

ACTION PLAN - HMCIP REPORT

ESTABLISHMENT: HMP PENTONVILLE

POSITION AS AT: 8 SEPTEMBER 2017

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 recommendations To the governor				
5.1	The prison should take action to reduce violence, make the prison safer and support victims of violence and antisocial behaviour. There should be a range of interventions to address lower level antisocial behaviour and prevent it escalating into more serious disorder. (S40)	Accepted	<p>HMP Pentonville acknowledges the need to reduce the levels and intensity of violence within Pentonville. Reducing the levels of violence is now clearly set as a priority for the prison within the Service Delivery Agreement.</p> <p>The prison will engage in active dialogue with the Metropolitan Police to improve information flows, to be more informed about developments in local gang violence. This is a prime driver of violence in the prison.</p> <p>Additional national resourcing will be used to improve the investigation of violent incidents to better understand the drivers of this behaviour.</p> <p>Catch 22 have been commissioned to deliver a gang identification and intervention service. This project has already significantly improved the knowledge of dynamic gang tensions within the community, which are causing instability within Pentonville. This service will be made central to the work of a new enhanced Residential Intelligence meeting, which will be tasked with disrupting the potential for violence and minimising conflict. The actions from each meeting are sent out to relevant managers and the progress is monitored at the start of each weekly meeting.</p> <p>This service will also actively utilise formal mediation between prisoners in conflict. This will be in addition to the in-house peer led Mediator Service, which is now being used to reduce tensions between prisoners. Mediation will be used to actively reduce</p>	Head of Safer Prisons & Equality	January 2018

			<p>violence for the prisoners.</p> <p>Mediations will be collated and reported back through the Catch 22 monthly report. The overall progress will be assessed against reductions in violence as measured by the Violence Diagnostic Tool (VDT).</p> <p>The next development in this innovative approach is to establish a 'One Postcode' identity for prisoners arriving at Pentonville. New arrivals will be invited to leave external gang affiliations at Reception and sign up to an integrated regime whereby if they remain gang neutral they can access an enhanced level of privileges. Adherence to the 'One Postcode' will also be used to support pre-sentence assessment and post-conviction progression.</p>		
5.2	<p>All acts of self-harm should be recorded, and care for prisoners vulnerable to suicide and self-harm should be improved. Actions from Prisons and Probation Ombudsman reports should be fully implemented and subject to ongoing reinforcement. (S41)</p>	Accepted	<p>All known acts of self-harm are recorded on an Assessment, Care in Custody & Teamwork (ACCT) and are captured within the statistics, which are presented at the monthly Safer Custody meeting. It is recognised that the Incident Reporting System (IRS) reporting has not been similarly comprehensive and therefore a new Orderly Officer group is to be established which will ensure more accurate reporting of incidents on IRS.</p> <p>The improvements in ACCT case management will be led by a newly appointed Senior Officer (SO) within the Safer Custody team who will lead improvements in case reviews and Care maps as a priority. Residential managers will also institute a more systematic approach to quality checking of ACCTs. Thirdly a new pilot of Case Manager (CM) training has been delivered at HMP Pentonville and all SOs and CMs will be required to complete the training. Suicide and Self Harm (SASH) training will also be delivered to all staff by 2019.</p> <p>Prisons and Probation Ombudsman's (PPO) reports do receive the highest priority, it has been noted that some recommendations have lost their potency as the immediate demands of the challenging operating environment overtake longer term consideration. This is now being addressed by ensuring that the recommendations are reviewed at monthly Safer Custody Meetings, with specific historic PPO reports being considered in full on a rotating basis. Senior Management Team (SMT) meetings will also consider PPO reports, and recommendations will be formally allocated to functional heads for ongoing delivery</p>	Head of Safer Prisons & Equality	December 2017

			and compliance.		
5.3	Managers should regularly quality assure key documentation for disciplinary processes and routinely collect and analyse data about segregation, adjudications, use of force and the incentives and earned privileges (IEP) scheme. (S42)	Accepted	<p>The Adjudication Standardisation meeting has been made aware of the Inspectors concerns about some examples of poor inquiry by Adjudicators. The Governor will quality assure a sample of hearings on a quarterly basis.</p> <p>The importance of segregation should necessitate standardised data capture and analysis across the prison estate. In the absence of any centralised formal data sets compiled by HM Prison and Probation Service (HMPPS), local volunteers that have the skills to set up a local segregation data recording and analysis tool will be identified. Once in place this data will be submitted to the Segregation Monitoring and Review Group (SMARG) meeting for consideration.</p> <p>The Use of Force data will collated by the Safer Custody Team and be presented to the quarterly Segregation Monitoring and Review Group (SMARG). This group contains the IMB and other multi-disciplinary attendance.</p>	Head of Safer Prisons & Equality / Adjudicating Governors/ Head of Residence (for Incentives and Earned Privileges)	September 2017
5.4	The needs of the foreign national population should be better understood to ensure the support provided is appropriate and that the men are clear about who to approach for support. (S43)	Accepted	<p>The Immigration Service and Safer Custody teams will meet on a quarterly basis to discuss joint working and collective assessment of the needs of the foreign national population. Both teams will improve the sharing of information about prisoners at risk of suicide and self-harm. The Immigration Service will provide regular 'wing surgeries' to allow Foreign National Prisoners to directly access advice. The 'Big Word' interpretation service will be promoted throughout the prison to ensure that it is fully utilised.</p> <p>HMP Pentonville facilitates a regular range of workshops to provide advice, support and connectivity for foreign national prisoners. A number of third sector providers who specialise in assisting refugees and persons without status attend these workshops. Foreign language books are stocked in the library and there is a regular delivery of a wide range of foreign newspapers and magazines. This is all delivered by the dedicated Equalities Officer who offers bespoke support to foreign national prisoners.</p>	Head of Safer Prisons & Equality	October 2017
5.5	Prison managers should ensure that their leadership and management of learning and skills and work find innovative ways of developing provision and have a better focus on a wide range of detailed data to drive improvements, including the number	Accepted	This will be achieved through the development of the current bi-monthly Quality Improvement Group (QIG) meetings. The format of this meeting will be reviewed to ensure that the meeting is a platform to challenge the Education provider to deliver what has been agreed on the curriculum. The date of the QIG meeting has changed, the up to date education data can be analysed and challenged.	Head of Reducing Re-offending	December 2017

	of learners who start and complete each course. (S44)		The aim is to improve the communication links between the Activity Hub and Education to ensure that prisoners with the correct length of sentence are enrolled in the appropriate courses.		
	Recommendations To HMPPS				
5.6	The number of prisoners allocated to Pentonville should be reduced to enable less crowded conditions. (2.8)	Accepted	<p>As part of prison reforms the long-term goal is to reduce overcrowding, while maintaining sufficient capacity in the prison estate to manage the demands of the courts and the sentenced population as efficiently as possible.</p> <p>Prisons are not expected to operate above their operational capacity. This level is kept under constant review, taking into account fluctuations in the prison population and useable capacity across the estate. The prison ensures that this level of operational capacity is set to reflect the provision of safe and decent accommodation and the operation of suitable regimes and that levels of crowding in prisons are carefully managed.</p> <p>The occupancy of prison cells is determined by the Governor of each establishment and, where cells are proposed for sharing when they were originally designed for single occupancy, this is certified by the relevant Prison Group Director in accordance with Prison Service Instruction 17/2012, which provides clear guidelines for determining cell capacities. Cells will only be shared where a Prison Group Director has assessed them to be of adequate size and condition for doing so.</p>	Prison Estate Transformation Programme (PETP) / Governor	December 2018
5.7	Community offender supervisors should respond to home detention curfew requests promptly, to enable prisoners to be released at their earliest eligibility date. (4.16, repeated recommendation 4.11)	Accepted	<p>The Ministry of Justice (MoJ) and HMPPS are currently reviewing the provision of home circumstances reports to establish the reasons for any delay and take necessary remedial action.</p> <p>A guidance protocol to Community Rehabilitation Company (CRC) providers about their responsibilities in respect of the Home Detention Curfew (HDC) scheme is being developed.</p> <p>A system is in place at HMP Pentonville to monitor and log all Home Detention Curfew (HDC) reports requests sent to Offender Managers in the community mainly CRC providers. If there is no reply after ten days, a follow-up request is made and logged. If there is no response within seven days, this is brought to the attention of the Offender Management Hub Manager and a third request will be made to the Manager of the Offender Manager in the community with a supporting message from the Head of Function. This will also be logged again. These actions will ensure</p>	Sentencing Policy Unit / Heads of Offender Management / Senior Probation Officer	October 2017

			<p>that all requests are being monitored by both the HDC Clerk and Hub Manager. The prison is aware who to escalate issues to if prompt replies are not received from the Offender Manager. This system will be reviewed on a monthly basis by management and the logging system put in place, is effective. As the Head of Function would normally be involved during the third escalation process, when there is a delay and the process was progressed through raising it with the Manager.</p> <p>The CRC are also having various meetings in the community to look at the reason why there is a delay and work on improving this. There is a scheduled quarterly meeting to take place between the prison and CRC Lead to monitor respond timescales.</p> <p>All the action points from the quarterly meeting will be logged and CRC non-performance actions will be escalated to the CRC Service Delivery Manager who monitors contract delivery.</p>		
5.8	Multi-agency public protection arrangements (MAPPA) levels should be confirmed six months before release. (4.18)	Accepted	<p>The Multi-Agency Public Protection Arrangements (MAPPA) Guidance states that the prison should be informed of the level at which a MAPPA offender will be managed at least six months before the prisoners release. The prison is the recipient of this communication. An escalation process has now been agreed between prison, MAPPA Coordinators and National Probation Service (NPS) to address this situation</p> <p>A review of the MAPPA levels of Offenders to be released within six months will take place immediately.</p> <p>The Public Protection Clerk will on a monthly basis receives a Discharge printout from Prison NOMIS, of offenders being released within six months to ensure they have MAPPA levels. For any offender without a MAPPA level, the outside MAPPA co-ordinator in the probation department will be contacted immediately to provide the information.</p> <p>Any MAPPA levels that had not been confirmed within six months will be discussed at the monthly Inter Departmental Risk Management Team (IDRMT) meeting and escalation process will be put in place by the Senior Probation Officer (SPO) and Head of Function to obtain the MAPPA levels from the outside MAPPA Coordinator and the offender's Offender Manager.</p>	Safer Custody, Public Protection Group (SCPPG), Heads of Offender Management, Senior Probation Officer	October 2017
	Recommendations To the governor				
	Courts, escort and transfers				

5.9	The reasons for the reduction of the use of the video link should be explored and action taken to increase its use. (1.4)	Accepted	Analysis of data is conducted in performance reviews, data is shared with the courts at user meetings. The data shows an increase in video-link use since the last inspection.	Head of Operations	Completed & ongoing
	Early days in custody				
5.10	Reception and first night staff should coordinate their functions effectively to ensure that new arrivals who are potentially vulnerable are identified and risk information is used to manage the men safely. (1.11)	Accepted	<p>Reception Staff and First Night Staff are to be amalgamated into one group as part of the establishment re-profile. This will result in a much more coordinated approach to the management and care of men who are received into custody.</p> <p>Subject to the population pressures managed by Headquarters, a space on the Vulnerable Prisoner Unit will always be made available to Vulnerable Prisoners. There are contingencies in place and used if spaces are not available.</p>	Head of Operations / Head of Residence	September 2017
	Self-harm and suicide				
5.11	Prisoners should be able to see a Listener on request and in a confidential setting, and there should be more Samaritans telephones around the prison. (1.22)	Accepted	<p>The access to Listeners is not restricted, but at some periods (especially overnight) it can take some time for Listener to arrive to meet the appropriate person, and then access the Listeners Suite. A Listener will often attend the cell and commence to understand the nature of the issue before the Orderly Officer can arrive with the cell key. This can result in the 'listen' being concluded satisfactorily before the cell door is opened. The Prison fully accept that the 'listen' should take place in a confidential and discreet setting, however the Listeners themselves are resolving issues before this can be effected. This will continue to be monitored, as part of the monthly Safer Custody meeting.</p> <p>The provision of Samaritans phones has been increased, and whilst there are a small number of cells where the signal is poor, provision is available to allow prisoners to be moved to alternative locations to use the phones.</p> <p>HMP Pentonville does already provide a range of discreet Listener Suites across the Prison. 'Listens' should always take place in a discreet confidential space. There is however a logistical problem with providing such a facility to F5 landing (the Vulnerable Prisoners Unit). This self-contained landing does not have any available space for a suite. When the rest of F wing is locked-up prisoners on F5 requiring a listen can use the mainstream F wing suite. At other times alternative solutions are required, which fall below the policy expectation. As mentioned in the above response, in many cases, primarily at night, it can take staff time to attend the wing to unlock both parties for a listen. In some of</p>	Head of Safer Prisons & Equality	Completed

			these cases the Listener may get to the cell first and effectively 'triage' the request, and in so doing, resolve the need.		
	Safeguarding				
5.12	The governor should initiate contact with the local director of adult social services (DASS) and the local safeguarding adults board (LSAB) to develop local safeguarding processes, and the prison should ensure that staff understand how to identify and refer prisoners with safeguarding needs. (1.24)	Accepted	<p>HMP Pentonville's safeguarding policy will be reviewed by the Senior Probation Officer (SPO) and Head of Function to ensure that it complies with Prison Service procedures.</p> <p>As part of the review, there will be links established with stakeholders in the community including Adult Social Services and Safeguarding Adults board within London Borough of Islington and other boroughs around the prison.</p> <p>This will ensure that the establishment policy on safeguarding adults has developed processes that will enable staff understand how to identify prisoners with safeguarding needs in custody and in preparation for release to ensure adequate provision is available in the community. The Head of Operations attended the Local Safeguarding Adults Board (LSAB).</p>	Heads of Offender Management / Senior Probation Officer	November 2017
	Security				
5.13	Staff should submit intelligence reports whenever necessary. Intelligence should be processed on time and required action should be followed up. (1.32)	Accepted	<p>The Staff Information Notice (SIN) has been published reiterating the importance of reporting concerns. The review of process has been completed to ensure Intelligence Reports are processed on time. Additional support from both Operational and band four Intelligence Analysts.</p> <p>The Internal Reviews (IRs) that require further dissemination are shared appropriately and actions such as searches and relevant linking are completed appropriately.</p>	Head of Security & Intelligence	Completed
5.14	Prisoners should only be strip searched when there is sufficient intelligence that this is necessary. (1.33)	Rejected	<p>National Security Framework Function 3.1- PSI 8/2016 Searching of the Person, requires that male prisoners outside of the high security estate are routinely given a full search on initial reception to prison, on reception on return from release on temporary licence (ROTL) or an outside working party (closed prisons only), on return from a non-prison escort, on transferring to another prison and all other discharges apart from on final discharge and discharge for ROTL. All prisons must comply with the PSI's minimum requirements. Local risk assessments are undertaken in other circumstances.</p> <p>Full searching is an essential method used to find items of contraband secreted on the person and to prevent its importation into establishments. HMPPS has a duty of care to prevent and deter illicit items from entering establishments which could be</p>	Head of Security & Intelligence	

			used by a prisoner to harm themselves or others.		
5.15	Prisoners should only be placed on closed visits when there is specific evidence that they have abused visits, and closed visits should never be imposed as a punishment. (1.34)	Partially accepted	<p>The focus of the current closed visits policy is on the prevention of smuggled contraband, although this should not necessarily exclude other considerations for closed visits, such as where a prisoner has history of, or risk of being, violent during visits. The prison is under a duty of care to keep prisoners safe and that duty naturally extends to visitors and prisoners during visits, therefore various security measures such as restrictions on visits may be appropriate to ensure this duty is upheld.</p> <p>Closed visits 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. However, closed visits should not be applied as a punitive measure.</p> <p>Closed visits may also be imposed in the absence of specific visits related activity and as an administrative measure where necessary, for instance reasons of securing good order or discipline or for the prevention of crime or in the interests of any persons.</p> <p>In each case the suitability of the imposition of closed visits must be considered on the facts, and any closed visits decision must be necessary, proportionate and justified. Closed visits may be imposed in cases where these measures are met and in the interests of upholding public safety, for the prevention of disorder or crime, and to ensure the good order and discipline of the establishment</p>	Head of Operations	Ongoing
	Discipline				
5.16	Governors should investigate all adjudication charges fully and record their findings so that hearings are demonstrably fair. (1.39)	Accepted	This issue has been discussed at the Adjudication Standardisation meeting and all Governors have been reminded of the need to demonstrate full inquiry before reaching a finding. The issue will be revisited at the meeting on a regular basis. The Governor's quality assurance, as referenced in 5.3, will also assist in driving up the quality of inquiry.	Head of Safer Prisons & Equality / Adjudicating Governors	Completed and ongoing
5.17	Managers should ensure that oversight of use of force and special accommodation is sufficient to ensure they are used proportionately and only as a last resort. (1.44)	Accepted	The quarterly Use of Force (UoF) Committee will be scheduled throughout the year and will quality assure a selection of UoF paperwork. The Deputy Governor will add an additional layer of scrutiny by reviewing all instances of use of baton. The formation of a permanent Orderly Officer group will allow for consistent review of incidents to ensure that UoF paperwork is correctly	Deputy Governor / Head of Safer Prisons & Equality	November 2017

			<p>generated and that the justification for UoF is fully documented.</p> <p>The Use of Force Committee will take place in line with each quarterly segregation, monitoring and review group (SMARG). The attendance at the SMARG meeting also forms the nucleus of an appropriate group to scrutinise use of Force, including the Independent Monitoring Board (IMB).</p>		
5.18	All prisoners in the segregation unit should be offered a shower, exercise and a telephone call every day. (1.48)	Accepted	<p>The Segregation Unit regime explicitly provides for each prisoner with a shower, access to phones, and exercise each day.</p> <p>The operational pressures and the need to adequately manage risk will on occasion mean that this may be compromised. Every effort will be made to avoid any curtailment of the regime. The Head of Safer Prison and Segregation will monitor the regime delivery on the Unit.</p>	Head of Safer Prisons & Equality	Completed
5.19	Documentation for segregation authorisation and review should demonstrate clear reasons why segregation is necessary and the steps taken to reintegrate the prisoner into normal location. (1.49)	Accepted	<p>All Governors have been reminded to provide full reasoning whenever a prisoner is segregated. The Segregation Unit staff have recently attended an 'away-day' where they were reminded of their important role to advise and support Governors when completing paperwork to ensure that it reflects full reasoning and is communicated to the Independent Monitoring Board.</p> <p>The Segregation Reviews will continue to set constructive targets that seek to provide a route to reintegration at the earliest opportunity. The targets will seek to provide prisoners with the opportunity to demonstrate reduced risk. One of the biggest challenges to reintegration has been the complex gang rivalries which affect many prisoners at HMP Pentonville and prevent them from returning to specific wings and locations. The use of Catch 22 gang identification service will assist in providing informed advice about the suitability of onward locations.</p>	Head of Safer Prisons & Equality	Completed
	Substance misuse				
5.20	All prisoners with substance misuse problems should have easy access to the full range of psychosocial support and mutual aid groups, regardless of their location. (1.56)	Accepted	<p>The prisoners currently have good access to psychosocial support during their stabilisation period and then if they choose to opt into the "Drug Free" environment currently being located on a dedicated wing (J wing). The access to services on other wings can currently not be assured due to limited resource from Phoenix Futures as currently commissioned, logistics and availability of group rooms etc.</p> <p>Prisoners currently have good access to psychosocial support during their stabilisation period. Provision will be reviewed with our partners (Phoenix Futures and CareUK) with a view to remove any</p>	Head of Residence and Building Futures	October 2017

			location barriers. There is a review of group room location as part of the working party and action plan to relocate the services on J wing to G1. Clinical reviews take place in private and secure rooms on F Wing.		
	Residential units				
5.21	Cell bells should be answered within five minutes. (2.9, repeated recommendation 2.12)	Accepted	This requires a continued culture change, there have been issues with the monitoring IT system due to its age, which makes the data unreliable. Some is produced which is used to monitor performance. This will be monitored through performance measures. The Managers challenge staff when cell bells are seen to be left unanswered. All staff, both uniformed and non-uniformed have been instructed to respond to cell bells when they walk past them.	Heads of Residence	Ongoing
5.22	Telephones for prisoners should offer privacy and be switched on all day, and there should be a systematic response to reports of broken phones. (2.10)	Accepted subject to resources.	Currently not all phones have privacy booths fitted, sometimes due to the location for instance if there is a lack of space. The hoods are fitted where it is possible. Telephone engineers requested and booked through the Business Hub immediately upon receiving notification of faults through wing-based prisoner representatives. The BT Engineers are requested as soon as faults are identified and reported. The funding for in cell telephony have been requested	Heads of Residence / Head of Business Assurance	Completed & ongoing
	Equality and diversity				
5.23	The equality policy should be updated, monitoring information should be collected regularly and the action plan kept up to date and reviewed at a well-attended equality meeting. (2.17)	Accepted	The Equality Policy and Action Plan have both been updated. Prisoner Equality meetings have been interrupted due to operational pressures, however this will be re-scheduled. Once the Lammy Review of Black, Asian and Minority Ethnic (BAME) representation in the Criminal Justice is published, a seminar will be established within HMP Pentonville to consider the findings and these can be addressed.	Head of Safer Prisons & Equality	December 2017
5.24	There should be greater effort to understand the distinct needs of young adult prisoners and steps taken to meet them. (2.26)	Accepted	HMP Pentonville will include and develop courses which are appropriate for Young Adults and will also generate interest amongst this group of prisoners. This will be prepared through the curriculum reviews with the Education providers, and also through Offender focus groups to identify such courses. The Young Adult Forum will be re-launched, and Catch 22 will be asked to assist in formulating the attendance to avoid any potential for violence.	Head of Reducing Re-offending / Head of Safer Prisons & Equality	March 2018
	Complaints				
5.25	All complaints alleging staff	Accepted	All complaints alleging staff misconduct are screened by the	Head of Business	Completed and

	misconduct should be investigated thoroughly. (2.32)		Business Hub Manager and passed to the relevant manager for a response if deemed appropriate depending on the nature of the complaint or to the Governor for a response in all other instances.	Assurance	ongoing
	Legal rights				
5.26	Prisoners should have access to bail information and support with accessing accommodation for bail applications. (2.36)	Accepted	The provision of access to bail information and accessing accommodation will be expanded with the implication of the Offender Management Model.	Head of Reducing Re-offending	January 2018
	Health services				
5.27	There should be a prison-wide systematic approach to promoting prisoner well-being; this should include harm minimisation and publicising the availability of barrier protection. (2.47)	Accepted	<p>All prisoners are encouraged to engage in our well-being assessment which enables the prisoner to work alongside a healthcare professional to identify their healthcare needs and be sign-posted to the relevant specialist.</p> <p>The policy is being developed jointly with the prison and will be published to promote access to barrier protection. The well-being screening is taking place. The "Wellbeing Wheel" and policy is published and in use. The Socrates mobile phone application, where prisoners can download medical notes and prescriptions is now available for prisoners on release.</p> <p>The London Health in the Justice Team is working with providers in all London prisons to develop a more robust response to prisoners presenting with a range and number of vulnerabilities. The newly commissioned Health and Well-being (HWB) model will ensure the current providers work with greater integration to reduce the assessment process for patients. This consists of having one single point of access to HWB services and appropriately managed care-coordination model.</p> <p>Access to condoms is on request and located at the dispensing hatches.</p>	Head of Residence / Head of Healthcare / NHS England	April 2018
5.28	Prisoners should have shorter waiting times in the health centre waiting room before and after health appointments. (2.53)	Accepted Subject to Resources	<p>The healthcare staff escort prisoners back from the clinic area as and when the staffing numbers allow. However this is not a formal agreement and is done on an ad-hoc basis.</p> <p>Currently there are no plans to introduce a "mini" free flow system allowing a smaller number of prisoners to move through the AM and PM activity hours. This may be considered as and when staffing numbers increase and the prison stops operating with negative staffing numbers.</p>	Head of Residence / Head of Healthcare	January 2018

			This will be considered in the next re-profile exercise following Offender Management implementation.		
5.29	There should be sustained management action to reduce the high non-attendance rates for some clinics. (2.54)	Accepted	<p>Both Healthcare and Prison Management meet during a monthly Local Delivery Board to review the Did Not Attend (DNA) results and identify where there could be a pattern for the non-attendance and then work together to reduce the amount of non-attendance.</p> <p>Healthcare will utilise peer support to encourage prisoners to attend their appointment or to let Healthcare know that they no longer need their appointment, so that others may utilise the space and ensure clinical utilisation.</p> <p>Healthcare will publish the amount of DNAs each month in residential areas and they will encourage the participation from the population group.</p>	Head of Residence / Head of Healthcare	March 2018
5.30	The shower area on the inpatient unit should be refurbished. (2.55)	Accepted subject to resources	<p>Discussions are underway to develop plans to invest in the shower facilities at HMP Pentonville.</p> <p>The remedial work undertaken by the maintenance work stream is logged with the Contractor, Carillion following the HMIP / Care Quality Commission recommendation. The problems with the ventilation system, pressure boosting pumps applicable to the water supply have been rectified and the contractor is addressing issues with the wall coverings.</p>	Head of Residence	March 2018
5.31	The comfort and dignity of vulnerable inpatients should be assured by documented checks. (2.56)	Accepted subject to resources.	<p>There are clear admission and discharge criteria for those clients needed to be managed and supported within the in-patient unit.</p> <p>There is a daily handover with prison and Healthcare Staff and all patients have a clear care plan. Should a patient require access to their cells outside of the normal core day, this is discussed and documented within the clinical notes.</p> <p>Regular checks are carried out and documented within the clinical notes to ensure that patient welfare is assessed according to their healthcare needs.</p> <p>Should it be discovered that Healthcare Staff have not been able to gain access to the patient's cell as a result of prison regime, this is escalated to Senior Management level in both Healthcare and the prison to address those concerns.</p>	Head of Residence / Head of Healthcare	March 2018
5.32	Prisoners should have secure storage for medication. (2.61, repeated	Accepted subject to	This option has been repeatedly researched and currently there appears to be limited options of secure storage boxes which would	Head of Residence / Head of Healthcare	December 2018

	recommendation 2.94)	resources	<p>be appropriate to fit into cells this in addition to the excessive cost has deemed this not to be a priority of the establishment. Additional funding would need to be available to purchase, install and effectively and safely manage this directive.</p> <p>HMP Pentonville will though work with Healthcare providers to Pilot having storage boxes in specific cells (F4 and F5) for the first half of 2018.</p>		
5.33	Systematic checks should be conducted on patients receiving in-possession medication. (2.62, repeated recommendation 2.95)	Accepted subject to resources	<p>A Spot Check protocol / policy has been agreed by both the Healthcare providers and the prison management. Imminently to be introduced.</p> <p>The Healthcare staff will be made available however this will be dependent on the availability of operational staff to assist with in-cell spot checks.</p>	Head of Residence / Head of Healthcare	Ongoing
5.34	There should be action to introduce governance to the dental service. This should include assurances of safety and integrity, improved efficiency of waiting lists, reduced nonattendance rates and compliance with infection control standards. (2.66)	Accepted	<p>A robust action plan has been developed and bi-monthly meetings have commenced between the Regional Manager, NHS England Commissioner and dental providers to ensure clear governance between all parties is visible. A review of the area has been undertaken and improvements have been made.</p> <p>A new dental chair has been ordered and new flooring is to be fitted to ensure compliance with infection control.</p> <p>The Head of Healthcare will continue to undertake spot checks of these areas and feedback to the Regional Manager (RM) to ensure compliance is maintained.</p>	Head of Residence / Head of Healthcare	December 2017
5.35	Patients requiring care in external mental health services should be transferred as soon as possible. (2.73)	Accepted	<p>The Department of Health Good Practice Procedure Guide, the transfer and remission of adult prisoners under s47 and s48 of the Mental Health Act, 2012, suggests that patients can only be conveyed and admitted to hospital within the period of 14 days starting with the day on which the patient was last examined by a doctor.</p> <p>All patients requiring transfer under the Mental Health Act are assessed promptly, and every effort is made to expedite transfers. However, this is dependent on the availability of Mental Health hospital beds which is beyond the control of the prison's healthcare.</p> <p>The current Prison Transfer and Remission Guidance published</p>	Head of Residence / Head of Healthcare	Completed and ongoing

			<p>by the Department of Health in 2011 is being reviewed. In particular, a focus of the work is about ensuring that the most appropriate timescales are developed and implemented in relation to prison transfers and remission, taking into account clinical urgency and need.</p> <p>HMPPS is working with NHS England to ensure transfers to hospital from prison take place within appropriate timescales. Where there are delays evident, work is underway to establish the reasons for this and work collaboratively to address the issues.</p> <p>Healthcare and prison service actively work with outside services to get those prisoners with enduring mental health concerns transferred as soon as a bed becomes available. Should difficulties arise with accessibility then the Commissioners are notified to investigate alternative support.</p>		
	Catering				
5.36	Breakfast should be served on the morning it is eaten and lunch should not be served before noon and the evening meal not before 5pm. (2.78, repeated recommendation 2.115)	Accepted subject to resources	<p>The serving of breakfast packs the evening before is a well-established practice across the prison estate and the contents of the packs are suitable to be stored in the prisoners' cells overnight and resources ensure a cold lunch is served before 12:00pm. In line with a drive to get prisoners to take responsibility for their own actions educational material about when food should be consumed will be sent out.</p> <p>The evening meal will be designed to be served post 17:00pm in the new profile. Currently at HMP Pentonville it is impractical to begin serving the evening meal post 17:00 due to the Offender Management review the prison starts earlier due to the regime.</p>	Head of Residence	September 2017
	Purchases				
5.37	Prisoners should be able to access a full prison shop order within 72 hours of arrival. (2.81, repeated recommendation 2.121)	Partially accepted	<p>Provisions are in place for emergency canteen for those who arrive outside the regular ordering window. Due to the contract structure and impracticalities availability of a full prison shop is not possible. This is due to this national contract prohibiting individual establishments holding a full list of items. National contract renegotiation would be required. This is to be raised at a regional forum.</p> <p>In HMP Pentonville the national contract cannot be changed, however prisoners can purchase as hoc canteen packs containing limited items.</p>	Head of Residence / Head of Business Assurance	September 2017
	Learning and skills and work				

	activities				
5.38	The range and levels of qualifications should be expanded further to meet the needs of the Pentonville population. (3.15)	Accepted	This recommendation will be met through the curriculum reviews with the Education provider. The new curriculum has been agreed and signed off.	Head of Reducing Re-offending	March 2018
5.39	Prisoners should be offered planned and carefully structured individual learning pathways to improve their employment and rehabilitation prospects on release. (3.16)	Accepted	This will be achieved through on-going support and development for teachers and workshop Instructors by the advanced practitioner. All workshop instructors will be qualified assessors by October 2017 allowing the introduction of meaningful qualifications in all of the workshops.	Head of Reducing Re-offending	March 2018
5.40	Prisoner attendance at the induction to learning, skills and work should be improved and the sessions should be effective. (3.26)	Accepted	The initial Education and Work Assessment (EWA) for new prisoners is now computer based. This is more efficient and saves time. It also promotes the use of the virtual campus machines, giving prisoners access to a wide range of services and resources to prepare them for release.	Head of Reducing Re-offending	December 2017
5.41	Prison and Novus managers should ensure that the quality of teaching and learning improves to good overall, and that the different needs of learners are met. (3.27)	Accepted	There is an advanced practitioner in place that will continue to support teachers and increase the quality of their teaching and management of classes. Prison and NOVUS managers will conduct regular learning walks and lesson observations, report back to the Education Managers to identify any training needs to improve teaching standards. These will be monitored through the bi-monthly Quality Improvement Group (QIG) meetings.	Head of Reducing Re-offending	March 2018
5.42	Prisoners with learning disabilities or difficulties should be identified accurately and appropriate specialist support provided routinely. (3.28)	Accepted	There are discussions taking place between Education and Healthcare providers to scope a service for a joint provision. An assessment process will be established, and a protocol put in place to help manage Offenders who fall within this category. London Health in the Justice System team invested funding for a Learning Disability (LD) coordinator role in each prison. Following this investment the team commissioned an audit of this implementation and have received key recommendations on consistency of approach and quality of role function. A community practice network will be set up to support the LD Coordinator roles and ensure ongoing support.	Head of Reducing Re-offending / Heads of Healthcare	June 2018
5.43	Prisoners' targets and the feedback they receive on their work should enable them to improve the standard of their work. (3.29)	Accepted	Agreed targets will be set by offenders and their instructors or teachers in their relevant courses. There will be periodic recorded reviews to ensure that prisoner learners are on track to achieve the relevant qualification(s) to prepare them for work upon release.	Head of Reducing Re-offending	June 2018
5.44	Prisoners' English language and	Accepted	The curriculum review will identify and provide relevant English	Head of Reducing	March 2018

	writing skills should be developed through their vocational and education sessions. (3.35)		language course in the quantity required by the prison population. Outreach English sessions will be earmarked for work areas in most need for it, and there will be a timetable which will ensure that there is a consistency in the provision of their service.	Re-offending	
5.45	Prisoners in work should have job descriptions so that they can demonstrate to employers what skills they have learnt and applied. (3.36)	Accepted	This will be achievable through the skills tracking initiative which has been pioneered in both the Textiles and Recycling workshops. This will be supported by the Industries (band four) staff who will be trained as assessors and will be qualified to supervise and assist prisoners gain relevant qualifications in the respective workshops.	Head of Reducing Re-offending	June 201
5.46	Prisoner attendance at learning, skills and work sessions should be improved so that a much higher proportion attend their allocated sessions. (3.37)	Accepted	In conjunction with the Residential wings, prisoners will be challenged if they refuse to attend their allocated activity area of work. Prisoners will be encouraged to apply for work and to attend. Persistent refusal to engage in any form of purposeful activity will be managed through the Incentives and Earned Privileges (IEP) process.	Head of Reducing Re-offending	March 2018
5.47	Prison and Novus managers should implement as a priority strategies that increase substantially the number of prisoners who start and complete a course. (3.41)	Accepted	An action plan will be written and implemented to ensure that prisoners are allocated into the correct courses with their length of sentence in mind. The communication lines between the Activity Hub and Education will be streamlined to ensure that allocation of prisoners is more effective to produce more completion in courses.	Head of Reducing Re-offending	March 2018
5.48	Prisoners should be provided with appropriate information about the library, and have better access to it. (3.45)	Accepted	The librarian and the team will promote the availability of the library resource to prisoners through various forms of communication. For instance, prisoner TV information channel, posters on the wing and leaflet drops to cells. The access will be subject to additional operational staffing resources specifically to escort Offenders from the wings to the library and back.	Head of Reducing Re-offending	March 2018
	Physical education and healthy living				
5.49	The sports hall and wing gyms should be redecorated, and the showers in the wing gyms should be improved. (3.48)	Accepted subject to resources	This can be achieved subject to the availability of financial resources. Locally HMP Pentonville is awaiting a quote for the request submitted to Carillion to redecorate the Gym's and improve the showers.	Head of Reducing Re-offending	June 2018
	Strategic management of resettlement				
5.50	Offender supervisor resources should be sufficient to ensure all key work is completed. (4.4)	Accepted	The Benchmark staffing for Offender Supervisors in Offender Management Hub is not fully compliant due to recruitment issues. Locally at HMP Pentonville the recruitment of Prison Officers is currently ongoing, two staff members have been allocated to the	Heads of Offender Management / Senior Probation Officer	December 2017

			<p>Recruitment centres to support the recruitment process of Prison Officers. This will enable the establishment to fill up the Prison Officers vacancies in the prison. Once majority of the Prison Officers vacancies are filled, it will enable the vacancies in the Offender Management Hub to be filled with Offender Supervisors.</p> <p>The recruitment process will also enhance staffing levels around the whole prison which will ensure that adequate staffing levels are maintained throughout the prison to deliver regime activities. This will reduce re-deployment of Offender Supervisors that will enable sufficient resources within Offender Management Hub to deliver key Offender Management Work.</p>		
	Offender management and planning				
5.51	All eligible prisoners should have an up-to-date OASys assessment and sentence plan with relevant objectives. (4.14)	Accepted subject to Resources	<p>HMP Pentonville has implemented the Offender Management Model and Case Administration Model to deliver Offender Management to all sentenced offenders.</p> <p>All offenders serving twelve month sentences and above will have an Offender Assessment System (OASys) Assessment Report including Sentence plans completed on them.</p> <p>All Offenders with an OASys will have a yearly review to ensure that their sentence plans are still relevant. Steps will be taken to continually reduce the OASys backlog to manageable levels. The escalation process will be in place to encourage Offender Managers in the community to complete OASys Assessment on High Risk Offenders.</p> <p>A monitoring tracker is in place to monitor the OASys backlog on a weekly basis.</p>	Heads of Offender Management / Senior Probation Officer	December 2017
5.52	All offender supervisors should have casework supervision, especially for their cases covering high risk of harm prisoners. (4.15)	Accepted	<p>All Offender Supervisors managing High Risk Offenders are Probation Offender Supervisors. The Senior Probation Officer provides casework supervision to all Probation Offender Supervisors.</p> <p>A plan is being devised to ensure that all uniform Offender Supervisors that manages Medium and Low Risk offenders have casework supervision by Offender Management Hub managers under the guidance of the Senior Probation Officer.</p>	Heads of Offender Management / Senior Probation Officer	November 2017

5.53	Category B prisoners should not stay too long at the establishment. Sentence plan objectives and proactive offender supervision should aim to ensure that they are transferred quickly to the most appropriate establishment. (4.20, repeated recommendation 4.22)	Accepted	<p>HMPPS will always find appropriate accommodation for those committed by the courts and therefore the first priority for prisoner transfers will be to maintain headroom in local prisons.</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. HMPPS 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 needs presented by their individual case.</p> <p>At HMP Pentonville, Offender Supervisors have been assigned caseloads and to plan sentence planning boards and risk management plan as part of OASys assessment. The actions from these will enable offenders to be identified for transfer to a suitable establishment.</p> <p>The Prison is encouraging one to one transfer process by Offender Supervisors once OASys and the Sentence Planning Board had taken place. This is a slow process however some offenders that are engaging with their sentence planning are being transferred.</p>	Heads of Offender Management / Senior Probation Officer	November 2017
Reintegration planning					
5.54	All resettlement plans and rehabilitation work with prisoners should be kept up to date and shared with community responsible officers to facilitate continuity for prisoners on their release. (4.24)	Accepted	<p>This is currently being actioned by CRC staff, however links need to be strengthened with CRC providers in the community to ensure that prisoners' transition from custody into community is smoother and seamless.</p> <p>The further expansion of the resettlement work in custody that the establishment is responsible for, including referrals and rehab will be discussed at tri-partite meetings.</p>	Head of Reducing Re-offending	March 2018
5.55	The prison should clarify the roles of community rehabilitation company and offender management staff in managing the resettlement needs of prisoners serving over 12 months, especially those assessed as low or medium risk of harm. (4.25)	Accepted	<p>CRC Co-ordinator / Cluster Manager to meet with the Offender Management Unit Managers to establish who will be responsible for the various resettlement needs for Offenders serving under twelve months, or how both can work effectively together to provide resettlement services for this group of Offenders.</p> <p>This resettlement work will take place in September and will be further expanded with the implementation of the Offender Management Model.</p>	Head of Reducing Re-offending	March 2018

5.56	All prisoners should receive pre-release careers advice and guidance, and have the opportunity to take part in a pre-release employability course. (4.32)	Accepted	The CRC resettlement providers and National Careers Service providers will establish, promote and develop this service as part of the resettlement provision.	Head of Reducing Re-offending	March 2018
5.57	Prisoners with substance misuse needs should be able to have training on overdose management, including the use of naloxone, before their release. (4.37)	Partially accepted	A feasibility study will take place between Healthcare providers, Building Futures, prison staff, local authorities and charities to assess viability given resources and staffing infrastructure.	Heads of Healthcare	March 2018
5.58	The prison should develop services to support individuals while in custody and before their release who have experienced domestic abuse or worked in the sex industry. (4.47)	Accepted	This will be achieved through the mandatory provision of resettlement services contracted to the Community Rehabilitation Companies, at a local level provided by Penrose, the CRC provider at Pentonville.	Head of Reducing Re-offending	March 2018

Recommendations	
Accepted	45
Accepted Subject to Resources /Partially Accepted	12
Rejected	1
Total	58