

ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMP STAFFORD

TIMETABLE	DATE	STATUS OF THIS RETURN
Full UnAnnounced inspection	8-19 February 2016	
Report published	21 June 2016	
Action Plan Submitted	15 September 2016	Attached

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1. Rec. no	2. Recommendation	3. Accepted/ Rejected	4. Response Action Taken/Planned	5. Function Responsible/ Policy Lead	6. Target Date
	Main recommendations To the governor				
5.1	Nursing staff levels and skills mix should reflect the complex health needs of the population. Primary mental health care provision should meet demand and reflect the specialised nature and risks of the population. (S43)	Accepted	Care UK were appointed as the new health care provider in April 2016 and have implemented a recruitment campaign for additional nurses to better meet the range of skills needed for the prison population. A permanent GP has recently been appointed and progress continues to be made in reconfiguring the capability and breadth of all health care services delivered and this includes an integrated Mental Health and Drug and Alcohol Recovery Service (DARS) provided through a sub contract with South Staffordshire and Shropshire Healthcare NHS Foundation Trust (SSSFT).	Head of Healthcare	30 September 2016
5.2	The quality of purposeful activity should be regularly evaluated by prison managers using data on outcomes, and delivery partners should be challenged to effect improvements. All activity should be underpinned by a clear learning and skills and work strategy, which is shared with partners. (S44)	Accepted	A learning and skills work strategy is now in place and overseen by HMP Stafford's Quality Improvement Group (QIG) and this has been shared with partners. The group evaluates the quality of purposeful activity and outcomes, and delivery partners are challenged to improve outcomes for prisoners where this is necessary.	Head of Reducing Re-Offending	Completed and ongoing
5.3	There should be a robust reducing re-offending strategy, incorporating offender management to address them. It should be informed by a needs analysis and driven by regular strategic planning	Accepted	The establishment will conduct a needs analysis to form a revised and robust Reducing Re-Offending Strategy that incorporates offender management. A Reducing Re-Offending Strategy Group has been formed and meets on a bi-monthly basis. A Custodial Manager has also been redeployed to drive the Reducing Re-Offending Action	Head of Offender Management & Head of Reducing Re-Offending	30 November 2016

	meetings. (S45)		Plan and co-ordinate resettlement activity.		
5.4	A range of appropriate interventions, with sufficient places to meet the need, should be available to ensure that all prisoners address their offending behaviour in an appropriate and timely way to minimise the risk of harm to others and to protect the public. (S46)	Accepted	<p>NOMS is currently developing a training plan for residential Prison Officers and staff within Offender Management Units (OMUs). This will include making sure Prison staff are knowledgeable about available programmes, both within the local prison and surrounding estate. It will also include awareness of what staff can do to support prisoners learning after attending programmes. It is planned to have new training available by Summer 2017 after initial testing and evaluation.</p> <p>The Heads of Offender Management and Reducing Re-Offending will engage with Commissioners to discuss the most effective and efficient programme configuration using available resources. There is always likely to be a need to transfer some prisoners to access some specialist services and interventions not delivered at HMP Stafford or where course timings or available places do not meet demand quickly enough so there is a key dependency with recommendation 5.5.</p> <p>HMP Stafford applied for and has been accepted as part of the new Horizon pilot programme. Programme facilitators will be trained between July and November 2016 to deliver this new programme. This programme does not require all participants to accept their offending behaviour and is shorter than the other Sex Offender Treatment Programmes (SOTP) thus assuming there is demand the number of completions should increase.</p> <p>In relation to low risk of reoffending cohort research has confirmed that SOTP that follow the risk-need-responsivity (RNR) principle principles lead to the largest reductions in reconviction. That is, medium and high-risk sexual offenders have lower reconviction rates after treatment. Low-risk sexual offenders are less likely to benefit from treatment, and evidence suggests that intensive treatment could, in fact, be counterproductive.</p>	Head of Offender Management & Head of Reducing Re-Offending	31 December 2016
	Recommendation To NOMS				
5.5	The national management of prisoner movements should enable prisons to make speedy transfers to other	Accepted	Population Management oversees the transfers of prisoners in accordance with the national offender flow model and in response to individual requests from prisons. It is not always possible to act swiftly on these requests because of a shortage	The National Offender Management Service	Completed

	establishments for the purposes of programmes or resettlement. (4.19)		of spaces at some establishments and a limited prison transfer fleet.	(NOMS) Population Management Unit	
	Recommendations To the governor				
	Early days in custody				
5.6	All private interviews with new arrivals in reception should be conducted to a high standard. The interviews should elicit the prisoner's mood and any associated risks. (1.5)	Accepted	<p>The Head of Safer Custody will arrange for Reception staff to be trained on interview techniques and Assessment Care in Custody and Teamwork (ACCT) assessments to make sure all private interviews with new arrivals are carried out to a good standard.</p> <p>The Governor has restructured the middle management line to make sure there is a Custodial Manager supervising the reception. This manager is now carrying out quality assurance checks and training is recorded on a centralised database.</p>	Head of Safer Custody	30 September 2016
	Bullying and violence reduction				
5.7	There should be clearly documented support for the victims of bullying and violent incidents. The outcomes of police investigations into serious allegations and subsequent support offered should be clearly recorded. (1.10)	Accepted	<p>A database has been developed at the establishment and is now being used to record the support that has been offered to victims of bullying and violent incidents.</p> <p>The outcomes of police investigations and the subsequent support given will be clearly recorded on Prison-NOMIS by the Safer Custody team.</p>	Head of Safer Custody	Completed
	Self-harm and suicide				
5.8	Staff on night duty should be trained in first aid, ACCT procedures, use of a defibrillator and response to an in-cell emergency. (1.16)	Accepted	<p>All Custodial Managers are trained in these areas and all Operational Support Grades (OSGs) will be trained in emergency first-aid, which includes using a defibrillator and ACCT procedures.</p> <p>There is a night visit conducted by a Senior Manager every month. Scenario type style questions will be added to the compliance check sheet to make sure all night staff understand how to respond to life-threatening situations.</p>	Head of Security	30 November 2016
	Security				
5.9	The security team should track	Accepted	The Head of Security will introduce a tracking system and this	Head of	31 August 2016

	all actions commissioned as a result of intelligence reports, pursuing any that are late and ensuring that lessons are learned. (1.23)		will enable the security team to pursue any late reports and to make sure that any lessons are learned and improvements made.	Security	
5.10	Prisoners should only be strip-searched on the basis of individual risk assessment. (1.24)	Rejected	PSI 67/2011, 'Searching of the Person', requires that male prisoners are full-searched in certain circumstances. Prisoners can be full-searched at all other times on the basis of suspicion or intelligence.	Head of Security	
	Discipline				
5.11	All planned use of force should be filmed. (1.34)	Accepted	All planned use of force is now filmed at HMP Stafford.	Head of Safer Custody	Completed and ongoing
	Substance misuse				
5.12	Prisoners undertaking DARS drug and alcohol programmes should have access to counselling services, to address issues underpinning their vulnerability to substance misuse. (1.40)	Partially Accepted	Since April 1 st 2016 Care UK have been commissioned to provide a fully integrated psycho-social service which is delivered through their sub contract with SSSFT. This supports access to a range of mental health interventions managed by an integrated mental health service that cover the step care model. SSSFT will offer an integrated Mental Health and Drug Alcohol Recovery Service (DARS) which will include counselling services and anxiety management.	Head of Reducing Re-Offending	30 November 2016
	Staff-prisoner relationships				
5.13	All staff should receive regular anti-conditioning training, and offender supervisors should receive specialist training for work with sex offenders. (2.9)	Accepted	This training will be incorporated in HMP Stafford's annual staff training programme.	Head of Security & Head of Offender Management	31 October 2016
	Equality and diversity				
5.14	Equality strategy and action planning should be developed and informed by a periodic analysis of need and advice from care specialists for elderly people. (2.14)	Accepted	An older prisoner strategy has been drafted and finalised. The content has formed one of HMP Stafford's key objectives in the establishment Service Level Agreement (SLA). A Custodial Manager has been appointed to take the lead role in the co-ordination of delivery. The strategy is progressing well and is supported by Age UK.	Head of Safer Custody	Completed
5.15	There should be	Accepted	Forums for protected groups are now in place at HMP Stafford.	Deputy	Completed and

	consultation/support forums for all protected groups. (2.15)			Governor	ongoing
5.16	An appropriate stock of daily living aids should be maintained to meet the needs of all prisoners with disabilities. (2.24)	Accepted	Living aids have been purchased and are available to those that require them as identified by a social worker following a social care assessment.	Head of Safer Custody	Completed and ongoing
5.17	Adverse data from the equality monitoring tool should be investigated and addressed promptly. (2.25)	Accepted	The adverse data is scrutinised by the Equalities Action Group on a quarterly basis. The group consists of key Stakeholders including prisoners and partners. Any actions are then included in the Equalities Action Plan to be addressed	Deputy Governor	Completed
5.18	The needs of foreign national prisoners should be met, including the provision of interpreting and translation services. (2.26)	Accepted	Translation services are available for foreign national prisoners and a foreign national forum is now also in place.	Head of Offender Management	Completed
	Complaints				
5.19	Complaint boxes should be located away from staff offices to enable prisoners to submit complaints discreetly. (2.32)	Accepted	Complaint boxes are now located away from staff offices.	Head of Residence	Completed
5.20	All replies to complaints should be respectful and focused. (2.33)	Accepted	Training on how to respond to complaints has been delivered to all management grades. A monthly quality assurance check is completed by the Deputy Governor and remedial action will be carried out where necessary.	Deputy Governor	Completed and ongoing
	Legal rights				
5.21	Prisoners should be able to consult their solicitors in private. (2.35)	Accepted	The Head of Security will introduce privacy screens to make sure prisoners are able to consult with their legal representatives in private.	Head of Security	30 September 2016
	Health services				

5.22	Prisoners should have access to all required secondary health services within community equivalent waiting times. Prioritisation of attendance should be based on clinical decisions(2.53)	Accepted	Additional hours have been secured to allow delivery of additional secondary health sessions. Patients will be triaged to make sure prioritisation of attendance.	Head of Healthcare	30 September 2016
5.23	There should be regular and vigilant supervision by officers at the medicine hatches to ensure there is no diversion of medicines. (2.62)	Accepted	Prison Officers will be assigned supervision duties during dispensing of medication on residential units.	Head of Residence	Completed
5.24	The in-possession policy, risk assessment process and the prescribing formulary should reflect established good practice in relation to the status and indication for all prescribed medicines. (2.63)	Accepted	A review of Care UK in-possession policy, risk assessment process and prescribing formulary is to take place on the appointment of the new pharmacy technician and this will be monitored as part of the Integrated Quality Care Improvement Meeting.	Head of Healthcare	30 November 2016
5.25	Supervised medicines should be administered according to recommended dosage regimes to ensure clinically effective treatment. (2.64)	Accepted	To make sure clinically effective treatment is given a review of the in-possession (IP) assessment will be carried out and more IP medications will be introduced (depending on risk assessment) to allow regimes to be followed more robustly. This will require regular medication counts with the prison assistance. Regular reviews of all night time medications to make sure they are still appropriate and clinics will be ran e.g. sleep clinics to reduce the need for medication.	Head of Healthcare	Completed
5.26	There should be sufficient pharmacist hours to meet need. (2.65)	Accepted	Lloyds Pharmacy provides the service at HMP Stafford and has insufficient contracted hours to meet the current need. Care UK will supplement the pharmacist services deploying a pharmacy technician to assist with medicines management.	Head of Healthcare	30 November 2016
5.27	There should be a comprehensive review of medicines management, including ordering, receipt, storage and supply of medicines, with regular oversight through prison specific medicines management meetings. (2.66)	Accepted	A comprehensive review of medicines management (including ordering, receipt, storage and supply of medicines) will take place on appointment of the new Pharmacy Technician. Management of medicine will be a standing agenda item on Care UK's Quality Assessment and Improvement meeting.	Head of Healthcare	30 November 2016
5.28	Waiting times for prisoners to	Accepted	A new contract with the dental services provider is now in place.	Head of	Completed

	be assessed for dental treatment should be in line with those in the community. (2.69)		Additional sessions now include dentist, nurses and hygienists to reduce waiting lists and waiting times.	Healthcare	
5.29	The range of treatments offered should reflect national guidance and meet prisoners' needs. (2.70)	Accepted	The introduction of additional dental and hygienist sessions will extend the range of oral health and dental treatment available to prisoners.	Head of Healthcare	Completed
5.30	All staff should receive mental health awareness training. (2.75)	Accepted	The prison's safer custody training package includes a session on basic mental health awareness and additional training will be provided by the prison's primary mental health service in partnership with HMP Stafford.	Head of Safer Custody	31 December 2016
	Purchases				
5.31	Prisoners who miss the submission date for the weekly order form should not have to wait a week to be able to place an order. (2.82, repeated recommendation 8.13)	Rejected	Each prison has one set ordering day in the week for retail purchases, and one corresponding delivery day. To provide extra deliveries outside of this for new arrivals would be cost prohibitive. Prisoners should be offered a reception pack to purchase on arrival; a number of different packs are available. Their first order can then be placed on the next usual ordering day. All new arrivals are provided with a Reception pack (for smokers or non-smokers). If they do not have available funds, an advance is provided to allow the prisoner to purchase.	Head of Residence	
	Time out of cell				
5.32	Prisoners should have at least one hour's exercise in the open air each day. (3.3)	Accepted	The prison operates a benchmark regime which currently provides a half-hour exercise period. Prisoners have additional time in the open air when walking to and from activity places. The recommendation is accepted on the basis that this is desirable and it is something that the prison will look to do when it next revisits its regime and work profiles. National policy set out in the Residential Services Prison Service Instruction (PSI 75 / 2011), states prisoners are afforded a minimum of 30 minutes in the open air daily, as defined in the SLA / Contract. This provision is mandatory subject to weather conditions and the need to maintain good order and discipline.	Deputy Governor	31 July 2017

			Prisoner pay is under review and this will take account of Dame Sally Coates review which recommended incentives that encourage attendance and progression in education.		
5.36	Teachers should plan effectively to meet the needs of prisoners of all abilities, and prisoners' individual learning plans should clarify how they can improve and achieve their targets. (3.22)	Accepted	Staff have received training to effectively use specific, measurable, achievable, realistic and time bound targets (SMART), and a new locally developed Individual Learning Plan (ILP) document is being rolled out across the department giving a standardised ILP in a format supported by the National Offender Management Service (NOMS) and the education provider. Staff training will be monitored to make sure that the training is effectively delivered and is consistent.	Head of Education	30 September 2016
5.37	The senior support group for older prisoners should provide more structured activities and social and intellectual challenge. (3.23)	Accepted	The senior support group will run an activity day centre similar to that provided in the community care centres. There will be structured activities to meet the needs of older prisoners.	Head of Safer Custody	31 December 2016
5.38	Purposeful activities should be used to their full potential to ensure that all prisoners develop essential employability skills, such as English and mathematics. (3.26)	Accepted	<p>HMP Stafford is supporting workshop instructors to embed English & Mathematics in all activity areas. The Shannon Trust now delivers 60 sessions per week for those prisoners that need to improve their written English and reading. The establishment has also secured the services of one-to-one mathematics which will make sure trained prisoners deliver mathematics to their peers on a one-to-one basis. At the weekly allocation board, the Activities Hub Manager determines the needs and allocation of prisoners so they can develop employable skills.</p> <p>The delivery of all offending learning and skills strategy provision is monitored through quarterly service delivery meetings with each provider. These meetings allow performance and funding to be discussed openly.</p> <p>Common issues and concerns are then raised and discussed at the quarterly Quality Improvement Group meeting which is a more general meeting attended by all providers and key stakeholders within the establishment.</p>	Head of Reducing Re-Offending	31 December 2016
5.39	Data on attendance at the library should be analysed to	Accepted	As part of the Partnership Delivery Review Meeting, the agenda will now include a report on library visits.	Head of Reducing Re-	Completed

	identify patterns of use and to ensure that all groups of prisoners use the facilities well. (3.33)		<p>HMP Stafford will monitor this by reviewing the library visits report to identify any prisoner usage trends and promote library usage for all prisoners.</p> <p>N.B Library usage has increased since the inspection with the library service now having full staffing. There has also been greater links between education and the library. Library sessions are now being included in some course curriculums.</p>	Offending	
	Physical education and healthy living				
5.40	Links between health care and the gym should be strengthened to ensure that all prisoners are placed on appropriate programmes. (3.39)	Accepted	<p>The Physical Education (PE) department will nominate a lead PE instructor to attend the health promotion meetings to align services and programmes for prisoners that include remedial PE.</p> <p>A written prisoner referral procedure has now been agreed between healthcare and PE that includes rehabilitative and healthy lifestyle referrals.</p> <p>The PE department supports 'health champions' delivery of healthy lifestyle and health promotion in partnership with healthcare.</p>	Head of Reducing Re-Offending	30 September 2016
	Offender management and planning				
5.41	Adequately trained offender supervisors should have regular and meaningful contact with prisoners to motivate, challenge and support them throughout their sentence. This should be underpinned by robust management oversight and quality assurance to ensure that all elements of offender management are timely and of adequate quality. (4.9)	Accepted	<p>The Head of Offender Management Unit is working collaboratively with a Senior Probation Officer to make sure all Offender Supervisors are adequately trained.</p> <p>NOMS is developing a training plan to support staff delivering offender management within prisons and complement local training in order to make sure staff are skilled and supported to deliver these roles. The service specification manage the sentence – custodial and post release periods is currently being revised with a target date of April 2017 for issue. This will include the standards for work with prisoners during the custodial element of the sentence.</p>	Head of Offender Management	30 November 2016
5.42	An effective strategic framework should be in place for the prison to escalate	Accepted	The Head of Offender Management will develop appropriate links with the National Probation Service (NPS) to make sure offender assessment systems (OASys) are completed in	Head of Offender Management	30 November 2016

	issues within the National Probation Service to ensure that the Service meets its responsibilities to complete relevant OASys and to confirm MAPPA levels at least six months before release. (4.14)		<p>accordance with timescales. A six month prior to discharge board is now scheduled for all prisoners. This board will trigger escalation where Multi-Agency Public Protection Arrangements (MAPPA) levels are not confirmed.</p> <p>NOMS continues to review the OASys backlog and the prioritisation criteria remains in force, which is to make sure the highest priority cases are completed in full, with a reduced assessment for those lower risk cases. Public Sector Prisons are currently pursuing further proposals to target specific prisons with the highest backlog numbers. NOMS are now working closely with NPS, setting up a process for them to have access to their backlog numbers in order that these can be specifically targeted in order to reduce any outstanding assessments swiftly.</p> <p>A Senior Leaders Bulletin was issued in July 2016 to prisons and to the NPS establishing an escalation process for prison staff to follow if they have not received confirmation of the MAPPA level .Governors should make that this process is followed through.</p>		
5.43	Reports to MAPPA meetings should contain appropriate analysis and be fit for purpose. (4.15)	Accepted	Training will be given to staff attending MAPPA meetings to make sure that appropriate analysis of behaviour is always reported.	Head of Offender Management	30 November 2016
5.44	All relevant cases should be discussed at the IRMT meeting, including prisoners due for release into the community. (4.16)	Accepted	<p>Risk management meetings will prioritise discussions for high risk individuals and those due for release.</p> <p>Discussions about high risk prisoners and those due for release will be prioritised at interdepartmental risk management team (IMRT) meetings.</p>	Head of Offender Management	30 November 2016
	Reintegration planning				
5.45	There should be a robust and effective system in place to identify and address outstanding resettlement needs before prisoners return to the community, to ensure that their release is coordinated and as safe as possible. (4.25)	Accepted	<p>In a non-resettlement prison like HMP Stafford the NPS are required to consider purchasing rehabilitation or 'Through the Gate' resettlement services from the 'rate card' provided by the host Community Rehabilitation Centre (CRC). Since May 2016, the NPS have introduced a new operating model which enables the NPS staff working in prisons, instead of the community, to decide on the purchase of these services. This will streamline the process for the NPS to purchase services from CRCs in non-resettlement prisons.</p> <p>NOMS is evaluating delivery of the Through the Gate services for offenders across the country, including sex offenders, to make sure they are being appropriately supported on their return</p>	Head of Offender Management	30 November 2016

			to the community. An effective system will be put in place by the Head of Offender Management (working with NPS and CRCs), to identify and address any outstanding resettlement needs to make sure release plans are managed well.		
5.46	All prisoners who are to be released directly from the prison should have full access to specialist accommodation and debt advice services. (4.35)	Accepted	The CRC now runs a surgery in HMP Stafford to address the housing needs of lower risk sex offenders. For the majority of high risk sex offenders, the NPS will recommend a stay in an approved premises on release to manage risk and public safety. The Head of Offender Management will make sure all prisoners released directly from the prison will have access to accommodation and debt advice services.	Head of Offender Management	30 November 2016
5.47	The visits hall should have more comfortable seating, an accessible toilet and an adequately resourced and supervised play area. (4.40)	Accepted	New chairs have been ordered to replace the damaged ones. Disabled access toilets for the visitors centre are being scoped with a view to bid for funding the alterations The play area is supervised until 15.30pm and signposts will be displayed advising users New play items have been purchased for the Creche area and have been assembled.	Service Delivery Manager & Head of Security	31 January 2017
5.48	A range of family support interventions should be provided to promote the maintenance of family ties, including for prisoners with older children. (4.41)	Accepted	HMP Stafford will consider and introduce a range of family support interventions, such as parenting courses and 'Storybook Dads'. Family visits and lifer days are now in place at the establishment. The offender family and significant others services, is in the process of being reprocured. It is envisaged that among the range of services selected for delivery by establishments will be parenting courses. The Governor will be able to decide which services best suit the needs of the population and purchase those within the allocated budget. Elements of family learning can be included as part of the Offender Learning and Skills Services (OLASS) provision.	Head of Security	31 December 2016

Recommendations		Housekeeping Points	
Accepted	45	Accepted	0

Accepted Subject to Resources /Partially Accepted	1	Accepted Subject to Resources /Partially Accepted	0
Rejected	2	Rejected	0
Total	48	Total	0