



HM Prison &  
Probation Service

Action Plan: HMP Hull

Action Plan Submitted 12 December 2018

A Response to the HMIP Inspection 26 March - 12 April 2018

Report Published 7 August 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 HULL**

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	The reasons for the increase in self-harming should be understood and action implemented to reduce it. The management and care of prisoners' subject to ACCT procedures should be strengthened – case management should be consistent, care maps should be used effectively and focus on all underlying causes of distress, and reviews should be multidisciplinary. (S38)	Agreed	<p>HMP Hull have expanded the Safer Custody monthly report to include a calendar breakdown of dates when self-harm takes place to identify any potential pattern.</p> <p>This information is recorded every day on the HMP Hull Safer Prisons Local Database. This is later evidenced in the Monthly Statistical Report. This report is condensed and added to the Monthly Safer Prisons Meeting and the Monthly Safe and Secure Meeting. This is discussed at length with the Senior Management Team (SMT) and other Non-Operational Prison Partners. Furthermore, the Safer Prisons department send out a weekly Prison Assessment Report which includes Heat Maps and a Calendar reference.</p> <p>The legal status, Indeterminate Sentence for Public Protection (IPP) prisoners, Incentive and Earned Privilege (IEP) level at the time of the self-harm (or act of violence) taking place and employment status will be looked at to enable the Prison to identify trends and then act to address the findings.</p> <p>The prison will share information with the Regional Psychology Lead on Safety and will collaborate to identify issues and appropriate actions.</p> <p>HMP Hull will ensure the Quality Assurance of Assessment, Care in Custody &amp; Teamwork (ACCT) documents are included within the Residential management checks monthly.</p> <p>The SMT ACCT training was planned and delivered in August 2018. The Duty Governor completes a 72-hour quality check on an ACCT and their findings are relayed back to the Case Manager, the Case Managers Line Manager and the Safer Custody team.</p>	Governor (Head of Residence Safety)	Completed
5.2	All prisoners should have access to clean communal showers that are in good order and provide privacy. All toilets should be	Agreed	Since the HMIP visit HMP Hull have fitted a new pump to showers that were not in working order, painted showers that needed refurbishment with few remaining which will be completed.	Governor (Head of Residence Services)	January 2019



	screened and covered. All damaged cell flooring should be replaced, as should fire safety systems. (S39)		<p>The flooring programme has begun and an additional work request has been submitted and awaiting funding confirmation. The painting programme has been agreed and embedded. Most cells had privacy screens but rollout is ongoing.</p> <p>All wings have new toilet seats in place. A floor replacement programme which will see 200 areas/cells being provided with new flooring is ongoing.</p> <p>A replacement Fire safety system will be completed. This is an ongoing multi-million-pound national upgrade.</p>		<p>March 2019</p> <p>March 2019</p> <p>March 2020</p>
5.3	Equality policies and strategies should be based on a needs analysis specific to HMP Hull and address all prisoners with protected characteristics. The prison should develop and promote a culture that encourages tolerance and embraces diversity. (S40)	Agreed	<p>The prison will conduct an annual needs analysis of the prison population based on protected characteristics.</p> <p>The annual strategy document will be based on the needs analysis, to include all protected characteristics. The publication is still in early stages, working with the National Equalities Lead initially on Disabilities. The initial focus will be to ensure there are robust processes in place to gather and collate disability data from within the prison and from partners (Health Care, Education and Programmes) and young people (YP). The prison is liaising with the Ministry of Justice (MoJ) Improvements Team to consider the use of the Maturity Toolkit, and awaiting findings from Pilot areas. The Contacted London Prisons Safer Custody Lead will arrange a visit to a prison with good practices to support Black and Minority Ethnic (BAME) and YPs.</p> <p>HMP Hull will hold quarterly prisoner forums to support the outcome of the needs analysis above. Forums and prisoner consultations are taking place, minutes and action points (with responsible owners) are evidence of having a far clearer purpose. The Agenda ensures purposeful topics of discussion. The minutes and action points are issued to attendees. The minutes will be issued to Prisoner Information Desk (PID) workers on each wing to share with the wider population in the future.</p> <p>Visits will be arranged to other prisons (identified by HMIP) to identify good practice, from prisons piloting the maturity resource tool kit for young prisoners. The first visit has been completed to HMP Forest Bank in September 2018, there are further best practice visits planned.</p> <p>To implement the Lammy Report recommendations specific to the custodial setting, outlined below:</p> <p><b>Lammy Report - Recommendation 24</b>, The prison will include the IEP process as a standing agenda item on all the forums, including Prisoner representative meetings held monthly by Head of Residence. The prison will include IEP figures in the bi-monthly Equality Action Team (EAT) report to discuss and keep under review.</p>	Governor (Head of Equalities)	<p>April 2019</p> <p>July 2019</p> <p>July 2019</p> <p>April 2019</p> <p>July 2019</p>



			<p><b>Lammy Report - Recommendation 25</b>, Her Majesty's Prison and Probation Service (HMPPS) have asked prison governors to ensure with immediate effect that they have appropriate, diverse forums to review the use of force, with an authoritative member on each panel to represent prisoners' interests. The data collection, and the record of which staff members have used force, is being strengthened to identify apparently anomalous behaviour.</p> <p>Use of force and adjudication will be monitored routinely by the HMPPS equalities sub-committee</p> <p>There is now quarterly scrutiny by diverse outside organisations of the UOF forms.</p> <p>Adjudications are now monitored and discussed at the bi-monthly EAT meeting.</p> <p>HMP Hull holds quarterly external Scrutiny Panels for Discrimination Incident Reporting Form (DIRF) and Use of Force (UoF), through Humberside police. The first scrutiny panel was held June 2018, the second was held Sept 2018 and future panels timetabled and embedded.</p> <p>HMP Hull will ensure that 100% of directly employed staff complete the Civil Service on-line equality and diversity training 2018/19 to promote a culture that encourages tolerance and embraces diversity. The prison will seek assurance from partner agencies, on an annual basis, that their staff have received training in equality and diversity</p> <p>HMP Hull will raise awareness for acceptable behaviours and awareness around Bullying and Harassment (staff). The Human Resources (HR) Business Partner is currently developing a strategy, using tools already available from MoJ HR</p> <p>The Lammy Report recommendations will be reviewed at quarterly Diversity Practitioners meeting with external quarterly meetings to be attended by local Criminal Justice Service (CJS) representatives to discuss how HMP Hull is moving forward on the areas of the LAMMY recommendations, ensuring the prison has sight of the bigger picture in the local area.</p>		<p>Complete</p> <p>April 2019</p> <p>April 2019</p> <p>February 2019</p>
5.4	Risk management planning for release should be consistently good and supported by effective oversight to ensure inter-departmental plans can be developed and action taken to	Agreed	<p>The Prison will hold quarterly practitioner meetings between Offender Supervisors, Case Workers and Community Rehabilitation Company (CRC) staff to raise awareness of respective roles and improve engagement.</p> <p>A training package will be delivered to Key Workers across a variety of subjects related to Offender Management (OM) including CRC activity. The bi-monthly meetings between the OM Hub managers and CRC Managers will develop improved systems for ensuring information exchange, particularly in the last few months before</p>	Governor Head of Offender Management	February 2019



	escalate concerns when necessary. (S41)		<p>a prisoner's release. This will promote more effective risk management planning and avoid duplication.</p> <p>The updates on delivery include Practitioner meetings will commence.</p> <p>There will be further Keyworker training for up skilling, following the initial roll out of Keyworker Training at HMP Hull delivered 12 months ago.</p> <p>Bi-monthly meetings between CRC Managers and Offender Management Unit (OMU) Hub Managers have started and will continue,</p> <p>The monthly multi-disciplinary risk management meetings will review all release plans when 'high risk' prisoners are within 12 months of release and discuss non-National Probation Service (NPS) cases as prisoners enter the Through the Gate (TTG) contract window. Offender Assessment System (OASys) reviews will be commissioned outside the normal review cycle, when a prisoner has repeatedly displayed offending related behaviour and/or demonstrated a significant deterioration in compliance.</p> <p>The Multi Agency Public Protection Arrangements (MAPPA) levels will be considered at these monthly meetings and recommendations made to external probation colleagues if the need for review is identified. The monthly Inter Departmental Risk Management Team (IDRMT) meetings will commence.</p>		<p>January 2019</p> <p>February 2019</p> <p>January 2019</p> <p>January 2019</p>
	<b>Recommendation To HM Prison and Probation Service</b>				
5.5	Prisoners, including sexual offenders and category B men, should be able to move to other prisons to achieve their sentence planning targets and demonstrate that they have progressed. (4.34)	Agreed	<p>The system design supports the intention to ensure that category B prisoners (including those convicted of sexual offences) who are serving over 12 months and Indeterminate Sentence Prisoners (ISPs) are transferred from local prisons to training prisons in a timely way. HMP Hull manages the allocation of these prisoners held at the prison including requesting appropriate transfers. For some groups such as category B prisoners convicted of sexual offences and ISPs, delays have occurred. There is work ongoing to address this through the Prison Estate Transformation Programme (PETP) working in conjunction with the HMPPS Sexual Offending Management Board.</p> <p>The PETP will restructure the adult male Prison Estate to realign supply and demand of prison places and enable men to flow through the Prison Estate to access the relevant services at the correct point in their sentence. HMP Hull has been scoped to become a training prison, which will add much needed training spaces to the estate and support prisoners to be able to progress through their sentences.</p>	Prison Estate Transformation Programme (PETP)	December 2021



	<b>Recommendation To Home Office immigration services</b>				
5.6	Prisoners subject to deportation procedures should only be held in prisons under exceptional circumstances and for as short a time as possible. (2.48)	Not Agreed	The Home Office only detains with a view to deport / remove and have no wish to detain people, whether in prisons or elsewhere, for any longer than necessary. The Government believes that the introduction of an artificial and arbitrary time limit on immigration detention would serve only to encourage individuals, including those who present a risk to the public, to refuse to comply with immigration processes until they reach the point at which they must be released from detention, and therefore frustrate their removal from the UK. This would not be in the public interest. Whilst the aim is to deport foreign national offenders at the earliest opportunity, some detainees will repeatedly refuse to comply with the deportation process, deliberately seek to contravene the system to disrupt efforts to deport them or attempt to lodge multiple appeals. Factors such as these, along with a history of absconding or a risk or harm to the public, can lead to detention in prisons being prolonged. Nearly all individuals held under immigration powers in prisons are foreign national offenders, who will be transferred to immigration removal centres only after careful risk assessment, which is in the public interest given the more open regime of immigration removal centres.	Home Office	
	<b>Recommendations</b>				
	<b>Early days in custody</b>				
5.7	Prisoners should be transferred to prison shortly after the conclusion of their court appearance. (1.10, repeated recommendation 1.5)	Agreed	<p>The objective of minimising the time prisoners spend waiting in court cells is reflected in the Prison Escort and Court Service (PECS) contract. Where late arrivals occur, the PECS contractor will be subject to contract delivery indicators, where it is confirmed that they are culpable of the failing.</p> <p>There are a number of key performance measures (Contract Delivery Indicators) which assist with the management of the service. Each of the Contract Delivery Indicators specifies the criteria by which each area shall be measured and the remedies that shall apply in the event of poor performance. The Current procedures that are employed are to deter poor performance.</p> <p>The CDI criteria for the return of prisoners is – “Return of a Prisoner to the relevant designated location no later than 30 minutes before the latest reception time as listed in Schedule 26 (Prison Reception Times), which is due to the Contractor and results in additional cost to the Authority.” The consequence, or remedy for failing these criteria where the contractor is at fault is, Liquidated Damages. £150 per hour (or part hour).</p> <p>The Governor of HMP Hull has addressed the issue personally with PECS, GeoAmey and the Court Services with a view to making local changes to ensure prisoners are transferred from the Courts to HMP Hull in a timely manner.</p>	Executive Director	Complete and Ongoing



5.8	The reception area should provide new arrivals with a more welcoming environment and men should be able to speak to staff in private. (1.11)	Agreed	<p>HMP Hull will Review the reception process, including speaking to service users to ensure that maximum privacy is given to prisoners on their arrival using the current Reception configuration. This will include ensuring all prisoners are able to have a private conversation with a member of staff, without other prisoners listening.</p> <p>A bid for a building reconfiguration to provide space for private interviews to take place safely and securely has been submitted in accordance with the 10 prisons project to request funds directly from the Minister as part of the decency upgrades. The prison will not be aware if this funding has been granted until further notice.</p> <p>HMP Hull will continue to improve the holding rooms within Reception, including daily cleaning/painting programme, improved signage, information TVs and notice boards so that those in custody for the first time at HMP Hull are provided with information whilst awaiting their initial induction. The cleaning and painting is in place and other improvements are awaiting funding, a review of reception décor by service users will be commissioned.</p>	Governor Head of Operations	<p>March 2019</p> <p>March 2019</p> <p>March 2019</p>
5.9	First night cells should be clean, free of graffiti and properly equipped. (1.12, repeated recommendation 1.14)	Agreed	<p>HMP Hull will refurbish and paint all induction/first night cells on G Wing to provide a clean, decent and well-equipped cell with the following equipment; TV, kettle, picture boards, toilet covering, decency screen, serviceable bed, working toilet and sink unit, clean bedding and toiletries.</p> <p>Hold minimum stock levels (on site) to support the above. Funding has been requested to ensure stock levels are acceptable as part of the new 10 prison initiative.</p>	Governor Head of Residence Services	<p>Completed</p> <p>March 2019</p>
	<b>Managing behaviour</b>				
5.10	Investigations into violent incidents should be undertaken within the agreed timescale. (1.22)	Agreed	<p>The Challenge Support and Intervention Plan (CSIP) referrals for completion are highlighted at the daily morning briefing and noted on the Governors report. The Safer Prisons team are re-evaluating the process of CSIP and how it is conducted locally. Once a concise delegation process has been agreed on, this will then be delivered on multiple wing and gate based awareness sessions. This is to ensure coverage for as many staff as possible.</p> <p>Pocket guides and Cards will be designed and ultimately distributed during awareness sessions. Gate awareness week will help increase awareness with operation and non-operational staff. The drop-in awareness sessions at front facing non-operational staff i.e. Education and Healthcare will also be implemented. The outcomes of criminal investigations and Independent Adjudicator hearings to staff and prisoners are issues as a Notice to Staff (NTS) and Notice to Prisoners (NTP)</p>	Governor Head of Residence Safety	November 2019
5.11	IEP levels should be sufficiently distinct from one another and the prison should provide prisoners on	Agreed	HMP Hull will review the local Incentives and Earned Privileges (IEP) scheme to, ensure there is clear distinction between IEP levels to support positive behaviour, sentence plan compliance and responds to poor behaviour and / or non-compliance.	Governor Head of Residence Services	January 2019



	the basic regime with structured support to help improve their behaviour. (1.23)		<p>HMP Hull provides a basic regime, although it is planned to visit other prisons (identified by HMIP) to identify good practice, from prisons using basic reintegration arrangements. The prison will implement a revised IEP Scheme, based on above comments and in line with the new PSI once published, which will be, informed by consultation.</p> <p>The IEP scheme will be evaluated through stakeholder and service user engagement, and amended as necessary.</p>		Completed
5.12	Information about the nature of adjudications should be used strategically to help identify and deal with trends and patterns. (1.29, repeated recommendation 1.55)	Agreed	HMP Hull will implement a Quarterly Adjudications standard meeting, which will include data analysis of penalties awarded by different adjudicators and penalties given to prisoners with protected characteristics.	Governor Deputy Governor	January 2019
5.13	Segregated prisoners should have access to meaningful regime activities. (1.38)	Agreed	HMP Hull will design an in-cell regime in conjunction with the Head of Reducing Re-Offending, which includes work, library, addressing substance misuse, restorative justice, education and physical activity. The prison will also implement an in-cell regime based on the above designs. The prison will assess the level of risk for each prisoner and allocate an appropriate regime to meet that risk. HMP Hull will incorporate a pay structure for segregated prisoners in the Prisoners' Pay Policy, which is ethical and compliant with national pay policy. Prisoners will have meaningful engagement and HMP Hull aims to improve the current service.	Governor Head of Residence Safety	March 2019
	<b>Security</b>				
5.14	The risk of trafficking posed by recalled prisoners should be assessed and procedures introduced to mitigate it. (1.48)	Agreed	<p>Using existing records, the prison will carry out a security analysis of all licence recalls through the Regional Intelligence Hub and Monitor impact of recall prisoners on the frequency of drug incidents on the First Night Centre / Induction Unit.</p> <p>All the property belonging to recalled prisoners will be subject to Rapiscan itemiser (drug testing) and X-ray.</p> <p>A bid to the Director of Safety and Drug Strategy has been submitted for increased searching staff in Reception and 'dry cells' on identified wings as part of the ten prisons project awaiting confirmation.</p>	Governor Head of Operations	<p>February 2019</p> <p>March 2019</p>
	<b>Safeguarding</b>				
5.15	Prisoners with primarily behavioural issues should not be in the well-being unit. (1.57)	Agreed	HMP Hull have reinforced the referral criteria for the Well-Being Unit to all Operational Managers. The Wellbeing Unit referral criteria will be republished and sent to all staff.	Governor	January 2019



			<p>The Wellbeing Unit has prisoners with behavioural issues, a new policy is being looked at, which will be implemented to ensure the suitability of those with behavioural problems.</p> <p>HMP Hull will re-publish the Wellbeing Criteria. The Wellbeing Unit is part of the prisons Certified Normal Accommodation (CNA) so if the Establishment is at full capacity the Wellbeing Unit will be utilised.</p> <p>The prison is looking at an Electronic referral, which will be a three tier Electronic referral process, including Oscar 1, Victor 2 and a Healthcare professional, on nights it would be Oscar 1 and the Healthcare Professional.</p> <p>The new referral process will state all prisoners who enter the Wellbeing Unit will have a re-integration plan. The first review will take place within 72 hours, will be multi-disciplinary and include those who have placed the prisoner into the Wellbeing Unit. The Duty Governor and team who have authorised the prisoner in the Wellbeing Unit will take ownership of the prisoners three tier re-integration plan, including discharge to ensure justifiable decision making throughout their journey in the Wellbeing Unit. This will help with the prisoner's flow of information onto his new residential area.</p>	Head of Residence Safety	
5.16	Residents in the unit should have access to regular therapeutic interventions as part of a regularly reviewed case management plan. (1.58)	Partly Agreed	<p>This recommendation is partly agreed because, the resources are partly regionally based and the prison has little control over them. In addition the demand for such interventions over which there is limited control, this could exceed what can realistically be provided.</p> <p>The prisoners will be provided with interventions as part of the case management process but most of the resource will be provided by the Regional Psychology team.</p>	Head of Residence Safety/Regional Psychology Lead	January 2019
	<b>Daily life</b>				
5.17	Prisoners should be able to eat together. (2.20, repeated recommendation 2.96)	Not Agreed	The Wing landing space is insufficient to facilitate dining out for 100+ prisoners, in a safe manner.	Governor	
5.18	Prisoners should have access to a full canteen order within 72 hours of arrival. (2.21, repeated recommendation 2.102)	Not Agreed	The national canteen service specification only provides the scope and capacity for weekly orders/delivery. This would require national contract variation negotiations with Commissioners and service providers.	Governor	
5.19	Consultation arrangements should be given a higher profile in the prison. (2.27)	Agreed	HMP Hull will introduce a " <i>What's Happening in Hull</i> " Notice Board on all Residential Units, this will have the information on what forums are available, how to contribute to and access these. The minutes will be provided for all the consultation forums on the " <i>What's Happening in Hull</i> " Notice Boards.	Governor Head of Residence Services	January 2019



			<p>HMP Hull will publish a Notice to Staff and Notice to Prisoners to advise them of the consultation forum that is run, to also include agreed Terms of Reference.</p> <p>The monthly Prisoner Information Desk (PID) Worker / Prisoner representative meetings will take place and minutes to be published. There will be a prisoner exit survey, prisoner complaints and applications analysis. The assurance will provide evidence of engagement and ensure a consultation process is in place with prisoner population.</p>		
5.20	All replies to complaints should be full and constructive. (2.28)	Agreed	<p>Prisoner Complaints PSI 02/2012 - is clear that complaint responses must address the issues raised. The answer is being given on behalf of HMPPS, and not simply from the individual who is replying or their functional area. The complaint must therefore be answered by someone who can provide an adequate and meaningful reply, and others must be consulted before replying where necessary.</p> <p>HMP Hull record, scan and issue 100% of replies to complaints. There is a review of responses to ensure that full and constructive replies are provided. The prison commission an annual analysis of complaint responses by the Regional HMPPS Psychology Team. An annual best practice guide on how to respond to complaints fully and constructively to all staff will be published.</p>	Governor / Head of Business Assurance	January 2019
	<b>Equality, diversity and faith</b>				
5.21	Residential staff, including night staff, should be conversant with evacuation plans for less mobile prisoners. (2.49)	Agreed	<p>The prison holds all Personal Emergency Evacuation Plans (PEEPs), in a folder format, in the Wing office and a PEEP notice on identified cell doors. The prison will publish a Notice to Staff, which will offer guidance on the PEEP process to all staff including those who work on the night shift.</p> <p>All prisoners with a PEEP in place will be highlighted on NOMIS case notes. "Live" Evacuation exercises will ensure staff are aware of evacuation plans for less mobile prisoners.</p>	Governor /Head of Residence Services	January 2019
	<b>Health, well-being and social care</b>				
5.22	Responses to complaints should address all the issues raised. (2.66)	Agreed	HMP Hull will provide training to all Healthcare Staff in how to respond correctly to complaints. The template for letters has been changed. All letters are checked by the Practice Manager or Head of Healthcare prior to being sent to the prisoner.	Director of City Healthcare Partnership CiC	Completed
5.23	All treatment areas should meet infection control standards. (2.67, repeated recommendation 2.69)	Agreed	<p>HMP Hull has submitted Additional Work Requests (AWRs) for all identified clinical areas to meet infection control standards. The Head of Healthcare and the Governor will hold monthly bilateral meetings, to discuss and progress all outstanding AWRs.</p> <p>AWR includes the purchase of clinical hand washing sinks for all clinical treatment rooms. To include the Healthcare Centre on the agreed annual painting programme</p>	Governor Director of City Healthcare Partnership CiC	Completed and Ongoing



			The local assurance at HMP Hull includes bi-monthly meetings with the Head of Healthcare and Governor to check work requests have been completed or escalated. There are weekly Senior Staff Nurse checks of all clinical areas to ensure cleanliness and reporting of any minor work requests are through Planet FM. The Head of Healthcare ensures monthly check of all clinical areas, for compliance and then reports any areas of concern. Medical staff complete an infection control check of the clinic rooms daily.		
5.24	Prisoners with mental health problems should have prompt access to a range of support that meets their identified needs, which should be outlined in a care plan. (2.91)	Agreed	The prison will conduct a full review of the current Mental Health (MH) caseload. All mental health care plans will be reviewed and include the patients' identified mental health needs are completed and documented on Systm1. The prison will complete a review of the Integrated Offender Health pathway and the DART/MH model will be implemented in line with recently published service specifications. The care pathways will be defined and shared with the Offender Health Team to enhance early 'sign posting' to mental health services. The prison will implement a range of self-help support groups, low to moderate depression and Anxiety / Health Promotion / Recovery and Smart Programmes.	Governor Head of Healthcare	Complete and ongoing
5.25	All prisoners should have easy access to a full range of psychosocial support, including self-help groups and prisoner recovery champions. (2.99)	Agreed	<p>The prison Safer Custody Lead has discussed and agreed individualised psychological support packages of care with the City Healthcare Partnership Community services 'Let's talk'. City Healthcare Partnership CiC will initiate a range of self-help support groups, which are low to moderate depression and Anxiety / Health Promotion / Recovery and Smart Programmes. These self-help groups are now delivered each week. Depression and anxiety group and positive mental health group have commenced. The SystmOne Group recording template has been approved by Governance and is now in place to support prisoner group work access.</p> <p>The care pathways have been revised and are now in place to ensure prisoners are put forward for Group work where required. Training has been delivered for using Templates for screening assessments –and the Dart team will support referrals to Group work. These templates are now in use which supports easy access to Group work.</p> <p>The prison has discussed and agreed the Terms of Reference and operating practices for the team of Prisoner Recovery Champions on A Wing (drug recovery Unit).</p>	Director of City Healthcare Partnership CiC	Completed



5.26	The in-possession policy, including the risk assessment and standard operating procedures, should be reviewed to ensure they are up to date and reflect current practice on prescribing highly tradeable medicines. (2.110)	Agreed	<p>PSI 12/2011- Prisoners' Property Prisoners may retain 'in possession' authorised property appropriate to their privilege level under the locally operating IEP scheme, subject to the limitations of the prison's facility list and volumetric control. The standardised facilities list set out in PSI 30/2013 provides a 'menu' of items available for selection and application to each level of the IEP scheme to meet local needs and circumstances. Governors may select items from the list but must not add to it. Where items are selected and where they appear at more than one IEP level they must be allowed at all the levels specified unless the Deputy Director of Custody has authorised an exemption. Books must be selected by Governors for inclusion in local facilities lists.</p> <p>City Healthcare Partnership CiC will lead review and revise and implement a Standard Operating in-possession Policy, in consultation with stakeholders and service users. A Clinical Lead will be appointed to ensure all GPs, Pharmacists and Non-Medical Prescribers are following policy and their prescribing habits are audited bi-monthly.</p> <p>Clinical Lead and the Pharmacist now check weekly 10% of all new receptions to ensure the medication algorithm has been completed correctly. The audits are now fully introduced, with new version of templates. Quality Monitoring Programme audits are now in place.</p> <p>Staff have been made aware of a new process which has an additional governance check in place by pharmacy, so that no in possession medications will now be prescribed without the risk assessment being completed.</p> <p>The ratification of changes to the in-possession policy and the Standard Operating Policy will be reviewed at the Joint Operational CHCP Offender Health meeting and the CHCP Safety and Quality Forum, Clinical Team meetings and Safe &amp; Secure Committee meeting, chaired by the Deputy Governor to ensure all stakeholders are consulted.</p>	Director of City Healthcare Partnership CiC	Completed
5.27	Prisoners should have access to routine dental appointments within six weeks. (2.114)	Agreed	<p>City Healthcare Partnership CiC have reviewed current waiting times for prisoners to see the Dentist and there have been additional dental sessions to meet demand. The waiting times by monitoring weekly 'Did Not Attend' (DNA) rates for pre-booked Dental appointments. Healthcare SMT monitor the list weekly and agreement of cover sessional staff available. The prison will engage with the Healthcare prisoner 'champions' to provide a clear message to all prisoners of the importance to attend appointments once booked, or contact Healthcare through the normal route to cancel in advance. The patients have access to appointments within 6 weeks of request.</p> <p>HMPPS will increase staff presence on daily clinics to deliver/collect prisoners to/from activity areas/wings. The prison now provides two extra escort staff to support patients attending appointments.</p>	Director of City Healthcare Partnership CiC  Governor	Completed



	<b>Time out of cell</b>				
5.28	Retired men and those with disabilities should be unlocked during the working day. (3.9)	Agreed	The new core day supports the prisoner group being unlocked during the working day and all operational groups are now aware. This is reinforced through staff briefings.	Governor Head of Residence Services	Completed
5.29	All prisoners should be able to spend at least one hour in the open air every day. (3.10)	Party Agreed	Residential Services PSI 75/2011 Prisoners are afforded a minimum of 30 minutes in the open air daily, as defined in the SLA/Contract. HMP Hull has Implemented a revised Core Day which includes an hour in the open air. However, should the core day require changing in the future then the site will ensure that at least 30 minutes of open air is afforded to the men as per the mandatory actions set out in the Residential Services PSI 75/2011	Governor Head of Residence Services	Completed
5.30	The prison should monitor and analyse the take-up of provision, including the library and PE facilities, to evaluate the impact and reach of services. (3.11, repeated recommendation 3.13)	Agreed	HMP Hull will undertake an analysis of attendance for Gym and Library every six months. The prison will look at the previous six months to identify if any groups or type of prisoner are not accessing these facilities. The analysis will cover Age, Ethnicity, Disability and Race.  HMP Hull is currently reviewing the analysis at the Reducing Re-Offending Committee to consider and implement if any identified adjustments to provision are required. It is using data from the last six months. The outcome of the review will be discussed at the Reducing Reoffending Committee meeting.  HMP Hull will Publish a Notice to Staff and Notice to Prisoners to inform them of any agreed amendments.	Governor Head of Reducing Re-Offending	February 2019  February 2019
	<b>Education, skills and work activities</b>				
5.31	All prisoners should attend their allocated activities regularly. (3.22)	Agreed	HMP Hull will use education based assessments, sentence plans and resettlement plans to inform the sequencing and allocation to activities. The attendance is monitored daily, any non-compliance is reported to the relevant Wing Custodial Manager to ensure appropriate sanctions for non-compliance are actioned. Where the prisoner's attendance at an activity is linked to a sentence or resettlement plan the OMU will be informed of any non-compliance.  The Key Workers will be informed of any repeated non-compliance, so this can be addressed with the prisoners directly, providing encouragement, support, and motivating prisoners to attend activities as allocated. The Activities Custodial Manager routinely visits wings and work areas, monitoring attendance, seeking feedback, and ensuring that appropriate sanctions are applied for non-attendance.	Governor  Head of Reducing Re-Offending	Completed  February 2019



			<p>The prison will hold four prisoner engagement forums, each year, to receive feedback on activities attendance and explore reasons for non-attendance.</p> <p>The Activities Hub maintain a daily spreadsheet of non-attendance, including reasons. This is shared daily with wing Custodial Managers, who ensure that their staff are applying appropriate sanctions for non-attendance. The Head of Residence and Services is receiving a weekly overview report. Attendance figures are reported daily at the SMT morning meeting. Attendance figures are reported routinely at the monthly Reducing Reoffending Committee meeting and at the bi-monthly QIG. Any corrective action needed to drive up attendance figures are included on the QIP, which is monitored by the QIG.</p>		February 2019
5.32	A detailed analysis of available information and data about different groups of prisoners should be undertaken so that further improvements to the provision can be planned. (3.23)	Agreed	<p>HMP Hull will carry out an analysis of the prison population, labour market intelligence, and prisoner feedback. This will include Age, Ethnicity, Disability and Race. The prison will review the analysis at the Reducing Re-Offending Committee to discuss, agree and implement any adjustments to provision. The data will be reviewed from the analysis as part of the six monthly OLASS curriculum reviews and this will be part of the bi-annual Reducing Re-Offending Strategy Review.</p> <p>This work was not completed in time to be considered as part of the August 2018 curriculum review. As part of this review the level of qualifications in the following areas have been increased to cater for a longer-term population:</p> <ul style="list-style-type: none"> <li>• Level 3 graphics from level 2</li> <li>• Level 3 art from level 2</li> <li>• Level 2 kitchen from level 1</li> </ul> <p>The prison has been working on commissioning the new Education Contract. HMP Hull have suffered a significant Budget cut, which will impact on provision post April 2019.</p>	Governor  Head of Reducing Re-Offending	April 2019
5.33	Career action plans should be reviewed and revised regularly to ensure prisoners' achievements are recognised and changes made where necessary. (3.31)	Partly Agreed	<p>Following Education Induction and assessment the Career Action Plan is copied to the Activities Hub, they will consider the proposed actions as part of the allocation process. This no longer includes any input from the National Careers Service. The prison has been working on commissioning the new Education Contract. HMP Hull have suffered a significant Budget cut, which will impact on provision post April 2019.</p> <p>The commissioning of the Information, Advice &amp; Guidance (IAG) element of this new service has not been announced. When this is announced HMP Hull will have the opportunity to contribute towards the specification for service provision.</p>	Governor Head of Reducing Re-Offending	April 2019
5.34	Instructors should recognise and record accurately the skills that prisoners develop in prison work. (3.32)	Agreed	All prison workshops, waste management, gardens, and kitchen have now implemented the Measure Your Progress document (phase 1)	Governor Head of Reducing Re-Offending	March 2019



			<p>The Measure Your Progress document will be rolled out to all wing based workers in January 2019 (phase 2)</p> <p>The Measure Your Progress document will be rolled out to all other work areas by February 2019 (phase 3)</p> <p>HMP Hull will maintain an accurate record of progress for prisoners, attained against those objectives and give prisoners regular feedback to help improve these skills.</p>		
5.35	Prison managers should ensure that prisoners attend relevant courses in preparation for their release. (3.37)	Agreed	<p>HMP Hull will use education based assessments, sentence plans and resettlement plans to inform the sequencing and allocation to activities.</p> <p>The New NOMIS (currently under development by the Digital Justice Team) activity allocation and appointments sections will be used to clarify what are allocated activities and what are appointments. The new NOMIS movement sheet will be used to show both allocated activities and appointments (with times) on the same page so that Wing Staff, Movements Officers and Activity Supervisors can see clearly where a prisoner should be at a given time during the day. Pilot currently in place on one unit will be expanded to all units.</p>	Governor Head of Reducing Re-Offending	March 2019
5.36	Success rates on level 1 and 2 English courses should be improved. (3.42)	Partly Agreed	<p>The Budget for Education Contract in 2019 has seen a significant reduction, which will impact on overall provision</p> <p>The specification for the contract has yet to be written, but will include service delivery criteria and contract management arrangements.</p> <p>The prisoners are achieving, as of 18/9/2018 the success rates for English are:</p> <p>Level 1 Classroom 82% compared to 73% in September 2017 Fast Track 82%</p> <p>Level 2 Classroom 64% compared to 43% in September 2017 Fast Track 90%</p>	Governor Governor Head of Reducing Re-Offending	April 2019
	<b>Children and families and contact with the outside world</b>				
5.37	All visitors should be able to start their session at the advertised time. (4.10)	Partly Agreed	This recommendation is partly agreed because unfortunately due to operational reasons there could, on occasion be cause for visits to be delayed. HMP Hull will strive to avoid this wherever possible and to communicate with both prisoners and visitors on such occasions.	Governor Head of Operations	December 2019



			<p>HMP Hull will publish social and official visits start and end times to staff, prisoners and visitors. The visit start/finish times will be reviewed in consultation with service users. The Visits Policy will be amended and published based on the findings of the study.</p> <p>The Time and Motion study is to be completed reviewing all aspects which could affect timeliness of visits, this has been conducted over the last two months and once finalised the report will highlight areas for improvement.</p>		February 2019
5.38	Prisoners should not have to wear coloured bibs during visits. (4.11, repeated recommendation 4.55)	Not Agreed	The high visibility vests form part of the Local Security Strategy and Visits policy. To minimise the risk of any brazen walk out by a prisoner, which would undoubtedly result in an escape from the prison. The need to identify prisoners, within the Visits Hall, also minimises the risk of illicit articles being passed.	Governor/ Head of Operations.	
5.39	The prison should investigate why prisoners perceive there to be problems sending or receiving mail and remedial action should be taken to address any issues. (4.12)	Agreed	The prison will publish operating guidelines to both staff and prisoners regarding receipt and dispatch of mail. The prisoner consultative forums will be used to investigate prisoner's perceptions of the mail services. The prison will ensure all correspondence is delivered, to respective wings, on the day of arrival and all mail is processed daily for collection by Royal Mail. HMP Hull have addressed Mail delivery issues and all mail is delivered daily however if the recipient is subject to public protection or security restrictions this may be delivered in 48 hours.	Governor Head of Security and Intelligence	February 2019
	<b>Reducing risk, rehabilitation and progression</b>				
5.40	A reducing reoffending strategy, based on robust analyses of the prison population's needs, should be developed and implemented. It should put offender management at the centre of the work and set out how the CRC and other departments should work together to manage prisoners' risk of harm. (4.24)	Agreed	<p>HMP Hull will undertake a needs analysis of the prison population, which will include:</p> <ul style="list-style-type: none"> <li>• Prisoner questionnaire</li> <li>• Prison Segmentation Data</li> <li>• OASys Report of Criminogenic Need</li> <li>• Current Intervention data from within the prison; Accommodation / Education / Training, &amp; Employment / Health / Drugs and Alcohol / Finance, Benefit, &amp; Debt / Children &amp; Families / Attitudes, Thinking, &amp; Behaviour</li> <li>• Police Offending/Re-Offending Data from Hull and Humber sub-region</li> <li>• Hull and East Riding Reducing Re-Offending Board priorities</li> </ul> <p>The above analysis will be used to develop the 2018/19 Reducing Re-Offending Strategy and identify the responsibilities of each department in delivering the strategy. This includes the OMU using OASys / Basic Custody Screening Tool (BCST) and other assessments within the prison will identify the risk and need of each prisoner.</p> <p>The Reducing Reoffending Strategy sets out how the prison intends to address the risks and the needs of prisoners. The Reducing Reoffending Committee monitors and oversees the implementation of the strategy. Specifically monitoring achieved outcomes, headlines, and reporting any barriers preventing the achievement of the</p>	Governor Head of Reducing Re-Offending	March 2019



			<p>strategy. Corrective action where required will be initiated by the committee. Copies of the minutes are circulated to the Governor and SMT for information and assurance.</p> <p>The OMU will develop a comprehensive sentence plan for all eligible prisoners and ensure that all relevant referrals are made to the departments responsible for delivering interventions. The CRC will develop a comprehensive resettlement plan for all eligible prisoners and ensure that all relevant referrals are made to the departments responsible for delivering interventions.</p> <p>The identification of risk, need and any work carried out to address these will be considered as part of all risk assessments relating to the custodial sentence and any preparation for management of risk on release.</p>		
5.41	The standard of offender management work and contact frequency levels should be improved to promote consistency across all high-risk cases. (4.25)	Agreed	<p>The prison will allocate all prisoners designated 'High Risk of Harm' to Probation staff or more experienced Offender Supervisors. The implementation Hub working will ensure a more even spread of complex cases, improved support for less experienced staff, improved quality and consistency. Offender Managers will maintain a record of contacts which will be reviewed for quality purposes by the SPO on a regular basis. Professional supervision by the SPO will be implemented for all high-risk cases, in line with the new NPS Supervision Framework. The prison will complete a training needs analysis for Prison Offender Supervisors and agree a staff training plan from the findings. The new SPO is now in post and the prison is seeking support from NPS training resources to assist with the Training Needs Analysis (TNA).</p> <p>The implementation of Hub working is expected to commence. HMP Hull will begin to remove any inappropriately allocated cases.</p>	Governor  Head of Offender Management	March 2019  March 2019  January 2019
5.42	Prisoners staying at HMP Hull should be meaningfully involved in a plan for their progression and undertake relevant offending behaviour work to reduce their risk of harm to others. (4.26)	Partly Agreed	<p>This recommendation is partly agreed because decisions about which offending behaviour programmes are delivered at HMP Hull and the resources to deliver them are commissioned by the Regional Psychology team.</p> <p>Offending behaviour programmes and the resources to deliver these programmes are commissioned nationally.</p> <p>HMP Hull works with the Yorkshire Prisons Group (YPG) Psychology Team to identify the needs of our population. The Regional Psychology Team advise MoJ Commissioners of the need within the YPG. Commissioners then advise on what Offending Behaviour Programmes (OBPs) will be commissioned in each establishment</p> <p>HMP Hull will identify the needs of the prison population annually, considering the risk and needs of prisoners who are unable to complete offending behaviour programmes</p>	Governor / Regional Psychology Lead Head of Reducing Re-Offending	April 2019



			<p>at HMP Hull and where appropriate seek to transfer them to a prison where their risk can be addressed.</p> <p>As part of the annual commissioning round, a case is put to the commissioners identifying the needs of the prison population at that time. The prison will consider the risk and needs of prisoners who are unable to complete offending behaviour programmes at HMP Hull and where appropriate seek to transfer these prisoners to a prison where their risk can be addressed</p>		
	<b>Interventions</b>				
5.43	<p>Prisoners who are not suitable for sex offender treatment programmes and those who have committed serious violent offences should have more opportunities to undertake work to change their attitudes, thinking and behaviour. (4.43)</p>	Partly Agreed	<p>This recommendation is partly agreed because decisions about which offending behaviour programmes are delivered at HMP Hull and the resources to deliver them are commissioned by the Regional Psychology team.</p> <p>Within this context the programmes team at HMP Hull recognise that there is a lack of provision for those prisoners with sexual convictions who do not meet the eligibility criteria for Accredited sex offender programmes. On this basis the prison now has a schedule in place for 2018-19 for the delivery of the non- accredited A-Z programme for this group of prisoners.</p> <p>This intervention is also available for those prisoners with non-sexual convictions and the plan is to implement a delivery schedule for this group. HMP Hull plan to deliver an adapted version of the A-Z programme to those prisoners with learning disabilities. The prison is also currently working with the CRC towards delivery of a Police and crime commissioner (PCC) funded domestic abuse programme to eligible prisoners with domestic abuse related convictions in HMP Hull.</p>	Governor / Head of Reducing Re-Offending	April 2019
	<b>Release planning</b>				
5.44	<p>Resettlement plan reviews should be carried out well enough ahead of release so that all necessary action to prepare the prisoner can be taken. (4.48)</p>	Agreed	<p>The Resettlement Plans are initiated when prisoners are first sentenced. All resettlement plans are formulated by the Community Rehabilitation Company under their contract arrangements with HMPPS.</p> <p>Three months prior to discharge prisoners should be returned to their correct Contract Package Area (CPA) and appropriate Resettlement Prison. HMP Hull holds a small population as a Resettlement Prison.</p> <p>HMP Hull will work in partnership with the CRC to facilitate a review of resettlement plans between 12 and 8 weeks prior to the prisoner's discharge.</p> <p>The local assurance at HMP Hull will include six weekly meetings with the CRC Contract Manager. The CRC will report on:</p> <ul style="list-style-type: none"> <li>Staffing levels and any remedial action because of shortfalls</li> </ul>	Governor Head of Reducing Re-Offending	February 2019



		<ul style="list-style-type: none"> <li>• Number of prisoners due for discharge</li> <li>• Number of prisoners who have had a review of their resettlement plan between 12 and 8 weeks</li> <li>• Cases and the reasons why a review has not taken place within 12 and 8 weeks</li> <li>• Agree any remedial action to address shortfalls</li> </ul> <p>CRC Management attend the prison SMT Meeting monthly to give further assurance to the Governor on their performance relating to review of resettlement plans.</p>		
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Recommendations	
Agreed	33
Partly Agreed	7
Not Agreed	4
<b>Total</b>	<b>44</b>

