

Separation Policy

Hillside Secure Children's Home



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Neath Port Talbot Council

DRAFT

APPROVED BY

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1. PURPOSE

Neath Port Talbot Council ('the Council') is committed to safeguarding the wellbeing of children, young people and adults in its care, within a culture that gives safeguarding the highest priority. Our employees are required to share this commitment and support the Hillside Secure Children's Home ('Hillside', or 'unit') Statement of Purpose, namely:

Hillside actively promotes wellbeing, good health and recognises the importance of enabling children and young people to achieve and enjoy life in a safe way. Children and young people are provided with a platform where they can begin their recovery and have access to support to help understand the causes of their behaviour. Hillside helps children and young people to take responsibility for their own behaviours and to set appropriate boundaries by agreeing general behavioural expectations applicable to both staff and children/young people, based on mutual respect.

The purpose of this policy is to set out the process to be followed and considerations applied when a young person may be separated from other residents.

Additionally this policy is designed to provide a framework to support staff in managing young people in conjunction with the Behaviour Management Policy and applies to all Hillside employees. Breach of this policy by any employee would be considered by the Council as a potential act of misconduct. The Council has a Whistleblowing Policy and staff are encouraged to report poor practice where they see it.

2. LEGISLATION, STATUTORY GUIDANCE AND LINKS TO OTHER POLICIES

This policy is based upon and takes into account the following legislation, standards, legally binding agreements and statutory guidance in so far as they may be applicable:

- Social Services and Wellbeing (Wales) Act 2014
- The Children's Homes (Wales) Regulations 2002 as amended by the Children's Homes (Wales Amendments) Regulations 2017
- National Minimum Standards for Children's Homes (Wales) 2002
- Regulation and Inspection of Social Care (Wales) Act 2016
- The Regulated Services (Service Providers and Responsible Individual (Wales) Regulations 2017 and statutory guidance issued thereunder
- United Nations Convention on the Rights of the Child (UNCRC)
- Use of restraint policy framework for the under 18 secure estate 2012

This policy relates to and emanates from the following Hillside Policy:

- Hillside Behaviour Management Policy

3. DEFINITION OF A SEPARATION

A separation in Hillside is defined as any period of time where a young person is confined in an area where the door is locked and they are separated from their peers, whether a voluntary separation through own choice or to manage a perceived risk of harm, or being managed in an area of Hillside away from their peers/communal areas, e.g. temporary confinement in a corridor in which no other young person is present

Voluntary Separation

Each young person at Hillside has their own bedroom with en-suite facilities that is considered their own personal space, and which they may utilise from 07:30 until their bedtime at 21:00. Whenever a young person requests to go into their room during these hours, the door must be locked for security purposes and this is defined as a voluntary separation.

Single Separation

Any area where a young person may be separated from their peers in a locked area away within the home in response to them presenting a risk of harm to themselves or to others is defined as a single separation. Every effort must be made to manage the risk in less restrictive ways to avoid the need for a single separation, the period of the separation must always be proportionate to the presenting risk.

4. THE APPROPRIATE USE OF CONTROL

As defined in Regulation 29 (1) of the Regulated Services (Service Providers and Responsible Individuals) (Wales) Regulations 2017, care and support must not be provided in a way which includes acts intended to control an individual unless those acts:

- (a) Are necessary to prevent a risk of harm posed to the individual or another individual, and
- (b) Are a proportionate response to such a risk

In consideration of the above and the requirements set out in the National Minimum Standards for Children's Homes (Wales) 2002, as amended, single separation in Hillside is only used to prevent a risk of harm to the child concerned or to others, and then only to the minimum extent necessary to avoid the harm. Single separation is not used as a punishment,

as a means to enforce compliance with instructions, or in response to challenging behaviour which does not give rise to a clear and justified expectation of harm.

If a child/young person is causing damage to property then single separation is only permitted where there is a clear risk to the young person or others resulting from the damage to property, such as a risk of self-harm, the risk of the young person using the damaged property as a weapon, or the property itself in its damaged state presenting a risk to the young person or others, for example live electrical equipment with exposed live parts, or sharp edges presenting a serious laceration hazard and the use of single separation is proportionate.

5. SINGLE SEPARATION PROCEDURE

A young person should whenever possible be given the opportunity to resolve the issue through a talk time with staff members, once this has been exhausted and as a last resort the use of a single separation would be considered.

Staff will look to negotiate with the young person wherever possible that they walk unaided, but accompanied, to their room as directed by staff. Prior to being separated during the talk time, if the incident cannot be de-escalated staff must always explain to the young person the reason why they are being separated and the reason must be recorded on the incident form.

Once a young person has been separated, a member of staff must attempt to resolve the issue and the need for separation through discussion with the young person. When a discussion is taking place within the bedroom there must always be another member of staff present in order to offer support if necessary. **Staff must always check that the en-suite door is locked when a young person is single separated due to this being a possible ligature point.**

Where the risk to staff is assessed as being too great for staff to be within the bedroom with the young person, the bedroom door must always be locked. Staff are reminded to gain support at any time of concern by pressing their emergency call alarm.

When a young person is subject to a single separation, completion of the Single Separation Monitoring Form (Appendix 1) must be commenced immediately and accompany the incident form. This single separation will monitor at the current observation check frequency set in the Risk Management and Behaviour Support Programme for the young person. The Duty Manager must be informed as soon and within 15 minutes of the commencement of the separation. The informed Duty Manager must immediately assess the situation and consider alternative ways of managing the separation and record this on the monitoring form.

When a young person is separated in their bedroom the member of staff undertaking the checks will try to re-engage with the young person. Staff will clearly record these discussions on the Single Separation Monitoring Form and also document any actions, behaviours and demeanours of the young person. Staff will also need to clearly record why the separation is necessary and justify the length of the separation, this needs to be fully endorsed with clear rationale by the Duty Manager and reflected in the paperwork. Should the young person request to use the en-suite facilities, the opening and closing of the en-suite door will be documented on the Single Separation Monitoring Form. Any request to use the en-suite by the young person will be dynamically risk assessed.

Following any incident that has led to a separation, staff not involved in any restrictive intervention will debrief the young person as soon as possible to then facilitate a peaceful discussion and find a resolution. Staff will also ensure that they listen to the young person and ensure their views are recorded. Staff will need to assess when it is safe to enter the room for the initial debrief. For any significant incidents that occur staff can complete a post incident key work session to explore further the triggers and behaviours that led to the incident.

The quality assurance of the management of any incident will be undertaken by a manager who is not directly involved in the incident and this, like all records of the incident, needs to be completed within 24 hours of the incident. Further information can be found under section 9 of this policy.

If the single separation period needs to last beyond 15 minutes, the Duty Manager must be involved in the decision whether to extend the period of separation for a period not exceeding a further 15 minutes. The Duty Manager will manage the period of separation and the decision making process. The Duty Manager will coordinate with the Assistant House Manager/Shift Leaders the period that the young person is to remain separated in their rooms and document this within the comments section of the Single Separation Monitoring Form (appendix 1) and section 1 part (a) of the Single Separation page of the incident form (appendix 2). This process will be repeated at time points 30-45 minutes and 45mins to 1 hour and section 1 parts (b) and (c) will be completed. The Duty Manager will have complete oversight of any periods of single separation and will ensure that clear and accurate records are made

If a young person's period of separation is to exceed one hour a review of the situation must be conducted by a Senior Manager. Out of hours, the on-call Senior Manager will be contacted, and s/he will decide whether it is necessary to attend the centre to manage the separation, or whether the review can be conducted by telephone. This decision and reasons will be clearly recorded as part of section 2 of the Single Separation page of the incident form. Following the review, the revised behaviour management programme area of the single separation monitoring form will be shared with all staff involved.

If a young person's single separation is to exceed two hours another review will be held, utilising the above process, and section 3 of the Single Separation page of the incident form completed.

A young person's single separation period may only exceed a continuous three hour period or overall three hour period within any 24 hour period (excluding normal bedtimes) in exceptional circumstances. The interaction by staff, and the management plan, as defined on the single separation monitoring form for each period of single separation should include being focused on the goal of reintegrating the young person to normal routine at the earliest appropriate time, ensuring there is no potential risk of harm to self and others.

If a young person's period of single separation lasts three hours a further continuation review must take place, chaired by a Senior Manager, as above, and Section 4 of the Single Separation page of the incident form. Following the review the management plan as defined on the single separation monitoring form will be shared with all staff involved.

A detailed record of every single separation exceeding three hours will be made and a copy sent to the Social Worker/Youth Offending Team for the young person along with a copy of the incident form. The social worker/Youth Offending Team must also be informed by telephone where a single separation exceeds three hours. Three hourly reviews will continue throughout the period of single separation.

All children/young people are able to make a complaint following any period of separation to the Resolve clinic, this is a confidential complaints process that operates by the Hillside Safeguarding Officers. Any complaint received will be taken seriously and investigated fully.

A prolonged behaviour management support programme can be used in which there will be alternating periods of time separated and in the communal areas, this will be determined by the Shift Leader in consultation with the Duty Manager and must be subject to continuous review.

Any single separations should be ended at the earliest opportunity to facilitate the young person in reintegrating back to the communal areas with staff and other young people. Staff should frequently review the situation and behaviour of the young person and any continuation of a separation must be justified and recorded on the incident/separation form. Should any period of separation be in place immediately before bedtime then separation monitoring ends at the bedtime and staff revert to the bedroom monitoring at night time, the single separation would be reviewed in the morning with the view of reintegration of the young person to the communal areas unless in exceptional circumstances, however there must be clear justification for this and recordings on why reintegration is not possible.

If at any time during the separation a monitoring checks is late or missed the Duty Manager must be immediately informed.

Please see Appendix 4 – Flow Chart on Single Separation

6. VOLUNTARY SEPARATION PROCEDURE

A young person may at times request to go to their room for a number of reasons, this is called a voluntary separation.

Whilst a young person is in their bedroom, staff must check the en-suite door is locked other than when the young person has requested to use it, and ensure the bedroom door is also locked. A Monitoring Form will be commenced and time checks linked to their individual Risk Management Formulation will be initiated and recorded. **Staff must always check that the en-suite door is locked when a young person is voluntary separated due to this being a possible ligature point.**

Although it is recognised that young people may enjoy spending time in their bedrooms alone, staff should encourage them to also spend free time on the houses participating in alternative activities and engaging with their peers. If a pattern is identified where a young person is spending considerable periods of time in their room this will be explored in key working sessions with the young person with their key worker, shift leader or house manager.

If at any time during the monitoring a check is late or missed the Duty Manager must be immediately informed.

7. TRAINING

All new staff will undertake an intensive induction process lasting six weeks, part of the induction programme is on behaviour management training. The behaviour management training will provide information on the behaviours displayed by the young person and the use of separations. Safeguarding training covers compliance checks around separations and how they should be recorded.

Behaviour Management training is refreshed at a minimum of yearly and Safeguarding Training is refreshed every three years. Key messages from this Policy will be reinforced to all staff through consultation sessions which will also provide a forum for staff to share and discuss and feedback the practicalities of implementing the policy.

8. ROLES AND RESPONSIBILITIES

The Responsible Individual (RI) will ensure that:

- There is a suitably accredited behaviour management syllabus in place
- An appropriate manager is appointed and the management of Hillside is supervised in line with the supervision policy of the Council
- There is effective management of the service, with a suitable level of staff resources to react to incidents and ensure adequate supervision of children and young people
- They visit the home a minimum of once every 3 months to monitor the performance of Hillside, which will include talking to children and young people at the home with their consent in addition to inspecting the premises, complaints and a selection of records
- There is a policy in place for the appropriate use of control and restraint which is reviewed a minimum of annually giving regard to Hillside's Statement of Purpose; the policy will be shared with all staff and the Care Inspectorate Wales (CIW) and Youth Custody Service following any amendments within 28 days of these taking place
- A positive approach to behaviour management is used within Hillside that is consistent with meeting the care and support needs of the child/young person and the wellbeing of others for whom care and support is provided
- Suitable arrangements are in place to assess, monitor and improve the quality and safety of the service via quarterly reports to the Hillside Registered Manager and the Social Care, Health and Wellbeing Committee, and six monthly and annual reports to Care Inspectorate Wales
- All staff receive annual behaviour management training as a minimum and must sign following the training to indicate that they have read, understood and have continued access to the policy, a record of which will be kept on file
- Suitable systems are in place to record incidents, complaints and the keeping of records
- All staff are aware of and encouraged to use the Whistleblowing Policy, the Authority's stance is zero tolerance for poor care or lack of concern for the wellbeing of individuals and that concerns from staff are encouraged, sought out in a confidential manner and addressed accordingly
- That there are appropriate quality assurance, audit systems and processes in place for monitoring the service which are continually reviewed
- That information on control, restraint and discipline is analysed and that recommendations are made to the service of how and where the quality and safety of the service can be improved

- A culture of candour is promoted in Hillside that advocates all staff to be open, honest and transparent in line with Social Care Wales guidance

The Registered Manager (RM) will ensure that:

- There is a policy in place for Separations which is reviewed a minimum of annually giving regard to Hillside's Statement of Purpose, the policy will be shared with YCS in advance and the Care Inspectorate Wales following any amendments within 28 days of these taking place
- A purposeful and positive approach to behaviour management is used within Hillside that is consistent with meeting the care and support needs of the child/young person and the wellbeing of others for whom care and support is provided
- Any changes to the Separation Policy will reflect current legislation and national guidance, staff will be kept updated of any changes made to the Policy
- All new staff will receive behaviour management training to include this policy during their induction period prior to commencing work with any children and young people in Hillside
- Deployment of staff is adequate to react to incidents and ensure safe supervision of children and young people
- Management/Senior Staff will ensure that all records of separations are fully completed, updated and will be kept in the appropriate file as soon as possible within 24 hours of occurring
- All records of separation are monitored for compliance, quality assurance and effectiveness of decision making
- All occasions of separation are made clear to the placing authority, child, parent(s), carers, before, or in the case of an emergency placement, at the time the child is to move into Hillside Secure Children's Home
- Children are encouraged to develop a proper awareness of their rights and responsibilities (UN Convention on the Rights of the Child)
- Staff will have an awareness of the rights and responsibilities of children and young people through training received on the Qualification and Credit Framework (QCF) in line with the UN Convention of the Rights of the Child and promote such to children and young people
- All children are encouraged to discuss incidents and express their views, either verbally, in writing, or through an independent professional advocate
- All staff supervision and meetings address issues of behaviour management including use of separation and agree practicable and acceptable means of responding to inappropriate behaviour
- A culture of candour is promoted in Hillside that advocates all staff to be open, honest and transparent in line with Social Care Wales guidance

All staff will ensure that:

- All records of separations are completed as soon as possible and in any event within 24 hours of the incident occurring
- They respond positively to acceptable behaviour and where unacceptable it is responded to in a constructive and positive way in line with the Behaviour Management Policy and the Separation Policy
- Positive relationships with children and young people are formed and any behaviour management and separation measures are consistently applied and fair
- Reparation, restoration and conflict resolution is followed where appropriate
- All separations are recorded and reported in the relevant documentation in line with the policy and procedures
- All staff will enact pro-social modelling in line with the Psychologically Informed Planned Environment (PIE)/Trauma Recovery Model.

9. REVIEW, SCRUTINY AND QUALITY ASSURANCE

There are a number of review processes in place for the monitoring and scrutiny of separations:

- All records of any incident requiring separations are completed by the relevant staff member within 24 hours of occurring and are reviewed Monday to Friday by a senior manager in centre briefing
- Duty Manager approval will be obtained before any separation goes beyond 15 minutes
- Scrutiny of use of separation by the multidisciplinary team will take place to ensure that each child/young person's risk assessment is reviewed and is reflective of their needs and details staff response to presenting behaviours, this will be at a minimum of every three weeks or sooner if necessary
- A review by local authority designated officers where an incident is submitted to them as part of a child protection referral
- Quarterly visits and reports by the Lead Officer for Safeguarding in Neath Port Talbot to focus on consequences, incidents, separations and restrictive interventions
- Six monthly quality assurance audits on separations undertaken under the quality assurance audit programme
- Focused audits where necessary to provide greater detail and understanding of separations
- Make incident paperwork available to the Youth Custody Service (YCS) for those children/young people placed in a YCS bed

- A review of incidents and separations by the Care Inspectorate Wales for any child/young person accommodated in Hillside as deemed appropriate by them
- The Independent Visitor, as the representative of the RI, analysing data and interacting with the children/young people on a monthly basis
- The Responsible Individual visits and completion of a quarterly report, annual report and statement of compliance in accordance with the regulations of the role.
- Hillside internal safeguarding meetings will review data and analyse trends at an organisational level

10. GOVERNANCE

- Every six months a report on separations will be presented to the West Glamorgan Safeguarding Board for scrutiny/oversight
- At a minimum of six monthly update reports on the service will be provided to the West Glamorgan Safeguarding Board.
- Monthly performance report will inform/challenge practice and identify trends on separations, this report will be scrutinised monthly by the Senior Management Team and acted upon where necessary. An overview of the report will be provided to the Hillside Development Board
- Hillside Safeguarding Board will be established and will review and analyse data trends and provide recommendations for change and challenge practice
- Any separations that it is believed may meet the criteria for a Multiagency Professional Forum (MAPF) or Child Practice Review (CPR) will also be referred to the Safeguarding Lead and the West Glamorgan Safeguarding Board for consideration
- Quarterly reports to the Social Care, Health and Wellbeing Scrutiny committee from the Registered Manager (RM)
- The Responsible Individual (RI) will complete a quarterly report on the quality of care at the home as part of their duties in relation to Regulation 74 of the Regulated Services (Service Providers and Responsible Individuals) (Wales) Regulations 2017, these reports will include the independent visitor reports and will be shared with the service, reviewed by the Social Care, Health and Wellbeing Scrutiny committee and will be made available to Care Inspectorate Wales and Youth Custody Service

SECTION 1 OF SINGLE SEPARATION

Part (a) REASON AND CRITERIA FOR CONTINUED ISOLATION (15 – 30 MINUTES ONLY)

What has been attempted to end the isolation and what are the engagement plans for the next 15 minutes?

Part (b) REASON AND CRITERIA FOR CONTINUED ISOLATION (30-45 MINUTES ONLY)

What has been attempted to end the isolation and what engagement plans are in place for the next 15 minutes?

Part (c) REASON AND CRITERIA FOR CONTINUED ISOLATION (45 MINUTES TO 1 HOUR ONLY)

What has been attempted to end the isolation and what are the engagement plans for the next 15 minutes?

SECTION 2 OF SINGLE SEPARATION (AFTER 1 HOUR ISOLATION)

Name of Senior Manager:

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Time of Meeting:

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Other staff present:

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CURRENT REASON/CRITERIA FOR CONTINUED ISOLATION:

IMMEDIATE BEHAVIOUR SUPPORT PROGRAMME FOR NEXT HOUR (INCLUDE FREQUENCY OF CHECKS)

AHM/SHIFT LEADER SIGNATURE:

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DUTY MANAGER SIGNATURE:

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DATE:

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DATE:

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SECTION 3 OF SINGLE SEPARATION (AFTER 2 HOUR ISOLATION POINT)

Name of Senior Manager:

Time of Meeting:

Other staff present:

CURRENT REASON/CRITERIA FOR CONTINUED ISOLATION: (WHY SHOULD SINGLE SEPARATION CONTINUE)

IMMEDIATE BEHAVIOUR SUPPORT PROGRAMME FOR NEXT HOUR (INCLUDE FREQUENCY OF CHECKS)

SECTION 4 OF SINGLE SEPARATION (AFTER 3 HOUR ISOLATION POINT)

Name of Senior Manager:

Time of Meeting:

Other staff present:

BEHAVIOUR SUPPORT PROGRAMME OF YOUNG PERSON OVER INITIAL ISOLATION PERIOD:

BEHAVIOUR SUPPORT PROGRAMME FOR NEXT THREE HOUR PERIOD: (INCLUDING FREQUENCY OF CHECKS)

AHM/SHIFT LEADER SIGNATURE:

DUTY MANAGER SIGNATURE:

DATE:

DATE:

Appendix 4

