencies and statutory bodies to be part of a steering group. The steering group met four times to discuss emerging findings and identify issues for consideration.

Establishments have worked hard to develop and improve safeguarding in custody. However, the findings focus on what remains to be done. In spite of the many differences between establishments and across the estate there are common themes for improvement both operationally and in relation to structures and systems.

Summary of findings from the review

The main findings from the review are outlined below.

Overall sense of safety

Young people perceive the biggest risk to their safety as bullying or violence from other young people and do not fear direct harm from the staff. Young people feel safest in secure children's homes and least safe in YOIs, with STCs in between. The exception to this is the girls' units within YOIs, where findings suggest that their feelings of safety are comparable to an STC.

The following themes emerged from the review in relation to feelings of safety:

- young people feel much safer in small units with adequate staffing levels
- the culture and ethos of the staff and the relationships they form with young people are crucial
- the quality of the physical environment contributes to a sense of safety
- transporting young people to YOIs in vehicles predominantly used to transport adults was found to be frightening and uncomfortable.

A framework for safeguarding

The review identified the following as important components of effective safeguarding frameworks:

- staff within the secure estate being given clear direction about expectations, including clearly defined roles and responsibilities
- sufficient capacity to fulfil responsibilities
- transparent lines of accountability
- effective systems and ways of monitoring the work and effecting any necessary improvements.

However, these elements cannot be developed by establishments in isolation; national and local governmental agencies need to create the right framework. As laid out below, there is a need for:

- effective policies and procedures
- adequate structures and resources
- effective use of information.

Effective policies and procedures

All settings had safeguarding policies in place, but they did not always fulfil their purpose in providing clear direction about what should happen if a concern arose, particularly in the YOIs. The most effective policies were those that were:

- short
- localised to the establishment
- suitable for this age group and the range of difficulties they present
- accompanied by procedures outlining what action should be taken
- supported by summary versions suitable for young people, families and practitioners.

Adequate structures and resources

There is no single ideal model for a safeguarding structure as it is dependent on the size and type of establishment. The review indicated that an effective safeguarding structure should have the following ingredients, but these components were not always found to be in place:

- meetings where safeguarding is considered with clear terms of reference, action plans and follow through
- good quality management information and analysis to inform action
- meeting chairs and members with sufficient authority and skill, and who attend on a regular basis
- clarity regarding safeguarding roles and responsibilities, and staff with the necessary resources, knowledge and skills to undertake them effectively
- clear lines of accountability for safeguarding within each establishment and to the LSCB
- purposeful involvement from young people's representatives.

In YOIs, more effective structures and resources commitment were identified where safeguard managers were senior staff and their roles were ringfenced to undertake only safeguarding duties.

Effective use of information

All establishments recognised and welcomed the need for external scrutiny, but felt that the current national framework for performance management and inspection was confusing and even unhelpful. There is no single framework of standards and, therefore, a range of information and statistical data is required, leading to inconsistency and duplication.

In order for a system to be effective, there needs to be a process for monitoring and review so that weaknesses are identified and tackled. This needs to encompass both quality assurance of the work undertaken with individual young people, and an analysis of overall patterns and trends within an establishment.

The review found that:

- quality assurance was variable across the estate and more formalised systems need to be in place; the larger an establishment is, the more difficult it can be to know what is going on at the frontline of service delivery

- particular gaps were found in quality assurance arrangements, particularly in respect of the use of force and complaints in YOIs
- establishments devising their own systems in isolation raised the question as to whether more central support could be made available
- management information systems did not always allow for the collection of the range of relevant information with the capacity for cross-reference and analysis.

A safeguarding ethos

It is important that all staff within an establishment know when to be concerned and what action they should take in response to their concerns. An effective response was achieved more consistently in secure children's homes, STCs and the YOI girls' units, which tended to take a more holistic view of the young people's needs, including their need to be protected from harm.

Effective safeguarding is strengthened if the establishments are in a position to take an overview of their policy and practice, to identify their strengths and weaknesses and to develop plans to improve. Most establishments were attempting to do this but could be better supported through the input of external bodies, particularly central government and LSCBs. One challenge, mainly but not exclusively for the YOIs, was the issue of establishment culture. It cannot be assumed that all staff share the same values, particularly in YOIs, where some staff at all levels may not have chosen to work with young people. This can compromise safeguarding. Only secure children's homes appeared to reliably contain staff who had expressly chosen to work with challenging young people and who fully understood the implications of this.

The findings are summarised below.

- Within YOIs, safeguarding was not always understood – or prioritised – throughout the whole establishment.
- The culture of some YOIs or staff groups was at odds with the values underpinning effective safeguarding practice.
- Many LSCBs have not yet fully recognised their responsibility to young people within the secure estate and there is scope for more meaningful involvement.

Engagement with the external environment

There was a clear sense that all establishments were open to input from the external environment and had developed many creative links with external agencies, resulting in an impressive range of services for young people. However, the review found that the sustained engagement of statutory services presented the biggest difficulty. Children's services were not always providing services that were based on the expectation that young people who offend have the same entitlement to be protected from harm as other children. The same applied to local health and Child and Adolescent Mental Health Services (CAMHS).

Advocacy services are valued by most staff and young people but there can be tensions in the smaller establishments where there is a more informal approach to problem-solving and advocates can be perceived as too adversarial.

YOIs have a more formalised approach to resolving problems and some advocates have found a niche within this that could be further developed. The Independent Monitoring Board (IMB) within YOIs seemed to play a less significant role, in spite of their more formal involvement in the scrutiny arrangements for YOIs. Finally, the review noted how important the chaplaincy service was for young people, and the range of support provided by it.

An ongoing concern within the YOIs, raised by a number of establishments, is the role of Samaritans. As an organisation, Samaritans has had an important role in listening to prisoners at risk of suicide or self-harm. However, their blanket rule of complete confidentiality may be in conflict with the duty to safeguard young people.

Sound safeguarding practice

Harm from self

The systems for managing the risk of suicidal or self-harming behaviour aim to remove any opportunities for self-harm while tackling the underlying causes. Establishments are operating within a risk-averse culture that finds it difficult to differentiate between self-harm as a coping strategy and suicidal behaviour.

The Assessment, Care in Custody, and Teamwork (ACCT) system is relatively new within the Prison Service and has been generally welcomed, but there are some weaknesses in the way it is operating:

- many ACCT care maps are formulaic
- it is not evident from the paperwork if actions have been undertaken
- the system is not specific to young people
- particular risks or behaviours associated with adolescence have not been identified within the system
- there is a lack of multi-agency input into the risk assessment process.

YOIs generally lacked a consistent approach and struggled with deciding where best to care for young people at risk of self-harm. There were a variety of arrangements in place. Some establishments had specialist units where all young people needing additional supervision were cared for, resulting in young people who were disruptive, bullying or aggressive being accommodated with those who were suicidal or who had special needs. Others used care and separation units, which also contain disruptive young people, health care units or safer cells. Staff pointed out a number of design flaws in these safer cells. Within secure children's homes and STCs, staff reported using prolonged physical restraint in order to prevent self-harm and were uncertain about the validity of this approach.

Harm from peers

Harm from peers was the biggest fear for young people but it was acknowledged across the secure estate to be the weakest area of practice. Themes included those listed below.

- The identification of bullying behaviour was not set within the context of adolescent behaviour. Young people complained that normal interactions were wrongly labelled as bullying.

- Establishments were struggling to devise suitable interventions and there was too great an emphasis on punishing the bully rather than eliminating root causes.
- There was a lack of focus on the victims of bullying.
- Some establishments had begun to seek advice or services from a range of external experts or were linking in with work being undertaken within their local authority and were finding this useful.

Violence itself was acknowledged to be different from bullying. On the whole, young people were reasonably confident that staff would intervene quickly if violence occurred, however:

- this was affected by the number of staff available and the nature of the environment
- known ‘hotspots’ within many YOIs remain.

Harm from adults

Practice in all settings was hampered by the lack of a clear definition about what constituted a child protection concern, and therefore what the threshold was for referral to the local authority. Establishments and LSCBs had been left to make their own interpretations of the categories of abuse within *Working Together to Safeguard Children* (DfES, 2006) in the context of a secure setting and had reached different conclusions.

The concerns identified are listed below.

- There was no consensus about the definition of child protection or the threshold for referral to local authorities, and some authorities did not perform a meaningful role.
- There was confusion between child protection and criminal or disciplinary processes following allegations against staff.
- Accountability for decision-making was unclear, with the onus sometimes being placed on young people as to whether they wanted to ‘proceed’.
- Where investigations were undertaken, staff and young people were not always provided with independent support, and outcomes were not always recorded.
- Some allegations against staff were not considered within safeguarding processes, such as those arising within complaints or use of force documentation.

From the new *Working Together to Safeguard Children* (DfES, 2006) guidance, all allegations against staff are referred to the local authority designated officer, even if they are unlikely to reach the threshold of significant harm or police investigation; this seems a positive step. This system was beginning to have an impact on STCs and secure children’s homes but was much less evident in YOIs and it is unclear how the arrangements will work in relation to Prison Service guidance on disciplinary processes.

It is a positive reflection on secure settings that previously unrecognised child protection concerns come to light when young people are in custody, and such concerns were consistently referred to the appropriate local authority, but albeit with mixed results and poor feedback.

The use of physical restraint

Concerns about the use of physical restraint inevitably arise when we consider the risk of harm from adults and that was the case within this review. A separate Joint Government Review of Restraint in the secure estate is currently being conducted by the Ministry of Justice (MoJ) and the DCSF and is due to report later in 2008. Comments about restraint are therefore restricted to current practice.

Within YOIs, there was little evidence of the holistic and planned approach to behaviour management required by the *Code of Practice for Managing the Behaviour of Children and Young People in the Secure Estate* (YJB, 2006), including attempts at de-escalation before using force or systematic debriefing. The 'use of force recording system' does not lend itself to such approaches and some establishments had devised their own formats in an attempt to introduce reflection about whether force could have been avoided, how staff and young people had been affected by the incident and what could be learned from it. A more holistic approach to behaviour management was evident in STCs and secure children's homes but it remains a source of concern among staff.

The extent to which restraint is monitored internally and externally varies widely across the estate, although basic data has been reported to the YJB since early 2007. There was no evidence of LSCBs taking an active role in monitoring the use of restraint and this could be an area for development.

A final area of concern identified across establishments, although the detailed practice differs, is that of full searches and the use of special accommodation or single separation, which are potentially harmful to young people. Establishments are particularly concerned about the conflicting messages they are receiving from the various inspectorates and Government departments about what is expected of them.

Responsiveness to complaints

The ability to complain and have that complaint taken seriously is an important safeguard for all young people living away from home. Although young people were aware of their right to complain, and how to make a complaint, they expressed mixed views about the value of doing so. Themes of concern within the complaints system in YOIs included:

- investigations were not independent
- responses were poor
- allegations that should have been considered within child protection procedures were not always referred
- complaints using the confidential access system were sometimes passed back to the staff who were the subject of the complaints
- there was no consistent approach to ensuring independent scrutiny of complaints, no right of reply and little analysis of themes.

Complaints were taken more seriously overall, and there was more independent scrutiny in STCs and secure children's homes than in YOIs, and investigations were much more effective. Not all complaints were dealt with formally due to a more developed approach towards early problem-solving and discussion to avoid grievances from escalating.

A skilled and knowledgeable workforce

All types of establishment identified a need for more training for all levels of staff. Common themes within YOIs included:

- governors, safeguard managers and co-ordinators have been expected to understand, develop and implement safeguarding policies without any relevant training
- the training available within the Prison Service is said to be too basic and there is limited access to external training
- although there is some take-up of LSCB training, this is not always suitable for this age group or the secure setting.

Particular gaps were identified in the knowledge and skills base in relation to bullying and child protection work and, more generally, in working with adolescents.

The problems identified were less acute in STCs and secure children's homes than YOIs. A major difference in terms of developing staff skills is that STCs and secure children's homes have a culture of supervision, although it may not always take place as often as it should.

Issues for consideration

The review identified a need for national co-ordination of safeguarding young people in a secure environment. As part of the review, the YJB established a steering group containing representatives from the Women and Young People's Group (Prison Service), DCSF, Welsh Assembly Government, Secure Accommodation Network (SAN), safeguarding managers, Ofsted, Her Majesty's Inspectorate of Prisons (HMIP), Association of Directors of Children's Services (ADCS) and the Joint Youth Justice Unit (JYJU). The steering group considered the Review of Safeguarding and advised the YJB on issues needing further consideration.

For young people to be considered 'child first, offender second', consideration should be given to how the issues identified by the review that bear on the work of a number of Government departments will be taken forward. The YJB will perform a lead role in taking forward areas of strategic change which fall within its statutory function. The YJB will work with MoJ, DCSF and Department of Health to consider the issues and to agree the response and accountability for taking work forward. The YJB will do this by working, wherever possible, through existing mainstream structures.

The following issues have been identified for further consideration:

Strategic change – YJB-led

The YJB is committed to improving safeguarding in custody and will perform a lead role in the three areas listed below.

Strategic planning

There is a need for better planning on safeguarding at a strategic level. Consideration should be given to:

- agreeing a set of principles underpinning the approach to safeguarding practice that are based on a commitment to 'child first, offender second', and enshrining these within a safeguarding code of practice
- developing a national safeguarding strategy for young people in the secure estate
- leading a programme of activity to implement the strategy, including arrangements for evaluation and review.

Safeguarding code of practice

Consideration should be given to developing a safeguarding code of practice that sets out how safeguarding should be embedded within establishments and linked into the inspection framework. It needs to be based on the principles identified above and include expectations regarding:

- leadership
- staff practices
- information and case management

- working with partners, including LSCBs
- young people's participation.

Performance monitoring

The review identifies a need for a more co-ordinated approach to performance monitoring and the systematic management and use of relevant data. Consideration should be given to:

- developing, consulting, agreeing and publishing a framework for performance monitoring that links to both the safeguarding code of practice and inspection standards; it should be consistent, avoid duplication and be qualitative as well as quantitative
- taking action to support secure providers in developing and using systems for the collection and analysis of relevant data, including electronic methods and databases, so that they are able to evaluate their establishment within the agreed framework and include mechanisms for sharing good practice
- ensuring that individual establishments are supported to develop a culture of self-evaluation, quality assurance and performance management that supports best practice.

Strategic change – working with Government departments

Agreeing definitions

There is a need for agreed definitions, referral thresholds and responses in relation to child protection concerns, bullying, suicide and self-harm that are suitable for adolescents in the secure estate. Consideration should be given to how processes for dealing with allegations against staff can be established and the need for interventions to be developed nationally that are suitable for use in the context of a secure environment.

Framework for inspection

The review identifies the need for greater coherence in the framework for inspection across the secure estate, and for a system which takes into account the differences between YOIs, STCs and secure children's homes, as well as the similarities. This framework should link, as appropriate, to other inspections of children's services (Comprehensive Area Assessment/Children in Care/Association of Police Authorities), and to the safeguarding code of practice.

Recruitment and training

In the *Youth Crime Action Plan* the Government set an expectation that young people should be supervised and cared for by staff who are committed to working with under-18s and who are properly trained for that role. This review highlights the need for a national workforce strategy to be developed specifically for recruitment within a secure children's environment that:

- is aligned to s 11 of the Children Act 2004 in England and s 28 in Wales
- is based on childcare principles and aligned to the Children's Workforce Development Strategy

- sets out the minimum requirements for staff qualifications, skills and experience as well as requirements for the provision of supervision, personal development and training opportunities, including training leading to qualifications and management development training.

DCSF is drawing up a national workforce strategy and the YJB has recently published its own workforce strategy.

Built environment

The review identifies issues with the built environment, particularly in YOIs. Consideration should be given to continuing to review the built environment, drawing on expert advice about the most suitable conditions to accommodate young people. In taking forward the strategic development of the estate, consideration should be given to the message from young people that they feel much safer in small units with adequate staffing levels.

Strategic change – local authority-led

The review identifies the need for children's services to be challenged about the services they offer to young people in secure establishments, based on the expectation that they have the same entitlement to be protected from harm as other children.

Partnership working and communicating the strategy

Strong partnership working between LSCBs, local authorities, health authorities and secure providers will help to drive awareness and involve all areas and services in taking the strategy forward. This should include areas that do not contain a secure setting as well as those that do.

Local safeguarding children boards with a secure setting in their area

There is a need for LSCBs and secure establishments to work closer together to develop an informed, shared overview of the safeguarding needs of young people in secure settings. Jointly, they should ensure that effective arrangements are in place to meet those needs. Such links could be promoted through the development of a local safeguarding action plan.

LSCBs and secure establishments should work together to increase access to their training programmes and ensure that course content is relevant and transferable where appropriate.

Local safeguarding children boards without a secure setting in their area

There is also a need for LSCBs to have an informed overview of the safeguarding needs of local young people who are placed in secure settings elsewhere and effective arrangements to meet those needs. This should be supported by protocols, quality assurance arrangements, training and appropriate representation at meetings.

All LSCB agencies, even where their local area does not contain secure establishments, should have systems, processes and services in place to safeguard local young people

placed in secure settings and to ensure that they receive the same level of service as a young person in the community.

Operational change – YJB-led

The review identifies the following issues that should to be addressed by the YJB:

- the need to develop opportunities for secure establishments to access information about safeguarding and to share good practice
- the need to review the built environment, drawing on expert advice about the most suitable conditions in which to accommodate young people
- the need to review the arrangements for transporting young people to YOIs.

Operational change – secure provider-led

The main report of the review of safeguarding contains a more detailed commentary on operational level issues and includes a number of suggested actions and practical steps that staff and managers in STCs, secure children's homes and YOIs can take to improve their safeguarding practices.

The review identifies the need for the Prison Service to review their national policies to ensure they are compatible with the duty to safeguard young people. Joint work is already underway between YJB and the National Offender Management Service to:

- clarify the expectations regarding local policies, particularly on split-sites
- support establishments to develop policies and procedures that are user-friendly and promote best practice in this setting and with this age group
- develop explicit policies on behaviour management and complaints
- ensure that establishments have provided adequate resources, and have effective systems and processes to fulfil their safeguarding functions
- support establishments in developing the meaningful participation of young people in decisions that directly affect them and in the service as a whole
- ensure that young people have free access to independent support from advocates, chaplaincy or other agencies in all areas where it may be needed, and that the effectiveness of those providing independent support, including the (IMB) and Samaritans, is reviewed.

In addition, the Governor should ensure that each establishment understands, and is committed to, the concept of safeguarding and that this commitment is shared by all staff, and that lines of accountability are clear, including those of non-prison staff.

YJB action plan

The YJB believes that all of our secure estate providers are committed to the safeguarding agenda and recognise that they have actively taken part in ensuring the achievements listed earlier in this document have taken place. However, neither providers nor the YJB are complacent about safeguarding and acknowledge that there is further work to be done in this area. Safeguarding remains a priority for the YJB and we are committed to working with secure estate providers to improve the safeguarding of young people in the secure estate and to addressing the issues identified by the review. As well as performing a lead role in progressing strategic change in some areas, as mentioned before, the specific areas in which the YJB will take action over the next three years are:

- continue to invest in improving buildings, including reception centres, and increasing CCTV coverage in known bullying hotspots
- enforce the ringfencing of the safeguard managers' posts through the Service Level Agreement with the Prison Service to stop the dilution of roles; the YJB will also work with the Prison Service to address the training needs of safeguard managers
- consider how to bring identified benefits and best practice found in smaller units into any new capital developments
- review the use and appropriateness of telephone helplines, such as Samaritans and consider alternative approaches that are more aligned to the duty of safeguarding young people
- develop a workforce strategy, which will involve tackling some of the issues around recruitment and retention, as well as reviewing the Prison Service training programme (Juvenile Awareness Staff Programme)
- review the use of separation units and special cells
- review the use of complaint systems across the secure estate and how they might be improved to make them more young person-specific.
- continue to promote the *Code of Practice for Managing the Behaviour of Children and Young People in the Secure Estate*, particularly in relation to de-escalation and debriefing of staff and the young person/s involved
- review practices around full searches, taking into consideration its use, trends and effect on safeguarding and human rights legislation
- pilot peer support and individual staff supervision approaches
- engage with government colleagues regarding social work provision with an expectation for local authorities to provide and fund the service from April 2009
- act on recommendations arising from the Government's Joint Review of Restraint
- ensure that arrangements are in place to provide advocacy services for at least the next three years

- review arrangements for escorting young people to YOIs
- ensure safeguarding issues continue to be prioritised by secure estate providers, and that their performance in this area is monitored; YJB monitors will be provided with familiarisation training in safeguarding
- consider the feasibility of providing specialist external advice to safeguarding managers to support them in their role
- develop a three-year programme with the Prison Service to address the issues raised in *A Review of Safeguarding in the Secure Estate*.

We are committed to delivering the action listed above and will make every effort to secure the additional resources required to progress this work.