

ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMP BULLINGDON

| TIMETABLE | DATE | STATUS OF THIS RETURN |
|-----------------------------|-------------------|------------------------------|
| Full Unannounced inspection | 15 – 26 June 2015 | |
| Report published | 29 October 2015 | |
| Action Plan Submitted | 20 January 2016 | Attached |

ACTION PLAN - HMCIP REPORT

ESTABLISHMENT: HMP BULLINGDON

POSITION AS AT: JANUARY 2016

| 1. Rec. No. | 2. Recommendation | 3. Accepted/ Rejected | 4. Response Action Taken/Planned | 5. Function Responsible/ Policy Lead | 6. Target Date |
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| | Main recommendations to the governor | | | | |
| 5.1 | Data collection and analysis around incidents of violence, victimisation and bullying should be comprehensive and accurate so that managers understand what nature of violent and antisocial incidents, who is committing them, why and where. On the basis of the analysis action should be taken to make the prison safer. (S54) | Accepted | <p>With the introduction of a new violence reduction strategy it will become clearer how HMP Bullingdon will monitor prisoners involved in violence.</p> <p>The safer custody team will continue to collect data each month and develop the heat map in line with the violence diagnostic tool from the National Offender Management Service (NOMS) Performance and Analysis Group. The data will be discussed at monthly safer custody meetings and, in liaison with residential and security relevant action taken.</p> | Head of Safer Prisons & Equalities | Completed and ongoing |
| 5.2 | Recommendations from Prisons and Probation Ombudsman reports should be actioned and reviewed to make sure that lessons are learned. The quality of assessment, care in custody and teamwork (ACCT) documents should be improved and evidence consistent case management, effective care planning and multi-disciplinary input. (S55) | Accepted | <p>Recommendations from Prisons and Probation Ombudsman reports will be fed into a safer custody consolidated action plan and reviewed every six months to make sure actions are still relevant.</p> <p>Full quality checks are carried out on assessment, care in custody and teamwork (ACCT) documents every two weeks by the safer custody team. This covers all areas of the document. Feedback is given to senior management team (SMT), managers and supervising officers with suggestions for improvement. Good practice is highlighted, as well as documents falling short of expected standards. Focus is currently being given to case management and multi-disciplinary</p> | Head of Safer Prisons & Equalities | Completed & Ongoing |

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| | | | reviews. | | |
| 5.3 | Dedicated forums should be held across protected characteristics to provide support and inform delivery. Equality data should be collated and analysed, and action should be taken to ensure that the needs of minority groups are met. (S56) | Accepted | Forums have been re-introduced with two forums timetabled each month covering all protected characteristics. Data from the equalities monitoring tool (EMT) is analysed at the equalities meeting. Data from the EMT will be fed into forums with minority groups. | Head of Safer Prisons & Equalities | Completed and ongoing |
| 5.4 | All sentenced prisoners and all remand prisoners who wish to work should be allocated to suitable learning and skills and work activities and should be required to attend. Failure to attend should be addressed. (S57) | Accepted | All allocation systems are currently being reviewed. The new system that will be introduced will be monitored by the Governor at a weekly operational meeting. The incentives and earned privilege scheme will be applied to all prisoner who do not comply with the requirement to attend activity. | Head of Reducing Re-Offending | 30 April 2016 |
| 5.5 | Offender assessment system (OASys) assessments should be up to date, and categorisation and home detention curfew decisions should be completed on time to enable prisoners to progress. (S58) | Accepted | <p>A project has been commissioned by the Governor to look at an interim arrangement and a model that will provide a more static group of band 4 staff working primarily within the offender management unit (OMU) during the core working day. This group will manage caseloads of offenders. Sessional overtime for probation staff and Payment Plus for the unified staff is available to allow current backlogs to be addressed. This has been well received.</p> <p>Initial categorisation is given daily priority to make sure that prisoners are categorised within the required four working days of receipt of the essential documentation. There is a backlog of categorisation reviews due to staffing issues within case administration and pressures of competing workloads. In order to address this, identified staff within the band 4 offender supervisor group will now raise all re-categorisation paperwork between one and two months prior to the review dates and distribute around the entire band 4 group for completion. Work is underway to reduce the current backlog. This will be reviewed once case</p> | Head of Offender Management | 31 March 2016 |

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| | | | administration is more settled. Due to staffing issues and understanding of the complexities of Home Detention Curfew (HDC) within the case administration department the number of outstanding HDC assessments was high. An identified experienced member of the probation team is now picking up HDC as a matter of priority and working on this every weekday morning. This has already seen results. | | |
| | Recommendations To NOMS | | | | |
| 5.6 | The National Offender Management Service should ensure that the progression of category B sex offenders is not delayed owing to a lack of places nationally. (4.31) | Accepted | NOMS continues to develop plans to reconfigure the prison estate to best meet the needs of all prisoners, including sex offenders, in order for these prisoners to benefit from the regime and opportunities at designated prisons. | NOMS Capacity Management Team - Operational Services and Intervention Group | |
| | Recommendations To the governor | | | | |
| | Early days in custody | | | | |
| 5.7 | Listeners and Insiders should be used routinely during the reception and first night processes to help settle in and advise new prisoners. (1.13) | Accepted | The safer custody team will make sure that Listeners and Insiders are routinely in reception daily. At least one of the three reception orderlies will be trained as a Listener. | Head of Safer Prisons & Equalities | 29 February 2016 |
| 5.8 | Information should be available in a range of languages and a professional telephone interpreting service should be used when necessary. (1.14) | Accepted | Work will be done to translate the most commonly used instructions and notices into a variety of languages. These will be published on the wings and in other relevant areas. There is now a dedicated conference caller in the reception, (first night officers room) with full instructions on accessing translation services when dealing with prisoners where English is not their first language. In addition, a further three conference callers are available in the establishment. Notice to staff (NTS) 165/15 explains that conference call should be used at any time when translation services are required. | Head of Safer Prisons & Equalities | 29 February 2016 |
| 5.9 | All prisoners should complete the induction programme promptly, attendance should be | Accepted | A full review of the induction process will take place which will include representation from | Head of Residence and Safety | 29 February 2016 |

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| | tracked and the course content should be comprehensive. (1.15) | | safer custody, first night staff, prisoner representation and residential managers. The terms of reference will include the appropriate timing for induction and information to be included. Attendance will be tracked using Prison-Nomis. | | |
| | Bullying and violence reduction | | | | |
| 5.10 | Young adults (especially those located on the sex offender unit) should be risk assessed to identify and manage any vulnerability. (1.22) | Accepted | An additional assessment sheet will be introduced during induction. This will consider vulnerability and risk and will make reference to relevant Prison Service Instructions (PSIs). | Head of Residence and Safety | 31 January 2016 |
| | Self-harm and suicide | | | | |
| 5.11 | Prisoners on open ACCT documents who are located on the segregation unit should undergo an enhanced assessment to ensure that their location is appropriate, that sufficient consideration is given to their vulnerabilities and that a supportive regime is initiated. (1.29) | Accepted | HMP Bullingdon will make sure that enhanced assessments take place for any prisoner moved to the segregation unit or for any prisoner where an ACCT document is opened while they are located there. This will include a representative from healthcare and an assessment by a member of the mental health team or a nurse with a mental health background. If the decision is made for the prisoner to remain in the segregation unit, the duty governor will make sure the document is endorsed by them. | Head of safer Prisons & Equalities | Completed and ongoing |
| | Safeguarding | | | | |
| 5.12 | The safeguarding policy should be reintroduced and fully implemented, and adults with safeguarding needs should be identified and appropriate care provided. (1.32) | Accepted | Vulnerable adults are discussed as part of the weekly decency meeting, but work will take place to reintroduce this policy fully. This will be done in liaison with healthcare managers and Oxfordshire Social Care Teams. HMP Bullingdon will be represented at the Oxfordshire Safeguarding Adults Board | Head of Safer Prisons & Equalities | 31 March 2016 |
| | Security | | | | |
| 5.13 | Closed visits should be applied only for reasons related directly to visits. (1.42) | Rejected | PSI 15/2011, "Management of Security at Visits", provides that closed visits may be imposed in the absence of specific visits-related activity. Closed visits may be imposed as an administrative measure where necessary in | Security Policy Group | |

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| | | | accordance with Prison Rule 34 (1) and (3), i.e. for reasons of securing good order and discipline or for the prevention of crime or in the interests of any persons. They should be applied where prisoners are proved or reasonably suspected of involvement in smuggling prohibited items through visits, or are considered to pose a reasonable risk of involvement, or when the application of closed visits is otherwise necessary for the grounds specified in the Prison Rules. In considering the imposition of closed visits, establishments should be able to demonstrate that in deciding to apply closed visits they: (a) have taken into account all the individual circumstances of the case; (b) have acted proportionately; and, (c) have kept the requirement for the closed visit under review. | | |
| 5.14 | The prison should establish a strategically coordinated, whole-prison approach to drug supply and demand reduction. (1.43) | Accepted | The establishment wide drug strategy has been revamped and meetings re-established. A custodial manager has been given lead responsibility for the drug strategy and will drive this forward. | Head of Reducing Re-Offending | 31 January 2016 |
| | Safer Custody | | | | |
| 5.15 | Adjudication data should be collated accurately and analysed for trends and to improve quality. (1.52) | Accepted | There is a new template made available to segregation unit staff to record the outcome of adjudications. This has allowed the prison to improve data analysis and look for trends which will be presented at each quarterly adjudicating governors and segregation monitoring and review group meetings. | Head of Safer Prisons & Equalities | Completed and ongoing |
| 5.16 | All adjudication hearings should be heard and dealt with on time. (1.53) | Accepted | Work has taken place to provide administrative support to the segregation unit to make sure HMP Bullingdon are able to process adjudications on time. Further work will be undertaken to make sure all staff working in the segregation unit are trained in how to process adjudications. | Head of Safer Prisons & Equalities | 29 February 2016 |
| 5.17 | Governance of use of force should be rigorous, | Accepted | Governance of use of force is now rigorous and | Head of Safer Prisons & | Completed and |

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| | and data on trends and patterns used strategically to reduce the number of such incidents. (1.57) | | data is presented at the monthly meeting attended by all SMT and healthcare managers. Use of Force has increased in the last 12 months, but work is taking place to address this with the introduction of body worn cameras (BWCs) strategically placed on the wings that have had the highest number of incidents month on month. | Equalities | ongoing |
| 5.18 | The regime for prisoners on the segregation unit should be improved and include purposeful activities. (1.65) | Accepted | A full review of the regime on offer in the segregation unit will be conducted. This will include looking at what activities can be provided in-cell. | Head of Safer Prisons & Equalities | 29 February 2016 |
| 5.19 | Individual care and reintegration plans should be introduced to address the needs of segregated prisoners and plan for their return to normal location where appropriate. (1.66) | Accepted | Individual care and reintegration plans will be re-introduced, specifically targeting those prisoners where there is the potential to return to normal location. | Head of Safer Prisons & Equalities | 29 February 2016 |
| Substance misuse | | | | | |
| 5.20 | Prescribing regimes for substance-dependent prisoners should be flexible, based on individual need and adhere to national guidance. (1.76) | Accepted | National guidance will be adhered to. The head of healthcare will conduct a full review to make sure that HMP Bullingdon comply. | Head of Healthcare | 29 February 2016 |
| 5.21 | Opiate substitution medication should be administered at the same time on all days of the week, to ensure a consistent 24-hour interval between doses. (1.77) | Accepted | Healthcare is working with residential staff to make sure that prisoners receive opiate substitute medication at the same time each day, while working within the prison regime. | Head of Healthcare | 29 February 2016 |
| Residential units | | | | | |
| 5.22 | Cells designed for one prisoner should not be used to accommodate two. (2.7, repeated recommendation 2.15) | Rejected | The occupancy of prison cells is determined by establishments and certified by Deputy Directors of Custody (DDC) in accordance with PSI 17/2012, which provides clear guidelines for determining cell capacities. Cells will only be shared where a DDC has assessed them to be of adequate size and condition for doing so. All accommodation is compliant with the certified cell certificate. | Deputy Director of Custody (DDC) | |
| 5.23 | Damaged furniture should be replaced, toilets deep cleaned and descaled, and toilet lids provided. (2.8) | Accepted | HMP Bullingdon is introducing enhanced accommodation fabric checks and disposing of damaged furniture where necessary. A full rolling programme to descale the toilets is being | Head of Residential & Services | 30 April 2016 |

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| | | | devised. Toilet lids will be purchased. Improvements in management checks of cells will be introduced. | | |
| 5.24 | Showers should be suitably screened for privacy. (2.9) | Accepted | All showers on the residential function will be inspected and appropriate shower curtains installed. | Head of Residential & Services | 30 April 2016 |
| 5.25 | A sufficient amount of prison-issue clothing and bedding should be available in all units. (2.10, repeated recommendation 2.16) | Accepted | A system of recycling and capturing clothing going from reception will be introduced in order to reduce loss, particularly when men are discharged from custody. An audit of prison issue bedding will be carried out locally and frequent and regular meetings will take place with the internal laundry to make sure there is sufficient bedding will be carried out. | Head of Residential & Services | 30 April 2016 |
| 5.26 | Applications should be tracked and monitored to ensure timely and good-quality replies. (2.11) | Accepted | A project to overhaul the current application system will take place. This will involve much greater use of prisoner led application surgeries. In addition, offender management unit (OMU) wing surgeries have positively impacted on applications. | Head of Residential & Services | 31 January 2016 |
| 5.27 | Incoming prisoners' mail should be delivered to the wings promptly. (2.12) | Accepted | New processes have been put in place to improve this process. | Head of Security and Intelligence | 31 January 2016 |
| | Staff-prisoner relationships | | | | |
| 5.28 | All personal officers should engage actively with prisoners, and case note entries should be routine, meaningful and subject to management oversight. (2.17) | Accepted | The prison will devise a guide for staff to refer to make sure all immediate issues are addressed when first assigned to a prisoner. A checklist will be implemented for personal officers; this will cover important information to be recorded in monthly comments, such as family links, activities, and adherence to sentence plans. This will be designed with input from the OMU, safer custody, activities, residential staff and prisoner representation. This will form part of regular managers' assurance checks. | Head of Residence and Safety | 31 January 2016 |
| | Equality and diversity | | | | |
| 5.29 | The diversity strategy should be relaunched, based on a thorough needs assessment and with appropriate levels of management oversight. (2.23) | Accepted | A strategy will be published based on the recently issued NOMS Equality Strategy 2015–2017. It will be based both on the nationally identified differences in outcomes (as set out in | Deputy Governor | 31 January 2016 |

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| | | | the above document) and the early findings from local equalities monitoring tool (EMT) data and HMP Bullingdon equalities action team meetings. | | |
| 5.30 | Discrimination incident report forms should be investigated thoroughly, and responses should be timely and their quality checked both by prison managers and an independent, external organisation. (2.24) | Accepted Subject to Resources | The Deputy Governor will quality check responses to discrimination incident report forms and provide appropriate feedback. Local support organisations will be approached to see if any are willing to provide someone on a voluntary basis to provide external scrutiny. | Deputy Governor | 30 April 2016 |
| 5.31 | All prisoners with a disability should have a care plan, which should be reviewed periodically to ensure that it is being implemented and to identify any changes in their circumstances. Plans should be informed by all departments, especially health care, which have knowledge of these prisoners' needs. (2.38) | Accepted | Work is underway to make sure that, where necessary, a care plan is in place from a prisoner's initial reception and that all prisoners held with a disability are reviewed. Care plans will be reviewed every six months to make sure the prisoner's circumstances and needs remain the same, or if further support is required. Input will be sought from all relevant departments, including healthcare and social care. | Head of Safer Prisons & Equalities | 31 March 2016 |
| 5.32 | Prisoner carers should have clearly defined roles and their activities should be monitored to ensure the appropriateness of their work. (2.39) | Accepted | Care management plans will be given to carers detailing the care provision that they can engage in. This will be monitored by healthcare staff. | Head of Healthcare | 29 February 2016 |
| | Faith and religious activity | | | | |
| 5.33 | The negative perceptions of Muslim prisoners about access to chaplains should be explored and addressed. (2.46) | Accepted | The chaplaincy team will take the following actions: <ul style="list-style-type: none"> • There will be Chapel/Muslim representatives on each residential unit, who can be point of contact between chaplains and prisoners. Regular Representatives' meetings will take place. • A World Faith event will be organised; | Head of Chaplaincy | 31 January 2016 |

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| | | | <p>speakers and community faith leaders will be invited and all prisoners will be welcome to attend.</p> <ul style="list-style-type: none"> • A Muslim chaplain will visit all units at least once a week and will be available to Muslim prisoners should they wish. | | |
| | Complaints | | | | |
| 5.34 | Information about trends in complaints should be formally reviewed and used to inform management action to make improvements. (2.51) | Accepted | Trends in complaints are now monitored and fed back at the prison's monthly performance and policy meeting attended by SMT and band 5 managers. | Acting Head of Corporate Services | Completed and ongoing |
| | Legal rights | | | | |
| 5.35 | Legal services should be available, especially for those on remand. (2.55) | Partially Accepted | <p>PSI 74/2011- <i>Early Days in Custody</i>, removed the mandatory requirement for each prison to have a designated legal services officer and the relevant training course for this role is no longer in existence. When each unit previously had static senior officers, training was given by OMU staff who had been in the role of legal services, in order for them to be competent to issue and deal with appeal paperwork.</p> <p>A system will be adopted at HMP Bullingdon that will allow prisoners, especially those on remand, to have legal services available to them. This may have to be in the form of signposting to access to a directory of local and national solicitors.</p> | Head of Offender Management | 31 March 2016 |
| | Health services | | | | |
| 5.36 | Governance systems, including incident reviews, should be robust and supported by effective, regular joint clinical governance meetings and policies. (2.71) | Accepted | Appropriate reporting pathways are required to highlight, investigate and improve on issues that are presented. This is carried out in a number of ways including near miss reporting, serious incident reporting system (SIRI) and Critical Incident Reports Issues are to be raised by each provider at the fortnightly sub clinical meeting where all healthcare providers have a | Head of Healthcare | 29 February 2016 |

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| | | | platform to discuss such issues in terms of how they have been mitigated / managed. | | |
| 5.37 | All clinical areas should be decorated to a satisfactory standard and meet relevant cleaning and infection control standards. (2.72) | Accepted Subject to Resources | A request for redecoration of healthcare will be made. A defined and dedicated cleaning schedule will be put in-situ. | Head of Healthcare | 29 February 2016 |
| 5.38 | Patients should not wait excessive periods of time in waiting rooms prior to and following their health care appointments. (2.73, repeated recommendation 2.106) | Partially Accepted | Where patients are being seen in the main healthcare, waiting times is an issue due to the prison regime which only allows for movement to and from healthcare at set times of the day. Healthcare has identified this issue and have instigated clinics on each wing to reduce the number of clinics in main healthcare. However, clinics will still need to occur in main healthcare where waiting times are dependent on the prison regime. | Head of Healthcare | 29 February 2016 |
| 5.39 | Prisoners should have access to regular, systematic health promotion campaigns throughout the prison, including easy confidential access to barrier protection. (2.74) | Accepted | Healthcare are working with the prison to initiate and carry out health promotion activities, such as a day on smoking issues. Discussion are taking place with regard to setting up a health promotion group, including healthcare, with a view to implementing health promotion days for both prisoners and staff. Confidential access to barrier protection, such as condoms, can be accessed through the sexual health clinic or by submitting a general application to healthcare. Once received the condoms are distributed in a brown bag with no identifiable makers. During the reception process prisoners will be asked if they require condoms and, if so, will be directed as how to access them. | Head of Healthcare | 29 February 2016 |
| 5.40 | Newly arrived prisoners should receive prompt initial health services in reception, followed by a comprehensive secondary screening within 72 hours. (2.81) | Accepted | An initial health screening takes place on arrival into the prison, however, this has been identified as being too long. To reduce this, risk related issues will be concentrated on and will be addressed (i.e., medication issues, substance use issues and risk to self and others). Following this, a second more in-depth health screening will take place the following | Head of Healthcare | 29 February 2016 |

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| | | | day. | | |
| 5.41 | Discipline staff should supervise medication administration queues, to manage prisoner behaviour and reduce the risk of diversion. (2.88) | Accepted | This will be considered as part of the re-profile and included in the terms of reference. | Head of Residence and Safety | 31 March 2016 |
| 5.42 | Prisoners should not wait more than six weeks for assessment and for routine dental treatment. (2.93) | Accepted | Routine treatments are now occurring at just under the six week time frame, and new patient assessment and treatment plans are taking just under two weeks. | Head of Healthcare | Completed |
| 5.43 | Discipline staff should have regular mental health awareness training to enable them to identify and support prisoners with mental health problems. (2.100) | Accepted | The prison will work with the head of healthcare to produce a package of training which is fit for purpose. | Head of Healthcare | 29 February 2016 |
| 5.44 | A comprehensive primary mental health service should be provided, offering a full range of support for prisoners with mild and moderate mental health problems, learning disabilities and attention-deficit hyperactivity disorder, including psychological therapies. (2.101) | Accepted | There is currently limited funding for the range of primary care mental health services. However, the services are currently under procurement with a new service specification. | NHS England | 30 April 2016 |
| 5.45 | Patients requiring a transfer under the Mental Health Act should be assessed promptly and transferred within the current transfer guidelines. (2.102) | Accepted | NHS England has revised good practice guidance on transferring adult prisoners to secure hospitals under sections 47 and 48 of the Mental Health Act 1983. This guidance includes the expectation that a transfer will take place within 14 days, when the need for hospital admission is urgent, and that longer transfer periods should be reported to NHS commissioners, so that steps can be taken to improve. The guidance will be published shortly. | NHS England | 29 February 2016 |
| | Catering | | | | |
| 5.46 | Prisoners should be provided with an adequate breakfast, served on the day it is to be eaten. (2.109) | Rejected | The serving of breakfast packs the evening before is a well-established practice across the prison estate and one, which contributes to a swifter start to the morning regime, including start time for work and other activities. | | |
| 5.47 | Lunch should not be served before noon. (2.110) | Partially Accepted | The prison regime in HMP Bullingdon, as in many other local establishments, dictates the timings when lunch is served. The serving of meals is restricted in order to make sure the | Head of Residential & Services | Completed and ongoing |

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| | | | prison is able to run a regime that incorporates activity attendance, exercise and association. HMP Bullingdon do however, endeavour to serve food as close to what is considered as 'lunch time' as is practically possible. | | |
| | Purchases | | | | |
| 5.48 | Prisoners should be able to access a full shop order within 72 hours of arrival. (2.116) | Rejected | It is national policy that there is one standard order and one following delivery day per week for each prison. It is not financially viable to fund additional deliveries for new arrivals outside of this schedule. New arrivals are offered the option to purchase smokers' or non-smokers' reception packs on arrival. An order from the full local range can then be placed on the next usual ordering day. | | |
| | Time out of cell | | | | |
| 5.49 | Prisoners should have access to daily exercise and evening association. (3.6) | Accepted | There are two periods of exercise, one in the morning and one in the afternoon. Evening association takes place each evening. | Head of Residence and Safety | Completed and ongoing |
| | Learning and skills and work activities | | | | |
| 5.50 | The prison should improve the quality improvement arrangements to include the observation of teaching and learning in industries and vocational workshops and by using the views of prisoners to inform the self-assessment process. (3.16) | Accepted | The head of learning and skills and the industries manager are working together to ensure that learning walks and observations are embedded in the department. This will involve seeking views of prisoners | Head of Reducing Re-Offending | 30 April 2016 |
| 5.51 | Curriculum planning should be improved by using local market intelligence, by planning progression to receiving prisons and by analysing the needs of prisoners, particularly in industries and vocational workshops. (3.17) | Accepted | Curriculum planning will look at local market intelligence. The ILPs for prisoners will also be analysed to establish their needs. | Head of Reducing Re-Offending | 31 January 2016 |
| 5.52 | The level of vocational qualifications available should be increased to enable prisoners to progress to higher levels. (3.22) | Accepted | Due to the high turnover of the offender population and the role of HMP Bullingdon as a local and resettlement prison, there is a limit to the level of qualification that can be achieved in the time available. However, the prison will deliver more in farms and gardens, laundry, DHL and in the gymnasium. | Head of Reducing Re-Offending | 31 January 2016 |
| 5.53 | Links with employers should be increased, to | Accepted | These links will be developed with partner | Head of Reducing Re- | 30 April 2016 |

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| | provide prisoners with a better understanding of employment opportunities and workplace expectations. (3.23) | | agencies, Milton Keynes College, National Careers Service and Thames Valley Community Rehabilitation Companies. | Offending | |
| 5.54 | English and mathematics provision should be increased further to meet the needs of prisoners assessed with pre-entry and entry-level skills. (3.24) | Accepted | An adult learning needs analysis and curriculum review will take place. This will inform the new curriculum planning in this area. | Head of Reducing Re-Offending | 29 February 2016 |
| 5.55 | The prison should improve planning for individual learning by setting prisoners detailed and challenging targets and by providing good-quality feedback on written work; staff should ensure that prisoners are clear about their progress and what they need to do to improve. (3.36) | Accepted | Training will be delivered to managers to make sure that quality individual learning plans are implemented and used for the benefit of the learners. | Head of Reducing Re-Offending | 30 April 2016 |
| 5.56 | Interactive learning technologies should be available in all classrooms and teachers should use this to improve the quality of teaching and learning. (3.37) | Accepted Subject to Resources | The vision would be to have interactive smart boards in all of the adult learning areas, however, in the current financial climate this will be very difficult. The head of learning and skills is exploring the option of portable interactive specific, measurable, achievable, realistic, time bound boards as an acceptable alternative. | Head of Reducing Re-Offending | 30 April 2016 |
| 5.57 | Formal, accredited training for classroom helpers/peer workers should be provided so that they can contribute more effectively in teaching and learning sessions. (3.38) | Accepted | Curriculum planning is in place to deliver a peer mentor qualification. | Head of Reducing Re-Offending | 30 April 2016 |
| 5.58 | Prisoners' development of English and mathematics should be integrated into vocational training and work. (3.39) | Accepted | The use of the adult learning pod working model will be re-established and options increased for short sessions in all of the work areas. | Head of Reducing Re-Offending | 30 April 2016 |
| 5.59 | Prisoners who start courses should be able to complete them. (3.43) | Accepted | The head of learning and skills will work with the offender management team to ensure appropriate prisoners are held at Bullingdon of the adult learners on qualification courses. This cannot be for all courses due to the turnover of offenders in the local environment. | Head of Reducing Re-Offending | 31 January 2016 |
| 5.60 | Outcomes for learners in functional skills English and mathematics should be improved. (3.44) | Accepted | Curriculum review and improved recruitment of college staff will have a positive outcome for learners. | Head of Reducing Re-Offending | 31 July 2016 |

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| 5.61 | The level of skills development in industries should be increased and skills developed in work and vocational workshops should be accredited to improve prisoners' chances of employment after release. (3.45) | Accepted | The head of learning and skills and the industries manager will work together to ensure that work already started will be continued and offered to a larger group of men. | Head of Reducing Re-Offending | 30 April 2016 |
| 5.62 | The prison should undertake a biannual library survey to assess how well the library is meeting the needs of the population. (3.49) | Accepted | The head of learning and skills will work with the service provider to carry out the survey. | Head of Reducing Re-Offending | 30 April 2016 |
| Physical education and healthy living | | | | | |
| 5.63 | The outside pitch should be repaired and made available for use. (3.56) | Accepted Subject to Resources | This is subject to resources being made available. A bid has been made and rejected. However, the prison is working to source alternative funding. | Head of Reducing Re-Offending | 30 April 2016 |
| 5.64 | The number of prisoners who use PE facilities should be increased and they should be allowed to use the small gym rooms attached to the residential wings. (3.57) | Accepted | The use of the cardio vascular rooms on all units will be re-launched. The PE department will look at increasing attendance at all sessions. | Head of Reducing Re-Offending | 31 January 2016 |
| Strategic management of resettlement | | | | | |
| 5.65 | All prisoners should be able to access help from the community rehabilitation company based in the prison, to deal with housing and debts problems at any point during their sentence. (4.7) | Accepted | The Thames Valley community rehabilitation company now has an agreed mandated service provision document in place which is agreed with all parties and ensures delivery within the contract guidelines to all offenders located in HMP Bullingdon regardless of their home community rehabilitation company. | Head of Reducing Re-Offending | Completed and ongoing |
| 5.66 | A reducing reoffending strategy, based on a comprehensive needs analysis, should be developed which reflects the complex population held at the establishment and the new arrangements for resettlement support, and addresses the considerable weaknesses in offender management. (4.8) | Accepted | The head of reducing re-offending and the OMU will carry out a needs analysis which will inform the strategy. | Head of Reducing Re-Offending | 30 April 2016 |
| Offender management and planning | | | | | |
| 5.67 | Better data collection should be introduced and more management oversight provided to identify issues and tackle poor performance. (4.16) | Accepted Subject to Resources | A number of databases were being used to collect/correlate data. These have now been streamlined, however, this still relies on data entry when staff are dealing with backlogs as well. Regular checks by managers have been introduced to give better oversight. | Head of Offender Management | 31 March 2016 |

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| 5.68 | All reviews of OASys should be thorough and include a comprehensive plan for managing the risk of harm. All departments should provide information to help to develop better sentence plan targets. (4.17) | Accepted | The senior probation officer will implement a more comprehensive quality assurance regime beyond the formal quality assurance system. The senior probation officer will countersign all OASys assessments to gain an overview of quality improvement and will monitor for comprehensive risk management plans and evidence of multi-agency involvement. | Senior Probation Officer | 31 March 2016 |
| 5.69 | P-Nomis should be used as the central recording system. (4.18) | Accepted Subject to Resources | It is not possible to upload files to Prison-Nomis and there is no facility to restrict access to sensitive information. All staff working within the OMU will be advised of the requirement to use Prison-NOMIS as their primary recording system to make sure that all contacts with offenders on their caseloads are written with clarity and brevity. | Head of Offender Management | 31 March 2016 |
| 5.70 | Completed multi-agency public protection arrangements (MAPPA) F reports should include a better analysis of information to provide an assessment of progress made, changes in custodial behaviour and risk levels. (4.23) | Accepted | The senior probation officer will arrange a rolling programme of training, which will be available to all offender supervisors to make sure that an improvement is made in the quality of MAPPA F completions. Figures and statistics around MAPPA F completions will be reported to the head of function and deputy governor. | Senior Probation Officer | 31 March 2016 |
| 5.71 | Confirmation of the MAPPA management level should be sought six months before release and the interdepartmental risk management team meeting should provide better oversight of these cases, with attendance for all relevant departments. (4.24) | Accepted | The interdepartmental risk management team (IRMT) is under ongoing review following recent communication with another prison that has been recognised as having good practice in this area. This is work in progress and will introduce a new approach to public protection procedures including a weekly multi-agency risk panel for new prisoners and an improved monthly IRMT meeting that reviews MAPPA levels six months prior to release for priority cases. | Head of Offender Management | 31 March 2016 |
| 5.72 | Categorisation reviews should clearly set out specific and achievable targets for the prisoner. (4.29) | Accepted | Due to the high numbers of newly promoted offender supervisors, the training needs analysis will be updated to make sure that in-depth on the job training and mentoring is provided to make sure that all recategorisation | Head of Offender Management | 31 March 2016 |

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| | | | documents include specific and achievable targets to give the best chance for a reduction in both risk and security conditions. | | |
| 5.73 | Prisoner transfers should be given a higher priority and be informed by sentence plan targets to promote progression. (4.30) | Partially Accepted | <p>HMP Bullingdon has minimal control over this, due to ongoing and ever changing demands. The prison is very much dependant on the spaces allocated nationally and locally by Population Management Unit. Taking into account the national prison population and available spaces, this proves to be difficult. The prison's role as a local and resettlement prison holding prisoners from Hampshire and Wiltshire offenders adds to these pressures.</p> <p>Wherever possible prisoners are and will continue to be allocated establishments that serve their needs and intervention requirements as identified in their sentence plans.</p> <p>NOMS continues to ensure that transfers of prisoners are progressive, appropriate and are carried out in a timely fashion as possible.</p> <p>Enabling progressive transfers of prisoners is subject to space in the appropriate part of the prison estate becoming available. The speed of transfers, therefore, reflects these constraints on the availability of places in a particular location or of a particular type. NOMS remains committed to making the most effective use of the estate to support prisoners' needs, including by seeking to hold prisoners in the most appropriate security conditions and in prisons that are able to meet the need presented by their individual case.</p> | Head of Offender Management | 31 March 2016 |
| 5.74 | Indeterminate-sentenced prisoners (ISPs) should not stay at the establishment for too long and more support should be provided, including a system to identify and support potential ISPs | Accepted | Indeterminate sentenced prisoners are identified immediately following sentencing and categorised within the designated timeframe. A multi-agency lifer risk assessment panel will be | Head of Offender Management | Completed and ongoing |

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| | throughout their remand period. (4.34) | | convened at the earliest opportunity to identify any major risks or triggers. Following this all attempts are made to move the prisoner to a high security or category B establishment. This is very much dependant on spaces available and in line with appropriate allocations from Population Management Unit. | | |
| | Reintegration planning | | | | |
| 5.75 | The effectiveness of the new arrangements for providing housing advice and help should be measured. (4.41) | Accepted | The Thames Valley community rehabilitation company now has an agreed mandated service provision document in place which is agreed with all parties and ensures delivery within the contract guidelines to all offenders located in HMP Bullingdon regardless of their home community rehabilitation company. The outcomes are being recorded and reported to the head of reducing re-offending and the reducing re-offending monthly meeting. | Head of Reducing Re-Offending | Completed and ongoing |
| 5.76 | Through links with employers and outside agencies, and attendance at good-quality resettlement classes, prisoners should be prepared for, informed about and supported to find employment, training and education on release. (4.43) | Accepted | The Thames Valley community rehabilitation company will be delivering the <i>Getting It Right</i> program which will provide preparation for release from custody. This will be aimed at those in the last twelve weeks of custody. | Head of Reducing Re-Offending | 31 January 2016 |
| 5.77 | A robust system to monitor the progression of prisoners post-release should be introduced and the data used to evaluate the impact of the National Careers Service provision on prisoners. (4.44) | Accepted | This work will be completed in partnership with the community rehabilitation company who is responsible for maintaining contact during the licence period. | Head of Reducing Re-Offending | 30 April 2016 |
| 5.78 | All prisoners should have access to a comprehensive range of debt and finance support and advice, including case management and the opening of bank accounts before release. (4.50) | Accepted | The Thames Valley community rehabilitation company now has an agreed mandated service provision document in place which is agreed with all parties and ensures delivery within the contract guidelines to all offenders located in HMP Bullingdon regardless of their home community rehabilitation company. The outcomes are being recorded and reported to the head of reducing re-offending and the reducing re-offending monthly meeting. The | Head of Reducing Re-Offending | 30 April 2016 |

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| | | | opening of bank accounts will be developed further | | |
| 5.79 | The nature and extent of prisoners' needs to re-establish or maintain contact with children and families should be established and steps taken to meet these needs. (4.59, repeated recommendation 4.61) | Partially Accepted | This work will be completed in partnership with the community rehabilitation company. At present this is not part of the contract and agreed mandated services. Discussions will need to take place with the Ministry of Justice contract management to establish if this can be incorporated into the role of the community rehabilitation company. | Head of Reducing Re-Offending | 31 May 2016 |
| 5.80 | The need for a replacement victim awareness programme should be explored and provision developed if appropriate. (4.63) | Accepted | The Sycamore Tree programme is being delivered throughout this financial year. The academic research findings will inform the Public Sector Prison management board of effectiveness and whether public funds will be available in the next financial year. Professional relationships with colleagues in Prison Fellowship will continue to be developed to ensure future delivery if at all possible. | Head of Reducing Re-Offending | 30 April 2016 |
| | Housekeeping points | | | | |
| | Legal rights | | | | |
| 5.81 | The availability of the 'Access to Justice' equipment should be publicised to prisoners. (2.56) | Accepted | A notice to prisoners will be published explaining the policy of who is permitted to apply for access and who the application should be made to. | Head of Security and Intelligence | 31 January 2016 |
| | Health services | | | | |
| 5.82 | Consultations should occur in private, with the door closed, unless an individual recorded risk assessment indicates otherwise. (2.75) | Accepted | Consultations will be held in private, unless a risk assessment indicates otherwise. | Head of Healthcare | 29 February 2016 |
| 5.83 | Prisoners should be able to complain about health services through a well-publicised, confidential system, and neither the complaints nor the responses should be included in clinical records. (2.76) | Accepted | A clear complaints process poster has been published on all wings and main healthcare. Complaints and complaint responses will not be scanned or recorded onto the medical records. They will be stored separately in a folder and reference to the complaint may be made SystemOne, if recorded in a consultation. The process has now been implemented and the head of healthcare will monitor for compliance. | Head of Healthcare | Completed and ongoing |
| 5.84 | Prisoners should be discharged from the | Accepted | Prisoners discharged from the inpatient unit | Head of Healthcare | 29 February |

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| | inpatient unit with a clear, regularly reviewed care plan for wing nurses and discipline staff to follow. (2.82) | | back to their wing will have a care plan. This will be followed up and acted on accordingly on the wings in conjunction with generating management plans for wing based carers and staff. | | 2016 |
| 5.85 | Drug refrigerators should be monitored appropriately and requisite remedial action taken and recorded when required. (2.89) | Accepted | The fridge temperatures will be checked twice daily and the pharmacy technicians will carry out a weekly governance inspection to make sure this is happening. | Head of Healthcare | 29 February 2016 |
| 5.86 | In-possession risk assessments should be reviewed regularly and should clearly document the rationale for all administration decisions. (2.90) | Accepted | An in-possession risk assessment is carried out for all prisoners who have medication in-possession. These will be reviewed on an annual basis unless there is a change in the patient's condition which would initiate a review of this process. | Head of Healthcare | 29 February 2016 |
| 5.87 | The dental suite should include a magnifying light to ensure adequate cleaning. (2.94) | Accepted | A magnifying light has been requested as a fixed equipment requirement through the prison's system of ordering. | Head of Healthcare | 31 March 2016 |
| 5.88 | All dental equipment should be serviced and monitored adequately. (2.95) | Accepted | It is acknowledged that this should be in-situ. The prison/healthcare teams will work together to overcome some of the difficulties posed by new arrangements in facilities management. | Head of Healthcare | 31 March 2016 |
| | Catering | | | | |
| 5.89 | Food trolleys should be kept clean. (2.111) | Accepted | A full audit of the cleaning systems and process of accountability will be checked and implemented. | Head of Residential & Services | 30 April 2016 |

| Recommendations | | Housekeeping Points | |
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| Accepted | 65 | Accepted | 9 |
| Accepted Subject to Resources /Partially Accepted | 11 | Accepted Subject to Resources /Partially Accepted | 0 |
| Rejected | 4 | Rejected | 0 |

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