



HM Prison &
Probation Service

Action Plan: HMP USK and HMP & YOI PRESCOED

Action Plan Submitted: 20 April 2018

A Response to the HMIP Inspection of 9-19 October 2017

Report Published: 20 February 2018

INTRODUCTION

HM Inspectorate of Prisons (HMIP) is an independent inspectorate which provide scrutiny of the conditions for and treatment of prisoners. They report their findings for prisons and Young Offender Institutions across England and Wales to Ministry of Justice (MOJ) and Her Majesty's Prison and Probation Service (HMPPS). In response to the report HMPPS / MOJ are required to draft a robust and timely action plan to address the recommendations. The action plan confirms whether recommendations are agreed, partly agreed or not agreed (see categorisations below). Where a recommendation is agreed or partly agreed, the action plans provides specific steps and actions to address these. Actions are clear, measurable, achievable and relevant with the owner and timescale of each step clearly identified. Action plans are sent to HMIP and published on the HMPPS web based Prison Finder. Progress against the implementation and delivery of the action plans will also be monitored and reported on.

Term	Definition	Additional comment
Agreed	All of the recommendation is agreed with, can be achieved and is affordable.	The response should clearly explain how the recommendation will be achieved along with timescales. Actions should be as SMART (Specific, Measureable, Achievable, Realistic and Time-bound) as possible. Actions should be specific enough to be tracked for progress.
Partly Agreed	Only part of the recommendation is agreed with, is achievable, affordable and will be implemented. This might be because we cannot implement the whole recommendation because of commissioning, policy, operational or affordability reasons.	The response must state clearly which part of the recommendation will be implemented along with SMART actions and tracked for progress. There must be an explanation of why we cannot fully agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.
Not Agreed	The recommendation is not agreed and will not be implemented. This might be because of commissioning, policy, operational or affordability reasons.	The response must clearly state the reasons why we have chosen this option. There must be an explanation of why we cannot agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.



ACTION PLAN - HMCIP REPORT
ESTABLISHMENT: HMP USK and HMP & YOI PRESKOED

1. Rec. no	2. Recommendation	3. Agreed / Partly Agreed / Not Agreed	4. Response Action Taken/Planned	5. Function Responsible/ Policy Lead	6. Target Date
	Main recommendations to the governor				
5.1	The prisons should strengthen the management of quality in education and skills to ensure that evaluations focus on prisoners' achievement and progress, and are based on first-hand evidence and data analysis.(S44)	Agreed	The prison will introduce a revised and improved approach to quality management following a review of Learning and Skills undertaken at a regional level. This approach will formally include prisoners' achievement, progress and qualifications as a component of all assessments and evaluations. Evaluations will focus on robust and timely data as well as first-hand evidence and experiences.	Prison Group Director	September 2018
5.2	Oversight of offender management work at Usk should be improved to ensure men receive effective support in reducing their risk of harm, and progressing towards release. (S46)	Agreed	<p>The Head of Offender Management Usk is committed to ensuring that offenders at HMP Usk receive effective support and direction through a comprehensive and rigorous Offender Management process.</p> <p>HMP Usk will implement the new Offender Management in Custody (OMiC) model to ensure that every prisoner has adequate support from their Offender Managers and Key Worker support from a Prison Officer. The OMiC model will ensure that the Offender Management resource is sufficient to deliver on these goals, including the introduction of a new Prison Offender Management role carried out by both the prison and probation staff.</p> <p>The prison is introducing the case management elements of this model at an accelerated pace. The prison will have an additional seven Prison Officers and two Custodial Managers to support the Key Worker support elements of the model, and a Senior Probation Officer to provide specific expert oversight into Offender Management work.</p> <p>Prisoners' progression needs are identified upon First Night / Induction interview with Induction Officers and again with their Offender Supervisor during the Offender Management Unit induction interview. The Referrals are made to relevant departments and agencies.</p> <p>All prisoners that are not managed under the OMiC model have a sentence plan, which identifies outstanding resettlement needs. The</p>	<p>Governor</p> <p>Prison Group Director</p>	<p>September 2018</p> <p>September 2018</p>



			prisoners entering their 12 week resettlement window are identified and transferred to a resettlement prison wherever possible. The prisoners who cannot transfer to a resettlement prison (due to engagement in programmes, medical appointments, education qualifications etc.) are referred to agencies to ensure that their resettlement needs are met where possible.		
5.3	A strategy should be developed for managing men who are not eligible to attend the offending behaviour programmes offered at Usk. (S47)	Agreed	<p>The Head of Reducing Reoffending will review the Reducing Reoffending Strategy and ensure that this strategy includes a clearly defined offer for prisoners who are not eligible for the accredited programmes. This offer will be dependent on the individual needs of prisoners and will set out the support they can expect such as; access to drug services, learning and skills support, employment and career advice, advice on debt management and family support services. The Strategy will be reviewed annually to ensure this offer continues to be relevant.</p> <p>All prisoners will have the Progression Plan targets managed through the Key Worker elements of the OMiC model, which will be implemented. This model ensures all prisoners at HMP Usk will have a Key Worker to set relevant targets for their sentences and ensure that prisoners are taking action to reduce their risk (such as engaging with the regime or addressing needs such as substance misuse) even if they are not eligible for accredited offending behaviour programmes.</p>	Governor Prison Group Director	September 2018 September 2018
	Main recommendation to HM Prison and Probation Service				
5.4	The criteria for accepting men with sexual convictions at Prescoed should be reviewed to ensure men can progress as planned. (S45)	Partly Agreed	<p>The prison must currently adhere to a Ministerial Directive on accepting men with sexual convictions at Prescoed. This Directive was made with the Secretary of State (John Reid, 2006), Paul Coggins and Gerry Sutcliffe (Prison Minister's, 2006), Edwina Hart (Minister for Social Justice, WAG), Local MP (David Davies), HMPPS and representatives from the local community.</p> <p>A review of allocation criteria across the open estate, including Prescoed, is currently underway. This will determine whether the restrictions currently in place regarding men convicted of sexual offences remain appropriate. No decisions have been taken regarding the outcome of this review.</p>	Prisons Directorate and Capacity Management (PETP)	December 2018
	Recommendations				
	Managing behaviour				
5.5	Applications for enhanced status should be considered swiftly to enable deserving prisoners to take advantage of higher level privileges. (1.17)	Agreed	The Head of Residence at HMP/YOI Prescoed is committed to supporting a dynamic and responsive approach to the Incentives and Earned Privileges (IEP) policy at both sites.	Governor	Completed



			<p>At HMP/YOI Prescoed, the procedure has been thoroughly reviewed and applications are now considered within three days of submission to the residential Custodial Manager.</p> <p>At HMP Usk, reviews for enhanced are now scheduled to take place fortnightly, managed by the Residential Custodial Manager. This frequency allows for sufficient consideration of each case whilst ensuring that offenders hear a result as swiftly as possible.</p>		
5.6	Managers should ensure that data are collated and analysed across all aspects of behaviour management to identify any areas of concern where action needs to be taken.(1.22)	Agreed	<p>The Head of Residence and Safety at HMP Usk and HMP/YOI Prescoed is committed to taking a robust and proactive approach to analysing and acting on data to ensure that both sites are as safe, decent and rehabilitative as possible.</p> <p>Safer Custody meetings take place on a quarterly basis, and take account of data and information relating to Violent incidents, Incentives and Earned Privilege (IEP) levels, security intelligence surrounding behavioural issues and adjudication data. The data is then presented in three parts:</p> <ol style="list-style-type: none"> 1. Executive summary 2. Conclusion and Recommendations 3. Data Analysis. <p>The recommendations are added to the Safer Custody Action Plan.</p>	Governor	Completed and Ongoing
	Security				
5.7	Prisoners should only be strip-searched on the basis of intelligence or specific suspicion.(1.29, repeated recommendation 1.46)	<p>Not Agreed HMP Usk</p> <p>Agreed HMP/YOI Prescoed</p>	<p>PSI 07/2016 states: 'Visits: Male prisoners must routinely be given a Level A rub-down search and hand-held metal detector scan following visits. In addition, a percentage [10%] of male prisoners selected at random must be full searched following visits, at a level agreed as part of local searching strategies.'</p> <p>At HMP Usk the only additions to the 10% of visits searching as per PSI is a result of specific intelligence relevant to managing the risk in visits. For cell searching prisoners are only strip-searched on the basis of intelligence.</p> <p>Prisoners in HMP/YOI Prescoed are only strip searched following intelligence received as part of the Local Security Strategy (LSS).</p>	Executive Director Security, Order and Counter Terrorism	Completed
	Safeguarding				
5.8	The strategic management of suicide and self-harm should be improved and there should be a focus on data	Agreed	The Head of Residence and Safety brings together a multi-disciplinary team in a quarterly Safer Custody meeting. The team ensures that all	Governor	Completed and ongoing



	analysis and understanding the distinct needs of men at each site.(1.36)		self-harm and linked data is analysed. This analysed data is then presented in three parts: 1. Executive summary 2. Conclusion and Recommendations 3. Data Analysis The recommendations are added to the Safer Custody Action Plan. These actions are added to the plan are assigned to a responsible Manager, are time bound and monitored by the Head of Safer Custody.		
5.9	Emergency equipment at Usk should be checked regularly and restocked. (1.37)	Agreed	At HMP Usk all the defibrillators are now in date. The People Hub hold formal responsibility for restocking to ensure a consistent approach to maintaining emergency equipment. On a daily basis an emergency equipment check is now formally included as part of Orderly Officer duties. This is then further supported by a monthly Health and Safety management check. As an additional measure the new units automatically self-check every 24 hours and sound an audible alarm if needed. The Residential Admin Support Officer then responds to that warning and takes appropriate action as directed by the Unit.	Governor	Completed
5.10	Formal processes to protect adults at risk should be implemented and staff should be trained to identify risks and make appropriate referrals. (1.40)	Agreed	HMP Usk and HMP/YOI Prescoed will ensure that all staff will both understand and have the skills and confidence to deliver the safeguarding responsibilities. The Adult Safeguarding policy was republished in January 2018 and an establishment Safeguarding panel now meet quarterly to review identified risks. Safer Custody staff and Residential Administration Support now have training accounts with South East Wales Safeguarding Board (SEWSB). To date they have undertaken training in Coercive Control, Domestic and Sexual Violence and Child Safeguarding procedures. Together with SEWSB the prison will introduce bespoke training in Child and Adult Safeguarding for all staff with direct prisoner contact. This will focus specifically on recognition and referral.	Governor	Completed Completed and Ongoing December 2018
	Equality, diversity and faith				
5.11	The DIRF process should be publicised. DIRFS should be investigated thoroughly and responses quality assured. (2.23)	Agreed	HMP Usk and HMP/YOI Prescoed is committed to ensuring that any equality, diversity and faith issues are robustly identified and resolved through the Discrimination Incident Report Form (DIRF) system.	Governor	Completed



			<p>A Notice To Prisoners and Notice To Staff outlining DIRF reporting procedures was published in February 2018. The process is also now published on the equality Notice Boards where they can be easily seen by staff and prisoners. Prisoners are also reminded of the DIRF process and encouraged to use it through the prisons' regular Prisoner Forums the prisoners are encouraged to submit DIRFs.</p> <p>A Quality Assurance process is now in place for submitted DIRFs. This is carried out by the Head of Residence and Safety on completion of the investigation and recorded on each DIRF. Further quality assurance on all DIRF's is then carried out in the quarterly Equalities Meeting.</p>		
5.12	Regular forums with black and minority ethnic men, Travellers and foreign national prisoners should be used to identify their needs and concerns and develop appropriate services. (2.37)	Agreed	<p>Monthly equalities forums have been established at HMP Usk and HMP/YOI Prescoed to engage with prisoners in custody across all protected characteristics, address perceptions and tackle issues that impact on staff and prisoner relationships. Any comments made with regard to the assessment of prisoners with protected characteristics are clearly defined and details include dates and times of meetings with tangible outcomes identified. The agenda and terms of reference of these forums also reflect the recommendations of the Lammy Review of Black, Asian and Minority Ethnic representation in the Criminal Justice System. These meetings are well attended.</p> <p>The meetings appear on a Meeting Schedule and all relevant stakeholders are invited including the Independent Monitoring Board (IMB).</p>	Governor	Completed
	Health, well-being and social care				
5.13	Prisoners should not have to wait outside the health department in Usk at peak times in bad weather. (2.52)	Partly Agreed	<p>The Head of Residence and Safety will ensure that use of the waiting room at HMP Usk is as effective as possible, whilst recognising the limitations of the site.</p> <p>This recommendation is partly agreed as there is limited space available inside the healthcare department. However, to bolster existing provision, a bespoke outdoor canopy has been ordered and is due to be fitted to the entrance of the Healthcare Unit. This canopy will ensure that anyone waiting for Healthcare at HMP Usk is well-protected against bad weather.</p>	Governor	May 2018
5.14	Prisoners should be able to raise health complaints and concerns through a clear, confidential and well-understood system. (2.53)	Agreed	<p>HMP Usk and HMP/YOI Prescoed will work with Aneurin Bevan University Health Board (ABUHB) to ensure that complaints and concerns are well managed and dealt with confidentially and effectively. ABUHB are responsible for the provision of healthcare at the prison.</p> <p>Information on how prisoners are able to confidentially raise concerns regarding their health will be embedded into a new Healthcare Information Leaflet. The healthcare information leaflet will advise the</p>	Aneurin Bevan University Health Board (ABUHB) / Governor	June 2018



			<p>prisoners to submit any healthcare concerns either verbally or written to Head of Healthcare in the first instance. These concerns and responses are logged on healthcare database. All complaints and responses are then escalated and reviewed monthly through the Quality Patient Safety Board at ABUHB in order to comply in dealing with concerns, complaints and incidents. The prisoners also have access to ABUHB 'Putting Things Right' leaflet in the waiting area of the Healthcare Centre.</p>		
5.15	<p>Patients with complex health needs should be identified and have a formal care plan overseen by a care coordinator. (2.62)</p>	Agreed	<p>ABUHB will ensure that patients with complex health needs receive adequate health support delivered through a comprehensive and well-coordinated care plan.</p> <p>The Healthcare team now have registered nurses in position who act as Care Coordinators for those prisoners with complex health needs. Through a more formalised multidisciplinary case meeting, patients with complex needs will be allocated to the most appropriate Care Coordinator, which will be responsible for developing the individual care plan.</p>	ABUHB	Completed
5.16	<p>Patients requiring ongoing mental health support should have clear recorded assessments and care plans that are drawn up with the prisoner, detailed in their clinical records and reviewed regularly. (2.76)</p>	Agreed	<p>ABUHB ensures that patients with ongoing mental health needs receive robust assessments and comprehensive care plans drawn up in collaboration with prisoners.</p> <p>Two Primary Care Forensic Psychiatry Service Nurses /Care Coordinators now ensure that assessments and care plans are contained within the patients' electronic record and reviewed on a quarterly basis in collaboration with the patient.</p>	ABUHB	Completed
5.17	<p>Robust systems should ensure patients receive all required physical health checks linked to their prescribed medication and condition. (2.77)</p>	Agreed	<p>The Primary Care Forensic Psychiatry Service Nurses in close liaison with General Practitioner's (GP's), Psychiatrists and Pharmacists now ensure that prisoners with mental health needs have a robust physical examination and regular review.</p>	ABUHB	Completed
5.18	<p>The drug and alcohol strategy should explicitly reflect the different populations in each prison and be informed by a current needs assessment. The implementation of the strategy should be driven by a dynamic action plan that is regularly reviewed at the drug and alcohol committee meeting. (2.84)</p>	Agreed	<p>The Head of Reducing Reoffending at both HMP Usk and HMP/YOI Prescoed has developed a rigorous and comprehensive approach for addressing the supply and demand of drugs, working with a diverse range of partners and supporting a holistic approach across prison and probation. This forms part of an overall regional strategic approach for addressing substance misuse.</p> <p>A needs analysis has been completed and evidence from this has informed the strategy and action plan. Both sites have individual supply reduction measures that meet the distinct needs of each establishment. The action plan for driving change against the strategy will be reviewed on a monthly basis to ensure it is continually relevant and effective.</p>	Governor	Completed



5.19	Prisoners should have easy access to community-equivalent pharmacist advice and clinics, such as medicine use reviews. (2.91)	Agreed	<p>ABUHB have commenced fortnightly face to face sessions with the Lead Pharmacist for the prison in order to provide equity of access at HMP Usk. These sessions have been well received and have provided an opportunity to review treatment and compliance.</p> <p>Sessions for face to face pharmacist access are now in place on a fortnightly The prison has also implemented fortnightly sessions to review pain management with the pharmacist and nurse.</p>	ABUHB / Governor	Completed
5.20	Prisoners should have prompt access to over-the-counter medication for minor injuries and illnesses, including out of hours. (2.92)	Agreed	<p>HMP Usk and HMP/YOI Prescoed works with ABUHB to ensure that all prisoners at the prison have adequate access to over-the-counter medicine.</p> <p>Vending machines have been ordered to provide out of hours access for over-the-counter analgesia e.g. paracetamol.</p>	ABUHB / Governor	June 2018
5.21	Prisoners should have access to routine dental appointments at Usk within six weeks and at Prescoed within community-equivalent waiting times. (2.95)	Agreed	<p>ABHB is responsible for dentistry provision and ensures that prisoners at HMP Usk and HMP/YOI Prescoed have adequate and community-equivalent access to routine dental appointments.</p> <p>Dental provision on both sites has been reviewed and 'Time for Teeth' now provide three sessions for HMP Usk and one session for HMP/YOI Prescoed each week. These sessions take place within the clinical suite at HMP Usk Healthcare Centre. The patients on both sites are currently being triaged to identify priorities and treatment has commenced for patients on both sites. The waiting times are recorded and monitored on a quarterly basis through Partnership Board meetings.</p>	ABUHB	Completed
	Education, skills and work activities				
5.22	The prison should ensure that teachers are allocated to areas that make the most of their specialist expertise. (3.31)	Agreed	The Head of Learning and Skills will lead a review of staff qualifications, experience and expertise which will ensure the value of the teaching team is maximised across both sites and that staff are allocated intelligently to ensure utilising their specialist skills. This report will be presented to the Governor and regional colleagues for formal sign-off.	Governor	May 2018
5.23	The prison should improve individual learning plans. (3.43)	Agreed	<p>HMP Usk and HMP/YOI Prescoed will ensure that every prisoner in education at the prison has an individual learner plan (ILP). ILP targets are now being broken down into specific outcomes for each individual.</p> <p>The Head of Learning and Skills will contact colleges recommended by Estyn to ensure that individual learning plans reflect best practice.</p>	Governor	September 2018
	Children and families and contact with the outside world				



5.24	Visits facilities at Usk should be improved. (4.8)	Partly Agreed	<p>The Head of Residence and Safety at HMP Usk is committed to providing a visits environment which aids rehabilitation and supports meaningful contact with family members and significant others.</p> <p>This recommendation is partly agreed due to limitations with the physical space available in the visits area. However, a range of work has been driven to improve the environment, including a review of the refreshments area, the introduction of a hot meal facility and new decorations.</p>	Governor	Completed
5.25	The prisons should consult visitors to see what practical support could be offered to help them get to the prisons. (4.9)	Agreed	<p>PSI 16/2011 – Providing Visits and Services to Visitors sets out that the Senior Manager responsible for visits booking must monitor and review the service through a formal annual review process, including social and professional visitor feedback.</p> <p>An annual survey will be conducted on each site to identify any issues that visitors may be having. The prison will also ensure that the Assisted Prison Visits Scheme is well advertised to all prisoners and their visitors through posters, leaflets etc.</p> <p>At HMP/YOI Prescoed, a visitor survey has been conducted focussing on transport needs. The survey results are being analysed and will lead to a formal action plan. The logistics and feasibility of supplying a mini bus shuttle service on the appropriate days is being investigated, although any service will need to be justified by need.</p>	<p>Director, Prison Reform Policy, MoJ</p> <p>Governor</p>	September 2018
	Reducing risk, rehabilitation and progression				
5.26	More comprehensive needs analyses of the population at each prison should be undertaken and used to inform a specific strategy for reducing reoffending. (4.27)	Agreed	The Head of Reducing Reoffending agrees fully with this recommendation. Following the inspection a full and comprehensive needs analysis was completed across both HMP Usk and HMP/YOI Prescoed in November 2017. This has now informed both establishments' Reducing Reoffending strategy. The needs analysis will be completed on an annual basis to ensure that the prison continues to deliver a relevant approach over time.	Governor	Completed
	Interventions				
5.27	Men at Usk should have access to Jobcentre Plus to help with new benefit claims in preparation for release.(4.32)	Agreed	The Job Centre Plus now attend HMP Usk one afternoon a week, offering advice on employment and access to benefit claims prior to release.	Governor	Completed
5.28	The applications process for bank accounts for men from Prescoed should be improved. (4.33)	Partly Agreed	Applications are being turned down by the Bank because of prisoner's circumstances on the application, rather than the process itself. The establishment has made contact with local credit unions who can provide pre-paid cards giving prisoners access to benefits on release. Debt	Governor	September 2018



			management courses have been introduced at HMP/YOI Prescoed to improve the application success for prisoners.		
	Release planning				
5.29	Data collection at Prescoed should be improved so that the effectiveness of CRC release planning can be evaluated and links between the CRC and the OMU should be developed to ensure risks are managed appropriately. (4.37)	Agreed	<p>The Community Rehabilitation Company (CRC) have a contractual obligation to share data with the Governor. The CRC are invited to attend the monthly Senior Management Team meeting where they share a performance dashboard and data commentary, using a format developed at the start of the contract. Any concerns on CRC performance data are managed through local interface meetings and if necessary at the regional Service Integration Group.</p> <p>The data received from the CRC contractor will also be incorporated into the annual resettlement needs analysis. This will enable an assessment of how effective release planning is in achieving appropriate outcomes.</p> <p>The prison will ensure that links are strengthened between HMP/YOI Prescoed Offender Management Unit and the CRC to ensure that risks are managed effectively. To achieve this, a new multi-agency approach to sentence planning, including involvement from the CRC, will review all resettlement needs relating to each prisoner according to a standardised 'passport' framework of needs and risk factors. The passport pilot is currently underway with a view to full implementation.</p>	Governor Governor Governor	Completed October 2018 October 2018

Recommendations	
Agreed	24.5
Partly Agreed	4
Not Agreed	0.5
Total	29

