



Safeguarding Strategy HMP & YOI Feltham A

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Due for review: September 2024

This strategy should be read in conjunction with the HMPPS Safeguarding and Child protection in the children and young people's estate Policy Issues in July 2023 implemented 11th September 2023.

[\[YCS Safeguarding\] \(publishing.service.gov.uk\)](#)

Foreword by the Governing Governor – Natasha Wilson

Safeguarding the young people in our care is everyone's responsibility and is at the heart of everything we do. All children, whether in custody or the community, must feel safe in order to thrive and develop. Safeguarding needs to be embedded in our policies and procedures, as well as to inform the way we work. It is an expectation that all staff and visitors understand safeguarding and are committed to providing the highest levels of care for our young people. All staff and visitors to Feltham are expected to have professional and curious relationships with the children who live here. Any concerns relating to matters within the prison, or a child who may be at harm in the community, need to be taken seriously and our identified processes need to be used to investigate them or refer them onwards.

At Feltham, we have a dedicated Safeguarding lead who is a member of the Senior Leadership Team and works closely with social workers based within the prison, as well as the Local Authority Designated Officer and other stakeholders. They lead a dedicated team including a Child Protection Custodial Manager and Safeguarding Officer. All safeguarding referrals are investigated by our team, and the closure process involves the Governor or Deputy Governor. As a team we understand that safeguarding is a "golden thread" that runs through everything we do, and that we all play a vital role.

As Governor, I am fully committed to safeguarding and fully support the YCS national policy, alongside our localised strategy. I actively work with our partners to ensure that our approach is embedded, and that we support each other in keeping children safe and achieving the best possible outcomes for them. I am committed to attending and working with the Hounslow Safeguarding Children Partnership Board and contributing to learning from Child Safeguarding Practice Reviews.

Signed



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Natasha Wilson (Governing Governor)

Introduction

The HMPPS Safeguarding and Child Protection in the Children and Young People's Secure Estate Policy issued on 22 September 2023, with an implementation date of 11th September 2023 sets out the expected standards from Young Offenders' Institutions. This strategy sets out Feltham's commitment to safeguarding the children who live here, and any child in the community who we have reasonable belief may be at harm from an adult. This includes knowledge of adults whose behaviour may have, or has posed as a risk to children, and siblings of those who live at Feltham and have made a disclosure.

Safeguarding and child protection are inextricably linked;

Child Protection is the immediate action taken to protect a specific child or children when they have been identified as suffering (or likely to suffer from) significant harm, including procedures for responding to concerns about their care or welfare.

Safeguarding is focused on making the environment around children safe through the establishment of policies, procedures, and practices. For the purpose of this operating policy, safeguarding, promoting the welfare of children and protecting them from harm is defined as, *".....protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes."*

Our commitment and outcomes

At Feltham we are committed to promoting the welfare of every child in accordance with the duty laid down in section 11 of the Children Act 2004; and to provide a regime which helps contribute to every child's wellbeing as defined in section 10 of the Act as:

- *Physical, mental and emotional well-being*
- *Protection from harm and neglect*
- *Education, training and recreation*
- *The contribution made by them (the children) to society*
- *Social and economic well-being*

Children in custody may present with complex needs and these must be taken in to account when decisions about safeguarding their care and welfare are made. All decisions must be child centred, take account of the child's individual characteristics, culture and beliefs, and the response must reflect their individual care and wellbeing needs whilst balancing their rights; what is in their best interest; and their own goals and ambitions. Section 2 will define more about Feltham's demographic and population to set out how we meet those individual needs.

At Feltham, we are committed to achieving the standards set out in Working Together 2018 and using the learning from local and national child safeguarding practice reviews to continuously evolve our own standards to ensure that safeguarding is a golden thread through all our policies, procedures, and practices.

This will be led from the top down, with a mantra that safeguarding children is your responsibility until you are content that appropriate action has been taken. The Governor will attend the Hounslow Children Safeguarding Partnership Meeting and YCS Safeguarding Governance Board, or will send an appropriate representative, and the Governor will have oversight of 100% of Safeguarding Referrals submitted to Feltham.

All staff, contractors and volunteers must immediately initiate the processes set out in section 3 if they have concerns about the welfare of a child at Feltham and ensure that those concerns are brought to the attention of the Designated Safeguarding Lead. This will ensure that all necessary action is taken to protect the child promptly and relevant information is shared with the Local Authority or other safeguarding partners. This includes instances where this is prompted by inappropriate or problematic behaviour by another adult at Feltham.

The Governor is committed to ensuring all staff are up skilled & knowledgeable on the local processes, referral routes & designated safeguarding leads to make sure all concerns are known.

Our context

Feltham is based in the London Borough of Hounslow and receives male children between the ages of 15 and 18 predominantly from North, East & West London as well as the surrounding areas. Feltham will also house children from other parts of the country, should a specific risk or need arise, however, we will always aim to keep children close to their family & home local authority. Feltham houses children who are held on remand, those on trial and those who are sentenced, either until released or supported to transition to the adult estate. Sentences may vary from a Detention & Training Order (DTO), section 250, or those who receive a long-term sentence. Feltham has the security provision to hold children who are categorised as “restricted status”, meaning the regime provision may differ for these children and they may be subject to more full searches than other children.

As of 1st September 2023, the Feltham A population was 103 of these 103, 78 of the children at Feltham were a looked after child, some by virtue of the LASPO Act 2012, others due to care orders prior to entering custody and 10 were care leavers. Feltham’s resettlement team and dedicated social worker work with the home and host local authorities to ensure children receive the support and provision they are entitled to. Of the 103 children 76 were BAME, 35 had a registered disability, and 37 had a special educational need. 39 of the children were aged 18, this has seen a recent increase due to Operation Safeguard in the adult custodial estate and supporting wider capacity concerns within HMPPS. Feltham is committed to provide equal opportunities to everyone, and the governor chairs a monthly Diversity & Inclusion (D&I) meeting to monitor data, trends & risks within disproportionality.

The population, and the needs of our population are ever changing, and we will continuously evolve to meet the needs of the children at Feltham.

Feltham is one of two sites that has an Enhanced Support Unit (ESU), catering for children who have been identified as having the most complex needs within the YCS and who require additional support in a more therapeutic environment. The ESU is a national resource and children from across the country can be placed there, should the need dictate. The ESU has a governance structure & is psychologically led; however, this facility increases the number of children at Feltham with complex needs and additional safeguarding requirements. These children have an identified Enhanced Support Team (EST) who will have the expert knowledge on their risks and needs, the rest of the population will have an identified Core Support Team who will meet weekly and form part of the wider behaviour management structure at Feltham.

Monthly safety/security meetings and quarterly safeguarding meetings continue to monitor data and trends within violence, use of force, separation, self-harm, repairing harm caused by conflict, full searches & safeguard referrals – inclusive of disproportionality within these areas.

Roles & responsibilities

Where staff become aware of any safeguarding or child protection matter, whether that involves a child who is at the secure setting or in the community, their immediate response must be to highlight this to the Designated Safeguarding Lead to ensure the immediate safety and welfare needs of the child or children who are involved are met, and they are safe.

Who should you report to at Feltham? The specific point of contact for Safeguarding children within Feltham A are:

- ❖ Head of Safeguarding – Governor Katie Stone
- ❖ Child Protection Co-ordinator – CM Lewis White
- ❖ Dedicated social worker – Leanne Fretwell

Should an allegation or concern be linked to the above staff, or staff do not feel comfortable to report through this channel, Feltham's local whistle blowing policy advises staff on routes of escalation to the:

- ❖ Governing Governor – Governor Natasha Wilson
- ❖ Deputy Governor – Governor Gary Sillifant
- Security Governor – Governor Ron Macauley, or via a CPIR.

Safeguarding children is everyone's responsibility, everyone who works, visits & volunteers at Feltham has an obligation to report suspected, or evidenced harm. Harm can be difficult to define, and may sometimes be a "gut feeling", but will typically fall into the below categories:

- ❖ Neglect.
- ❖ Physical harm – from an adult (inside or outside of custody), or from a peer, current or historical.
- ❖ Sexual abuse – from an adult (inside or outside of custody), or from a peer, current or historical.
- ❖ Emotional abuse – from an adult (inside or outside of custody), or from a peer, current or historical.
- ❖ Extremism.
- ❖ Coercive control.
- ❖ Child criminal exploitation, modern day slavery, female genital mutilation, county lines.

The below form must be used to make a referral, the duty governor should be informed of any concern that will result in immediate harm to a child, or from a member of staff.



Feltham Safeguard
Referral.docx

All concerns should be sent to the functional mailbox:

cp.feltham@justice.gov.uk

The Designated Safeguarding Lead must make a referral to the Local Authority Designated Officer (LADO) within one working day if they receive allegations that a member of staff, contractor or volunteer (or visitor) who works with, or has contact with, children has:

- ❖ Behaved in a way that has harmed a child or may have harmed a child.
- ❖ Possibly committed a criminal offence against a child or related to a child.
- ❖ Behaved towards a child or children in a way which indicates that they may pose a risk of harm to children.
- ❖ Behaved, or may have behaved in a way that indicates they may not be suitable to work with children.

The Minimising and Managing Physical Restraint (MMPR) department will triage all uses of force, and de-brief all children who have had force used on them and raise any necessary safeguarding referrals.

Feltham has 24-hour health care provision, and all children will be seen post incident, if the health care providers are concerned with an injury, a child makes an allegation, or children are not receiving the correct health provisions a concern should be raised. A referral for a child protection medical will be made by health care or the DSW should an injury occur following an allegation that cannot be explained, or an allegation of sexual assault.

A child's Resettlement Practitioner (RP) will often be the central person to their care whilst at Feltham. They will support with communication flow between the prison and the community. Historical and current concerns are often shared through the child or their external support team through their RP, and they will subsequently share necessary information with the Safeguards Team.

Staff receive support throughout this process from the safeguards team, and their line management.

Barnardo's are the current child advocacy service at Feltham, and they will advocate on behalf of the child – at their request including during post incident de-briefs, adjudications, and writing complaints/safeguard referrals.

Safer recruitment

All staff who work and volunteer at Feltham will be subject to references and relevant security checks including (but not limited to) checks of criminal records and will have an enhanced Disclosure and Barring Service (DBS) certification. The employment and vetting of operational staff is completed centrally by HMPPS. Staff should be motivated and driven to work with children within the YCS and share the values and direction of the governor. The DBS certification will be renewed every three years.

The Head of Business Assurance (HoBA) has local oversight of the certifications that are due for renewal, whilst it is the employee's responsibility to make sure their DBS is in date, the people hub department will send reminder emails in advance of the certificate

expiring. The escalation route for failure to provide within a timely manner is through line managers and heads of function.

Should a member of staff have a substantiated outcome from a LADO investigation, a review meeting will be held with the employer and the local authority to determine if a DBS referral is required. Any subsequent internal investigation, and disciplinary hearing should consider the harm threshold for working with children when making decisions, and the local authority should be consulted.

Section five: Local Accountability & Governance

Safeguarding children is everyone's responsibility & as such, the processes, practices, and outcomes are highly scrutinised and subject to robust governance.

At Feltham the Head of Safeguards is committed to attending the dedicated Feltham YOI quarterly Hounslow Safeguarding Children Partnership Sub-Group meeting, as well as regular meetings with the partnership management team. Quarterly reports to the subgroup provide data, trends, risks, significant incidents, and good practice and is attended by key Heads of Function inclusive of resettlement, education, healthcare & security – this allows the board to discuss any concerns that have and to also offer support and additional scrutiny where appropriate. A bi-annual section 11 audit will be completed, with support of the sub-group, to ensure that the Feltham prioritises the need to safeguard and promote the welfare of children when carrying out daily activities, and that we will take preventative action if there are concerns about the safety or welfare of any children in our care.

Further information about section 11 audits can be found here:

<https://www.hscb.org.uk/partnership/auditing/>

The Head of Safeguarding & The Governing Governor make closure comments on all safeguarding referrals received, and only do so once content that all actions have been completed in the best interest of the child, and that the staff have been supported through the process, and all communication to relevant youth offending services and social workers has been completed.

In addition to local governance, the Local Authority Designated Officer (LADO) attends the site monthly and completes an audit of 10% of referrals that have not been referred to the LA – this provides assurances around the local decision making & allows for up-skilling & relationships to be maintain between the prison & the LA.

The LADO has oversight of 100% of incidents where a serious injury warning sign (SIWS) has taken place or when a pain inducing technique (PIT) has been used, if there is any concern that staff have failed to act in the best interest of the child, or conduct appears to be unjustified/malicious then this will progress to a full LADO referral.

All operational staff who work at Feltham are trained in local restraint package and understand the principles of behaviour management and restraint. All children are de-

briefed following the use of force, all incidents are triaged for immediate concerns and some progress to the full quality assurance process. An Independent Review of Restraints Panel (IRRP) visit Feltham twice a year and review incidents where a SIWS has taken place, or a PIT has been used, and constructive learning is offered and discussed.



Draft Terms of
Reference FYOI (002).



use-force-restraint-re
strictive-practices-pf.f

The YCS Safeguarding team visit the safeguarding team on a quarterly basis, as part of this assurance visit, a selection of referrals is reviewed. Good practice and learning points are shared with the Head of Safeguarding and Governing Governor to ensure processes are being upheld effectively.

The Head of Safeguarding attends quarterly meetings with the YCS Safeguarding team, and this is an opportunity to share the outcomes of any child safeguarding practice reviews, and any local trends, themes, and good practice. The head of resettlement will attend Heads of Service meetings as and when necessary to maintain good community links and relationships.

Should children, families, YOTs, social workers or any other outside stakeholder remain concerned about the safeguarding of children at Feltham, or they are not satisfied with the response they have received, they can refer to the local whistleblowing policy and the YCS matters of concern process.



Child Protection
Whistle Blowing Polic

https://assets.publishing.service.gov.uk/media/5ef30bdbd3bf7f713740f807/Matters_of_concern_safeguarding_concerns_allegations_and_complaints_-_as_of_1_April_2020.pptx

As a team and as an establishment we are committed to continuously developing our personal and professional ability to safeguard children, and to utilise our support networks and scrutiny visits to make sure what we do – is working in the best interest of children.