

# Proposed changes to joint inspections of secure training centres

Consultation document

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This consultation seeks your views on proposed changes to joint inspections of secure training centres.

This consultation is open from 17 July to **14 August**.

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## Introduction

1. Ofsted, assisted by HMI Prisons (HMIP) and the Care Quality Commission (CQC), is commissioned by the Ministry of Justice (MoJ) to lead annual joint inspections of the three secure training centres (STCs) in England.<sup>1</sup> This paper sets out proposed changes to the way we inspect STCs, for implementation in April 2019. We last made significant changes to the STC framework in 2015.
2. No STC was judged as good or outstanding in 2017/18. Oakhill was judged as inadequate in October 2017, while Rainsbrook was judged to require improvement to be good in August 2017. Medway was given an overall judgement of requires improvement at its most recent inspection in March 2018 after being judged as inadequate at its previous inspection in March 2017.
3. There have been some recent improvements. But overall, inspection outcomes and findings across all three STCs in recent years have reflected the serious concerns held nationally about the experiences of children and young people at the centres – especially about the behaviour management and the overall safety of children and staff.

## Summary of proposals

- A revised judgement structure for joint inspections of STCs.
  - A strengthened response to inadequate judgements of STCs.
  - The introduction of a 'point-in-time' survey of children's views, replacing the current HMIP-led on-site survey undertaken during the inspection.
4. The proposals have been shared with the MoJ, which commissions the inspections of STCs.

## Why are we making these proposals?

5. In April 2017, Ofsted implemented a [social care common inspection framework \(SCCIF\)](#) for a range of establishments and agencies following extensive consultation with stakeholders. Ofsted, assisted by CQC since April 2018, inspects England's secure children's homes under the SCCIF.
6. The SCCIF applied a greater consistency to the judgements we make and to what 'good' looks like for children, wherever they live or receive help.

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<sup>1</sup> Medway, in Rochester, Kent (run by the National Offender Management Service (NOMS)); Oakhill, in Milton Keynes (run by G4S); Rainsbrook, in Rugby (run by MTC Novo).

7. We think that the proposals we are making will:
  - **ensure that children’s experiences and progress are central to STC inspections** – we will focus more on the difference that the centres make to children’s lives, and less on processes and procedures
  - **bring a greater consistency to the way we look at the experiences of children in custody** – these proposals, if implemented, will align STC inspections more closely to the methodology and principles of the SCCIF and, therefore, to the way we inspect secure children’s homes.
8. The proposals are not designed to ‘raise the bar’ for good and outstanding judgements. We will, however, review the implementation of any changes to ensure that we understand, and respond promptly to, any unintended consequences.
9. The consultation is open from **17 July** to **14 August 2018**. We look forward to receiving responses from all organisations and individuals who have an interest in improving outcomes for some of the most vulnerable children in the country.

### **Proposal one: a revised judgement structure for joint inspections of secure training centres**

10. Currently, we make the following eight judgements following inspections of secure training centres:
  - Overall effectiveness, taking into account:
    - the safety of young people
    - promoting positive behaviour
    - the care of young people
    - the achievement of young people
    - the health of young people
    - the resettlement of young people
    - the effectiveness of leaders and managers.
11. We propose to replace these eight judgements with this streamlined structure:
  - The overall experiences and progress of children and young people, taking into account:
    - how well children are helped and protected
    - the quality of education and related learning activities
    - the quality of health care
    - the effectiveness of leaders and managers.

12. This judgement structure mirrors the structure used for inspections of secure children's homes under the SCCIF. It retains, however, its current judgement on children's health (not currently part of secure children's home inspections).
13. We think that this change will have the following benefits:
  - Fewer judgement areas will reduce the risk of unnecessary duplication of inspection activity and promote clearer and more concise reporting of children's experiences and progress.
  - The introduction of the 'experiences and progress of children and young people' as an overall judgement will reinforce the inspection focus on the impact of the centres' care and support for children.
  - The other judgements' influence on the overall judgement is more explicit.
  - A more consistent approach to inspections of secure settings will:
    - place Ofsted and our partner inspectorates in a stronger position to respond to the inspection needs for the proposed secure schools<sup>2</sup>
    - provide a more better understanding of the relative quality and effectiveness of the different types of secure establishments.
14. We will look at the existing descriptors of good for 'promoting positive behaviour', 'the care of young people' and 'the resettlement of young people' to ensure that we give due attention to these important issues in the new judgement structure and evaluation criteria.
15. In particular, we will always make a clear statement on the quality of resettlement work within published reports.

### Limiting and graded judgements

16. The judgement of how well children and young people are helped and protected at secure training centres will be a **limiting judgement**. This means that if inspectors judge this area of provision and care to be inadequate, then the overall 'experiences and progress of children' judgement will **always** be inadequate.
17. The judgement of the impact and effectiveness of leaders and managers is a **graded judgement**. If inspectors judge this area of provision to be inadequate, this is **likely** to lead to an overall 'experiences and progress' judgement of inadequate and certainly not a judgement that exceeds 'requires improvement'.
18. This reflects existing guidance for STC inspections. We do not propose that we should consult on whether there should be limiting or graded judgements.

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<sup>2</sup> [www.gov.uk/government/collections/secure-schools](http://www.gov.uk/government/collections/secure-schools)

Q1. Do you agree that we should apply the following judgement structure to inspections of secure training centres?

The overall experiences and progress of children and young people, taking into account:

- how well children are helped and protected
- the quality of education and related learning activities
- the quality of health care
- the effectiveness of leaders and managers.

## **Proposal two: to reinforce the inspection response to inadequate judgements**

19. Currently, the MoJ may commission additional visits between annual inspections if there are serious concerns, but have done so only rarely. We have agreed with the MoJ that we should strengthen the inspection response to a judgement of inadequate.
20. In summary, we propose that:
  - an urgent review meeting should always be held with the MoJ to determine the most appropriate action to take following an inadequate judgement
  - agreed action will always involve some inspection activity (usually within eight weeks) to ensure that children are safe, either as a monitoring visit or a full inspection.
21. A monitoring visit will result in a published report, unless publication would adversely affect an ongoing inquiry or investigation.
22. The exact timing and scope of further inspection activity will be determined by Ofsted and partner inspectorates, in consultation with the MoJ, and will take account of the nature of the serious concerns that led to the inadequate judgement.
23. These proposals are consistent with the action taken when a secure children's home is judged to be inadequate and with CQC's regulatory approach and inspection methodology.<sup>3</sup>

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<sup>3</sup> When inspecting the quality of health care in STCs, CQC takes regulatory action if breaches of regulations are identified (Health and Social Care Act 2008 (Regulated Activities) Regulations 2014).

Q2. Do you agree that there should be a more robust and consistent response to an inadequate judgement?

Q3. Do you agree with the following proposals to strengthen arrangements following a judgement of inadequate?

- Holding an urgent review meeting with the MoJ to determine the most appropriate action.
- Returning promptly to a centre (either as a monitoring visit or a full inspection) to ensure that children are safe, usually within 8 weeks of an inadequate judgment.

### **Proposal three: that the HMIP on-site survey of young people at STCs becomes a 'point-in-time survey'**

24. Currently, when we give STCs notice of inspection, HMIP researchers arrive on site to survey the views of all children at the centre. While this survey is being carried out, the lead inspector also arrives on site to begin planning the inspection activity. The full inspection team arrive on site on the next Monday, four days after the lead inspector gave notice.
25. From 2019, we propose that the HMIP-led survey should be carried out as a separate 'point-in-time' survey of children at the three STCs at that particular time. It will not form part of on-site inspection activity.
26. A point-in-time survey of children's views will give us earlier information about what children say about their experiences at the centre. This will help us to make the right decisions about the timing of inspections. It will also help us to develop strong lines of enquiry at the inspection itself.
27. Listening to children will continue to form an important part of on-site inspection activity. Inspectors will always speak to as many children as possible during the inspection itself.
28. We propose that we give three working days' notice for the inspection. This will give the inspection team the necessary time to plan and prepare for the inspection. We consider it is the minimum notice required to carry out a robust inspection. We will, however, review these arrangements post-implementation and consider whether the notice can be safely reduced.

Q4. Do you agree that we should do a 'point-in-time' survey of the views of children at STCs, replacing the current on-site survey?

Q5. Do you agree with the proposed three days' notice period for inspections of STCs?

## Next steps

29. We will revise the published guidance for inspectors to reflect any changes made to the joint inspection framework. The guidance will explain the methods inspectors use to gather evidence and will set out specific evaluation criteria for 'good' that help inspectors to make their judgements.
30. In late summer 2018, we will consult with key stakeholders on the draft evaluation criteria.
31. We will test the revised framework and guidance in the autumn of 2018.
32. We expect to publish the revised joint framework and guidance in February 2019, ahead of implementation on **1 April 2019**.



## The consultation process

1. We welcome your responses to this consultation paper. The consultation opens on **17 July 2018** and closes on **14 August 2018**.
2. The information you provide us with will inform our consideration of inspections of secure training centres.
3. We will publish a response to the consultation.

## Sending back your response

4. There are three ways of completing and submitting your response:

### ■ Online electronic questionnaire

Visit our website to complete and submit an electronic version of the response form: <https://www.gov.uk/government/consultations/proposed-changes-to-joint-inspections-of-secure-training-centres>.

### ■ Download and email

Visit our website to download a Word version of the response form that you can complete on your computer:

<https://www.gov.uk/government/consultations/proposed-changes-to-joint-inspections-of-secure-training-centres>.

When you have completed the form, please email it to [socialcare@ofsted.gov.uk](mailto:socialcare@ofsted.gov.uk) with the consultation name in the subject line.

### ■ Print and post

Visit our website to print a Word or PDF version of the response form that can be filled in by hand:

<https://www.gov.uk/government/consultations/proposed-changes-to-joint-inspections-of-secure-training-centres>.

When you have completed it, please post it to:

Ofsted, Social Care Policy team  
4<sup>th</sup> Floor  
Clive House  
70 Petty France  
Westminster  
London  
SW19 9EX

# Questionnaire for proposed changes to joint inspections of STCs

## Confidentiality

The information you provide will be held by us. It will only be used for the purposes of consultation and research to help us to become more effective, influence policies and inform inspection and regulatory practice.

We will treat your identity in confidence, if you disclose it to us.

Are you responding on behalf of an organisation?

- Yes  please complete Section 1 and the following questions  
 No  please complete Section 2 and the following questions

## Section 1

If you would like us to consider publishing the views of your organisation, please indicate this below.

Organisation: \_\_\_\_\_

## Section 2

Which of the below best describes you? Please tick one option.

I am:

|  |                          |  |                          |
|--|--------------------------|--|--------------------------|
| a parent or carer of a young person held, or previously held, at a secure training centre      | <input type="checkbox"/> | a provider of a secure training centre                               | <input type="checkbox"/> |
| a young person held at, or previously held, at a secure training centre                        | <input type="checkbox"/> | an employee of a secure training centre                              | <input type="checkbox"/> |
| a relative of a young person at a centre   | <input type="checkbox"/> | a professional working with young people at a secure training centre | <input type="checkbox"/> |
| a representative member of a national or regional group involved with a secure training centre | <input type="checkbox"/> | Local Safeguarding Children Board representative                     | <input type="checkbox"/> |
| prefer not to say  | <input type="checkbox"/> |  | <input type="checkbox"/> |
| Other (please specify)   |                          |  |                          |

### Question 1

#### Do you agree that we should apply the following judgement structure to inspections of secure training centres?

The overall experiences and progress of children and young people, taking into account:

- how well children are helped and protected
- the quality of education and related learning activities
- the quality of health care
- the effectiveness of leaders and managers.

| Yes                      | No                       | Don't know               |
|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

For more information about this proposal, see paragraphs 10–18 of this consultation document.

Please add any comments to our proposal:

## Question 2

**Do you agree that there should be a more robust and consistent response to an inadequate judgement?**

| Yes                      | No                       | Don't know               |
|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

For more information about this proposal, see paragraphs 19–23 of this consultation document.

Please add any comments to our proposal:

### Question 3

**Do you agree with the following proposals to strengthen arrangements following a judgement of inadequate?**

- Holding an urgent review meeting with the MoJ to determine the most appropriate action.
- Returning promptly to a centre (either as a monitoring visit or a full inspection) to ensure that children are safe, usually within eight weeks of an inadequate judgment.

|                          |                          |                          |
|--------------------------|--------------------------|--------------------------|
| Yes                      | No                       | Don't know               |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

For more information about this proposal, see paragraphs 19–23 of this consultation document.

Please add any comments to our proposal:

### Question 4

**Do you agree that we should undertake a 'point-in-time' survey of the views of children at secure training centres, replacing the current on-site survey?**

|                          |                          |                          |
|--------------------------|--------------------------|--------------------------|
| Yes                      | No                       | Don't know               |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

For more information about this proposal, see paragraphs 24–27 of this consultation document.

Please add any comments to our proposal:

### Question 5

**Do you agree with the proposed three days' notice period for inspections of secure training centres?**

|                                     |                                    |  |
|-------------------------------------|------------------------------------|--|
| Yes<br><br><input type="checkbox"/> | No<br><br><input type="checkbox"/> | Don't know<br><br><input type="checkbox"/> |
|-------------------------------------|------------------------------------|--|

For more information about this proposal, see paragraph 28 of this consultation document.

Please add any comments to our proposal:

## What did you think of this consultation?

One of the commitments in our strategic plan is to monitor whether our consultations are accessible to those wishing to take part.

### How did you hear about this consultation?

- Ofsted website
- 'Ofsted News', Ofsted's monthly newsletter
- Ofsted conference
- Twitter (@ofstednews)
- Another organisation (please specify, if known)
- Other (please specify)

**Please tell us what you thought of this consultation by answering the questions below.**

|  | Agree                    | Neither agree nor disagree | Disagree                 | Don't know               |
|--|--------------------------|----------------------------|--------------------------|--------------------------|
| I found the consultation information clear and easy to understand. | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> |
| I found the consultation easy to find on the Ofsted website.       | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> |
| I had enough information about the consultation topic.             | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> |
| I would take part in a future Ofsted consultation.                 | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> |

**Is there anything you would like us to improve or do differently for future consultations? If so, please tell us below.**



## Additional questions about you

Your answers to the following questions will help us to evaluate how successfully we are communicating messages from inspection to all sections of society. We would like to assure you that completion of this section is optional; you do not have to answer any of the questions. All responses are confidential.

Please tick the appropriate box.

### 1. Gender

|                                 |                               |
|---------------------------------|-------------------------------|
| Female <input type="checkbox"/> | Male <input type="checkbox"/> |
|---------------------------------|-------------------------------|

### 2. Age

|                                      |                                   |                                   |                                   |                                   |                                   |                                   |                                 |
|--------------------------------------|-----------------------------------|-----------------------------------|-----------------------------------|-----------------------------------|-----------------------------------|-----------------------------------|---------------------------------|
| Under 14<br><input type="checkbox"/> | 14–18<br><input type="checkbox"/> | 19–24<br><input type="checkbox"/> | 25–34<br><input type="checkbox"/> | 35–44<br><input type="checkbox"/> | 45–54<br><input type="checkbox"/> | 55–64<br><input type="checkbox"/> | 65+<br><input type="checkbox"/> |
|--------------------------------------|-----------------------------------|-----------------------------------|-----------------------------------|-----------------------------------|-----------------------------------|-----------------------------------|---------------------------------|

### 3. Ethnic origin

(a) How would you describe your national group?

- British or mixed British
- English
- Irish
- Northern Irish
- Scottish
- Welsh
- Other (specify if you wish)

(b) How would you describe your ethnic group?

|   |                          |  |                          |
|---|--------------------------|--|--------------------------|
| <b>Asian</b>  |                          | <b>Mixed ethnic origin</b>                                 |                          |
| Bangladeshi   | <input type="checkbox"/> | Asian and White  | <input type="checkbox"/> |
| Indian  | <input type="checkbox"/> | Black African and White                                    | <input type="checkbox"/> |
| Pakistani   | <input type="checkbox"/> | Black Caribbean and White                                  | <input type="checkbox"/> |
| Any other Asian background<br>(specify if you wish) | <input type="checkbox"/> | Any other mixed ethnic background<br>(specify if you wish) | <input type="checkbox"/> |
| <b>Black</b>  |                          | <b>White</b>   |                          |
| African   | <input type="checkbox"/> | Any White background (specify if you wish)                 | <input type="checkbox"/> |
| Caribbean   | <input type="checkbox"/> | <b>Any other ethnic background</b>                         |                          |
| Any other Black background<br>(specify if you wish) | <input type="checkbox"/> | Any other background (specify if you wish)                 | <input type="checkbox"/> |
| <b>Chinese</b>                                      |                          |  |                          |
| Any Chinese background<br>(specify if you wish)     | <input type="checkbox"/> |  |                          |

#### 4. Sexual orientation

|  |                                     |                                 |                                      |
|--|-------------------------------------|---------------------------------|--------------------------------------|
| Heterosexual<br><input type="checkbox"/> | Lesbian<br><input type="checkbox"/> | Gay<br><input type="checkbox"/> | Bisexual<br><input type="checkbox"/> |
|--|-------------------------------------|---------------------------------|--------------------------------------|

#### 5. Religion/belief

|           |                          |                          |                          |
|-----------|--------------------------|--------------------------|--------------------------|
| Buddhist  | <input type="checkbox"/> | Muslim                   | <input type="checkbox"/> |
| Christian | <input type="checkbox"/> | Sikh                     | <input type="checkbox"/> |
| Hindu     | <input type="checkbox"/> | Any other, please state: | <input type="checkbox"/> |
| Jewish    | <input type="checkbox"/> | None                     |                          |

#### 6. Disability

|  |                              |                             |
|--|------------------------------|-----------------------------|
| Do you consider yourself to have a disability? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
|--|------------------------------|-----------------------------|



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