



HM Prison &
Probation Service

Action Plan: HMP Onley

Action Plan Submitted: 13 May 2019

A Response to the HMIP Inspection: 12-23 November 2018

Report Published: 21 March 2019

INTRODUCTION

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

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



ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMP ONLEY

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	Main recommendations to the Governor				
5.1	The first night environment should be welcoming and reassuring. New arrivals should be supported and informed by staff and peer workers. Cells should be clean and fully equipped. (S62)	Agreed	<p>A designated reception room is to be created on H Wing (Induction Wing). This will be comfortable, well decorated, well-maintained and with sufficient information available. A wing Prisoner Information Desk (PID) worker will hold responsibility for the room.</p> <p>A comprehensive booklet will be provided to all new receptions that includes a time table for induction. All new receptions will be interviewed in a private room in reception and peer support, Violence Reduction / listener representatives are available at this time. In addition, all new receptions will be seen by the H Wing (Induction Wing) orderly. An additional Prison Officer will be profiled for the reception of prisoners onto H Wing Induction to facilitate a smooth transition from reception, and to ensure support and supervision for those new arrivals.</p> <p>All cells on the first floor landing (1s) will be dedicated for new arrivals and prepared and cleaned on vacation, prior to new receptions (prisoners) arriving, and will be fully equipped. All faults/damage on 1s landing cells will be immediately reported to the estates team and prioritised. Graffiti in the cells on the first floor landing will be painted over immediately on vacation of the cell. The condition and fixtures and fittings of the first floor landing cells will be part of the wing manager's assurance checks. Pre-occupancy checks will be undertaken by wing officers for all new receptions.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>June 2019</p> <p>June 2019</p> <p>June 2019</p>



			HMP Onley will review all wing workers job descriptions, policy and compacts to ensure there is responsibility for preparing cells ready for occupation.	Governor	June 2019
5.2	Robust strategic action should be taken to reduce levels of violence and make the prison safer. This should include an analysis of violent incidents; a local violence reduction strategy, with associated action plans; and improved violence management and victim support processes which are well known to all staff and implemented reliably. (S63, repeated recommendation S45)	Agreed	<u>Analysis of violent incidents</u> HMP Onley will introduce prisoner Safety Surveys every six months. Safer Custody Managers will analyse the results and the findings will be shared with the Safer Custody meeting to develop a multidisciplinary action plan, these actions will be monitored through the monthly meeting.	Governor	June 2019
			Attendance at the Violence Reduction meeting is closely monitored and non-attending departments at each meeting are challenged by the Functional Head.	Governor	Completed
			The Violence Reduction meeting will be reviewed by the Function Head to ensure: <ul style="list-style-type: none"> • Violence Diagnostic Tool data is interrogated at every meeting. • Trends and themes from Challenge, Support & Intervention Plan (CSIP – a case management model for violence) are discussed and actions are identified and monitored. • Safer Custody Supervising Officer will produce a report based on feedback and intelligence from staff and prisoners during the course of their duties. • Security Analyst feedback and tasking is discussed. • Violence Reduction prisoner representative feedback is explored. • Analysis of performance measures is conducted. 	Governor	June 2019
			Working with the Security function, HMP Onley will improve the exchange of information with regard to gang affiliations, to include improved liaison with sending establishments and develop a local strategy to address the risks posed by gang affiliation.	Governor	June 2019
			<u>Local violence reduction (VR) strategy and action plans</u> A local Safety Strategy will be produced by the Functional Head based around the national framework of the 5Ps (People, Procedural, Physical,	Governor	July 2019



		<p>Partnerships and Population) and will be tailored to local needs, including a 'live' action plan. Once the Safety Strategy is finalised the Regional Safer Custody Lead will review it and check it is fully compliant with National Policy. The "live" action plan will be reviewed every 2 months to ensure it has been updated. Dip tests will be carried out to ensure that what is claimed to be happening actually is happening. Comments will be recorded on visit report which are sent to The Governor and the PGD.</p> <p>The live action plan will be monitored locally at the monthly violence reduction meeting and with external scrutiny from the Regional Safer Custody Lead every two months. Sample tests will be carried out to ensure actions are progressing. Comments will be recorded on visit reports which will be sent to the Governor and the Prison Group Director.</p> <p>A Promoting Risk Intervention through Situational Management (PRISM) Assessment will be undertaken in collaboration with all managers and actions derived from this will be implemented with completion monitored through the Violence Reduction meetings.</p> <p>Failure to reduce the levels of violence within the prison has been added to the establishment Risk Register, and actions to mitigate are committed to and reviewed quarterly by the SMT.</p> <p>The recruitment process for Violence Reduction representatives has improved and includes more in-depth application and structured interview based on standard questions. A copy of the application form will be included in the monthly prisoner's newsletter.</p> <p>Due to the link between lack of maturity and violence a selection criteria based on data within OASys will be established selecting a small cohort of men. Key workers for these men will be provided with a resource pack of short interventions to use to support the men. This will be reviewed by the Functional Head after 6 months and discussed at the VR meeting.</p> <p><u>Improved violence management</u></p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>July 2019</p> <p>Completed</p> <p>August 2019</p> <p>May 2019</p> <p>May 2019</p>
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		<p>All violent incidents will be subject to CSIP investigations, completed within the prescribed timescales (72 hours) and prisoners identified as requiring intervention will be managed through the CSIP process.</p>	Governor	May 2019
		<p>10% of CSIP documentation will be quality assured by the Safer Custody Custodial Manager with the findings fed back to individuals. Investigations which fall outside of the prescribed timescales will be addressed through line management.</p>	Governor	May 2019
		<p>Safer Custody staff interview new arrivals with significant Violence in Prison Estimator (Viper) scores and share information with appropriate departments, including Security and Residential.</p>	Governor	Completed
		<p><u>Victim support processes</u></p>		
		<p>HMP Onley will implement local Vulnerability Referrals for staff to identify those in need of support or who are under threat and submit a referral to the Safer Custody Team. Safer Custody will interview the prisoner and take appropriate action to support their safety.</p>	Governor	May 2019
		<p>HMP Onley will introduce a new process where men who have been victims of violence are placed onto a supportive plan to ensure their safety. This process will be managed by the Safer Custody team.</p>	Governor	May 2019
		<p><u>Staff awareness and implementation</u></p>		
		<p>HMP Onley will introduce staff Safety Champions on each wing to form closer links with Safer Custody and to work with them as a flexible task providing information to prisoners about the support that is available to them at HMP Onley.</p>	Governor	August 2019
		<p>HMP Onley will ensure the Safety Diagnostic Tool (SDT) is accessed and utilised by as many appropriate staff as possible by providing easy to understand information via an information booklet to staff promoting its use. There will be a monitoring process for the amount of usage on the SDT and individual usage will be monitored and those not using it will be challenged.</p>	Governor	August 2019



5.3	Security intelligence should be promptly and fully analysed, and effective action taken in response to the concerns identified. (S64, repeated recommendation S46)	Agreed	The backlog of intelligence reports has now been reduced. An additional analyst has been recruited and recruitment is underway for an additional collator in order to ensure that the backlog continues to reduce and that prompt analysis of security intelligence can be maintained.	Governor	May 2019
5.4	A comprehensive drug supply reduction strategy and action plan should be implemented and monitored for effectiveness. (S65)	Agreed	A comprehensive drug supply and reduction strategy and action plan will be implemented. The action plan will be monitored at monthly, Supply Reduction Meetings. This is a monthly information sharing facility that will proactively share information with all relevant departments within the establishment and where required, will share information with external and partner agencies to prevent the ingress of illicit substances and the misuse of prescribed drugs.	Governor	June 2019
5.5	There should be sufficient education, training and work places for the population, and prisoners should attend their allocated activity. (S66)	Partly Agreed	<p>This recommendation is partly agreed as within current resource and facilities HMP Onley are unable to provide work for all men. HMP Onley will implement the Prisoner Education Framework contract arrangements and use the Dynamic Purchasing System to enhance and increase capacity for education, training and work places. HMP Onley will also review and increase capacity for industry areas, including recycling and construction.</p> <p>The PE programme will be extended to include consistent course offerings which will increase activity places.</p> <p>An activity management policy will be published that sets out a standardised approach to allocation and attendance procedures for all work areas. This will be driven by the Activity Hub and attendance figures will be monitored at the daily morning meeting.</p>	Governor	September 2019
				Governor	September 2019
				Governor	August 2019
5.6	All prisoners should have an up-to-date OASys assessment and sentence plan. Contact between	Partly Agreed	This recommendation is partly agreed as the establishment has no control over other establishments transferring offenders in without an OASys (Offender Assessment System) review.		



	confirmed by offender managers at least six months before release. (4.19)		<p>confirmation of MAPPA levels from outside Probation, HMP Onley are unable to guarantee that the requested information is returned.</p> <p>New offender management processes, EQuIP (Excellence and Quality in Processes), will be implemented from September 2019 which will assist in obtaining MAPPA levels. Community Offender Managers will be responsible for setting the MAPPA levels and this information will then be visible to the Prison Offender Manager via the same system.</p> <p>A nationally agreed escalation process is in place for those cases where the required information is not received. This process involves an escalation form being completed by the prison and sent to the MAPPA Co-ordinator, who is then required to escalate the issue to the relevant National Probation Service Head of Local Delivery Unit.</p>	<p>National Probation Service</p> <p>Governor</p>	<p>September 2019</p> <p>Completed and ongoing</p>
	Recommendations to the Governor				
	Managing behaviour				
5.8	Violent incidents should be promptly investigated, and findings shared with safer custody and security staff as appropriate. (1.20)	Agreed	<p>All violent incidents will be subject to Challenge, Support Intervention Plan (CSIP) investigations which will be completed within 72 hours and monitoring of this will take place in the Safer Custody function. Those that are at risk of not meeting the timescale will be reported at the morning operational meeting.</p> <p>10% of CSIP investigations will be subject to quality assurance checks undertaken by the Safer Custody staff to ensure thorough investigation, appropriate use of the monitoring system and any issues fed back to managers.</p> <p>Issues and trends are analysed at the Violence Reduction meeting and discussed in the weekly Safety Intervention Meeting (SIM). Information is shared with the Security Analyst with responsibility for Safer Custody and with the Security function via their attendance at the monthly meetings.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>May 2019</p> <p>May 2019</p> <p>Completed</p>



5.9	The management of prisoners who self-isolate in their cell and those who do not leave their wing should include regular reviews of their status, and plans for their reintegration. (1.21)	Agreed	The self-isolated prisoners' policy is to be reviewed and updated to include fortnightly case management reviews by wing managers, supported by Safer Custody. This will include discussions on reintegration. There is a reintegration strategy developed, which will continue to be embedded.	Governor	July 2019
			Safer Custody will undertake weekly assurance checks on all self-isolator documentation to include mandatory visitors who are ensuring their welfare including Duty Governor, Healthcare and IMB Safer Custody SO and Wing Custodial Manager (CM) and take remedial action if the requirements are not met. Self-isolated prisoners will be seen at least weekly by a senior manager.	Governor	July 2019
5.10	The incentives and earned privileges scheme should be used consistently to challenge poor behaviour. (1.22)	Agreed	It will be the responsibility of the Orderly Officer to ensure that Incentives and Earned Privileges (IEP) reviews take place either by conducting them themselves or disseminating this work to other CMs such as Duty Manager support. Sample tests by the Head of Residence will be completed on 10% of cases to ensure this happens, and those that do not ensure the reviews are completed will be challenged. A notice to CMs will be distributed to ensure they are aware of their responsibility as Duty Managers.	Governor	June 2019
			To ensure that low level misbehaviour is challenged, HMP Onley will keep reminding staff through newsletters and staff training sessions. A new IEP checklist has also been issued to staff.	Governor	June 2019
5.11	Managerial oversight of disciplinary procedures should focus on ensuring that hearings are held and completed within a reasonable time. (1.26)	Agreed	The Deputy Governor and Head of Residence & Safety will review the current adjudication process and any disciplinary procedures to ensure this captures the recent published guidance and that adjudications are concluded without unnecessary delay. The Custodial Manager within the Care and Segregation Unit (CSU) will also play a major role in the process to ensure all evidence and paperwork is coordinated and prepared in time for cases to be heard fairly and swiftly in accordance with the Prisoner Discipline Procedures PSI.	Governor	May 2019
			The monitoring logging system will be reviewed to include information where charges are overdue which will be highlighted and measures taken to address any delay.	Governor	May 2019
5.12	All use of force incidents should be fully	Agreed	A monthly Use of Force meeting has been set up, chaired by the Head of Operations, and a new Use of Force Co-ordinator is now in post and	Governor	June 2019



	documented and reviewed by managers, with the findings shared with relevant departments. (1.31)		undergoing training. Any incidents that are not fully documented will be followed up via line managers and performance procedures. The June target date allows time for new staff to embed and become fully effective in this process. The current Use of Force database will be reviewed to include a column where all Annex "A" outstanding paperwork will be monitored by the Use of Force co-ordinator to ensure timely completion.	Governor	June 2019
5.13	The standard of video-recording of planned use of force should be good enough to enable meaningful review by managers. (1.32)	Agreed	All planned removals are now recorded via video camera which has improved the quality of footage. Use of this has been communicated to all staff via Custodial Managers. 10% of footage from incidents will be reviewed by the use of force co-ordinator as standard with all footage being viewed in the case of a prisoner complaint or injury.	Governor	June 2019
5.14	The regime for segregated prisoners should be enhanced, subject to individual assessments. (1.38)	Agreed	A review of the regime for segregated prisoners will be completed to ensure statutory entitlements are provided. The review will look to include library and worship opportunities subject to individual assessments. HMP Onley will also explore the possibility of exercise equipment on one exercise yard, the use of which will be risk assessed. This will be for all residents on the Wing who will need the physical exercise.	Governor Governor	July 2019 July 2019
5.15	Reintegration plans for segregated prisoners should challenge the reasons for poor behaviour and detail how they will be reintegrated back to a residential unit. (1.39, repeated recommendation 1.51).	Agreed	HMP Onley will implement a local re-integration planning process to run in parallel with Rule 45 reviews (reviews for continued segregation) and contain a staged process for re-integration to residential wings. A new template will be designed to include a range of reintegration options to be considered during these reviews.	Governor	July 2019
	Security				
5.16	Security objectives should be set and shared with staff. (1.47)	Agreed	Since January 2019, security objectives are now set through the Local Tasking Assessment (LTA) team who meet monthly, and are then agreed by the Tactical Tasking & Coordination Group (TTCG). A global email is then used to communicate these objectives to the full staffing group.	Governor	Completed



5.19	The mandatory drug testing programme should be sufficiently resourced to undertake all types of testing within the required timescales. (1.50, repeated recommendation 1.35)	Agreed	The new staff profiling will provide sufficient resource to deliver all types of Mandatory Drugs Testing within the required timescales.	Governor	July 2019
	Safeguarding				
5.20	The prison should implement an evidence-based strategy which identifies the main causes of self-harm and actions to reduce it. Measures to drive improvement should be monitored over time. (1.56)	Agreed	<p>A review of all available evidence will be carried out to produce a new Safer Custody Strategy. The review will consider trends in self harm from the following areas:</p> <ul style="list-style-type: none"> • number of incidents • location • time • ethnicity • method • IEP level • reason given • any other relevant factors <p>Information to inform this will be drawn from: the Incident Reporting System; ACCTs; the Safety Diagnostic Tool; prisoner safety surveys and other prisoner feedback; and feedback from staff.</p> <p>From this a new strategy will be drawn up to identify the main causes of self-harm at Onley and put in place clear actions to address these. The monthly Safer Custody meeting will then analyse self-harm data on an ongoing basis to determine the effectiveness of the actions identified in the strategy and review or amend these where necessary.</p>	Governor	<p>August 2019</p> <p>August 2019</p> <p>August 2019</p>
5.21	All prisoners should have good, well-promoted access to Listeners 24 hours a day, and every wing should have a	Agreed	HMP Onley will commit to 24 hour access to a Listeners and Samaritans telephone. HMP Onley will use a centralised system, which enables better accountability and access. The Samaritans telephones will be monitored and kept in good working order and always be available.	Governor	May2019



	working Samaritans telephone. (1.57)		<p>A weekly Listeners rota will be drawn up by Safer Custody to ensure that prisoners have 24 hour access to a listener. A Listener will always be in attendance at Reception for new arrivals.</p> <p>Listeners will be promoted using posters on Listeners' doors, photographs of Listeners on the wing office doors and by encouraging Listeners to wear their t-shirts.</p>	Governor	June 2019
				Governor	June 2019
5.22	The prison should implement effective processes to identify and protect adults at risk of harm, abuse or neglect. (1.60)	Agreed	<p>HMP Onley's Adult Safeguarding Strategy will be re-launched with an information booklet produced and distributed to staff, to include information on the referral process. Staff Information Notices will be issued to support this. This will also give guidance for staff on how to report issues directly to the Northampton County Council Adult Safeguarding Team, if they feel it is appropriate. The Safer Custody Custodial Manager will attend the area Safeguarding Adults board meetings and will be the responsible manager for the safeguarding process.</p> <p>Those regularly undertaking prisoners' Induction interviews will be given additional Adult Safeguarding Awareness support from the Safer Custody Team.</p> <p>HMP Onley will consider an Adult Safeguarding referral during the assessment for all newly opened ACCT assessments. Assessors will document within the ACCT assessment that they have considered this and what action they have taken. Adherence with this instruction will be monitored through the management checks that are in place currently.</p> <p>Through the initial health screening, Healthcare staff working with new receptions flag up those deemed vulnerable in the prison environment, in order that support can be offered at the earliest opportunity. Those men requiring further support or safeguarding are discussed daily at the health operational briefing.</p> <p>Access to advocacy services will be publicised during induction as well as through the prisoner newsletter and access will be provided for vulnerable adults.</p>	Governor	<p>August 2019</p> <p>August 2019</p> <p>May 2019</p> <p>Completed</p> <p>May 2019</p>



			A prisoner 'Buddy' scheme will be introduced to offer additional support for vulnerable prisoners, if required. This will be managed by the Safer Custody Custodial Manager. Recruitment for these posts will be via application (held within the prisoner newsletter) and structured interview.		June 2019
	Staff-prisoner relationships				
5.23	Staff should be skilled and confident in confronting and controlling poor prisoner behaviour and should be supported in undertaking their role. (2.6)	Agreed	HMP Onley will devise and implement a training programme to ensure that staff are skilled and confident in controlling and confronting poor prisoner behaviour. This will include Control and Restraint refresher training (C&R), Key Worker training, CSIP and Five Minute Intervention training delivered through monthly staff training. Tutors will be encouraged to include techniques that will promote confidence in tackling poor behaviours on the landings and around the prison.	Governor	May 2019
	Daily life				
5.24	Outside and internal communal areas should be kept clean. (2.14)	Agreed	<p>HMP Onley will implement new cleaning schedules, job descriptions, training records and cleaning materials that allow prisoners to have the tools to complete the job required. Wing cleaners will ensure that the outside and inside areas are cleaned daily. A cleaning Policy has been published which includes all the above information and the H&S systems of work and risk assessments.</p> <p>A new Custodial Manager checklist was implemented in January to ensure that weekly tests are undertaken to ensure their staff are supervising cleaners adequately, and that the cleaners are completing their roles as per the job description, wearing correct PPE and that areas are clean.</p> <p>Weekly checks are undertaken by the Deputy Governor and Head of Residence on walk around to ensure the standard of cleanliness is improved. Staff will be made aware of this, as a priority, through communications such as newsletters, etc. A monthly competition will be put in place advertised by notice to staff and prisoners where the cleanest wing is determined with prizes to the staff and prisoners involved.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>June 2019</p> <p>Completed and ongoing</p> <p>Completed and ongoing</p>



5.25	Cells should be maintained to a consistent standard, all toilets and showers should be screened to ensure privacy.	Agreed	<p>Daily Accommodation Fabric Checks (AFCs) are completed to ensure that cells are in good working order. The AFCs being completed are quality assured by Custodial Managers weekly and documented on their check sheet. Refurbishment of cells is documented on a spreadsheet on the shared drive for audit purposes.</p> <p>Work is ongoing to provide screening for toilets and works requested are placed on Planet FM, where necessary.</p> <p>Funding for shower screening has now been agreed and HMP Onley are currently liaising with Amey to agree a start date for this work. This will be completed by end of September 2019.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>September 2019</p> <p>September 2019</p>
5.26	All cell windows should be in good condition. (2.15)	Agreed	The window refurbishment is underway and is a 2 year programme set to ensure each cell in the older part of the jail has new ventilated windows, curtains and is repainted and refurbished to a good standard.	Governor	October 2020



5.27	Prisoners should have sufficient clean clothes and bedding for the week. (2.16)	Agreed	<p>There are two washing machines and dryers available on the wings. If these break down there is a process to get them working again as quickly as possible, or replaced if necessary. In addition, dirty laundry is picked up twice daily (Mon-Fri) from the wings by a laundry party and Central Exchange Stores send this to HMP Long Lartin each week for cleaning. These processes were in place at the time of the inspection and communication has now improved to ensure that prisoners understand the system. A Prisoner Information Notice and Staff Information Notice has been reissued to promote this process and information is now included in the induction process.</p> <p>Head of Residential Services, the AMEY site Manager, Business Hub Manager and Activities Managers are working collaboratively to review and implement a new system which will address the responsibility of kit, effective ordering and distribution.</p>	Governor Governor	Completed and ongoing May 2019
5.28	Prisoners should have prompt access to their property. (2.17)	Agreed	HMP Onley now have increased managerial oversight in Reception which has led to a reduction in the backlog of property processing and resultant complaints. A database will be put in place to ensure that once authorised the Reception Custodial Manager is able to monitor the actioning of the application. Issues will be discussed at bilat by the Reception Custodial Manager and their Functional Head.	Governor	May 2019
5.29	Breakfast should be served on the day it is to be eaten and the evening meal should be served after 5pm. (2.22, repeated recommendation 2.90)	Not Agreed	<p>This recommendation is not agreed as the regime at HMP Onley is set to the National Core Day, and staffing and the regime are profiled around this. 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 and there are toasters available for prisoners to make toast in the mornings prior to freeflow movement.</p> <p>Moving the meal time to after 5pm would require additional resources that are not available at this time and would impact on the evening regime reducing the opportunity for prisoners to attend sessions such as the Gym, Library, and religious events.</p>	Governor	



5.30	The serving of food, including the issuing of breakfast packs, should be supervised by staff. (2.23)	Agreed	Following the introduction of the new staffing profiles, a member of staff will supervise meal times at the servery. Staff from non-residential areas such as reception, Mandatory Drug Testing (MDT), Offender Management Unit (until Prison Offender Managers are in place), escorts, etc. will be detailed to the wings during the serving of meals. Assurance checks will be completed by Custodial Managers and Duty Governors, and reported back at the morning meeting until this area is fully embedded as part of custom and practice. This process should be embedded by April 2019, when all Custodial Managers should be in post.	Governor	May 2019
5.31	New prisoners should be able to receive a prison shop order within two days of arrival. (2.24)	Partly Agreed	This recommendation is partly agreed as the prison shop order is operated by DHL Warehouse on a weekly contract and HMP Onley's shop operates once a week on Tuesdays. The Canteen Sheets are printed on a Thursday so any prisoner arriving after Thursday will miss out. The recommendation is currently met for all other prisoners. All prisoners arriving at Onley are offered vaping packs, non-vaping packs and Pin Phone credits. The non-vaping pack contains items including milk, sugar, tea, coffee, biscuits and chocolate. Prisoners are advanced on credit, where appropriate, until the next canteen day.	Governor Governor	Completed
5.32	Applications should be tracked and quality assured. (2.32)	Agreed	Applications will be tracked and a 10% sample check on application forms will be completed and checked against current procedure. Custodial Managers will quality assure the applications log book from the wing perspective. A full review of the Application Process will be completed (in line with the PIP (Performance Improvement Plan) and an associated action plan will be developed.	Governor Governor	May 2019 June 2019
5.33	Confidential access complaints should be responded to promptly. (2.33)	Agreed	All confidential access complaints submitted, once accepted by the Governor, are logged on the monitoring record separate from the official records held by the Business Hub Office. This is providing a two way cross reference check and monitoring for compliance.	Governor	Completed
	Equality, diversity and faith				



5.34	There should be clear personal leadership and accountability at senior level for ensuring that the needs and treatment of prisoners from minority groups are monitored and action taken to ensure their needs are met. (2.38)	Agreed	The Governor, or Deputy Governor in his absence, will chair the Equality Action Team (EAT) committee meetings and make functional heads pro-actively responsible to ensure treatment of prisoners are fair and in line with HMP Onley's commitment to procedural Justice, through the adjudication process, Use of Force and Complaints Responses. HMP Onley will also empower frontline Custodial Managers to be the first line of support on all matters on equalities in all forms including minority groups and protected characteristics.	Governor	May 2019
			There is now a dedicated Equalities Manager in post and part of the responsibilities of this role is to ensure that the monitoring and analysis of related data is improved.	Governor	Completed
			All incidents of discrimination and victimisation are investigated by a Band 5 and Band 6 Managers through the D.I.R.F process (Discrimination Incidence Reporting Form).	Governor	Completed
5.35	Prisoner forums should take place for all protected characteristics. (2.46)	Agreed	A rolling, annual timetable will be put in place for all protected characteristics forums. These will be bi-monthly. Leads will attend all forums relating to their characteristic and feedback to the Equalities Action Team (EAT) meeting.	Governor	August 2019
5.36	Prisoners requiring a personal emergency evacuation plan should have one, and all staff having contact with prisoners should be aware of their responsibilities in relation to this procedure. (2.47)	Agreed	All prisoners requiring a Personal Emergency Evacuation Plan (PEEP) will have one upon identification. These plans will be checked by Equalities staff the following day.	Governor	July 2019
			Staff awareness will be increased via Staff Information Notices. The Regional Health and Safety team will also support any additional training gaps identified.	Governor	July 2019
			A list of PEEPs will be produced and provided to all night staff to ensure that they are aware of their responsibilities in relation to prisoners with a PEEP.	Governor	July 2019
	Health, well-being and social care				



5.37	A representative health forum should be set up, to inform service developments and enable collective concerns to be addressed. (2.61)	Agreed	Posters were sent to all wings to request applications to join the Patient Experience Group. No applications were received for this initially so information was taken to the Prison Council Meeting in February, with an extended deadline for applications. The first Patient Experience Group has now taken place with limited uptake. Plans are in place to raise awareness using existing facilities in readiness for the next event.	Director of Northamptonshire Healthcare NHS Foundation Trust	Completed
5.38	All clinical areas should comply with infection control standards and offer a decent, safe and confidential environment. (2.62)	Agreed	<p>The area in the health centre which the Inspectorate did not feel was suitable for clinical treatments has now been taken out of use.</p> <p>During the Northamptonshire Healthcare NHS Foundation Trust (NHFT) Infection and Prevention Audit, the flooring in the main corridor was noted as requiring replacement and a business case is being submitted for this work. Northamptonshire Healthcare Foundation Trust are responsible for submitting the business case whilst the prison are responsible for the installation and approval of the cases.</p> <p>New furniture has been ordered for group rooms as the existing furniture was made from non-wipeable fabric and appeared tired.</p> <p>A request has been submitted for a hand washing sink to be installed in the clinic room to increase clinical intervention rooms.</p>	<p>Director of Northamptonshire Healthcare NHS Foundation Trust</p> <p>Director of Northamptonshire Healthcare NHS Foundation Trust / Governor</p> <p>Director of Northamptonshire Healthcare NHS Foundation Trust</p> <p>Director of Northamptonshire Healthcare NHS Foundation Trust / Governor</p>	<p>Completed</p> <p>December 2019</p> <p>Completed</p> <p>July 2019</p>
5.39	There should be a systematic, prison-wide strategy to promote prisoner well-being. (2.65)	Agreed	The Head of Healthcare will work with the Governor to publish a health promotion strategy with a whole prison approach in April 2019, including national awareness days. This work will involve close consultation with other departments, including gym staff and will include displays of seasonal promotional material on the wings and within healthcare, in addition to existing events such as the Wellman clinic.	Director of Northamptonshire Healthcare NHS Foundation Trust / Governor	May 2019
5.40	All prisoners should have a secondary health screen within seven days of arrival. (2.75)	Agreed	All prisoners are provided with an appointment for their second reception screen during their initial screen, however, there is a high number of 'Did Not Attend' at present for this second screening. Healthcare will carry out all second screens within the induction wing to attempt to reduce non-attendance. A room to use within H wing has already been identified which has System One (clinical case management system) installed.	Director of Northamptonshire Healthcare NHS Foundation Trust	May 2019



5.41	There should be a memorandum of understanding and information sharing agreement between agencies, to outline appropriate joint service provision of social care. (2.80)	Agreed	A meeting has taken place between the prison and the social care and healthcare representatives to discuss roles and responsibilities, and to agree a memorandum of understanding and information sharing between agencies. The Memorandum of Understanding will be in place by May 2019.	Director of Northamptonshire Healthcare NHS Foundation Trust / Governor	May 2019
5.42	Needs-led psychological interventions should be available. (2.89)	Agreed	A business case has been submitted for additional funding to meet the needs of the New Mental Health Specification April 2018 to provide trauma focused interventions for men at HMP Onley. The business case includes funding for a clinical psychologist, psychology assistant and additional psychiatry sessions to further develop a psychologically informed approach within the existing mental health team.	Director of Northamptonshire Healthcare NHS Foundation Trust	June 2019
5.43	Transfers to hospital under the Mental Health Act should take place within Department of Health transfer target timescales. (2.90)	Partly Agreed	<p>NHS England is working with partners across the criminal justice system to improve and redesign services for offenders with mental health difficulties; this includes diverting them from custody, and ensuring timely and appropriate transfers of care both to and from Mental Health hospital and also through the gate into the community. NHS England anticipate going to full consultation on the refreshed Transfer and Remission Best Practice Guidance in Quarter 4 of 2018-19, with publication in early 2019-20. This has currently been delayed due to the Publication of the Mental Health Act review by Simon Wessley published in December 2018.</p> <p>Annual Benchmarking Audits are being undertaken to provide a fuller understanding of the delays in the Transfer and Remission of prisoners under the MHA and NHS England is also working on improved Indicators of Performance to measure delays.</p> <p>NHS England are focussing on an offender mental health pathway which will ensure that offenders are directed to the most appropriate intervention to their needs at the right time in the criminal justice system. The programme of work includes; ensuring timely and appropriate transfers to a mental health hospital, timely remission to prison as part of a planned</p>	Director of Northamptonshire Healthcare NHS Foundation Trust	June 2019



			episode of care, and to ensure that those requiring treatment for mental ill health have access to high quality care.		
5.44	Prisoners starting clinical treatment for stabilisation should be monitored in accordance with national guidance. (2.101)	Agreed	All prisoners identified and placed on clinical treatment are monitored as per the agreed national commissioned document. A monitoring tool will be implemented to evidence this recommendation.	Director of Northamptonshire Healthcare NHS Foundation Trust	July 2019
5.45	Drug refrigerator temperatures should be monitored effectively and action taken when appropriate. (2.111)	Agreed	Thermometers have now been ordered and daily temperatures logs are in place.	Director of Northamptonshire Healthcare NHS Foundation Trust	Completed
5.46	All prisoners should have lockable cabinets in which to store their prescribed medicines safely. (2.112)	Not Agreed	This recommendation is not agreed as providing additional lockable cabinets outside the national contract for HMP Onley's population of over 740 is not possible as these items are frequently subject to damage and replacement costs would be unsustainable. All in cell furniture provision is made through the national contract, including the cabinets which are not lockable	Governor	
5.47	Medicines should be prescribed and administered at clinically appropriate times, to ensure optimal treatment. (2.113)	Not Agreed	This recommendation is not agreed as the prison regime and staffing shift patterns cannot facilitate additional, or later, treatment times from those already provided at 08:00hrs and 17:00hrs.	Director of Northamptonshire Healthcare NHS Foundation Trust	
5.48	A pain management policy should be implemented in line with national guidance. (2.114)	Agreed	<p>A Standard Operating Procedure (SOP) has been developed which will be implemented across the prison by May 2019 with Northamptonshire Healthcare Foundation Trust provision.</p> <p>An audit of medication prescribed for the management of pain is now undertaken pre and post implementation of the pathway.</p> <p>Contact has been made with the Phoenix Trust to introduce yoga sessions for men experiencing pain and reducing medication following a referral from the GP or physiotherapist. Yoga sessions will be managed and facilitated within healthcare.</p>	<p>Director of Northamptonshire Healthcare NHS Foundation Trust</p> <p>Director of Northamptonshire Healthcare NHS Foundation Trust</p> <p>Director of Northamptonshire Healthcare NHS Foundation Trust</p>	<p>May 2019</p> <p>Completed</p> <p>May 2019</p>



	Time out of cell				
5.49	The prison should operate a full regime, including evening and weekend association. (3.11)	Agreed	The proposed staffing profiles will be agreed and implemented. This will include providing evening and weekend full association.	Governor	June 2019
5.50	Efforts to promote literacy should be reintroduced and sustained across the prison. (3.12)	Agreed	HMP Onley will reintroduce the Shannon Trust scheme into the prison and, utilising new opportunities through PEF (Prison Education Framework) and library services, will further expand literacy throughout the establishment. This will include increased use of outreach support at work and on the wings, classes and support in the library (for example book club, story book dad's, Lily Pad) and engaging in family visits to support the teaching of literacy to children.	Governor	August 2019
5.51	Attendance at PE and the library should be routinely analysed, to understand if any groups are excluded and develop provision. (3.13)	Agreed	Standard management information tools will be developed and implemented locally to analyse attendance at PE and the library to allow for better data analysis, including those groups that may be excluded. The Quality Improvement Group (QIG) will also monitor data provided from PE and library and set improvement targets where necessary.	Governor	August 2019
5.52	All prisoners should be able to access weekly gym sessions without interrupting work or education classes. (3.14)	Agreed	A new timetable will be introduced that encourages attendance at work and education by facilitating gym sessions during the evening and weekend. Limited sessions will be available in the core day for workers that cover 6-7 days (e.g. kitchen) and those not able to work.	Governor	May 2019
	Education, skills and work activities				
5.53	The provision in mathematics and English should be adequate to ensure that all prisoners are able to improve these skills. (3.23)	Agreed	The introduction of the Prison Education Framework (PEF) from April 2019 will increase the provision and scope of English and maths. Outreach provision will be doubled. Discrete classroom delivery will be reviewed and new ways to teach introduced where possible to encourage men to engage.	People Plus	August 2019
5.54	The operation of the assembly shop should be reviewed, to make it	Agreed	The contract in place at the time of inspection has ended and a new supplier is being considered. With its introduction, the instructors will focus on Personal and Social Development and skills development from the	Governor	June 2019



	effective in improving prisoners' attitudes and skills. (3.32)		outset. Progression targets for the men to aspire to inside the workshop will be identified.		
5.55	Classroom teaching should be of adequate quality to motivate learners, so that they can progress. (3.33)	Agreed	The PEF provider will introduce a teacher quality management plan in agreement with the Governor. This will include targets for the outcomes of observations and actions required to maintain improvement. The plan will set out continuing professional development (CPD) arrangements for staff. This will be monitored by QIG and PEF contract meetings.	People Plus	August 2019
5.56	The importance of regular attendance in preparing for employment after release should be emphasised to prisoners in activities. (3.38)	Agreed	<p>A focused project on attendance is being carried out by Reducing Reoffending managers, supported by the Governor. This will identify the causes for poor attendance and set actions to improve through QIG and SMT.</p> <p>An activity management policy will be introduced that standardises the approach to allocation, attendance and behavioural management in work and education. Staff will provide encouragement and feedback through discussions and reviews, using punitive measures as a last resort. Outline details of the policy will be included in induction to ensure new receptions are adequately informed, and will be discussed during the initial meeting with the Information, Advice & Guidance Service (IAG) when a Personal Learning Plan (PLP) is composed.</p>	<p>Governor</p> <p>Governor</p>	<p>September 2019</p> <p>September 2019</p>
5.57	Peer mentors should be appropriately trained and effectively deployed by teachers and instructors. (3.39)	Agreed	A policy for the management and training of peer mentors in workshops and education will be introduced in conjunction with the PEF supplier. This will identify the role of a peer mentor and support mechanisms in place.	Governor	September 2019
5.58	There should be opportunities for all prisoners to gain vocational qualifications when working in a prison job, including the gym. (3.44)	Partly Agreed	<p>This recommendation is partly agreed as it is not possible to introduce qualifications for all prison jobs due to cost and staff resources to manage such a scale of delivery. In addition, there is no industry expectation for such accreditation in some workstreams.</p> <p>HMP Onley will seek expert industry advice and labour market information to inform the curriculum and introduce relevant qualifications that support</p>	<p>Governor</p> <p>Governor</p>	<p></p> <p>September 2019</p>



			prisoners having a realistic opportunity of gaining employment on release. Where formal accreditation is not available, HMP Onley will capture skills development and work experience through regular reviews by supervisors and the support of key workers.		
	Children and families and contact with the outside world				
5.59	Prisoners should be supported to maintain and re-establish family ties. (4.5)	Agree	<p>HMP Onley will use the national framework for purchasing family services and contract a provider to deliver family support and visitor services.</p> <p>HMP Onley have provided a camera and a printing facility in visits where family photos can be taken upon request at a reduced fee of £1, which goes towards the maintenance of the camera and buying the photo paper.</p> <p>HMP Onley also provide a monthly family visits for 28 selected prisoners and family who meet the family visits criteria, which is in addition to the domestic visits. Special craft works and children's stationery are provided during these sessions.</p>	Governor Governor Governor	October 2019 Completed and ongoing Completed and ongoing
5.60	Prison managers should take into account distance from home in developing the children and families' pathway, and take steps to alleviate transport difficulties for visitors to the prison. (4.6, repeated recommendation 4.51)	Agreed	HMP Onley have negotiated a reduced taxi fare with a local company to provide transport to and from the local train station. An information notice has been published to prisoners and information provided in the visitors centre to promote this.	Governor	Completed
	Reducing risk, rehabilitation and progression				
5.61	A comprehensive reducing reoffending strategy should be developed, based on a full	Agreed	HMP Onley has developed a comprehensive reducing reoffending strategy informed by a recent survey and needs analysis. This identifies the plan for the next 12 months and will be monitored through the monthly reducing reoffending meeting and SMT.		Completed



	analysis of offending-related needs and supported by a detailed action plan which is monitored and updated rigorously. (4.15, repeated recommendation 4.4)				
	Categorisation and transfers				
5.62	Progressive transfers to another prison should be clearly prioritised with the full involvement of offender supervisors. (4.22, repeated recommendation 4.23)	Agreed	<p>With the implementation of OMiC and Key workers (completed by 31st March 2019), those low risk offenders who will not have an Offender Supervisor will have transfer requests approved by their Key Worker. The priority list will be based on the OMU POD or “traffic light” system. Those offenders who are medium and high risk will have transfer requests approved by their Offender Supervisor. Both will have to give appropriate justification to demonstrate it is progressive. A new transfer form will be compiled in order to facilitate this. The only time this will not occur is when an offender is moved for operational reasons. Progressive transfers do take place to open establishments. The only hindrance to this is transport, which the establishment has no control over.</p> <p>The Offender Management Unit will inform the prisoner, preferably within 7 days of a planned move that they will transfer to a Prison within reasonable distance from where they will be released to. The prisoners will be aware that they are transferring but not when or to which establishment. Ideally there should be a handover between Prison Offender Managers or Key Workers and in all instances Prison-NOMIS and other assessments linked to the management of the prisoner will be updated to aid the handover process.</p>	Governor Governor	September 2019 September 2019
	Interventions				
5.63	The full extent of the need for offending behaviour work should be evidenced, and an	Agreed	A needs analysis of the criminogenic profile against the criteria for all offending behaviour interventions available to HMPPS will be conducted by the Interventions Team supported by Psychology and the OMU. This	Governor	August 2019



	appropriate range of interventions and places should be provided to meet this. (4.29, repeated recommendation 4.57)		will identify the factual need for the range of courses available and will inform future commissioning intentions and staff development.		
5.64	All prisoners should receive sufficient help with finance, benefit and debt problems, in a timely manner, when such need is identified following their arrival at the prison. (4.30)	Agreed	New opportunities for increasing provision with more prescribed support to the mandated service, will be available through the enhanced specification Community Rehabilitation Company contract, with plans for implementation from April 2019. Additional finance, benefit and debt service has been identified, including CAB, HMRC advice and 1:1 support deployed from April 2019 for those prisoners 12 weeks before release.	Governor / CRC Contract Management Group	September 2019

Recommendations	
Agreed	54
Partly Agreed	7
Not Agreed	3
Total	64



