



HM Prison &  
Probation Service

Action Plan: HMP Long Lartin

Action Plan Submitted 1 August 2018

A Response to the HMIP Inspection

Report Published 22 May 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 <b>must</b> 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 <b>must</b> 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 LONG LARTIN

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken / Planned	5. Responsible Owner	6. Target Date
	<b>Main recommendations to the Governor</b>				
5.1	A to D wings should be refurbished to include integral sanitation in cells. (S42, repeated main recommendation S51)	Not Agreed	<p>This recommendation is not agreed due to funding priorities. Investment proposals have previously been submitted, without success, for the replacement of older accommodation with two new house blocks containing in-cell sanitation. Installation of in-cell sanitation on A-D wings through refurbishment was considered as an alternative proposal but did not attract the necessary funding.</p> <p>The Ministry of Justice (MoJ) Estates capital budget is limited with only high priority work included in the capital maintenance programme in accordance with the following order of priority; fire safety, health and safety, statutory/regulatory/legal obligations, business critical investment and departmental reform programmes.</p> <p>The High Court ruled on 19 December 2011 in the case of Grant &amp; Gleaves v MoJ - [2011] EWHC 3379 (Queen's Bench Division), that the absence of in-cell sanitation did not breach a prisoner's human rights.</p> <p>Prisoners currently using the Nightsan system at HMP Long Lartin are equipped with decent alternative arrangements should they not be able to await their turn in the queuing system and are provided with camping style toilets (with lids) for such an eventuality. These prisoners are also provided with jugs to store water for washing purposes during lock up periods and have access to air fresheners and sanitizer hand gel.</p>	<p>Ministry of Justice, Director Estates / Executive Director of Facilities Management</p> <p>Governor</p>	



5.2	The prison should ensure that there are sufficient activity places to occupy all prisoners fully during the working day, and that all those allocated to activities are able to attend. (S43)	Partly Agreed	<p>This recommendation is partly agreed as HMP Long Lartin cannot commit to occupy all prisoners with full-time activity due to resource constraints and the ageing population.</p> <p>HMP Long Lartin will review the number of available activity places when operational capacity returns to normal after the completion of the Fire and General Alarm Upgrade work. A reprofiling exercise is underway which will determine how many staff are available to supervise activities and if resources are available to escort prisoners to appointments from activities, rather than remaining locked in cell. It is unclear if there is enough resource within the existing budget to fulfil all of these requirements.</p>	Governor	November 2018
5.3	The prison should provide a comprehensive range of support to help prisoners sustain and improve relationships with their children and other close family members. (S44)	Agreed	<p>HMP Long Lartin does not have a family services provider at the moment to facilitate this in full and is currently undergoing a procurement exercise for a provider. No confirmed bidder has yet been selected.</p> <p>In the meantime, however, HMP Long Lartin will work within the confines of the current provision to support improvements to help prisoners maintain family ties. Including regular family visiting sessions (subject to risk assessment) and 'Storybook from Dad', which enables fathers to send stories to their children to maintain the vital emotional bond between parent and child. This will be commenced by November 2018.</p>	Governor  Governor	December 2018  November 2018
	<b>Recommendations to HMPPS and the Governor</b>				
5.4	All maintenance jobs should be completed swiftly and those of most importance to prisoner well-being and decency should be prioritised. (2.9)	Agreed	<p>Amey, the service provider has been requested to make improvements to response times. Progress is being tracked via an action plan issued. A Risk Reduction meeting has taken place and HM Prison and Probation Service (HMPPS), Service Delivery Manager (SDM) has been placed in temporary oversight of the maintenance function.</p> <p>The SDM now has a formal process in place to deliver the work when Amey staff are unable to attend the prison.</p>	Executive Director of Facilities Management  Executive Director of Facilities Management	Completed  Completed



			<p>Amey have appointed a replacement Site Manager (SM) to resume the management of the maintenance function. The SM is now in post and will oversee this work.</p> <p>HMP Long Lartin follow an escalation procedure when reporting faults to Amey.</p>	<p>Executive Director of Facilities Management</p> <p>Governor</p>	<p>July 2018</p> <p>Completed</p>
5.5	<p>The national equality monitoring tool should cover all protected characteristics and produce data that is not more than a month old. The prison should use the available monitoring data and investigate any identified disparities. (2.31)</p>	Partly Agreed	<p>This recommendation is partly agreed as HMPPS is currently reviewing the frequency (as well as the content) of the Equalities Monitoring Tool (EMT). Whilst the principle of producing more timely data is agreed, HMPPS will need to take account of the operational practicalities of turning data around within one month, given the need to quality assure data provided by establishments.</p> <p>As part of the work in response to recommendations made in the Lammy review, an independent review of the treatment of, and outcomes for, Black, Asian and Minority Ethnic (BAME) individuals in the Criminal Justice System, data is being further scrutinised to have some new data fields held centrally. Where disproportionate outcomes are identified for specific groups in relation to their protected characteristics HMPPS will investigate and where applicable explain or reform the policies or procedure.</p> <p>Locally, with the support of Equalities, Interventions and Operational Practice Group (EIOPG), HMP Long Lartin will continue to analyse data to inform practice. All protected characteristics will be represented on the EMT.</p> <p>Potential negative disproportionality cases are investigated and discussed quarterly as a standing agenda item at the Equalities monthly meeting. Discrimination Incident Reporting Forms are checked on a monthly basis by the Safer Custody, Custodial Manager. This process is overseen by the Deputy Governor.</p>	<p>Deputy Director Analytical Services</p> <p>Executive Director, Rehabilitation &amp; Assurance</p> <p>Governor</p> <p>Governor</p>	<p>July 2018</p> <p>August 2018</p> <p>Completed</p>
5.6	<p>Offender supervisors should have sufficient time to undertake their roles in full. They should receive necessary training and</p>	Partly Agreed	<p>This recommendation is partly agreed due to current resourcing issues.</p> <p>Recruitment campaigns will be undertaken to recruit the appropriate staff. Previous campaigns have not, however, provided enough suitable candidates to fill the number of vacancies and it is anticipated that this will not change in the</p>	<p>Governor</p>	<p>August 2018</p>



	supervision, and an offender management policy should outline how their work is to be integrated with other departments. (4.20)		short term. HMP Long Lartin will be implementing the new Offender Management in Custody (OMiC) model, within which the Offender Supervisor role is discontinued. The establishment will ensure that an offender management policy is drafted and published, setting out the role of Offender Manager and how the work is integrated with other departments. Appropriate training and supervision will be provided to candidates to undertake their roles in full.	Executive Director, Human Resources	Ongoing
5.7	OASys assessments should be completed promptly, including by community offender managers. (4.21)	Agreed	<p>Initial Start of Custody Assessments should be completed within agreed timescales by local prisons or the National Probation Service (NPS) dependant on the risk of the offender. HMPPS have engaged with the Prison Service and NPS to improve reporting on the Offender Assessment System (OASys) backlog and communication to NPS areas to ensure cases are completed within timescales.</p> <p>The introduction of the OMiC model is expected to contribute to improvements in the quality and timing of OASys completion and sentence planning. Prior to full implementation, the roll out of the key worker role and additional staff should reduce the need for cross deployment reducing the demands upon Offender Management Units (OMUs). As the case manager element is implemented this will also increase the numbers of NPS staff based within prisons, which will provide greater opportunity to improve OASys completion rates for high and very high risk prisoners as OASys assessors within NPS have improved access to prisoners and to information within prisons. The model will also move the resource for OASys report completion into the training / resettlement estate and away from local / reception prisons, where there is more time for engagement with the offender and for the plan to be produced.</p> <p>HMPPS continues to closely monitor the OASys backlog to evaluate the situation and ensure increased OASys completion is achieved as the OMiC model is implemented throughout the closed estate.</p> <p>Locally, HMP Long Lartin have commenced activity for the key worker role and will monitor the number of outstanding assessments on a weekly basis via the Head of Offender Management. Local actions will be taken (either through the provision of local Offender Supervisor resources or escalation to external Offender Managers).</p>	<p>Executive Director of Prisons</p> <p>Governor</p>	<p>September 2019</p> <p>August 2018</p>



			Moving forward, OMU Managers will develop a robust system to monitor and record the work done in pursuing OASys assessments by NPS colleagues with a clearer escalation process and accountability for overdue work being challenged through Senior Probation Officers, although there is no local control over external resources to achieve assessment completions.		
	<b>Recommendation to the escort contractors</b>				
5.8	Prisoners' property should arrive with them on transfer or within a reasonable time after their arrival. (1.6, repeated recommendation. 1.6)	Agreed	<p>The requirement for the transportation of property is governed by Prison Service Instruction (PSI) 12/2011 Prisoners' Property and Discharge PSI 72/2011. It is measured against two volumetric sized boxes and a single outsized item or bag which, must not measure over 15 kg. In addition to this, the escort contractor will take legal documentation. The escort contractor is aware that property established within these limits must be taken to the facility to which the person is to be transported. If items exceed the agreed limits, this will detract from the ability of the contractor to transport all persons with their property to the required destination. The vehicle fleet is designed to carry the number of prisoners it is intended, together with their property to the volumetric limit. In all circumstances the contractor will decline to transport any property that exceeds the volumetric limit due to exact storage space upon the vehicle. It remains the responsibility of the sending establishment to make arrangements for excess property to be forwarded at their expense Prison Escort and Custody Service continue to monitor all aspects of the contractors' performance and on occasions where it fails to meet the agreed levels will be raised with the contractor for improvement.</p> <p>HMP Long Lartin will make conscious efforts to chase missing property with sending establishments to ensure prisoners receive their property within a reasonable time.</p> <p>The Head of Operations will monitor progress of requests for property transfer and the Business Hub Manager will monitor the progress of complaints sent to other prisons regarding property and intervene where necessary.</p>	<p>Head of Custodial Contracts</p> <p>Governor</p> <p>Governor</p>	<p>August 2018</p> <p>August 2018</p>



	<b>Recommendations to the Governor</b>				
	<b>Early Days in Custody</b>				
5.9	Wing staff should regularly check the welfare of new arrivals. (1.7)	Agreed	HMP Long Lartin will review its current practices to ensure the welfare of new arrivals is monitored and managed appropriately by wing staff. This will include allocation of a named Personal Officer to each prisoner and support from Insiders (appropriately selected and trained prisoners who deliver peer support). The Insiders initiative has two key aims; to offer reassurance to new prisoners and to provide them with key information useful to them in their first few days in custody and beyond.	Governor	July 2018
5.10	Prisoners should receive a comprehensive and meaningful induction about the prison's rules and regime. (1.8)	Agreed	HMP Long Lartin introduced a new Induction booklet in January 2018 which outlines the regime and the relevant prison rules / regulations. Key stakeholders were given an opportunity to review the booklet prior to implementation.	Governor	Completed
	<b>Managing behaviour</b>				
5.11	Prisoners on the basic level of the incentives scheme should be reviewed frequently and promoted to standard when there is evidence to show an improvement in behaviour. (1.15)	Agreed	A review of the local Incentives and Earned Privileges (IEP) policy has been conducted addressing the requirement that prisoners on basic level are reviewed frequently, every seven days.  Residential Custodial Managers and Heads of Function conduct weekly management checks to ensure that cases have been reviewed in line with local policy and that all aspects of good behaviour have been considered to qualify for standard level.	Governor	Completed
5.12	Prison managers should fully investigate the reasons for the significant increase in the number of adjudications, and address any concerns identified. (1.19)	Agreed	HMP Long Lartin reviewed data on adjudications at the Adjudication Standardisation meeting held on 27 February 2018 and discussed the significant increase in the number of adjudications.  Findings were the change in population over time to more mainstream prisoners (who attract more adjudications than vulnerable prisoners), the prison became a smoke free environment and increase in the prevalence of psychoactive substances (PS). Although the adjudication figures doubled in volume there was not a direct increase in the number prisoners on the basic level of IEP. There	Governor	Completed and ongoing





			<p>was also a nominal reduction of prisoners on enhanced status. The current process whereby staff place prisoners on report is considered an easier system than using the IEP system.</p> <p>Although the population age is lower than previous years, there is no data to suggest that it is in fact those prisoners who are being placed on report (both years present an average of prisoners aged over 35 years old).</p> <p>The inclusion of 'Spice' (PS) within the mandatory drug testing guidelines accounted for 29 proven adjudications during 2017. The Governor will continue to monitor adjudications to ensure they are fair, lawful, and just, that punishments are within locally published guidelines and proportionate, and that no prisoner is charged or punished for any reason other than their disciplinary behaviour.</p> <p>A number of management checks have been introduced to ensure that an IEP review takes place after a proven adjudication in all cases to address concerns that there were low numbers of prisoners on the BSC regime compared to increases in adjudication charges. This includes checks by the Safer Prisons Team, Residential Custodial Managers and Head of Residence.</p> <p>A Behaviour Compact has been drafted designed specifically for prisoners who have been misusing PS and will be introduced imminently. This comprises of a range of requirements and sanctions that balances the requirement to prevent drug use and supply with the rehabilitation of the individual.</p>	Governor	August 2018
5.13	Adjudications referred to the police should be followed up quickly to ensure natural justice for prisoners. (1.20)	Agreed	<p>The length of time to complete investigation work is the responsibility of West Mercia Police, and not within the Governor's control.</p> <p>However, HMP Long Lartin have improved the local recording and referral processes with the Police Intelligence Officer and will take regular action to track the progress of cases. This is to ensure adjudications have been proceeded with, to establish whether an investigation is ongoing and to check whether the prisoner has been updated – this is what we understand by the recommendation's reference to ensuring allegations referred to the police are "followed up".</p>	Governor	Completed



5.14	Prison managers should investigate and address the reasons behind the increase in the use of force and special accommodation. (1.25)	Agreed	UoF meetings are held regularly (once per quarter). There is a process in place to review uses of special accommodation. The Duty Governor of the day ensures that all necessary paperwork is completed and reviewed by the Deputy Governor.	Governor	Completed
			HMP Long Lartin held an additional Use of Force (UoF) meeting in February 2018 to investigate why there was increase in usage and to develop actions to address relevant issues. No specific themes were identified, only singular cases of behaviour which warranted UoF or special accommodation.	Governor	Completed
			In order to understand the reasons behind the cases a further review will be undertaken to identify any specific themes with individual prisoners whereby lessons can be learnt.	Governor	August 2018
5.15	Managers should regularly review the video recordings of planned interventions. (1.26)	Agreed	HMP Long Lartin have introduced the following processes: <ul style="list-style-type: none"> <li>• Due to the low number of planned interventions that take place 10% of UoF video recordings will be reviewed quarterly by the Control and Restraint Instructors, Independent Monitoring Board and other members from the UoF Committee for quality checks.</li> <li>• Lessons learnt are identified and relevant actions developed.</li> </ul>	Governor	Completed
5.16	Governance of the use of special accommodation should ensure that all uses are justified and properly documented, and that all procedures are correctly followed. (1.27)	Agreed	HMP Long Lartin have introduced a process whereby it is the responsibility of the Segregation Custodial Manager to audit all special accommodation paperwork after each occasion it is used.	Governor	Completed
			The Segregation Supervising Officer has been briefed on how to guide Senior Managers to correctly document authorisation use of special accommodation.	Governor	Completed
			To comply with governance procedures, the Duty Governor ensures in the first instance that paperwork completed by staff is complete and correct. The Deputy Governor then completes a subsequent check.	Governor	Completed
5.17	Prisoners undergoing self-harm monitoring should only be held in the segregation unit in	Agreed	HMP Long Lartin now has a process in place to ensure that prisoners under the Assessment, Care in Custody and Teamwork (ACCT) arrangements are only held in segregation under exceptional circumstances, this is done through a compliance check to establish whether reasons are justified. Written reasons are	Governor	Completed



	exceptional circumstances. (1.35, repeated recommendation 1.70)		clearly documented in the ACCT plan and includes all alternative options explored prior to coming to a decision that the Segregation Unit is appropriate. The Head of Small Units, an operational role with functional responsibility for Segregation, PIPE (Psychologically Informed Planned Environments) and Healthcare Inpatients, or in their absence the Head of Residence, conducts weekly management checks to ensure that those held in segregation undergoing ACCT monitoring are managed in accordance with this process.		
5.18	There should be effective reintegration planning for all prisoners held in the segregation unit. (1.36)	Agreed	HMP Long Lartin ensures all segregated prisoners are given an opportunity to attend and make representations at the multi-disciplinary Segregation Review Board. This includes target setting and reintegration progression planning.  A review of the current risk assessment processes has been conducted to ensure these are completed in an efficient and timely manner. Care plans are completed on all prisoners that are segregated for more than 30 days, with multi-disciplinary input.	Governor  Governor	Completed  Completed
5.19	Segregated prisoners should have daily access to showers and telephone calls, as well as a regime that provides more time out of cell if an individual risk assessment shows this is safe. (1.37)	Partly Agreed	This recommendation is partly agreed due to operational reasons and the physical constraints within the Segregation Unit.-When the roll in the unit reaches 24 prisoners' or above, this restricts the regime due to the limited number of resources, such as available exercise yards, showers and telephone booths to provide a full regime.  HMP Long Lartin ensures that the regime of the Segregation Unit is published and outlines the current regime opportunities.	Governor	Completed
	<b>Security</b>				
5.20	The visitors' dress code should be proportionate to the risks faced by the prison. (1.46)	Not Agreed	This recommendation is not agreed. HMP Long Lartin is part of the Long Term and High Security Estate and believes that the current visitors' dress code policy to be appropriate given its enhanced security status.  The dress code is explained to visitors when they book a visit via e-mail/post and is on display in the visitors centre. The visitors' dress code policy is reviewed annually and all stakeholders are consulted. A review will take place in July 2018 whereby all continuing restrictions will be evidenced and a rationale provided should they continue to be proportionate and remain in place.	Governor	



5.21	Mandatory drug testing facilities should be relocated to an appropriate testing and waiting environment. (1.47, repeated recommendation 1.45)	Not Agreed	Although a business case will be submitted to source funding to facilitate this work, HMP Long Lartin cannot commit to meeting the recommendation due to resource constraints.	Governor	
	<b>Safeguarding</b>				
5.22	Prisoners should be able to access Listeners easily, including on reception and at night. (1.52)	Partly Agreed	<p>This recommendation is partly agreed due to operational reasons. There are some restrictions regarding unlock arrangements in State A (an example of which could be during the night, where there are fewer staff and prisoners are not routinely unlocked) for certain prisoners. Therefore it is not always possible to offer easy access to Listeners during the night period.</p> <p>Access to a phone to contact the Samaritans is provided as an alternative. Each case is assessed individually against the requirements of the Local Security Strategy.</p> <p>HMP Long Lartin will ensure that local policy is updated to ensure all new receptions have reasonably prompt access to Listeners.</p>	Governor  Governor	Completed  November 2018
	<b>Daily Life</b>				
5.23	The prison should log and monitor responses to cell call bells. (2.10)	Agreed	<p>Access to the equipment that logs the cell calls is limited as the majority of the equipment is based in sensitive areas (such as roof spaces). This requires HMP Long Lartin to liaise with the contractor to obtain this information at a cost.</p> <p>An alternative system / location for the existing equipment is being conducted at the moment.</p> <p>In the interim, a process has been introduced whereby Residential Custodial Managers are required to conduct physical observational checks of cell bell call response times once per week on each wing, record the results and act on them where possible. The Heads of Residence will review the results of these assurance checks monthly.</p>	Governor  Governor	September 2018  Completed



5.24	Breakfast packs should be issued on the day they are to be eaten. (2.15, repeated recommendation 2.96)	Not Agreed	This recommendation is not agreed due to operational reasons. The serving of breakfast packs the evening before is a well-established practice across the prison estate and one which contributes to a swifter start to the morning regime, including start time for work and other activities. The contents of the packs are suitable to be stored in prisoners' cells overnight.	Governor	
5.25	Wing serveries should record food temperature checks consistently, and be cleaned after service, and prisoner kitchens on the wings should be kept clean and properly maintained. (2.16)	Agreed	Residential Supervising officers are responsible for checking that the wing food service areas are cleaned daily and this is recorded.  HMP Long Lartin will ensure that each wing is provided with a weekly Wing Servery Log Book to record food temperatures daily at the point of service. Both the Wing Supervising Officer and the Kitchen Manager will conduct weekly compliance checks of the record logs.  Adherence to cleaning schedules will be checked by Supervising Officers on a weekly basis.  A deep clean of food serving areas is currently being planned through the maintenance contract.  Servery workers will be trained to an appropriate food hygiene standards.	Governor  Governor  Governor  Governor	Completed  July 2018  July 2018  July 2018  November 2018
5.26	Prisoner consultation should be more widely promoted, and staff from all departments and representatives from each wing should attend meetings. (2.21)	Agreed	Prisoner Consultative Committee meetings now take place every month with two prisoner representatives from each wing. Managers attend from functions providing monthly updates and actions points drawn up at the meeting. Additionally, on each wing staff hold prisoner forums to address issues.  Consultations will be advertised through posters, wing notices and announced by staff at wing forums.	Governor  Governor	August 2018  August 2018
5.27	Prisoner applications should be logged and tracked. Responses to applications should be prompt, address the issue raised, demonstrate	Agreed	The Heads of Residence are conducting a review of the applications process. Wing Officers will be solely responsible for the initial processing, logging and tracking of applications. All applications will be taken daily (including weekends) verbally and in writing as per the Residential Services PSI 75 / 2011. Prisoners will receive a response to their application within three days. The Heads of Residence will implement quality assurance process to assess whether the	Governor	September 2018



	sufficient enquiry and be subject to quality assurance. (2.22)		content of the application response covers all of the points raised in the application and the timeliness of responses.		
5.28	Responses to all complaints should be timely and investigated at an appropriate level and should fully address the issues raised. (2.23, repeated recommendation 2.39)	Agreed	<p>HMP Long Lartin will ensure changes are made to the current complaints system. The most significant improvement change will be the issue of paper copies of complaint forms as opposed to the electronic process which is currently in place. There will also be a requirement that complaints to be answered within five working days and investigated by a Supervising Officer grade or above.</p> <p>All Functional Heads will introduce complaints assurance checks for the quality and standards of their own submissions and 10% of complaint responses will be checked by the Business Hub Manager and Head of Business Assurance. Results of the quality assurance work will be fed back via the Prisoner Consultative Committee and Senior Management Team meetings.</p> <p>Currently, 100% of responses are being checked by the Head of Business Assurance to make the required changes in a timely manner.</p>	Governor  Governor  Governor	September 2018  September 2018  Completed
	<b>Equality, Diversity and Faith</b>				
5.29	The equality strategy should outline how the needs of all protected groups will be identified and addressed. It should be underpinned by regular consultation and accompanied by a systematically implemented action plan. (2.30)	Agreed	HMP Long Lartin will ensure that the Equalities strategy is reviewed, this will be conducted by the Head of Safer Prisons. The strategy will be republished to include how the needs of protected groups will be identified and addressed. The new strategy will include regular consultations and provision for a specific Equalities Action Plan and involve arrangements for consultation with external stakeholders, such as third sector organisations who represent groups with protected characteristics, including an Equalities meetings invite and the option to be involved in equality assessments. All trade unions will also be invited to attend scheduled meetings.	Governor	September 2018
5.30	Professional translation and interpreting services should be used to engage with foreign national	Agreed	HMP Long Lartin will ensure that a more formal process is implemented to publicise how translation services can be accessed and properly identify foreign national prisoners who may benefit from the use of the service. The service will	Governor	September 2018



	prisoners who require them. (2.41)		be promoted via notices and posters displayed throughout the prison and briefings to staff who have contact with foreign national prisoners.		
5.31	The prison should develop a paid carer scheme to support prisoners with disabilities who needed extra support, and should make adapted cells available for vulnerable prisoners with identified needs. (2.42)	Partly Agreed	<p>This recommendation is partly agreed due to mainly affordability reasons to have adapted cells on the older style wings and containing night sanitation. It is not feasible to adapt the cells with wider doors, etc as the night sanitation control panel and associated wiring would need to be removed and relocated which would require substantial structural work resulting in insufficient space to reinstall the equipment.</p> <p>There are some although not fully adapted cells available for vulnerable prisoners (with identified needs) to use. In cell adaptations are made when required and where possible for example, including hand rails.</p> <p>HMP Long Lartin will look at implementing a paid carer scheme. However, this will be subject to an appropriate risk assessment.</p>	Governor  Governor	Completed  September 2018
	<b>Health, Well-Being and Social Care</b>				
5.32	The prison and health care staff should prioritise attendance at the planned local delivery board meetings to agree the key operational areas that require effective joint working. (2.54)	Agreed	<p>Local Delivery Board (LDB) monthly meetings (attended by the Governor) have taken place since February 2018 and have been running successfully. An Action Log is kept and worked through during these meetings. Key objectives are to improve operational working relationships, increase efficiency of healthcare service delivery and provide a platform for continued improvements.</p> <p>The Head of Healthcare with input from key stakeholders (such as Commissioners) along with the Governor will review the format of the LDB to track its effectiveness.</p>	Director for Care UK and Governor  Director for Care UK and Governor	Completed  October 2018
5.33	Patients should be able to attend all necessary external health appointments. (2.60)	Partly Agreed	<p>This recommendation is partly agreed due to operational and security reasons.</p> <p>Monthly meetings now take place with the Head of Security to address any issues with booked hospital appointments and to reduce the number of cancelled ones.</p> <p>HMP Long Lartin will ensure, where possible, that all necessary external appointments are fulfilled. There are on occasions operational reasons why an</p>	Director for Care UK and Governor  Director for Care UK and Governor	Completed  August 2018



			<p>external appointment cannot be facilitated, relating to either security considerations or resourcing issues, however a process will be implemented to ensure that the appointment is rebooked and facilitated.</p> <p>The Healthcare Department will comply with policy around management of external appointments.</p>		
5.34	The inpatient service should operate through an agreed operational policy that that prioritises clinical need, and should deliver an effective therapeutic regime. (2.61)	Agreed	<p>An operational policy will be drafted by the Head of Healthcare, whereby an admissions and discharge pathway is agreed by the Governor to ensure that all admissions to the inpatient unit are prioritised based on clinical need. This will be reviewed at LDB and Quality Assurance and Improvement meetings. Once developed and agreed the policy will be communicated with prison staff and healthcare staff. Adherence to the policy will be monitored by the Head of Healthcare and Governor at their one- to- one meetings. The Head of Healthcare will also attend the reducing re offending meeting where allocations are discussed.</p> <p>The Head of Healthcare and Governor will agree and deliver a therapeutic regime accessible by the patients residing in the inpatient unit. HMP Long Lartin is currently awaiting a proposal from Care UK to begin these discussions.</p>	<p>Director for Care UK and Governor</p> <p>Director for Care UK and Governor</p>	<p>August 2018</p> <p>October 2018</p>
5.35	Prisoners accepted as needing transfer to hospital under the Mental Health Act should be moved within the Department of Health timescales. (2.66)	Partly Agreed	<p>This recommendation is partly agreed as although every effort is made to expedite transfers and assess patients promptly, transfers are dependent on several factors such as the completion of appropriate assessments and, administrative processes within the NHS and the availability of accommodation in mental health hospitals.</p> <p>NHS England (NHSE) has developed a plan to improve services for prisoners with mental health issues, and includes specific reference to timely transfer and remission of patients and information about how this will be implemented and sustained.</p> <p>The Prison Transfer and Remission Guidance published by the Department of Health in 2011 has not been agreed by NHSE. NHSE will be consulting on new guidance in relation to transfer and remissions in the first quarter of 2018-19, with timescales that consider clinical urgency and need.</p>	<p>Director of NHS England</p> <p>Director of NHS England</p>	<p>Completed</p> <p>December 2018</p>





			Locally, a clinical pathway will be reviewed to ensure clear processes are in place to assess patients transferred to secure mental health settings.	Director for Care UK and Governor	August 2018
5.36	Prisoners with substance misuse needs should be able to access group work as part of their programme of care and support, where indicated. (2.70)	Agreed	The Head of Healthcare will work with the Governor to find suitable rooms within the prison to enable the running of group work.  An allocation process will be agreed to ensure those prisoners suitable for group work are prioritised through the allocation sequencing boards to ensure access to substance misuse treatment is maintained.	Director of Care UK  Director of Care UK	November 2018  December 2018
5.37	The in-possession medication policy should clearly identify the specific risks of drugs that could be tradable, and provide clear advice to prescribers. (2.76)	Agreed	The Head of Healthcare will work with the pharmacy to draw up an in-possession medication document policy which will be agreed and shared with prescribers so that there is clear guidance around the risk management of tradable medications.  This will be communicated to staff through a written notice and reviewed to identify staff awareness and whether the advice is clear to prescribers. Prisoners will receive an 'Information for You' notice.  HMP Long Lartin will ensure medication on prescription will be issued in line with the safer prescribing guidelines and a review of in possession medication will take place and be communicated to users.	Director of Care UK  Director of Care UK  Governor	August 2018  December 2018  January 2019
	<b>Time out of cell</b>				
5.38	Exercise should be offered for an hour a day. (3.9)	Not Agreed	This recommendation is not agreed due to national policy. The minimum daily exercise in the open air requirement for prisoners on normal location of 30 minutes as set out in PSI 75 / 2011 Residential Services, equally applies to those who have been segregated. This provision is mandatory subject to weather conditions and the need to maintain good order and discipline.  HMP Long Lartin will ensure that the current provision is reviewed as part of the upcoming reprofiling exercise. However, it will be necessary to continue the current provision of 30 minutes per weekday in order to maintain all other areas of regime delivery under current resources. Where regime permits on weekends and Bank holidays additional exercise will be built into the regime.	Director Prisons Policy, Ministry of Justice / Executive Director of Prisons	



5.39	All prisoners should have equitable access to PE facilities and qualifications. (3.10)	Not Agreed	<p>This recommendation is not agreed as HMP Long Lartin cannot commit to providing all prisoners with access to physical education (PE) facilities and qualifications as there are not enough hours in the core day and the current staffing resources to deliver the required number of gym sessions and qualifications for all prisoners. There are also no current plans to increase the staffing resource in this area.</p> <p>However, HMP Long Lartin will ensure that a review of current PE provision takes place and will identify how existing resources can be maximised to offer equitable access to facilities and qualifications as far as possible.</p>	Governor	
	<b>Education, skills and work activities</b>				
5.40	There should be sufficient higher level courses to meet the learning needs and aspirations of prisoners, especially those serving long sentences. (3.21)	Partly Agreed	<p>This recommendation is partly agreed due to commissioning and resourcing constraints. The upcoming changes to education purchasing processes will possibly impact upon this provision. HMP Long Lartin therefore cannot commit to ensuring that there is a sufficient number of higher level courses to fully meet all needs.</p> <p>HMP Long Lartin will ensure that a specific strategy is agreed with Milton Keynes College (MKC - the education provider) to increase access to higher level courses.</p>	Governor	July 2018
5.41	There should be structured provision of English for speakers of other languages (ESOL), and English and mathematics support should be included in all workshops as part of prisoner learning. (3.22)	Partly Agreed	<p>This recommendation is partly agreed as it is not possible to commit to meeting this provision for every prisoner, as the demand for provision will fluctuate significantly and is highly unlikely to be achievable within the available resource.</p> <p>The Head of Reducing Reoffending will oversee the preparation of a draft strategy to introduce English and mathematics into work areas where possible, seeking support from the education provider. The Learning and Skills Manager will implement the strategy.</p> <p>HMP Long Lartin will ensure that a suitable tutor is employed to deliver English for speakers of other languages.</p> <p>English and Maths support will be introduced in workshops according to specific need.</p>	Governor  Governor  Governor	September 2018  March 2019  March 2019



5.42	All prisoners, including vulnerable prisoners, should have access to the 'virtual campus'. (3.23)	Partly Agreed	<p>This recommendation is partly agreed due to current funding. The area where vulnerable prisoners undertake education does not have the necessary infrastructure to provide access to virtual campus (internet access to community education, training and employment opportunities). There is no funding available to install additional infrastructure.</p> <p>However, HMP Long Lartin will conduct a review of the current virtual campus provision to establish a way to gain access to virtual campus.</p>	Governor	December 2018
5.43	The results of prisoners' initial assessment of English and mathematics support needs should be routinely shared with staff in the workshops to help plan individual learning. (3.29)	Agreed	Staff at HMP Long Lartin will ensure that both initial and current assessments are available on the shared IT drive for all staff to peruse. A notice to staff will be published signposting staff to the location of the database containing the initial English and Mathematics assessments provided by MKC.	Governor	July 2018
5.44	Equality and respect for diversity should be promoted and reinforced in the workshops and training areas. (3.30)	Agreed	HMP Long Lartin will arrange for the Education Training Foundation (ETF) to visit the prison to facilitate staff training in workshops and training areas on promoting equality and respect for diversity. This action will be carried out by Operational Managers from the Reducing Re-Offending function and additional checks will be conducted by the Safer Prisons Teams as part of equality monitoring work.	Governor	September 2018
5.45	Trainers should record development of prisoners' personal, social and work skills to ensure that they are better prepared for progression to further education and training. (3.33)	Agreed	ETF will provide training to the workshop instructors on how to best record the development of prisoners' non-accredited personal, social and work skills. Prisoners will also receive a quarterly assessment from workshop instructors leading up to annual appraisal. The quarterly assessment will be reviewed to ensure it encapsulates the development of prisoners' skills and so that they are better prepared for progression to further education and training. In addition, considering how their assessments will be available on transfer.	Governor	September 2018
5.46	The prison should provide a sufficient range and quality of accredited work and vocational training to	Partly Agreed	This recommendation is partly agreed due to commissioning and affordability reasons as the prison is currently funded to provide a certain number of work places and training. HMP Long Lartin will introduce Textiles workshop, a Wood Mill (developing skills for employability – Practical Crafts Levels 2 and 3 for men	Governor	January 2019



	develop prisoners' work skills and ensure recognition of their achievements. (3.37)		working in the woodcraft workshops) and a Launderers Guild National Vocational Qualification Level 2 consisting of six modules – for men working in the Laundry).  Textiles will offer qualifications in the future once Instructors have received the required training. Specific recognition events to celebrate success will be introduced to acknowledge achievements which will be held at the end of each course cohort.		
	<b>Children and families and contact with the outside world</b>				
5.47	Visits should start at the advertised time, and prisoners should be able to have closed visits in privacy. (4.7)	Not Agreed	This recommendation is not agreed due to operational and affordability reasons. The desired outcome to always start visits on time cannot be fully achieved due to unforeseen operational constraints. HMP Long Lartin will start visits on time unless an operational incident dictates this is not possible. Timeliness will be improved through a more robust management oversight of visit start and finish times. The Duty Governor will be made aware of any delays and matters escalated to Functional Heads at the prison.  There is currently no funding in place to redesign the layout of the current closed visits area. Refurbishment of the Visits Hall and work to the closed area will be considered 2018 / 19 financial year but will remain subject to funding.	Governor	
5.48	There should be a supervised children's play area in the visits hall, and a wide range of food and drinks for visitors. (4.8)	Not Agreed	This recommendation is not agreed due to commissioning and potentially financial reasons. HMP Long Lartin does not have a family services provider at the moment to facilitate both parts of the recommendation, and cannot commit to supervision of a play area until affordable service provision plans are developed with the future provider.  HMP Long Lartin is currently undergoing a procurement exercise for a family service provider. However, in the meantime HMP Long Lartin will ensure that the current local provision is maintained.	Governor	
	<b>Reducing risk, rehabilitation and progression</b>				
5.49	Child protection training should be available for all staff, with priority for staff	Partly Agreed	This recommendation is partly agreed due to resource and operational constraints that hinder the provision of this training to <u>all</u> staff. A significant amount of training is currently needed to fulfil several priority objectives related		



	who have direct contact with children. (4.22, repeated recommendation 4.22)		to safety, and the prison therefore does not have the capacity to roll out this training to staff outside of roles where there is non-direct contact with children.  HMP Long Lartin will ensure that an e-learning child protection training package is completed by staff who have direct contact with children. This learning will be measured by the individual completing the training record, this will be logged on to staff individual learning path and fed into appraisal discussions.	Governor	August 2018
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Recommendations	
Agreed	28
Partly Agreed	13
Not Agreed	8
<b>Total</b>	<b>49</b>

