

ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMP LEYHILL

TIMETABLE	DATE	STATUS OF THIS RETURN
Full Unannounced inspection	5 – 16 September 2016	
Report published	25 January 2017	
Action Plan Submitted	28 April 2017	Attached

ACTION PLAN - HMCIP REPORT

ESTABLISHMENT: HMP LEYHILL

1. Rec. no	2 Recommendation	3. Accepted/ Rejected/ Partially Accepted / Accepted Subject to Resources	4. Response Action Taken/Planned	5. Function Responsible/ Policy Lead	6. Target Date
	Main recommendation To HMPPS				
5.1	Prisoners should not have their release delayed by the lack of approved premises. (S51)	Accepted Subject to Resources	<p>If an approved premise (AP) has been identified as the most suitable option for managing a dangerous offender on release, it would not be appropriate to release him or her into less suitable accommodation if a place in an AP was unavailable at the time of their release.</p> <p>HMPPS has noted HMCIP's comments about a shortage of places in APs and that this is raised as particular to HMP Leyhill. This will require further exploration with HMP Leyhill. HMPPS will be analysing whether the AP estate has enough capacity and, if not, will then need to make a business case for resources to increase capacity. Completion of the analysis is due in October 2017.</p>	HM Prison and Probation Service (HMPPS)	31 October 2017 and ongoing

	Main recommendations To the governor				
5.2	All prisoners in peer worker and mentoring roles should be trained and have regular supervision from staff to help to clarify and reinforce the limits of their demanding roles. (S49)	Accepted	<p>HMP Leyhill will seek to identify a funded peer mentoring qualification and deliver this to peer mentors once appointed.</p> <p>All peer support job specification and compacts (an agreement that is signed at the start of a role) will be reviewed and peer workers will be regularly supervised. The safer custody manager (SCM) will coordinate the supervision and prioritise the training of disability liaison orderlies.</p> <p>The SCM will draft and publish a local policy that helps to clarify and reinforce the limits of the demanding role.</p>	<p>Head of Reducing Reoffending</p> <p>Head of Residential Services</p>	<p>31 August 2017</p> <p>31 May 2017</p>
5.3	The number of high-quality work-related release on temporary licence (ROTL) placements should be increased and prisoners' should have timely access to ROTL, to enable them to progress. (S50)	Accepted	<p>HMP Leyhill will develop an external employer engagement strategy linked to appropriate work streams particular to the population.</p> <p>HMP Leyhill will review, revise and streamline release on temporary licence (ROTL) administrative processes and will identify the relevant population breakdown that best fits the provision. This will be monitored and outcomes measured against performance targets.</p>	<p>Head of Reducing Reoffending</p> <p>Joint Head of Offender Management</p>	<p>31 August 2017</p> <p>31 May 2017</p>
	Early days in custody				
5.4	Prisoner orderlies should not be involved in processing the property of new arrivals. (1.9)	Accepted	The processing of new arrivals' property at HMP Leyhill is now conducted by appropriately trained prison staff, who are familiar with the policy requirements. Once the property processing is completed by staff, orderlies are available to provide assistance in transporting property to prisoners' residential unit if requested.	Head of Security & Operations	Completed
5.5	All new arrivals should have a private interview with an officer on their first night to explore feelings of self-harm or suicide. (1.10)	Accepted	<p>In accordance with Prison Service Instruction (PSI) 07/2015 Early Days; prisoners must be interviewed, in private if possible, to discover and record any immediate needs and risks along with any other information about the prisoner that may be relevant, particularly on their first night in custody.</p> <p>Residential staff at HMP Leyill now offer all new receptions a private interview to discuss any self-harm or emerging issues upon arrival.</p>	Head of Residential Services	Completed

			Staff now record on the induction record and Prison- NOMIS if an interview took place or was declined, specifically in relation to those at risk of self-harm.		
5.6	New arrivals should be offered food and drink in reception. (1.11)	Accepted	Reception staff now offer all new receptions a hot drink upon arrival. Prisoners who are transported during meal times (and likely to have missed a meal) are offered food as well as a drink (taking into account religious, cultural and medical needs in line with national policy).	Head of Security & Operations	Completed
	Bullying and violence reduction				
5.7	Regular monitoring of the offence demographics of the population and their access to work placements and location within the prison should be undertaken. The results should be widely publicised to help to address the negative perceptions held by some prisoners. (1.18)	Accepted	The prison will address this by monitoring and obtaining feedback from the population through focus groups, feedback from the prisoner consultative committee, and through the annual needs analysis. This will be reviewed at the safer custody meeting and monitored via employment / activity allocation.	Head of Residential Services Head of Reducing Reoffending	31 August 2017
	Self-harm and suicide				
5.8	Operational staff should carry anti-ligature knives at all times. (1.23)	Accepted	Open establishments are required to have emergency response kits and have a local protocol on cut-down tools appropriate to their risk level. HMP Leyhill will review current practice, ensuring staff are aware of the location of cut down tools via a notice to staff (NTS) and, will seek to procure cut down tools for all staff and issue them (in accordance with locally developed policy) to all operational staff.	Head of Residential Services	31 August 2017
	Substance misuse				
5.9	Sufficient staff should be available to deliver substance misuse groups regularly. (1.49)	Accepted	Staff are now in place to facilitate this, with one vacancy to be filled. A variety of groups are now being held on a regular basis, with peer mentors also in post providing mutual aid groups.	Head of Healthcare Wellbeing Team Lead	Completed and ongoing

	Residential units				
5.10	Washrooms should be refurbished where necessary, and showers should be regularly deep cleaned to remove mould. (2.5)	Accepted Subject to Resources	<p>Funding is being sought to refurbish the washrooms but, in the meantime, HMP Leyhill have put the following short term remedies in place:</p> <p>A daily residential cleaning programme to address the issues identified.</p> <p>The facilities management contractor has drafted an action plan to price out of scope work in all recesses which the establishment will implement subject to resources.</p> <p>A steam cleaner will be purchased. Prisoners will be trained on how to use efficiently and effectively.</p>	Head of Residential Services	30 June 2017
	Staff-prisoner relationships				
5.11	Arrangements should be made to ensure that there is regular external community involvement and scrutiny of the work of the diversity and race equality action team, including discrimination incident report forms. (2.14, repeated recommendation 2.29)	Accepted	<p>Regular external involvement is currently provided by the Independent Monitoring Board who are tasked to review discrimination incident report forms.</p> <p>HMP Leyhill will continue to seek the further assistance of an external agency to scrutinise the work of the diversity and race equality action team, although this has previously proved very difficult due to the rural location of the establishment.</p>	Head of Residential Services	31 August 2017
	Equality and diversity				
5.12	The poor perceptions of safety by prisoners with a disability should be explored and action taken to improve them. (2.22)	Accepted	<p>Poor perceptions of safety by prisoners with a disability will be addressed by conducting the following actions:</p> <p>Holding regular focus groups and acting upon the outcomes of these.</p> <p>Personal Emergency Evacuation Plans (PEEP's) will be used to monitor and assist prisoners with disabilities.</p> <p>Ensuring regular supervision of disability liaison orderlies.</p> <p>Ensuring the establishment addresses any issues through the first night interview process.</p>	Head of Residential Services	31 August 2017

			A safer custody survey and acting on the results. Providing quality feedback to the offender group to keep them informed of progress.		
5.13	Unit-based care plans should be available for all prisoners with complex needs. (2.23)	Accepted	Health recovery passport and holistic care plans are now available and will be implemented for patients with complex needs. The plans will be made available on the unit, for those who consent to sharing of information between all those involved in their care.	Head of Healthcare	1 June 2017
5.14	Prisoners with limited mobility and complex health needs should be able to contact staff in an emergency. (2.24)	Accepted Subject to Resources	The Head of Residential Services has placed an order with a local contractor to install a call bell system in six rooms on Bravo South Lower landing (accommodating disabled/elderly prisoners). The four double sized rooms and two others will be fitted with a call system connected to the unit office. It is not possible financially to equip the whole landing. However, prisoners who are known to staff and who may require this facility will be allocated to one of the rooms.	Head of Residential Services	1 July 2017
	Complaints				
5.15	Confidential complaints should be stored centrally and responses should be quality assured. (2.31)	Accepted	The Governor's secretary now collates and retains complaints made under the confidential access system. Responses are quality assured by either the Governor or Deputy Governor.	Deputy Governor	Completed
	Health services				
5.16	Prisoners should receive all primary care services within community-equivalent waiting times and be prioritised based on clinical need. (2.50)	Accepted	All service waiting times are to be established and reviewed on a monthly basis to prioritise based on clinical needs and to enable comparison with community waiting times. Where the indication is that waiting times are lower or higher than the equivalent services in the community, the healthcare manager will liaise closely with the contracts manager to scope the addition or redirection of service provision across the prison contract to meet the population demand within budget.	Head of Healthcare	Completed and ongoing
5.17	Prisoners with complex health and social care needs should have recorded, regularly reviewed care plans. (2.51)	Accepted	Electronic care plan templates will be created, reviewed and updated at least monthly to capture the needs of patients with complex health and social care issues, and to take account of needs and interventions identified at monthly multidisciplinary complex case meetings.	Head of Healthcare	31 August 2017
5.18	Stock medicines should be date-checked and their use should be recorded and	Accepted	HMP Leyhill will review the stock medicine management logs and will implement a date checking method. A member of the pharmacy team will undertake a routine date checking and stock	Head of Healthcare	31 May 2017

	audited. (2.62)		use audit and escalate matters should concerns arise.		
5.19	Prisoners should be able to access basic medications easily and safely, to allow them to self-care as they would in the community. (2.63)	Accepted	<p>Paracetamol is now available to purchase from the canteen and offenders are advised to purchase and keep a supply (particularly for outside of healthcare hours) to encourage self-care of minor ailments as they would in the community.</p> <p>A minor ailments service is in place, providing access to advice and treatment for the management of a range of minor, self-limiting conditions.</p> <p>A project initiation document has been agreed for the health bar project which will run alongside canteen to provide a range of over the counter medications / remedies to further support patient access to self-treatment and promotion of self-care.</p>	<p>Head of Healthcare</p> <p>Bristol Community Health Lead Pharmacist for Prisons</p>	31 August 2017
5.20	Prisoners requiring routine dental assessments should be seen within six weeks. (2.66)	Accepted	<p>Time for Teeth have taken action to reduce the waiting list through introducing additional dental sessions. Alongside this they will continue to closely monitor the waiting list to ensure patients are seen within the time frame of six weeks or less.</p> <p>Any forthcoming challenges faced will be identified and escalated as a risk.</p> <p>Time for Teeth will liaise with the healthcare and contract manager to explore the scope of additional service provision to meet the population demand when necessary.</p>	Head of Healthcare	31 May 2017
5.21	Prison staff should have regular mental health awareness training. (2.72)	Accepted	A staff questionnaire is currently being developed to identify staff training needs. Upon analysis of the survey results, a tailored training package will be drawn up to meet these needs. Several training sessions will be offered to as many staff as possible on an annual basis; reviewing the training each year to ensure the guidance is still in use and up to date.	Head of Healthcare	31 August 2017
5.22	Prisoners should have access to attention-deficit	Accepted	A protocol and referral for these community services has been drafted and agreed action plans will be signed off at an	Head of Healthcare	31 August 2017

	hyperactivity disorder and autism spectrum disorder services. (2.73)		integrated governance meeting due to take place in April.		
	Catering				
5.23	The reasons for the apparent dissatisfaction of black and minority ethnic prisoners with the food should be explored. (2.79, repeated recommendation 2.112)	Accepted	Focus groups will be held to explore reasons for dissatisfaction and findings acted upon by considering improvements to meals / introducing meal varieties. This will be monitored through reviewing the food comment books and via focus groups.	Head of Residential Services	31 May 2017
5.24	Self-catering facilities should be improved, so that prisoners can develop some essential independent living skills needed for their release from prison. (2.80)	Accepted Subject to Resources	An independent living skills course, domestic cookery classes and resettlement and care for older ex-offenders and prisoners are provided at HMP Leyhill. These offer provision for older members of the prison population to develop independent living skills. Opportunities to develop independent living skills are also offered on ROTL. Substantial funding is required to address the power supply issues on A and B units which currently limits self-catering facilities. The establishment will submit a future bid for funding when an opportunity becomes available and the Governor will monitor this at the bilateral meetings with the Director for the South West region.	Head of Residential Services	Ongoing
	Learning and skills and work activities				
5.25	The prison's observations of teaching, training and learning in workshops should be appropriately evaluative and developmental for prison workshop staff. (3.7)	Accepted	Observation training will be carried out and an assessment schedule will be developed in line with internal verification and external verification requirements. HMP Leyhill will develop evaluative reports linked to the common inspection framework and timely feedback will be provided to workshop supervisors to agree recommendations and share best practice.	Head of Reducing Reoffending	31 August 2017
5.26	The prison should develop and implement discrete self-employment and business-related courses and further expand the	Accepted	HMP Leyhill will identify and provide a funded discrete self-employment/business related course through the offenders' learning and skills service provision. The establishment will conduct and review a prisoner needs	Head of Reducing Reoffending	31 August 2017 and ongoing

	vocational training provision. (3.14)		<p>analysis in conjunction with offender supervisors to identify appropriate vocational courses. HMP Leyhill will provide such courses, subject to resources.</p> <p>Following the Prison Safety and Reform White Paper published in November 2016 unnecessary rules and governance from education contracts have been stripped out to allow governors more oversight and control of existing services. Governors will be fully responsible for the education delivered in their prisons so that they can purchase the services they think are most appropriate to their prison. This means governors will be able to decide how to structure their education, who provides their learning delivery and how they will spend their budgets effectively.</p>	HMPPS	
5.27	Prisoners' progress and achievement of skills in the workplace should be better recorded. (3.21)	Accepted	The establishment will explore using individual learning plans in the workplace; and ensuring the outcomes of these are fully recorded and monitored.	Head of Reducing Reoffending	31 August 2017
5.28	All prisoners should wear the required protective equipment during work sessions. (3.25)	Accepted	HMP Leyhill will emphasise the use of protective equipment at the health and safety (H&S) induction session and ensure that H&S inductions are carried out on every work placement. The requirement to wear protective equipment will be specifically outlined in prisoner job compacts, enforced by workplace supervisors, and further enforced through management H&S walkthroughs conducted quarterly.	Head of Reducing Reoffending	31 May 2017
5.29	Attainment in level 1 mathematics should be improved. (3.28)	Accepted	HMP Leyhill will further develop a functional skills strategy to incorporate the attainment of a level 1 in mathematics and the establishment will regularly monitor this. This performance data will be reported at monthly governance meetings. The education provider and prison quality assurance processes are robust and ensure quality improvement in concerning areas.	Head of Reducing Reoffending	31 August 2017
	Strategic management of resettlement				
5.30	The resettlement needs analysis should be more comprehensive and the reducing reoffending strategy should place offender management at the forefront of the work.	Accepted	A comprehensive analysis of the needs of the population will be compiled from all relevant data sources. The reducing reoffending strategy will be reviewed to ensure offender management is at the forefront of the work.	Head of Reducing Reoffending Joint Heads of OMU	31 August 2017

	(4.5)				
	Offender management and planning				
5.31	Offender supervisors should have regular and meaningful contact with all prisoners on their caseload, in order to reinforce skills learnt, motivate them and keep them engaged in progression. (4.13)	Accepted	Offender supervisors will be reminded of the importance of having regular meaningful contact with prisoners to reinforce skills learnt, motivate them and keep them engaged in progression. HMP Leyhill will ensure staff formally record this on Prison- NOMIS and on local records as supporting evidence.	Joint Heads of OMU	31 May 2017
5.32	Reviewed multi-agency public protection arrangements (MAPPAs) management levels should be confirmed before starting ROTL, particularly for overnight releases. (4.19)	Accepted	Staff will confirm what multi-agency public protection arrangements (MAPPAs) level the prisoner is currently on when taking a ROTL decision - this action appears on the ROTL Board paper work and will now be mentioned in the summary. There is no ROTL policy requirement to undertake a separate review of a prisoner specifically to determine MAPPAs level. All decisions on ROTL involve the prison, probation and police and if it is felt necessary to refer for active MAPPAs management (i.e. level 2 or 3) earlier than a referral is required then under the national MAPPAs guidance they could take this course of action.	Head of Public Protection	31 May 2017
	Reintegration planning				
5.33	Links and information exchange between the community rehabilitation company and the offender management unit should be improved, to provide better awareness of risk issues and progress made. (4.30)	Accepted	Case administrators will include Catch 22 [contracted by the Bristol, Gloucestershire, Somerset and Wiltshire community rehabilitation company (CRC)] on all email notifications regarding parole and home detention curfew outcomes. Catch 22 will, in turn, confirm that prisoners have been notified of outcomes before engaging and working through release plans. CRC staff will update Prison- NOMIS to record actions taken or the outcome of their interventions and offender supervisors will ensure that updates are routinely added onto Prison- NOMIS. All risk related information is available in the prisoner record, which all staff within the establishment have access to. A monthly meeting will be set up to ensure the issues raised by the inspectorate are being addressed.	Joint Heads of OMU	31 August 2017

5.34	The number of places on the independent living skills programme should be increased to meet demand. (4.31)	Accepted Subject to Resources	HMP Leyhill will develop referral strategies with the offender management unit (OMU) and is liaising with the Offender Learning and Skills Service (OLASS) provider to increase the number of courses needed to meet this demand.	Head of Reducing Reoffending	31 August 2017
5.35	The number of prisoners released into suitable and sustainable accommodation should be reliably collated and used to evaluate the effectiveness of the provision. (4.34)	Accepted	<p>Performance measures will be introduced for both governors and probation providers as part of the Prison Safety and Reform programme. These will be shared performance measures between both the prison Governor and the probation services, which it is hoped will lead towards greater collaborative working. This will include measuring the rate of prisoners in suitable accommodation on release, compared to before they entered custody, so that the information can be used to increase the number of offenders that have somewhere to live on release and monitor progress. A comprehensive review of the probation system is currently underway, looking at how to ensure that probation providers are doing all that they can to improve outcomes, including accommodation for offenders; more detailed plans will be published after the review is completed (anticipated to be completed in April).</p> <p>The probation service and CRCs have been required, since January 2017, to collect data on the accommodation status of all managed individuals upon commencement of sentence, release from custody (where applicable) and completion of sentence. Subject to Parliamentary approval, both Prisons and Probation (public and private) will be subject to a new duty through the Homelessness Reduction Bill to refer anyone at risk of being homeless to the local authority.</p>	HMPPS	31 August 2017 and ongoing
5.36	The number of prisoners released into employment, education or training should be reliably collated and used to evaluate the effectiveness of the provision. (4.39)	Accepted	<p>The OMU will have a process in place to capture and collate this data which will then be used to evaluate the effectiveness of the provision.</p> <p>The Prison Safety and Reform White Paper set out a range of new performance measures for every prison (including HMP Leyhill) describing what each governor is expected to achieve. A performance table will be published from October 2017 to show how each individual prison is performing against key safety and reform standards.</p> <p>Performance measures will, over time, include the rate of</p>	<p>Joint Heads of OMU</p> <p>HMPPS</p>	31 August 2017 and ongoing

			prisoners in employment on release compared to before they entered custody, showing how many offenders enter full-time or part-time work on leaving prison; and the rate of prisoners in full or part-time education after release compared to reception into custody, showing how prisons have improved prisoners' access to education.		
5.37	Links with employers, training providers and voluntary sector organisations should be improved, to extend employment and training opportunities for prisoners on release. (4.40)	Accepted	The establishment will develop a strategic employer engagement policy to help improve links with employers and training providers.	Head of Reducing Reoffending	31 August 2017
5.38	Prisoners without children should be able to access family days, to promote their contact with other family members. (4.56)	Accepted	<p>HMP Leyhill will commence a scoping exercise (including a prisoner survey) to establish the demand for this, which will mirror the current child family days provision.</p> <p>The establishment will obtain prisoner feedback of the preferred structure of the adult family day events and will ask the prisoner consultative committee and the advice centre orderlies to assist with promotion of these and handling of the surveys.</p> <p>Subject to a more-than-minimal demand and, if necessary, prioritising those families living most distant from HMP Leyhill, an adult family day will be organised to take place in April / May 2017. Further such days will be considered, following review of the pilot.</p>	Head of Security & Operations	31 May 2017

5.39	A needs analysis should evidence the type and range of interventions required which are aimed at reducing the risk of reoffending. (4.60)	Accepted	<p>A comprehensive analysis of the population needs will be compiled and will include all relevant data sources.</p> <p>HMP Leyhill will collate data on identified needs from Offender Assessment System (OASYS), CRC, National Careers Service and the OLASS provider. This will be input alongside the current format offender needs analysis, covering the nine pathways for reducing re-offending. The data will be analysed independently by an external commercial company. The analysis will be discussed at reducing re-offending meetings and will inform agreed provision and services required to support identified needs, across all pathways.</p> <p>This will evidence the type and range of interventions required to reduce the risk of reoffending.</p>	Head of Reducing Reoffending	31 August 2017
------	---	----------	--	------------------------------	----------------

Recommendations	
Accepted	34
Accepted Subject to Resources / Partially Accepted	5
Rejected	0
Total	39