



HM Prison &
Probation Service

Action Plan: HMP Berwyn

Action Plan Submitted 3 September 2019

Response to the HMIP Inspection 4 – 14 March 2019

Report Published 11 July 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 BERWYN

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	Main recommendation				
	To HMPPS				
5.1	All prisoners released from Berwyn should receive support to review and address their resettlement needs. (S54)	Agreed	<p>HMPPS (Her Majesty's Prison and Probation Service) acknowledge that the Through The Gate (TTG, a service helping people in prison get prepared for release) provision is not currently meeting the standards required. HMPPS are investing an additional £22m per annum over the remaining life of the Community Rehabilitation Company (CRC) contracts to ensure that they deliver an enhanced Through The Gate service to offenders leaving prison. This investment will support approximately 500 additional CRC staff to deliver TTG in prisons.</p> <p>This new specification includes the requirement that CRCs complete specific, tailored, tasks to help prisoners to secure and maintain settled accommodation, gain employment and manage debt and their financial affairs. The new specification has been fully operational at HMP Berwyn since 1 April 2019.</p> <p>Resettlement Services are however currently only provided for prisoners being released into Wales, in line with the contract with the CRC. This provision will be extended to ensure these services are provided to all eligible prisoners released from HMP Berwyn.</p>	<p>HMPPS Briefing & Correspondence</p> <p>HMPPS Wales Executive Team/ Seetec Justice (Kent, Surrey and Sussex) CRC</p>	<p>Completed</p> <p>December 2019</p>
	Main recommendations				
	To the governor				



5.2	The prison should develop a strategy to reduce violence based on an analysis of the causes of violence, supported by an action plan to drive and monitor a reduction in violent incidents. (S44)	Agreed	The existing strategy has been revised and is informed by local trends and data. An updated Action Plan is in place that helps focus resources which will drive and monitor a reduction of violent incidents in the prison. The VR process will be Quality Assured (QA) by the Head of Custody.	Governor	Completed
			The monthly Safer Communities Meeting (A strategic meeting attended by all Key Stakeholders and Partners) is now chaired by the Governing Governor to raise the profile and importance of the meeting. The meeting agenda has been revised to include an analysis of the incidents of violence, promotion of lessons learned and focusing on actions that will reduce violence in the prison.	Governor	Completed
			The prison has introduced CSIP (Challenge, Support, Intervention Plan, a case management model that supports perpetrators and victims of violence) in line with the national roll out of this programme.	Governor	Completed
			<p>The response to Violent Incidents and the management of perpetrators will be further improved, with oversight from the Head of Safer Prisons, by actions that are designed to reduce violence including:</p> <ul style="list-style-type: none"> • Full and prompt investigations with communicated actions to prevent recurrence and to improve overall safety • Full implementation of CSIP informed by an effective Violence Management Process that focuses on the improved management of the perpetrators of violence and supporting victims • Improved assurance around delivery of sanctions through Adjudications, Independent Adjudications and Police Referrals • The review and publication of the Incentive and Earned Privilege scheme which reinforces action to be taken following incidents of violence • The introduction of a proactive and monitored Peer Support Network • Mobilising a weekly Safety Improvement Meeting on each House chaired by the Head of House or Deputy within 	Governor	September 2019



			<p>which all relevant incidents/persons of interest will be discussed</p> <ul style="list-style-type: none"> • Effective communication of learning and outcomes from the violence reduction work. 		
5.3	Prisoners who are self-isolating should have their basic needs for food, hygiene, social contact and fresh air are met. A plan to work towards ending their isolation should be agreed with them and regularly reviewed. (S45)	Agreed	<p>A Self Isolation Policy has been implemented and includes a robust identification and management process that ensures that:</p> <ul style="list-style-type: none"> • The reasons for isolation are known, documented and managed. • The individual is referred to and seen by Safety Support Officers as well as receiving support from their Community Staffing (house unit staff) and Keyworker (Keyworkers are being introduced as part of the Offender Management in Custody model (OMiC) to ensure that supportive professional relationships are formalised to assist prisoners in making changes in their behaviours and thinking) • Whilst isolating, all basic needs and requirements are met for the individual concerned and are monitored through an Individual Support Plan 	Governor	Completed
			<p>The identification and management process is Quality Assured by the Head of Custody</p>	Governor	Completed
			<p>The agenda for the Safer Communities Meeting has been revised to include oversight of Self Isolation in order to provide monthly assurances on progression and appropriate management and support for individual cases. The meeting provides accurate information of all those isolating in their areas, monitors progress and management of each case (including developing lessons learned and monitoring of trends of isolating practice).</p>	Governor	Completed
			<p>The process for managing incidents of Self-Isolation not associated with vulnerability (i.e. elective disengagement from the regime) has also formed part of the review of Incentives and Earned Privileges and will be consistently applied to support the re-engagement of prisoners into the regime.</p>	Governor	Completed
5.4	The prison should continue its focus on drug	Agreed	The existing Substance Misuse Strategy will be revised to cover the three key areas of restricting the supply of drugs, restricting	Governor	Completed



	supply and demand reduction, but should better coordinate and embed actions to reduce the availability and demand for drugs, and measure their impact. (S46)		<p>the demand for drugs and building for recovery. An experienced Senior Manager has been newly appointed as the Drug Strategy Manager and is in place to oversee the development of the strategy across the Partnership.</p> <p>The monthly Substance Misuse Strategy Meeting is chaired by the Head of Custody and completion of the Action Plan/Strategy Progress is managed and directed through this meeting to support progression. The quorum of this meeting has been revised to ensure appropriate representation and reporting from all areas responsible for establishing a whole prison approach to the Substance Misuse Strategy.</p> <p>The leadership responsibility for the Supply Reduction Strategy is undertaken by the Security Function and overseen by the Deputy Governor. They are responsible for identifying and reducing routes and the availability of drugs. This is monitored at the monthly Security Meeting and through targeted reductions in the number of prisoners testing positive through Random and Intelligence-led Testing drug programs.</p> <p>Demand Reduction Work continues to focus on promoting a culture that recognises the negative impact and consequences of drug use within the prison and the wider risks to prisoners, their future rehabilitation and their families, whilst offering opportunities to those in custody that give purpose and direction.</p> <p>HMP Berwyn's (substance misuse) recovery offer to meet the changing prison population will be agreed, mobilised and monitored through the established Substance Misuse Management Meeting and driven by the Head of Drug Strategy and Healthcare.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>November 2019</p> <p>November 2019</p> <p>January 2020</p>
5.5	Prisoners should be supported and managed effectively by a responsive and capable staff group. (S47)	Agreed	<p>Staff capability will be underpinned by a learning offer that builds on the guidance provided through national training (Five Minute Interventions and Key Work training).</p> <p>Under the responsibility of HR Business Partner, the prison will refresh the Key Work guidance by the provision of a prison guide</p>	<p>Governor</p> <p>Governor</p>	<p>October 2019</p> <p>October 2019</p>



			<p>to areas of interest that will support prisoners and give staff tools to deal directly with a number of common issues they face.</p> <p>Core policies will be refreshed to give greater consistency to 'whole prison' responses in relation to:</p> <ul style="list-style-type: none"> • Reward and Responsibility – now Incentives and Earned Privileges • Complaints Processing • Mail Collection and Distribution • Activity Attendance and Allocation • Consultation Processes and Prisoner Forums • Equalities and Inclusion • Self-Isolation • Violence Management • ACCT (Assessment, Care in Custody, Teamwork, a document to record and manage self-harm) Management and Quality Assurance <p>HMP Berwyn have launched a revised People Strategy that includes plans to build capability and resilience within their workforce. The outcome of this strategy will be to improve staffs ability to respond and provide necessary support to prisoners.</p>	Governor	October 2019
				Governor	Completed
5.6	Senior leaders should promote the importance of equality work in the prison. There should be a robust strategy and oversight of equality work, informed by routine consultation, to identify and address the needs of prisoners in protected characteristics groups. (S48)	Agreed	<p>The Governing Governor has taken personal leadership responsibility for Equalities and Inclusion, including realigning the designated Equalities lead reporting direct to the Governing Governor.</p> <p>The Equalities Strategy will be revised and an action plan formulated covering specific actions required to improve the establishments approach to Equalities, Diversity and Inclusion will be developed.</p> <p>The quorum for the monthly Equalities meeting has been revised and includes all Protected Characteristic Leads (nominated individuals from the Senior Management Team) identified for each core area and hard to reach groups. Protected Characteristic leads each have required actions as part of the prison Equalities Action Plan that are informed by local trend data and demographics. Success against the Action Plans will be monitored</p>	Governor	Completed
				Governor	Completed
				Governor	September 2019



			<p>at the bi-monthly Equalities Meeting, through bi-monthly Resident Feedback (a prisoner forum) and through the thematic analysis of DIRF's (Discrimination Incident Reporting Forms) in order to ensure positive change/identify issues across the population.</p> <p>The Resident Equality Mentor Role is being revised to ensure that opportunities for Peer Support and Resident Consultation are maximised. Necessary Governance and Supervision Processes will be agreed to ensure that any support based roles are monitored and managed appropriately to avoid any increased vulnerability.</p>	Governor	October 2019
5.7	The balance and range of education, training and work places should reflect the needs of the population, keep prisoners occupied and be sufficiently challenging. (S49)	Agreed	<p>The responsibility for the oversight of the Regime Offer has been provided by the Deputy Governor. The Interserve (a prison and probation facilities supplier) Activity Offer has been fully mobilised and the establishment is now able to offer permanent full activity at operational capacity.</p> <p>The Final Phase Project Team will provide an activity profile that reflects the forthcoming population increase plans and the needs of prisoners taking account of the prison learner needs assessment and workforce analysis data from the local community.</p> <p>The activity profile will be developed to match the need to keep prisoners occupied in meaningful ways, including the development of non-work activity time on communities when away from work.</p>	Governor Governor Governor	Completed November 2019 December 2019
5.8	All eligible prisoners should be allocated to an education, training or work placement, and should be encouraged and expected to attend. (S50)	Agreed	<p>The Establishment Allocation process has been revised to ensure that it is robust in identification and allocation and ensure that improvements are made to manage the volume of allocation to enable swift access to activity for all.</p> <p>The Resident Attendance Management, Sickness and Pay local policies have all been revised to dis-incentivise non – attendance/disengagement and the processes for management have been clarified for both Residential and Activity Areas to ensure improvement.</p> <p>The efficacy of these processes will be provided through monitoring incremental improvements relating to the :</p>	Governor Governor Governor	Completed Completed September 2019



			<ul style="list-style-type: none"> • Numbers of prisoners allocated to work, education or training • Numbers of prisoners attending the above activities • Numbers of prisoners locked up during the core day as unemployed or non-attendees of activities <p>Oversight by the Deputy Governor of these improvements will be provided through weekly review meetings chaired by the Head of Regimes which will be reported at the monthly Senior Leadership Team meeting.</p> <p>Prisoners will be encouraged and expected to attend activities. This will be applied through:</p> <ul style="list-style-type: none"> • Compact agreement through the induction process • Correct use of the IEP (Incentives and earned Privileges) scheme • Improving staff awareness of what level of engagement is expected and the correct process to follow when prisoners choose to disengage • Key Work (work being introduced as part of the Offender Management in Custody model (OMiC) to ensure that supportive professional relationships will be formalised to assist prisoners in making changes in their behaviours and thinking). 	Governor	September 2019
				Governor	September 2019
5.9	All eligible prisoners should have an up-to-date assessment that identifies their risks and needs. (S51)	Partly Agreed	<p>This recommendation can only be Partly Agreed because the prison does not have control of the arrival of prisoners with incomplete reports that should have been completed by the sending establishment.</p> <p>The recent recruitment of Prison Offender Managers (POMs) has reduced the caseload to acceptable levels that better allow staff to complete assessments within the agreed timeframe for new cases and to focus on existing out of date assessments. The number of POMs will increase dynamically as the population increases.</p> <p>A business case will be developed to allow resources for the completion of OASys reports for when HMP Berwyn take on a</p>	Governor	September 2019
				Governor	September 2019



			remand prisoner population and for dealing with any other prisoner transferred to HMP Berwyn without a completed OASys		
5.10	Prison offender managers should have regular, good quality contact with prisoners, which drives their risk reduction and sentence progression. (S52)	Agreed	<p>There is now a full POM staffing resource to maintain contact levels in line with current contact requirements. There are known training requirements surrounding OASys and Risk Management that will need to be addressed before full coverage can be achieved however these are progressing against an agreed plan.</p> <p>Offender Management Unit (OMU) Hubs have been established on each House (prisoner living accommodation) to provide space for interviews and assessments that will help maintain direct contact alongside telephone communications.</p> <p>Key work will also be developed to allow for the progression of risk and sentence plans will be monitored through these regular interactions with an escalation of concerns to Prison Offender Managers when needed. This work will be assured by the Head of Residential Services.</p>	Governor Governor Governor	September 2019 Completed September 2019
5.11	Public protection procedures should be given urgent and sustained attention to ensure that prisoners' risks, both in custody and on release, are managed effectively. (S53)	Agreed	<p>The Pin Phone Monitoring Processes, assured by the Deputy Governor has been revised in order to make compliance viable, to achieve the required protection for the public, and to identify and appropriately manage those in breach of their order or restrictions. This process:</p> <ul style="list-style-type: none"> • Limits the time available to Individuals subject to monitoring to use Pin Phones to ensure that the amount of calls to be listened to is manageable within the profiled hours. • Provides a profiled resource that focusses on monitoring current calls to ensure live risk is managed. • Provides effective review processes so that cases not requiring monitoring are removed when the risk assessment does not justify continued monitoring. • Provides an additional needs led resource to address the backlog, starting with those released first as they pose the greatest real time risk. • Mandates that those staff conducting monitoring refer individuals identified to be breaching Restraining Orders directly to the Police and that those breaching other 	Governor	Completed



			<p>orders are managed through the Incentives and Earned Privileges and Adjudication Processes.</p> <p>A system compliant with PSI 49/2011 Prisoner Communication Services, is being developed for prisoner so found to be using the PIN system to breach orders will have their telephone access restricted where appropriate.</p> <p>An Assurance Process has been implemented to ensure that the existing Mail Monitoring Process is sufficiently robust in managing those on restrictions and reporting where breaches of restrictions are identified.</p> <p>The Identification, Review and Management (IRMM) Process has been revised to ensure that prisoners with contact restrictions are raised for discussion and risk is managed appropriately in preparation for release.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p>
	Recommendations				
	Managing behaviour				
5.12	Challenge, support and intervention plans (CSIP) should be used effectively to address violent behaviour and support victims. (1.14)	Agreed	<p>The existing Violence Reduction Strategy has been revised and is informed by local trends and data. Overseen by the Head of Custody, an Action Plan is in place and improvement will be monitored through the monthly Safer Communities Meeting and Establishment Assurance Process.</p> <p>This review incorporates the effective use of CSIP to address violent behaviour through a robust 4 stage approach which is supported by the thorough investigation of all violent incidents and an improved understanding of violence within the population. The Tool is now embedded within the prisons approach to Violence Management and individuals are monitored and managed to secure reduction in violence and the protection of victims.</p> <p>Support for victims of violence as a standalone issue will be revised as part of the overall strategy review and will be improved through:</p> <ul style="list-style-type: none"> • The use of Peer Mentors to support Victims following incidents 	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>Completed</p> <p>October 2019</p>



			<ul style="list-style-type: none"> • The requirement for the investigation to encompass victim support and preventative actions • The requirement for all victims to be seen by the Safety Support Officers post incident and a support package to be configured, if required, in conjunction with Residential Services. 		
5.13	The rewards and responsibility scheme should incentivise prisoners to take responsibility and behave well, and provide effective and timely sanctions for poor behaviour. (1.15)	Agreed	<p>A review of the local Reward and Responsibility Policy will be completed and a revised policy put in place. This policy will be called Incentives and Earned Privileges and mirrors the National IEP Framework. The revised policy will clearly define expected standards of behaviour and makes the requirement to engage with the regime and activity offer explicit to all prisoners.</p> <p>An Annual Review Process has been completed to provide assurance that those holding Enhanced Level remain eligible and the automatic allocation to Enhanced Level on Reception has been removed.</p> <p>The adoption of the National Policy Framework will improve staff understanding of effective and timely sanctions and will also enable greater possibilities to incentivise good behaviour. The revised policy will include an appendix covering the provision of specific Enhanced Communities on each House that are configured to offer greater privilege to those who maintain consistent standards of exceptional behaviour.</p>	Governor Governor Governor	October 2019 Completed October 2019
5.14	There should be effective governance of the adjudications process to ensure it provides active challenge to poor behaviour. (1.20)	Agreed	<p>A full review of the Adjudications Process has been commissioned with outcomes to be reported and validated through the Monthly Segregation Monitoring and Review Group (SMARG) and Adjudication Standardisation meetings. This review will address the:</p> <ul style="list-style-type: none"> • Appropriateness of charging and use of minor sanctions (IEP) • Presence of Evidence and CCTV • Paperwork Standardisation • Annual Sanction Review including Tariff Range • Governance and Assurance <p>The meeting frequency and programme has been reviewed to ensure monthly occurrence and the Head of Custody will complete</p>	Governor Governor	October 2019 October 2019



			Governance and Assurance Checks of the Adjudication Process, complete quality assurance checks of concluded adjudications and take Senior Leadership Responsibility for Segregation.		
5.15	Full control and restraint and use of batons should be kept to a minimum through application of de-escalation techniques wherever possible. (1.24)	Agreed	<p>The local Restraint Minimisation Strategy has been validated, agreed and implemented, with oversight from the Head of Custody. The efficacy of this Strategy will be monitored, reviewed and progressed through the established monthly Use of Force Governance meeting.</p> <p>The Use of Force Governance meeting will be enhanced by the review of incidents in the reporting period and the creation of a learning log where opportunities to provide lessons learned present themselves. On-Scene Managers will be directed to review incidents and provide feedback to those involved, including the use of de-escalation techniques wherever possible.</p> <p>A Use of Force Debrief process has been implemented to ensure that prisoners are interviewed after having force used on them to provide opportunities for learning from the individual post incident.</p>	Governor Governor Governor	Completed September 2019 Completed
5.16	Segregated prisoners should have access to a regime appropriate to their risk and behaviour. (1.28)	Agreed	<p>The regime of Segregated Prisoners has been revised to ensure that those who demonstrate compliance and those located on their own interest are able to access regime activities appropriate to their risk and behaviour.</p> <p>Compliance will be further reviewed against new standards of expected behaviour to provide assurance to the Head of Custody</p>	Governor Governor	Completed September 2019
	Security				
5.17	The prison should ensure that, where practicable, all intelligence-led drug testing takes place. (1.37)	Agreed	Intelligence-Led Testing will be monitored and reported on through the Security Committee and the Substance Misuse Committee meetings to ensure resources are facilitating targeted activity where intelligence assessments provide evidence for this to be required.	Governor	October 2019
	Safeguarding				



5.18	The prison should record and analyse the causes of self-harm incidents, and use this material to inform the strategic management of safeguarding and suicide and self-harm prevention. (1.44)	Agreed	<p>The strategic approach to Suicide, Self-Harm and ACCT Management has been revised and the reporting and recording requirements surrounding incidents, causes and trends have been clarified.</p> <p>The Safer Communities meeting, now chaired by the Governing Governor, monitors and responds to submitted analysis surrounding incidences of self-harm in order to inform and improve the management of Vulnerability, and understanding of Suicide and Self-Harm Prevention and Safeguarding. Learning on issues relating to the strategic management of safeguarding and self-harm are escalated to the Senior Leadership Meeting by the Governor as required.</p> <p>The Safety Function have begun to complete Quick Learning Bulletins to support improvement among the Officer, Case Manager and Senior Leadership Groups and provide periodic training and workshops to drive improvement.</p>	Governor Governor Governor	Completed Completed Completed
5.19	Assessment, care in custody and teamwork (ACCT) casework management documentation should be of a consistently good quality. Care maps for individual prisoners should identify objectives to address their risk of self-harm and ensure they receive the necessary care and support. (1.45)	Agreed	<p>A Quality Assurance Framework for ACCT Casework Management has been implemented and is robustly monitored through Residential Services.</p> <p>This Framework requires all ACCT Documents to be Quality Assured on a weekly basis at 100% by an Independent Case Manager and sample checked at 10% by the House Manager (a senior manager grade). A report is required by the Safety Function to provide assurance that this has been completed with details around how issues have been addressed and rectified. The Safety Custodial Managers then complete a sample check and provide formal feedback to ACCT case managers. A report is submitted to the monthly Safer Communities Meeting for assurance with any repeat issues identified for address.</p> <p>The Governor has introduced weekly personal checks on ACCTs that, along with best practice and any other reported ACCT learning, is reported in the Berwyn Matters weekly staff briefing.</p> <p>The Safety Function have begun to complete Quick Learning Bulletins to support improvement among the Officer, Case Manager and Senior Leadership Groups and provide periodic training and workshops to drive improvement.</p>	Governor Governor Governor	Completed Completed Completed



5.20	All staff should understand their adult safeguarding responsibilities. (1.47)	Agreed	<p>The existing Adult Safeguarding Policy will be revised and launched. The policy will cover the reporting and referral process and what action staff should take when they are concerned about the safety of an adult or indeed a child.</p> <p>A named Senior Manager with responsibility for Adult Safeguarding has been added to the weekly Safety Improvement Meeting and Safer Communities agendas to raise the internal profile of adult safeguarding responsibilities.</p> <p>HMP Berwyn's Safeguarding responsibilities have been strengthened through multidisciplinary attendance at the Adult Safeguarding Board and this provides opportunity for the sharing of information and mutual support.</p>	Governor	October 2019
	Daily life				
5.21	There should be effective and consistent consultation with prisoners. (2.20)	Agreed	<p>A full review of all Peer Support and Mentor Roles, by the Head of Residence, will take place to ensure that all have a specific function, are properly defined and are tasked accordingly. All those appointed to Peer Support/Mentor Roles will be specifically identified, appropriately trained and properly supervised through a robust governance and assurance process.</p> <p>Appointed Peer Support Workers and Mentors will attend Resident Consultation Forums through which issues can be raised, actions agreed and matters progressed. These Consultation Forums will be the responsibility of the designated function to whom the Peer Support Worker is attached and will cover, as a minimum, the following areas:</p> <ul style="list-style-type: none"> • Equalities and Inclusion • Safety • Violence Reduction • Activities, Education and Employment • Health and Social Care • Progression and Release Planning • Daily Living <p>The current Executive Council that meets with the Governing Governor will continue and takes place on a monthly basis. The</p>	Governor	November 2019
				Governor	November 2019
				Governor	November 2019



			membership of this meeting will be revised to include the Peer Support Workers identified through the above process.		
5.22	Responses to complaints should be prompt. (2.21)	Agreed	<p>HMP Berwyn will introduce a Key Worker guide that will help inform staff on how to deal with initial queries to reduce the reliance on complaints to get answers to basic queries.</p> <p>A Prisoner Information Desk (PID) will be developed on each house which will include peer led responses to complaints to help support timely resolution of low-level, non-confidential queries in order to reduce the number of issues needing to be dealt with via the complaint system.</p> <p>The complaints process has been revised to ensure that allocation is swifter and responses more easily tracked.</p> <p>The use of Interim Responses (a response made within 5 days of the complaint being raised) will be more closely monitored and the criteria permitting their use revised to ensure that Interim Responses are entered only when there exists a genuine reason, outside of time, as to why the complaint cannot be responded to within the requisite time frames mandated by Prison Service Instruction (PSI) 02/2012 Prisoner Complaints</p> <p>Trends on responding to complaints will be reviewed and monitored at the Senior Leadership Team meeting.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>October 2019</p> <p>December 2019</p> <p>Completed</p> <p>November 2019</p> <p>November 2019</p>
	Equality, diversity and faith				
5.23	Personal emergency evacuation plans should always be fully completed and known to staff. (2.35)	Agreed	<p>Guidance has been issued to the Residential Areas regarding the completion of Personal Emergency Evacuation Plans (PEEPs) and those in place are monitored by the Night Orderly Officer. This monitoring includes an ad-hoc assurance check of the staff knowledge.</p> <p>A quick reference guide will be compiled to attach to the front of each PEEP in order to provide a checklist to those completing and managing each one that everything has been fully completed and all priority needs are known.</p>	<p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>September 2019</p>



			The designated Protected Characteristic Lead (a Senior Manager) for Disability reports on the number of PEEPs within the establishment and provide the necessary assurance to the bi-monthly Equalities Meeting as part of their routine reporting.	Governor	Completed
5.24	Prisoner carers should be trained, have job descriptions and be supervised. (2.36)	Agreed	A Minimum Training Requirement for Prisoner Carers will be agreed between Healthcare and the establishment and a Job Description and Person Specification devised to ensure that only those qualified and suitable for the role are allowed to operate. A Supervision and Assurance process will be agreed by the Head of Safer Prisons to monitor and assess the appropriateness of the carer provision once a Resident Carer has been appointed in order to prevent the risk of exploitation or potential vulnerabilities. All existing arrangements have been reviewed and assessed for their ongoing suitability as an interim measure.	Governor Governor	October 2019 Completed
	Health, well-being and social care				
5.25	There should be a prison-wide strategy to support health promotion. (2.52)	Agreed	Betsi Cadwaladr University Health Board (BCUHB) have made links with Public Health Wales and are developing a secondment opportunity for a member of Public Health Wales to develop and lead on implementing a Health Promotion Strategy for the Prisoners at HMP Berwyn. This Healthy Prison Strategy will be managed and executed in the partnership between BCHUB and the establishment, its efficacy will be reviewed at the partnership board.	Governor / BCUHB	December 2019
5.26	Health staff should always see prisoners returning from external hospital appointments to establish any treatment and support needs. (2.60)	Agreed	All patients who attend external hospital appointments are now added to the daily handover sheet. The Shift Co-ordinator is responsible for allocating a suitable Healthcare member of staff to review them on return to the establishment following their appointment. A Standard Operating Procedure has been developed to document/ formalise this process.	BCUHB BCUHB	Completed Completed
5.27	The prison should ensure that suitable occupational therapy equipment and adaptations are provided	Agreed	Occupational Therapy Staff identify Equipment and Adaptations that are required through an assessment of individual needs. Some of this Equipment can be provided by the Occupational Therapist through the Community Equipment Store and is	BCHUB	Completed



	and installed promptly. (2.66)		<p>obtained within a timely manner. Once at site the Occupational Therapist fits the equipment as required.</p> <p>Other equipment may be required that is not available through the Community Equipment Store but may be considered under Reasonable Adjustments and Equalities. This is discussed with Social Services and the Prison to ascertain which areas are responsible for the provision of this equipment. Any equipment agreed to be provided by Social Services will be delivered and fitted by the Occupational Therapy Team. Other equipment that falls under Reasonable Adjustments will be provided by the Prison. Occupational Therapists will liaise with the Prison Equalities Team and Business Hub to identify appropriate equipment and arrange any fitting/delivery either through the Team or through the Facilities Management Services if required.</p> <p>The Prison are currently revising their Reasonable Adjustments Policy to provide additional clarity and Occupational Therapy Services are supporting this review in terms of defining Reasonable Adjustments and providing clarity on the various funding thresholds/likely demands for service/adjustment.</p>	<p>Adult Social Care Service Manager/ Amey</p> <p>Governor/BCHUB</p>	<p>September 2019</p> <p>November 2019</p>
5.28	The substance use services should have the necessary rooms to deliver therapeutic treatment. (2.79)	Not Agreed	<p>There are funding implications to fulfilling against this recommendation due to the current limitations in infrastructure therefore this recommendation cannot be Agreed at this time.</p> <p>The lack of sufficient and suitable space in which to deliver group and one to one work has been identified and is on the HMP Berwyn Health, Wellbeing & Social Care Partnership Board Risk Register. A request for an Accommodation Review has been made through Partnership Board and a response is awaited.</p>	<p>Governor</p> <p>Governor</p>	<p>Completed</p>
5.29	There should be a formal and robust procedure to follow up patients who miss medicine doses. (2.87)	Agreed	A formal and robust procedure to follow up patients who miss medicine doses will be developed and will be communicated to all staff by the health provider.	BCHUB	September 2019
5.30	Pharmacists should carry out medicines use reviews with patients. (2.88)	Agreed	All patients now have the opportunity to request an appointment with a Pharmacist using the Uni-Link system and all on-site Pharmacists are fully involved in the Medicines Review Process.	BCHUB	Completed



			Resident Information surrounding Medication Review and Pharmacy Provision is being revised and improvements will be made.	BCHUB	September 2019
5.31	Prisoners should have access to dental treatment within community-equivalent waiting times. (2.91)	Agreed	Dental Waiting Times have reduced since the inspection due to the resolution of recruitment issues. The Dental Function is being reviewed and developed to maximise patient facing time to levels equivalent to those in the local community, thus increasing the number of available appointments to meet demand. Additionally an Oral Health Promotion Programme is being delivered, since June 2019, by the on-site Dental Therapist to support preventative action by patients in an effort to reduce demand where appropriate.	Lead Dentist Lead Dentist	December 2019 Completed
	Time out of cell				
5.32	Prisoner attendance at the library and the gym should be analysed routinely to identify if any groups are excluded and to develop provision. (3.7)	Agreed	The Activity Attendance Monitoring Data Reporting is being fully reviewed across the Activity Profile in order to improve monitoring of all demographics and ensure that any emerging trends are identified, analysed and challenged wherever the need is apparent. This data is inclusive of the Library and the Gymnasium and will be reviewed and discussed within the bi-monthly Quality Improvement Group Meeting and monitored quarterly as part of the Functional Assurance Report.	Governor	November 2019
	Education, skills and work activities				
5.33	Work and training should take place in realistic work environments. (3.39)	Agreed	The mobilisation of the Interserve Offer (A directly commissioned industry provider) and the subsequent capacity to review the Activity Profile will ensure that the overall offer is more purposeful and realistic in terms of replicating what would be expected in an external workplace. The Head of Regimes will continue planned work across the Partnership to progress opportunities for Embedded Learning and Work Readiness in order to best prepare the Prisoners for internal progression and work on release. This work will also encompass the challenges presented by the Final Phase Ramp Up due to the new populations and the test of the Activity Profile at Operational Capacity.	Governor Governor	October 2019 January 2020



			<p>The Head of Regimes will seek opportunities to mobilise Internal Quality Review Processes as the offer (from the training provider Interserve) progresses in order to ensure that quality of delivery and engagement is maintained as the offer grows with the population.</p> <p>These Internal Quality Review Processes will be brought to the Quality Improvement Group (QIG) Meetings for discussion with any recommendation for change presented to, and ratified within, the Strategic Senior Management Team Meeting.</p>	Governor	March 2020
				Governor	March 2020
5.34	There should be a clear strategy to promote the Welsh language and the Welsh dimension in activities for prisoners that encourages all prisoners, especially Welsh speakers, to use and develop their Welsh language skills (3.40).	Agreed	HMP Berwyn's HR Business Partner will agree and publish a strategy which will take in to account the new demographics of the prison population (which includes a contingent from England) to help promote the Welsh language by encouraging Welsh speakers to develop their skills including during enrichment activities.	Governor	December 2020
	Children and families and contact with the outside world				
5.35	Prisoners should receive their incoming mail within 24 hours of its arrival at the prison. (4.6)	Agreed	The Mail Delivery and Collection Processes have been revised for incoming and outgoing mail and an assurance process has been implemented to demonstrate that mail is received, sorted, collected and distributed to the population within 24 hours of its arrival at the Prison. Residential Staff have been briefed of their responsibilities in collection and delivery and are required to report, formally to the Mailroom Functional Mailbox, any incidences where daily mail has not been collected and distributed.	Governor	Completed
	Reducing risk, rehabilitation and progression				
5.36	Prisoners who are suitable for home	Agreed	All those suitable for Home Detention Curfew are now identified in a timely manner and released in line with the national HDC Policy	Governor	Completed



	detention curfew should be released on time. (4.16)		<p>Framework. Performance is monitored at the monthly Senior Leadership Meeting to ensure progress is being maintained and, where issues occur, they are tackled as a priority.</p> <p>An issue has been identified with sending establishments who transfer prisoners within the decision window without the process being commenced and this will be resolved by the Head of Offender Management Services.</p>	Governor	October 2019
5.37	There should be adequate provision to address the unmet needs of prisoners on indeterminate sentence for public protection post tariff. (4.17)	Partly Agreed	<p>The Recommendation can only be Partly Agreed as the Governor cannot influence the legacy of this sentence type in terms of actually aiding progression and release through the Parole Process. Equally the Governor may not be afforded the additional investment required to fund the submitted proposal and will therefore not be in a position to provide any opportunity greater than existing programmes (that may not be suitable for all unmet need), the generic support of a Custodial Setting and support to progress wherever possible.</p> <p>However, HMP Berwyn has taken steps to address these needs by:</p> <ul style="list-style-type: none"> • Securing the provision of Accredited Programmes (including the forthcoming Kaisen General Violence Programme) to which Post Tariff Indeterminate Prisoners with unmet needs are prioritised accordingly. • Commissioning an Internal Lifer/IPP Offer that supports individuals prepare as readily as they can for release and enables access to Probation Services and Purposeful Activities that will support Risk Reduction when it comes to Parole Board Consideration. • Committing to a Progressive Transfer Approach for those who are suitable for, and accepted by, those establishments providing specialist support. • Providing a learning offer to support Key Workers of indeterminate sentenced prisoners with information on how the sentence management and parole board systems operate for this cohort of prisoners. 	<p>HMPPS Wales Executive Team /Governor</p> <p>Governor</p>	October 2019
	Interventions				



5.38	There should be enough accredited offending behaviour programmes to meet the needs of the population. (4.33)	Partly Agreed	<p>This recommendation is only Partly Agreed as the establishment is limited to the amount of programmes the prison is commissioned to provide and the accommodation/resources needed to provide these programmes.</p> <p>However, HMP Berwyn will ensure that:</p> <ul style="list-style-type: none"> • Provision is informed by segmentation data, risk assessment and local information in order to ensure that places are offered to those presenting the greatest risk and in line with the published prioritisation criteria • The Delivery Programme is maximised according to need and frequency in order to make best use of available resources • Attrition is monitored and, where any difficulties arise, swiftly addressed ensuring that any potential for interruption to programme delivery is avoided as far as is possible • Prisoners with unmet needs are progressed through planned transfer as readily as they can be to facilitate programme completion elsewhere – with return capacity/transfers if necessary • Continually monitor the level of unmet need and work with the Population Management/Executive Team to re-configure population where considered necessary and where estate capacity allows <p>As referenced; the Programmes Team commenced the delivery of Kaisen General Violence in July 2019 which will improve the current offer and better meet the needs of the existing population.</p> <p>The Delivery Programme will be reviewed annually in order to keep delivery as responsive as it can be within the existing resource.</p>	<p>HMPPS Wales Executive Team / Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>March 2020</p> <p>Completed</p> <p>March 2020</p>
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Recommendations	
Agreed	34
Partly Agreed	3
Not Agreed	1
Total	38

