



Ministry
of Justice

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6 July 2026

TROWLER REVIEW INTO YOUTH CUSTODY SAFEGUARDING

Dear Andy,

As the chair of the Justice Select Committee, I want to bring to your attention the Trowler report which will be published tomorrow on 7 July, alongside the government publishing its full response.

I commissioned this review following the Prison and Probation Ombudsman's (PPO) report on Medomsley Detention Centre and in light of several safeguarding failures which have occurred within the estate in recent months.

Isabelle Trowler and a panel of partners from the sector, have made 34 recommendations. The review concludes that whilst safeguarding responses within the youth custodial estates are generally robust, there are still notable failings within the system. There are implications for the MoJ, the YCS, DfE and Local Authorities. Recommendations range from changes to YCS processes, to more significant policy changes for the MoJ and fundamental cross government reforms, such as making all children within custody looked after.

The government is taking forward all 34 recommendations. Many are already in train and where further work is needed, this will be implemented whilst working closely with our partners.

I, the Department and the wider Ministerial team are taking these matters extremely seriously and are committed to significantly improving how we safeguard children within our care. I look forward to working with colleagues from across the house on these important reforms. We will also build on these further within the upcoming Youth Custody Transformation Plan, which will be published in the Autumn of this year.

If you would like to discuss anything further on this with me, please do not hesitate to reach out.

JAKE RICHARDS MP



Ministry
of Justice

Government response to the Isabelle Trowler Review of Safeguarding in Youth Custody

July 2026



Government of the United Kingdom

Ministry of Justice

Government Response to the Isabelle Trowler Review into Youth Custody Safeguarding

Presented to Parliament by the Lord Chancellor and
Secretary of State for Justice by Command of His Majesty

July 2026



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Ministerial foreword

A Rapid Review of Safeguarding in Youth Custody

As Minister for Youth Justice, I welcome Isabelle Trowler's independent review into the safeguarding of children in youth custody, which builds upon the work of the Prison and Probation Ombudsman's (PPO) report into Medomsley Detention Centre. Upon joining the Department, I was clear that safeguarding children within our secure settings must be an absolute priority. I was therefore deeply concerned to learn of instances where children have come to harm while in our care.

In November 2025, the PPO report was published which examined what was known by authorities regarding the horrific abuse that occurred at Medomsley between 1961 and 1987, considered whether there were missed opportunities to intervene, and assessed the actions taken at the time. We must now ensure that every possible lesson is learned from this, which is why I commissioned Isabelle Trowler to lead this independent review.

I am extremely grateful to Isabelle and to all members of the panel for the considerable time, dedication, and expertise they have brought to this important work.

The review reports on the systems and governance in place for when allegations concerning harm to a child in custody are made. Isabelle has provided the MoJ and the YCS with an expert view of whether these are fit for purpose and where changes should be made. The review has also provided wider insights on the culture of practice, recruitment and training for staff. I acknowledge that the review has highlighted a number of areas where changes must be made, and I am committed to addressing these at pace.

The MoJ and the YCS have carefully considered all 34 recommendations and worked together closely in developing this response. We accept the principle of all recommendations and support the direction they set for the system. Delivering many recommendations is already underway, and the below response sets out those we will be taking forward immediately. However, some recommendations have far reaching implications and will require more substantial reform over the longer term. Whilst we accept in principle, further scoping will be carried out, and the longer-term ambitions will be subject to the outcome of the next Spending Review.

We are committed to working closely with our partners across government to consider how best to deliver these for the whole system. I thank my colleagues across government for all the work which has been undertaken on these recommendations so far.

We have taken forward several important changes in response already. This early action reflects the seriousness with which the government regard this review and our determination to drive improvement at pace. This includes securing new and dedicated resource within the YCS, including those with specialist child protection expertise and introducing a new Safeguarding Oversight Board to ensure consistent monitoring and scrutiny of safeguarding issues.

Strengthening our Workforce

The Trowler review sits within a broader programme of workforce reform across youth custody. As the review makes clear, staff in the secure estate do one of the most demanding jobs in public service. I want to thank those who carry out this work.

Our responsibility is to ensure staff have the support, skills and leadership they need to keep children safe and deliver effective rehabilitation. That is why we are redesigning initial training for frontline Youth Justice Workers, so they are better equipped to work successfully with children, and why we are strengthening recruitment to ensure the right people are in the right roles.

The review goes beyond formal safeguarding arrangements to address wider issues of culture, recruitment, training, qualifications and professional practice across the youth custody workforce. We must ensure staff are equipped with clear expectations, strong professional standards and high-quality training.

We will take these recommendations forward carefully and with urgency, including through work to establish a National Practice Framework for youth custody staff.

I am confident that taking forward the recommendations of the Trowler review will strengthen the workforce reforms we will set out in the forthcoming Youth Custody Transformation Plan.

I want to acknowledge the men who survived the horrific abuse at Medomsley, which was the catalyst for this review.

I would like to take this opportunity to pay tribute to you and reiterate the Government's apology to anyone who was affected. On our own behalf and that of past governments, we are truly sorry for what you endured and for how long it was allowed to continue. Without your courage in coming forward and sharing your experiences, the full extent of the abuse may never have come to light.

Having met with a group of these men and heard directly about the profound and lifelong impact this has had, the importance of this work has been reinforced to me even further. That is why strengthening safeguarding for children in custody today must remain an urgent and uncompromising priority.

Responses to recommendations

In this section, we set out how the Government will take forward each of Isabelle Trowler's recommendations. These commitments have been developed in close collaboration across government and with key delivery partners.

As health, social care and education are devolved in Wales, the majority of the action set out below relates to England.

The youth custodial estate comprises of four distinct settings: Young Offender Institutions (YOIs), Secure Training Centres (STCs), Secure Children's Homes (SCHs) and the Secure School, Oasis Restore (ORSS). These settings operate under different legislative and delivery frameworks, and the response to individual recommendations must reflect those differences.

A number of the recommendations will require further work to determine the most effective way to implement them. This will include careful consideration of how changes should apply across different parts of the estate, while avoiding unnecessary duplication and ensuring a coherent whole-system approach.

We will take all of this work forward in close partnership with the relevant government departments and delivery partners.

Recommendation 1:

HMPPS should ensure that all counter corruption allegations involving children are notified to the LADO in line with statutory guidance, Working Together to Safeguard Children.

Recommendation 2:

HMPPS should ensure that statutory child protection advanced expertise and advice is integral to counter-corruption decision-making and planning of their investigations involving harm to a child.

Recommendation 3:

HMPPS should make it a requirement that Governors of the YOIs and the STC should ensure that their counter-corruption teams are always included in safeguarding meetings where there is a suspected abuse of trust, or other corruption, to assist in planning investigations from their earliest point.

The YCS & the Counter Corruption Unit (CCU) have acted quickly to address this recommendation and change ways of working. Moving forward, Heads of Safeguarding within Young Offenders Institutions (YOIs) will now routinely be involved in counter corruption case management meetings, following the appropriate vetting taking place. This will bring a clear safeguarding perspective to these discussions, inform decision-making within investigations, and help to identify and respond to risks at an early stage.

We recognise the vital role the local authority designated officer (LADO) plays in providing scrutiny of safeguarding processes and decision-making. Therefore, the Heads of Safeguarding will inform the LADO of any abuse of trust allegations involving children. From September 2026, this approach will be in place across all YOIs, the Secure School, the STC and SCHs.

Recommendation 4:

The Ministry of Justice should ensure that there is independent inspection of HMPPS counter corruption practice similar to that undertaken by His Majesty's Inspectorate of Constabulary and Fire and Rescue Services.

HMPPS Counter Corruption Unit is not a law enforcement body and does not operate within the same statutory framework as organisations subject to independent inspection by His Majesty's Inspectorate of Constabulary and Fire and Rescue Services.

However, we fully recognise the importance of robust independent oversight and scrutiny of counter corruption activity. HMPPS is therefore undertaking a review of its Counter Corruption, Fraud and Bribery functions, which includes consideration of options for stronger independent assurance and scrutiny arrangements. The findings from the Trowler review, including the specific issues identified in the youth custodial context, will directly inform the next phase of the HMPPS review.

In parallel, we are scoping further work to ensure that equally robust scrutiny arrangements apply across commissioned settings and other parts of the youth custodial estate. This will include consideration of whether contractual or legislative changes are required to support a consistent and effective approach.

Recommendation 5:

HMPPS should ensure that all YCS sites have ready access to social workers with extensive statutory child protection investigation expertise, routinely involved in triage discussions and decisions with the Head of Safeguarding or Registered Manager so there is optimum planning for any subsequent investigation. HMPPS contracts for commissioned custody placements should make this a key condition.

We recognise and agree that all YCS sites should have access to extensive child protection professionals to support thorough investigations of allegations against staff. This is important to ensure that allegations against staff are assessed with the right level of specialist insight from the outset.

The YCS has already made significant progress towards completing the recommendation, with the Central Safeguarding Team having recruited two additional qualified senior social workers with extensive frontline social work experience. By September 2026, the social workers will lead on supporting sites to robustly investigate any allegations relating to staff misconduct and ensuring compliance with statutory frameworks and investigation processes.

Secure Children's Homes, including Secure Schools, are contractually required to maintain in-house safeguarding and child protection expertise, including trained staff, designated safeguarding leads, and robust policies aligned to statutory guidance. However, the contract is clear that safeguarding does not sit solely within the SCH, there is an expectation of immediate referral and active involvement of external partners, particularly the local authority safeguarding team and the LADO for any allegations against staff.

The STC already has social workers and a Head of Safeguarding with relevant expertise and we will ensure all future commissioning agreements include such requirements.

Recommendation 6:

HMPPS Heads of Safeguarding should have a social work qualification and solid expertise in statutory child protection investigations. Where that is not the case, they should receive an extensive professional development programme on appointment, focused on child protection practice and, specifically, investigations.

Recommendation 7:

All Heads of Safeguarding should receive frequent external professional supervision from the host Multi Agency Child Protection Team. This should be resourced by the relevant YCS site.

We recognise the importance of ensuring staff are appropriately qualified and experienced, particularly in relation to statutory child protection investigations. Work is under way to ensure the Heads of Safeguarding in the YOIs have the necessary skills to undertake this complex role.

In line with the recommendation, a comprehensive review of the site based Safeguarding Teams will be undertaken, with a view that staff in post have the appropriate qualifications and there is a continuous professional development pathway in place where improvements are needed.

Regardless of whether the Heads of Safeguarding have a social work qualification or have direct experience of statutory child protection, we will seek to ensure there are embedded links with local multi agency children protection teams (MACPTs) once they are established, to support the delivery of our safeguarding functions.

MACPTs will only apply in England, and while they may exist in Wales in some areas, they are not mandated through legislation. Therefore, we will work with the Welsh Government to understand how this could be achieved and negotiated within local authority children's services in the Welsh context, as staffing structures vary.

Recommendation 8:

The Department for Education (DfE) should review Working Together to Safeguard Children to ensure that statutory guidance regarding the role and responsibilities of the LADO is clarified for the next edition due in 2027.

Recommendation 9:

Host local authorities and the YCS National Team should introduce case review arrangements, so that referrals and consequent decision making between YCS sites and the LADOs across England and Wales is moderated, with learning and best practice shared.

We support recommendations 8 and 9 and have set out proposals to clarify the role and responsibilities of the LADO in the consultation on the statutory framework for help, support and protection. Consultation responses will be considered alongside this recommendation. Following consultation, DfE plan to update statutory guidance 'Working Together to Safeguard Children' and will work with the sector to ensure any operational guidance they publish also reflects this.

The YCS are committed to working closely with the relevant local authorities and LADO services with a YCS site within their area to take this recommendation forward. A programme of work will be undertaken to develop a clear system for oversight of LADO

referrals and decisions, which will ensure there is consistency in how allegations against staff are managed and any patterns and trends can be identified and acted upon.

In Wales, Working Together to Safeguard People and Wales Safeguarding Procedures – Section 5 procedures apply to concerns and allegations against professionals. This has recently been revised. The investigation of allegations is a multi-agency responsibility, and it would not be encouraged for employees to lead investigations where they are already working.

Recommendation 10:

HMPPS/ should ensure there are robust arrangements in place for independent and expert scrutiny of restraint, based on their own guidance on “Use of Force, Restraint and Restrictive Practices in the Children and Young People’s Secure Estate”, across all commissioned custody placements and that an overview of system health in relation to restraint is reported to the YCS Safeguarding Governance Board by the YCS Central Unit Head of Safeguarding every 6 months.

We are committed to ensuring that the use of force across the youth custodial estate is subject to robust transparency and scrutiny and used only as a last resort, where all other measures have been exhausted.

The review highlights the important role of the Independent Restraint Review Panel (IRRP), which provides scrutiny of restraint practice in YOIs and the STC. We welcome the finding that the IRRP is a valuable feature of the youth custodial estate, offering a strong mechanism for oversight, professional reflection and continuous improvement in practice.

Arrangements are different in Secure Children’s Homes and from other settings within the estate; therefore, practice will rightly vary in order to reflect the needs of each setting. However, it remains essential that all use of restraint is subject to expert review, with opportunities to learn and reflect. We therefore agree that there should be consistent and independent scrutiny across all of the different settings within the youth custodial estate.

Work is therefore underway to assess the feasibility of introducing an IRRP style scrutiny mechanism for commissioned services within YCS, including SCHs and the Secure School.

Recommendation 11:

The Department for Education should update 'Working Together to Safeguard Children' in the next edition due in 2027 to clarify expectations for host Local Safeguarding Children's Partnerships (LSCP) in overseeing the independent review of restraint in youth custody and associated reporting responsibilities. Detailed guidance, including on the knowledge and skills required for those undertaking such reviews, should be developed by the relevant departments.

DfE accepts recommendation 11 on strengthening the approach to the independent review of restraint in youth custody, including the role of safeguarding partners in providing oversight and ensuring appropriate reporting.

In the consultation on the statutory framework for help, support and protection, DfE has proposed strengthening expectations on access to training, supervision and expert advice for LADOs, including in relation to the use of restraint.

Following consultation, DfE plan to update statutory guidance Working Together to Safeguard Children and will consider how best to clarify expectations for safeguarding partners in overseeing the independent review of restraint in youth custody and associated reporting responsibilities. DfE will also work with relevant departments to consider the development of any more detailed guidance required, including on the knowledge and skills needed for those undertaking such reviews.

Consultation responses will be considered alongside this recommendation as part of the planned update to statutory guidance.

Recommendation 12:

In taking forward the recommendation from Dame Lynne Owen's report to consider establishing an equivalent body to the Independent Office for Police Conduct in the prisons sector, and the suitability of the Prisons and Probation Ombudsman to undertake this role, HMPPS should specifically set out the applicability and functions of any such body to the youth estate.

HMPPS should reconfigure the management of allegations against HMPPS youth custody staff, ensuring that the principle of independence from the relevant YCS site, is applied to all investigations regarding allegations against staff concerning harm to a child which, if proven, could result in dismissal (and, in some cases, referral to the Disclosure and Barring Service). HMPPS contracts for commissioned custody placements should include this expectation.

As referenced, Recommendation 2 of Dame Lynne Owens' Independent Review of Releases in Error specifically calls on the Ministry of Justice and HMPPS to explore and agree a route by which to professionalise the investigation process. This includes consideration of an escalation route into either the Prisons and Probation Ombudsman or another established independent body for cases meeting a defined seriousness criterion.

We agree with the importance of greater independence in the investigation process for allegations against staff, as well as significant events that impact on safety, risk and/or public confidence. Alongside strengthening the independence of investigations, we also recognise the importance of ensuring investigations are consistently robust and supported by the right capability and oversight.

We have therefore accepted Dame Lynne's recommendation in principle, and work is already underway to explore how this recommendation can be taken forward. Establishing a clear threshold for referring cases to an independent body will be a central element of this work.

In Wales, Working Together to Safeguard People and Wales Safeguarding Procedures - Section 5 procedures apply to concerns and allegations against professionals and this has recently been revised to ensure the principle of independence is upheld in investigations.

Recommendation 13:

HMPPS should ensure that all outstanding enhanced DBS checks across the YCS workforce are completed without further delay. YCS commissioning arrangements should include a standard expectation that enhanced DBS checks are undertaken every 3 years across all YCS sites.

HMPPS Human Resources should report to the YCS Safeguarding Governance Board, and in turn to the Ministerial Youth Custody Performance Board, at the earliest opportunity and no later than September 2026, to confirm all sites are operating in line with the policy.

HMPPS should ensure that arrangements are in place to audit compliance with HMPPS policy on DBS checks, across all YCS sites, including SCHs, the STC and the Secure School.

We agree that any outstanding Enhanced Disclosure and Barring Service (EDBS) checks must be addressed as a priority and that there should be clear, consistent expectations for renewal and oversight across all youth custodial settings.

In March 2025, a three-year enhanced DBS renewal cycle was put in place for directly employed staff in YOIs and the STC, and this requirement has also been built into the new SCH contracts that came into force in January 2026. Further collaborative work is

underway with Oasis Restore Secure School and the DfE to ensure equivalent arrangements are in place there.

We are engaging all parties to ensure any outstanding EDBS checks for directly employed staff are completed, with non-compliance letters being issued where necessary. Non-compliance letters are issued to any staff who do not engage with the renewal process and are given 10 days to undertake the required actions. If non-compliance continues beyond the 10 days, usual conduct and discipline processes are applied.

There have been known delays in progressing EDBS, due to the increase in the volume of applications, since HMPPS have moved away from using the Police National Computer in favour of the Disclosure and Barring Service for criminal record checks and any barring information.

Enhanced DBS and vetting remain a standing item in local workforce planning and are monitored through existing governance, contract management and assurance arrangements across commissioned services, so that issues are identified early and addressed promptly.

Recommendation 14:

HMPPS should ensure that all disciplinary matters are satisfactorily concluded even when the person under investigation resigns during the process, and ensure that where the threshold is met, referrals are made to DBS with sufficient evidence to secure inclusion on the barring list.

Where an employee resigns during a disciplinary investigation, the current HMPPS Conduct and Discipline policy allows (and in serious cases, such as those involving safeguarding concerns, expects) the investigation to continue and be concluded. A formal finding should still be reached and recorded, even if the individual is no longer employed.

Monitoring of disciplinary investigations and DBS referrals will be monitored via existing governance.

Recommendation 15:

The Home Office should work with the Disclosure and Barring Service to consider together the introduction of outcome notifications and appeal rights for employers, as well as provision of external scrutiny of DBS decision-making from which all partners can learn and develop their understanding of safeguarding practice and suitability to work with children.

The Disclosure and Barring Service (DBS) provides extensive guidance and outreach services to support organisations to understand what evidence is required/relevant when making a referral to DBS. This is further supported by the Barring Referral Service, which is the online gateway to submit referrals and structured to ensure that all relevant information is captured. Organisations may provide additional evidence to DBS during the consideration of a referral and DBS may reach out to referring organisations for additional information or clarification where it is deemed appropriate and necessary to do so. Should a subsequent referral be received for an individual previously referred, DBS will check for any earlier referrals and consider all relevant evidence alongside any new information.

DBS will also seek to gather information from other relevant sources in relation to the referred individual where it is aware that information may exist. For example, where an employer has advised that a Local Authority Designated Officer may hold information, DBS will contact the local authority to seek information to inform the barring decision.

However, DBS does not currently have a legislative basis to inform referring organisations of the outcome of a referral and there is currently no right of appeal for referring organisations to contest the outcome of a decision. Where a referring organisation can demonstrate a legitimate interest in knowing the barred status of an individual, they may apply to DBS for this information.

The Home Office and DBS regularly review the operation of the service which DBS provides and recognise the concerns highlighted in the review and will consider whether current arrangements can be strengthened further to ensure that the barring process is as effective as it can be in safeguarding children and that all partners are clear and confident in the role that they play in it.

Recommendation 16:

HMPPS should review the YCS National Unit to identify its key functions and to ensure it has sufficient resources and the skill necessary to deliver at pace and to quality. This includes day-to-day operations and additional resource to successfully implement any major new change programmes.

Recommendation 17:

A comprehensive central record of all allegations against staff concerning harm to a child should be maintained by the YCS National Unit so that patterns of concern can be readily recognised and acted upon.

Recommendation 18:

A regular audit of allegations against staff concerning harm to a child, including those resulting in no further action and those referred out to host authorities, should be conducted by the YCS National Unit across all youth custody sites to provide a check and balance on decision-making. This should be done in partnership with the host local authority.

Recommendation 19:

The YCS National Unit should establish a formal process for learning from serious incidents and high-profile events with effective mechanisms for learning embedded across all YCS sites.

Recommendation 20:

The proposed new YCS Safeguarding Governance Board should be established with sufficient resource as soon as possible to oversee the development of new systems for data collection, analysis, and audit activity to ensure safeguarding arrangements are working well. It should report to the Ministerial Youth Custody Performance Board at least quarterly.

Recommendation 21:

The Ministerial Youth Custody Performance Board, in addition to its existing brief, should routinely seek assurance from the YCS Safeguarding Governance Board about the quality of decision-making regarding allegations against staff concerning harm to a child, safer recruitment & vetting, DBS referrals and renewals, and local authority and YOT compliance with statutory duties, to ensure strategic oversight of safeguarding the welfare of children in custody

We agree it is vital that the Central YCS Safeguarding Team are equipped with the capacity and capability to provide effective oversight across the youth custodial estate. The safeguarding team has already been strengthened significantly in response to this review, with additional specialist resource secured to support implementation, including two senior social workers who will help drive forward a number of these reforms.

Furthermore, the YCS have recruited two additional temporary roles to the safeguarding team; the first focusing on Safer Recruitment and the second leading on data and analysis. This additional resource ensures a dedicated team who can provide a robust response to the review's recommendations and bolster business as usual safeguarding arrangements.

The data lead will prioritise establishing a central record of allegations against staff and will develop an audit framework.

A formal learning review process within the YCS will also be developed as a core component of the organisation's safeguarding framework, ensuring that learning from incidents, complaints, and reviews is systematically captured and embedded into practice. Learning will be shared across establishments and providers, with monitoring to track implementation and impact and support continuous improvement for children in custody.

We also agree that ministers should have consistent oversight of safeguarding issues and seek assurance about the quality of decision making within the estate.

An early output of this review was the establishment of the YCS Safeguarding Oversight Board. The YCS moved quickly to implement this, ahead of the review's conclusion, to put stronger safeguarding oversight in place. All safeguarding and safer recruitment will come to the Safeguarding Oversight Board in the first instance and report to ministers as appropriate.

The Safeguarding Oversight Board will routinely receive and scrutinise all of the information set out in this recommendation, providing focused oversight of key safeguarding risks and allegations which relate to harm of children.

Work to assess current data capture has started and will identify any changes required to improve processes in line with this review's findings. A safeguarding referral audit process will be designed and used to oversee practice, identify and address concerns.

This will all provide strengthened and central assurance around safeguarding data and decision making and will be consistently shared with senior leaders and ministers.

Recommendation 22:

HMPPS should introduce a single National Practice Framework for Youth Custody which clearly sets out the core purpose of youth custody, key principles of practice, core outcomes to be achieved for children in custody, key enablers necessary to achieve those outcomes including specific knowledge and skills for all grades, the evidence underpinning preferred practice methodology, and clarity about the expectations of practitioners and leaders.

HMPPS should ensure that this National Framework forms the core of all performance and contract monitoring, the basis for induction and professional development, and the design of support to staff.

Recommendation 23:

HMPPS should develop a knowledge and skills framework underpinned by evidence-based methodology, and an aligned curriculum and assessment methodology which includes a comprehensive focus on knowledge of child development, enduring relationships with family and community, the impact of trauma on behaviour, skills for building trusted relationships, positive behaviour management, restraint as last resort and effective resettlement.

We welcome this recommendation and agree that there is a strong case for a single National Practice Framework for youth custody.

As referenced within the report, staff across the youth custodial estate work in some of the most challenging circumstances in the whole public sector and with the most vulnerable children in society.

There is already significant alignment with this ambition within the YCS, including a clear emphasis on safeguarding and trauma-informed practice. These expectations are currently reflected across a number of frameworks, policies and commissioning requirements rather than within a single unified model.

The YCS agrees that consolidating these into a National Practice Framework would provide clarity to practitioners and leaders and support more consistent delivery across YOIs, STCs, SCHs and the Secure School. Key areas include:

- Clearly defining the core purpose of youth custody and the outcomes to be achieved for children, including safety, wellbeing and progression
- Setting out a consistent set of evidence-based practice principles, including safeguarding, trauma-informed and relational approaches
- Establishing clear expectations for practitioners and leaders, aligned to their roles
- Identifying the key system enablers required to deliver effective practice, including workforce capability, leadership, partnerships and governance

This Framework will inform performance oversight, commissioning expectations, staff induction, supervision and continuing professional development. In parallel, the YCS will consider a Knowledge and Skills Framework and aligned curriculum, underpinned by evidence-based practice.

These are considerable reforms which will have implications right across the estate and take time to implement successfully; careful sequencing, engagement with key partners, and alignment with existing delivery models will all be key. This includes working through how the Framework would apply in Welsh settings as different processes and terminology

will apply. Further work will therefore be undertaken to map current provision, identify gaps and ensure that the Framework is both evidence-based and deliverable in practice.

Recommendation 24:

HMPPS should introduce a second stage recruitment and redeployment process to ensure suitability and aptitude for working with vulnerable children in youth custody.

Currently, candidates for Youth Justice Worker (YJW) positions in YOIs undertake an additional assessment to determine their suitability and aptitude to work with children, as part of an online assessment centre, which is the process used for frontline recruitment across HMPPS custodial sites. Only candidates who are successful in this additional assessment can take up post in a YJW position. As part of the package of workforce transformation in 2026/27 there will be further review of the recruitment and selection process for YJWs. Values-based assessment has been added to all Youth Justice Worker online assessment centres from June 26 and the additional assessment for those working with children will be reviewed and refined to ensure that it meets this recommendation.

For other employees in YOIs, such as some specialists, who may be recruited externally or for employees who transfer in from other HMPPS sites, including senior leaders, assessment for suitability and aptitude to work with children depends on an interview process. This could be adapted to include a consistent assessment of aptitude and suitability to work with children. The wider workforce transformation project has commenced, and this will be considered alongside the YJW recruitment and selection changes.

Recommendation 25:

HMPPS should introduce a supported management and leadership pathway for those without a prisons background to form an expanded pool of talent for future YOI Governor and other management roles.

The wider transformation programme is starting now with work on the composition of the frontline workforce, recruitment, selection and training of Youth Justice Workers. We support the principle of expanding talent from outside HMPPS and will consider the composition of our leadership teams in YOIs and the professional skills offer for leadership roles as part of this wider transformation work.

Recommendation 26:

HMPPS should work the YOI Governors to identify policies that do not sufficiently address key differences when working with children and ensure these are amended in line with children's best interests. Priority attention should be given to those covering performance management and disciplinary action.

YCS, working closely with YOI Governors, recognises the importance of ensuring that policies fully reflect the distinct needs of children.

The YCS Operational Policy team is currently undertaking a structured review of policies within YOIs, with a focus on identifying those that do not sufficiently account for the differences when working with children. These are being prioritised, with particular attention given to areas requiring immediate action. Senior leaders across YCS have been consulted as part of this process, helping to shape the approach and ensure alignment with strategic priorities.

This work will support the ongoing development of policy in line with children's best interests.

Recommendation 27:

HMPPS should work towards introducing professional registration for YCS staff by an independent body in line with the IICSA recommendation.

We remain firmly committed to ensuring those who work in youth custodial establishments are held to the highest standards of professionalism.

Since the Independent Inquiry into Child Sexual Abuse recommendation, there has been an ongoing programme of work to strengthen safeguarding and workforce assurances. This includes the Safer Recruitment Project, which introduced an internal staff register in 2025 for all directly employed staff working in the three public YOIs and YCS headquarters. The register records enhanced DBS and vetting status. In parallel, all staff are now required to complete new mandatory safeguarding training.

We recognise that external professional registration can offer benefits, including greater independence and public confidence. However, this is a significant and costly reform, and it is important that we consider it carefully, taking account of the different roles across youth custody and how any future model would operate in practice.

We therefore need to consider external registration in the round, alongside the wider programme of reforms already underway in relation to workforce, training and

safeguarding. Independent registration may have an important role to play in the longer term, but first it must sit within a coherent practice framework.

We will be setting out our position on the future model for registration of youth custody staff as part of the Youth Custody Transformation Plan in the Autumn of this year. This will reflect the progress already made, the further reforms underway, and the need to ensure that any long-term approach is practical and proportionate.

Recommendation 28:

HMPPS complaints framework should be amended to allow trusted adults to raise formal complaints on behalf of children, with their full involvement at every stage. Commissioned custody placements should be contracted on the basis that similar arrangements are in place.

We are in full support of this recommendation and strengthening children's access to advocacy, ensure their voices are heard and reducing barriers to raising concerns where they may feel unable to do so themselves. The YCS will take this work forward to ensure that clear routes exist for trusted adults make complaints on behalf of children.

This recommendation relates to important findings in the Prison and Probation Ombudsman's Medomsley report, which highlighted that children often did not report abuse because they lacked confidence in the system or were unable to navigate it alone.

Currently, there are a range of mechanisms to raise concerns and complaints, including independent advocacy services, social workers, safeguarding teams, and established internal complaints systems. However, we acknowledge that too often children do not feel able to or do not want to raise a complaint through the routes currently in place. Some of the processes which underpin how YOIs operate are reflective of an adult-centric prison system, so all future changes must look to meet the specific needs of children in custody.

Therefore, the YCS will review the complaints framework, which will include considering moving away from the HMPPS policy, and creating greater flexibility for trusted adults (including advocates, social workers and family members) to support children in raising formal complaints or to raise them on their behalf, with an internal mechanism leading to the formal Ombudsman route if required. Previous exercises with children and staff support the need for this simpler process that is also accessible to those with neurodiverse and literacy support requirements. Work is already underway to address the accessibility needs for the current complaints system that will be in place until a new framework is developed and introduced.

This will include careful consideration of the child's informed consent and active involvement at all stages, will ensure processes remain child-centred and do not inadvertently override the child's wishes, and uphold that safeguarding confidentiality and data protection requirements.

Engagement will be undertaken with the Welsh Government and local authorities within Wales on the implementation of this recommendation in a Welsh context.

We will also then work to ensure that this or a similar process is used in commissioned settings.

Recommendation 29:

HMPPS should ensure that induction materials and processes across all YCS settings should be reviewed and redesigned to be accessible to children with low literacy levels, neurodiverse needs, and communication differences. Information about rights, complaints, and safeguarding should be reinforced through regular touchpoints throughout a child's placement.

We are committed to ensuring induction materials and processes across all YCS settings are accessible and inclusive to all children and support this recommendation.

Secure Children's Homes already embed accessible and ongoing induction practices, supported by speech and language therapists to adapt communication for children with low literacy, neurodiverse needs, and communication differences. Information about rights, complaints, and safeguarding is not delivered as a one-off but is introduced in a relational, phased way and reinforced through key work and daily interactions. This demonstrates that accessible, repeated communication is already an established and strengthened part of practice across SCHs.

The PPO report highlighted that children lacked confidence in navigating the complaints system. We also know that information provided at induction in custody today is not always accessible to those with low literacy, neurodiverse needs, or communication differences, leaving children unclear about their rights or how to raise concerns.

The YCS will work with custodial sites to undertake a comprehensive review of induction materials and processes. This will include a clear expectation that information is redesigned to meet the needs of children with low literacy levels, neurodiverse profiles, and a range of communication needs. Materials will be adapted to incorporate a range of accessible formats, including visual, verbal, and interactive approaches, to promote understanding and engagement from the outset of a child's time in custody. In the relevant settings, this will include the Welsh translation of materials.

In addition, the YCS will strengthen expectations that key safeguarding information, including children's rights, the complaints processes, and how to access support is not confined to initial induction, but is reinforced consistently throughout a child's time in custody. This will include regular, structured touchpoints delivered by key members of staff who have an established relationship with the child.

Recommendation 30:

To maximise opportunities for safeguarding in custody, the facilitation and strengthening of family relationships and resettlement plans, all children in youth custody should be considered 'looked after' by the home local authority.

We support the principle that all children in youth custody should have looked after status. We agree with the review that a child's entitlement to consistent support should not depend on whether they are remanded or sentenced.

Under the current framework, children who are remanded to youth detention accommodation are treated as looked after, whereas most children who are sentenced in custody are not, unless they already held that status beforehand. We agree that this distinction is difficult to justify. Children in custody, whether remanded or sentenced, often present with similar levels of vulnerability and need. Extending looked after status would help secure more consistent involvement from the home authority, including regular oversight by a social worker.

However, we are also clear that this reform would need to be delivered in a way that is practical and sustainable for the wider system. Extending looked after status to all children in custody will have implications and new duties for local authorities to fulfil. We will therefore work closely with the Department for Education, the Ministry of Housing, Communities and Local Government, the Association of Directors of Children's Services, the Welsh Government and the Association of Directors of Social Services Cymru to consider this carefully, including the legislative framework, operational and financial implications.

Looked after status is not, on its own, a solution to the wider safeguarding and performance issues identified in the review. This reform must therefore sit within a broader set of changes, including both the actions we are taking in response to this review and within the wider Youth Custody Transformation Plan. We are clear that this is not about transferring burdens elsewhere in the system, but about working with partners to address longstanding issues, strengthen consistency in the legislative framework, and put in place arrangements that better meet the needs of children in custody.

Implementing this recommendation will require primary legislation and sufficient time for passage through Parliament and the Senedd. We will continue to work across government to develop the policy and legislative approach so that, when parliamentary time allows, we are in a position to take this forward.

Recommendation 31:

Independent routine safeguarding enquiry should be introduced as a structured, routine, sensitive, private enquiry undertaken by the home local authority social worker as a distinct part of their duties towards children looked after by virtue of their custodial sentence.

We are committed to putting in place a routine enquiry pathway for all children in custody, focused on their experiences of safeguarding and delivered in a way that is sensitive, consistent and child centred. It is essential that every child in the youth custodial estate has access to a trusted individual with whom they can speak openly and safely to about concerns.

This recommendation reflects issues raised in the PPO's Medomsley report, which identified the need for a more consistent and reliable approach to asking children about their safety and experiences of safeguarding while in custody. The report also found that, at Medomsley, children did not have access to a sufficiently independent or trusted route through which they could disclose concerns, and that this was one of the factors that allowed abuse to continue unchecked for so long.

Following the publication of this review, we will take forward a programme of work to support the extension of looked after status to all children in custody. The MoJ will work closely with key partners on all aspects of this policy change, including how the home authority social workers should carry out this new routine enquiry, in the most effective way.

In advance of this, the YCS will ensure that all sites across the secure estate put in place arrangements for on-site social workers, where this is not already happening, to proactively and routinely approach children and provide a space for them to raise safeguarding concerns, if they have them. YCS will also work with commissioned settings, where staffing structures differ from YOIs, to ensure this is implemented appropriately in each setting.

Recommendation 32:

HMPPS should establish systems to track when children are visited, by whom and whether this is in line with statutory expectations of the home local authority. Reasons for visits not taking place should also be recorded.

HMPPS should establish the key barriers to scheduled visits going ahead as planned and resolve systemic causes in particular sites and across the secure estate.

We agree that further developing data capture surrounding children who are looked after is required. We will therefore continue quality development work relating to the utilisation of existing systems to draw data relating to children in custody's looked after status at a central level.

With regard to monitoring statutory expectations of home local authorities, a new performance dashboard has been developed to monitor Local Authority and Youth Offending Team compliance with their statutory visiting responsibilities in public YOIs, enabling areas of non-compliance to be identified and escalated appropriately. We will also ensure that reasons for visits not taking place, including due to security concerns, will be recorded and addressed through the above data analysis. We will also look to extend this to commissioned services.

Recommendation 33:

The Ministry of Justice should introduce a new statutory notification system where local authorities and Youth Justice Services are not meeting their statutory duties to visit children. These notifications should be sent to the Local Authority and the Youth Justice Service for urgent action, and to HMIP and Ofsted for consideration in their respective inspections.

It is important that children in custody continue to receive consistent support from their home authority social worker. We therefore agree with the intention behind this recommendation and support a more systematic approach to identifying where statutory visiting duties may not be being met.

At the same time, any new data collection must be fair, proportionate and accurate. We recognise that there can be a range of reasons why visits do not take place as expected, including operational pressures, difficulties in arranging access, or other practical barriers. Custodial establishments must play their part by enabling visits wherever possible and working constructively with children's services to resolve issues quickly.

We will consider how a new data collection could operate in practice and form one part of a broader inspection framework. We will work closely with the DfE, local authorities, the Association of Directors of Children's Services, Ofsted, the Welsh Government, the Association of Directors of Social Services Cymru and the Care Inspectorate for Wales and all custodial sites in doing so. We want any new arrangements to drive improvement and support better outcomes for children rather than create unnecessary burden, so we will consider how these fit with existing processes and plans in place around children.

Recommendation 34:

HMPPS should fund a dedicated service to help rebuild and repair fractured family relationships where this is not already being undertaken by the home local authority as an excellent and leading example of corporate parenting responsibilities as defined in the new Children and Wellbeing Act 2026.

We agree that strong family relationships and trusted adults play an important role in supporting children in custody and improving outcomes on release. We therefore support the view that rebuilding those relationships should be given greater priority across the system, and that the principles underpinning Lifelong Links and family group conferencing are an effective route to achieving this.

Any new function within the YCS should complement, rather than duplicate, the responsibilities of home local authorities and other statutory partners in supporting children in custody.

We have begun engagement with the DfE, to ensure there is a cohesive approach across this activity in England. DfE have launched a national sprint to support a roll out of Family Finding in every local authority. Family Finding programmes support children in care and care leavers to reconnect and build relationships with family members and trusted adults. We will continue to work with DfE to establish what further work in the YCS could complement this roll out of Family Finding and ensure that applicable young people in the YCS also have access to this support.

We will work through the details of this in a Welsh context as the Act does not apply to Wales.

Conclusion and next steps

This response sets out how the government will take forward the recommendations of Isabelle Trowler's review and significantly strengthen safeguarding arrangements across the youth custodial estate. The review's findings are welcomed, and the government supports the clear direction it provides for the system.

It is clear that improvements are required across a number of areas. Departmental priorities will include addressing how allegations against staff are handled, improving the quality and consistency of safeguarding data, building workforce capability, and ensuring that complaints and advocacy arrangements properly meet the needs of children across all sites.

The review rightly highlights the range of statutory partners involved in safeguarding children, and that there are challenges within the system affecting the consistency of the support children receive whilst in custody. Taken together, the recommended changes mark an important moment for the system. It is however important to recognise that these far-reaching changes will require sustained work over time, and we must ensure they are implemented in partnership across government, and with the Welsh Government.

It should also be recognised that many staff working across the youth custodial estate do so with professionalism and dedication in challenging circumstances, and that there is important good practice on which we can build.

We have acted quickly throughout the review process to begin implementing changes and to lay the groundwork needed. Progress against the recommendations will continue to be monitored closely, including through strengthened ministerial oversight.

Alongside the safeguarding changes set out in this response, I am committed to driving forward a range of changes to help build a more skilled, confident and resilient youth custody workforce, as a central part of our Youth Custody Transformation Plan.

We are committed to working with colleagues across government to ensure all of these changes are practical and sustainable. In doing so, we will take full account of the operational pressures and wider demands facing the system, while remaining clear that safeguarding children must be a shared and uncompromising priority. These changes will be driven forward so that all children in custody are not only kept safe while in our care but are also given the highest possible standards of support, safeguarding and rehabilitation.

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