



HM Prison &
Probation Service

Action Plan: HMP Littlehey

Action Plan Submitted 13th January 2020

A Response to the HMIP Inspection 22 July to 02 August 2019

Report Published 17th December 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 LITTLEHEY

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
Key concerns and recommendations					
Directed to the Governor					
S40	<p>Key concern: Over the previous two years, the heating and boiler system had caused chronic problems across the prison and had had a negative impact on the living conditions for prisoners. During this time, some prisoners had slept in cold cells and had not always been able to access warm showers daily. Contingency plans were in place, but many prisoners faced another winter living in cold conditions on the wings.</p>	Agreed	<p>Ministry Of Justice (MOJ) are currently working on an <i>Outline Business case</i> for the complete upgrade of all services across HMP Littlehey with a value of approximately £10.5m, to ensure that the heating and boiler system effectively meets the daily needs of prisoners. This has been confirmed as a top priority and HMP Littlehey will receive the necessary investment to rectify all problems and ensure that the system is working at maximum capacity. This work will continue throughout the rest of this business year and the next, and will result in a fully functioning system at HMP Littlehey.</p> <p>In the interim, temporary boilers provided by MoJ and Prison Maintenance Group remain in place, whilst project work continues. The Prison Maintenance Group will improve interim maintenance of the temporary boilers and heating and hot water system by:</p> <ul style="list-style-type: none"> • Sufficient funding will be put in place to cover contractual commitments. • Appropriate regular maintenance to be undertaken on existing heating and hot water systems to ensure continuity of service across the establishment. • Stepping in to take control of Government Facilities Services Limited (GFSL) operations at HMP Littlehey as required. 	<p>Ministry of Justice</p> <p>Regional Estate Manager (East), Prison Maintenance Group</p>	<p>June 2021</p> <p>January 2020</p>



	Recommendation: The prison should be equipped with an effective heating and boiler system to meet the daily needs of prisoners.		<ul style="list-style-type: none"> Formally escalating to the Director for MoJ estates, the failure of GFSL to appropriately staff and manage the Facilities Management provision at HMP Littlehey. Independently contracting additional maintenance staff as required, to ensure that appropriate support and provision is maintained. An appropriate heating system will be installed as an interim measure in the industries complex. 		
S41	<p>Key concern: Too many prisoners, about a third, arrived at the establishment without an initial OASys assessment, and at the time of the inspection about a half did not have an up-to-date assessment. This jeopardised the prison's ability to provide these prisoners with the right interventions to reduce their risk.</p> <p>Recommendation: All prisoners should have an up-to-date offender assessment system (OASys) assessment, to help them to address their offending behaviour and ensure that staff are able to monitor their progression effectively.</p>	Agreed	<p>Offender Management in Custody (OMiC) Phase 2 commenced in October 2019, under which Offender Management tasks will be completed as set out through the Excellence and Quality in Processes online platform (EQuIP). OMiC is aligned with estates reconfiguration projects and local prisons have been appropriately resourced.</p> <p>HMP Littlehey will utilise new OMiC funding to reduce the prison held Offender Assessment System (OASys) backlog, by allocating appropriate resources allowing the completion of up-to-date assessments. HMP Littlehey will continue to monitor the backlog using the Quality and Quantity Assurance mechanisms currently in place.</p> <p>NPS South East and Eastern Division have agreed a programme of recruitment in conjunction with Prison Group Directors through the Divisional Implementation Board (DIB), taking account of staffing levels across the division. This includes a 90% minimum staffing model at HMP Littlehey, which will receive an uplift in the NPS staff complement to meet OMiC obligations.</p> <p>HMP Littlehey will continue to review the community held OASys backlog and work with other Local Implementation Board (LIB) and Divisional Implementation Board (DIB) members to ensure progress.</p>	<p>Executive Director, Safety & Rehabilitation</p> <p>Governor</p> <p>SEE NPS Divisional Director</p> <p>Governor</p>	<p>March 2020</p> <p>December 2021</p> <p>April 2021</p> <p>January 2020</p>



			HMP Littlehey will refuse to accept any transfers from reception prisons within Bedfordshire, Cambridgeshire and Norfolk (BCN) and Hertfordshire, Essex and Suffolk (HES) directorates without an appropriate OASys assessment. Issues will be escalated to the PGD for any other area that consistently transfers prisoners without an appropriate OASys.	Governor	January 2020
S42	<p>Key concern: The levels of regular, meaningful contact between offender supervisors and prisoners were low, and mainly reactive. There was little proactive one-to-one work to address offending behaviour and drive motivation and progression.</p> <p>Recommendation: Prisoners should have regular, meaningful, structured, one-to-one contact with an offender supervisor.</p>	Agreed	<p>HMP Littlehey will ensure that prisoners have regular, meaningful, structured, one-to-one contact with an Offender Supervisor by:</p> <ul style="list-style-type: none"> • Ensuring that resources are in place to appropriately adhere to the frequency and quality of contact specified by the OMiC model. • A staff development programme has been initiated. • Quality and quantity assurance processes, including regular feedback from residents. 	Governor	January 2021
S43	<p>Key concern: The prison did not routinely consider all high-risk prisoners approaching release, to provide assurance that their risk would be appropriately managed.</p>	Agreed	<p>HMP Littlehey will ensure that all high-risk prisoners approaching release are reviewed to manage their risk appropriately by:</p> <ul style="list-style-type: none"> • A monthly meeting to review Risk Management Plans, including Multi-Agency Public Protection Arrangement (MAPPA) actions, accommodation arrangements and restrictions. Actions will be fed into the Interdepartmental Risk Management Team (IRMT) meeting. 	Governor	April 2020



	Recommendation: All high-risk prisoners approaching release should be systematically reviewed, to ensure that an appropriate risk management plan is in place.		<ul style="list-style-type: none"> Community Offender Managers (COMs) and Prison Offender Managers (POMs) will be tasked to ensure that any necessary arrangements to manage cases safely in the community are implemented, including risk management planning. 		
S44	<p>Key concern: Annual reviews of prisoners who are subject to child contact restrictions did not take place.</p> <p>Recommendation: Prisoners who are subject to child contact procedures should be reviewed annually, with appropriate multi-agency input, to ensure that these restrictions are justified.</p>	Agreed	HMP Littlehey will review Child Contact Procedures annually to ensure that any restrictions are justified. This annual assessment will be taken forward in conjunction with the POM, through the IRMT meeting, to review ongoing levels of risk and proportionate restrictions.	Governor	April 2020
S45	<p>Key concern: The monitoring of the telephone calls and mail of some prisoners subject to these restrictions did not always take place. This</p>	Agreed	<p>HMP Littlehey will ensure that timely communications monitoring takes place for all prisoners subject to public protection restrictions by:</p> <ul style="list-style-type: none"> Reprofiling of staffing resource to ensure a dedicated Services and Support Operational (SSO) grades staffing group. Implementation of a training package for SSO grades, to ensure that monitoring is focussed on key risk indicators 	Governor	April 2020



	<p>meant that the public were not always fully protected.</p> <p>Recommendation: Accurate, timely and high-quality telephone and mail monitoring should take place for all prisoners who are subject to these restrictions.</p>		<p>within communication and appropriate actions to highlight concerns.</p> <ul style="list-style-type: none"> • A management check will be implemented to ensure consistent staffing and that the appropriate measures are being applied in a timely fashion. 		
S46	<p>Key concern: Foreign language telephone calls made by prisoners subject to monitoring were not interpreted and transcribed into English. Again, this gap potentially meant that the public were not being fully protected.</p> <p>Recommendation: Foreign language telephone calls of prisoners subject to monitoring should be interpreted and transcribed into English.</p>	Agreed	<p>HMP Littlehey will ensure that foreign language telephone calls made by prisoners subject to monitoring are interpreted by:</p> <ul style="list-style-type: none"> • Utilising the skills of existing staff to translate. • Use of <i>The Big Word</i> interpreting service to translate 100% of foreign language calls made by residents subject to monitoring. <p>This will be subject to monthly management checking by Head of OMU and discussed at the IRMT for those subject to Public Protection monitoring. Those subject to security monitoring will be managed through the same process, managed by the Head of Security and the Security committee.</p>	Governor	April 2020
S47	<p>Key concern: There were not enough opportunities for prisoners who did not</p>	Partly Agreed	<p>This recommendation is partly agreed because for some prisoners denying their offence, attendance on Accredited Programmes may</p>		



			<p>documentation. Upon transfer, the escort provider is contracted to take property within these limits to HMP Littlehey.</p> <p>A new vehicle fleet will be provided for the new Prison Escort and Custody Service contracts, which commence operating from August 2020. These vehicles are designed to carry the number of prisoners it is intended, together with their full entitlement of property, plus a small surplus for consumable items a prisoner may have purchased in the prison shop.</p>	Senior Contract Manager, PECS	August 2020
Directed to the Governor					
1.18	Managers should quality assure violence reduction processes robustly, to support victims of violence and manage perpetrators of antisocial behaviour.	Agreed	A Challenge, Support and Intervention Plan Quality Assurance process is currently being trialled with the intention for it to be rolled out to Residential staff and Governors by the end of December 2019. This will enable better support for victims and develop a more comprehensive approach to managing perpetrators.	Governor	January 2020
1.23	Adjudication procedures should be accurately and diligently managed, to eliminate hearings that are dismissed or not proceeded with owing to procedural errors.	Agreed	<p>HMP Littlehey will improve adherence to adjudication procedures by:</p> <ul style="list-style-type: none"> • Implementing Adjudication Liaison Officer training to improve staff compliance with discipline procedures. • Analysing reasons for dismissed adjudications and those not proceeded with at the quarterly Segregation Monitoring and Review Group (SMARG) meeting. • Deputy Governor to actively monitor individual adjudicator's compliance, by completing a 10% check of all failures to proceed. • Head of Safer custody will complete a monthly management check on all outstanding adjudications, reported to the SMARG. 	Governor	March 2020
1.31	The shower area on the segregation unit should be	Agreed	Work has been completed on the shower area in the Segregation Unit by Government Facility Services Limited.	Governor	Completed



	maintained to an acceptable standard.				
1.37	Prisoners should not be strip-searched unless there is sufficient intelligence and proper authorisation.	Agreed	<p>Residents will only be subject to a full search on an intelligence based assessment. HMP Littlehey will:</p> <ul style="list-style-type: none"> • Amend the Local Security Strategy to reflect the new searching policy. • Ensure that staff are aware of the correct authorisation process, by providing updated guidance to reception staff. • Ensure that all paperwork stipulates the level of searching required and is authorised by a Band 5 manager or above. <p>Assurance Checks will be taken forward on a monthly basis through the Security Committee, as a standing agenda item.</p>	Governor	Completed
1.38	The prison's drug use strategy should be fully developed, and supported by an action plan.	Agreed	The establishment have developed and implemented a new Drug Strategy, ensuring that it meets the needs of the prison and population. The strategy will be supported by an action plan, monitored through the Drugs Strategy meeting.	Governor	Completed
1.48	The prison should refer adults at risk who are approaching release to safeguarding adult boards in their home areas	Agreed	<p>HMP Littlehey will refer adults-at-risk for adult safeguarding support in their home areas by:</p> <ul style="list-style-type: none"> • The Safety Intervention Meeting will identify adults at risk and disseminate relevant information to Offender Management Unit (OMU) staff. • POMs will liaise with the COM to share relevant information, to facilitate onward referral. • Head of OMU and Senior Probation Officer (SPO) will ensure that relevant actions have been taken forward through the <i>Pre-release Meeting</i>. 	Governor	March 2020
2.13	Cells designed for one prisoner should not be used for two. (Repeated recommendation 2.7)	Not Agreed	This recommendation is not agreed as population demands require us to maintain capacity across the estate. Whilst the average number of prisoners held in crowded conditions across the estate has fallen slightly, HMPPS recognises the ongoing concerns raised in relation to the use of crowded cells. While these places meet HMPPS standards for crowded accommodation and cells will only be shared where the Prison Group Director has assessed them as being of size and conditions for doing so, holding two men in a cell		



			<p>designed for one prisoner in order to accommodate national population pressures is not desirable.</p> <p>The wider problem of crowding in prisons is a longstanding issue that will not be easily addressed. However, HMPPS welcome the Government's recent announcement of up to £2.5 billion investment in new prison construction to create up to 10,000 prison places and the opportunity this creates to take steps towards reducing crowding.</p> <p>HMPPS' plan for reducing prison crowding is to replace prisons that are operating over their certified normal accommodation levels with new accommodation that is safe, decent, and uncrowded and close current (crowded or partially crowded) capacity. The first steps in this direction have already been taken with the opening of 2,100 uncrowded prison places at HMP/YOI Berwyn; 206 uncrowded places in a houseblock at Stocken; and a commitment to construct modern, decent, uncrowded prisons at the former HMP Wellingborough and HMP Glen Parva sites, which are due to open in 2021 and 2023, respectively, as well as the recent announcement that a new prison will be built at HMP Full Sutton alongside the existing establishment.</p>		
2.14	Prisoners should be able to access their stored property within one week of making the request.	Partly agreed	<p>This recommendation is partly agreed because it is not possible to always commit to the suggested timescale with the current staffing profile.</p> <p>HMP Littlehey will improve timeliness of access to stored property, providing better access through appropriate staffing and flexibility arrangements in this area.</p> <p>Opportunities to streamline property arrangements will also be identified.</p>	Governor Governor	March 2021 March 2020
2.15	Managers should be able to monitor emergency call bell response times easily and effectively.	Partly Agreed	This recommendation is partly agreed because the development of a centralised system of electronically monitoring cell-bell response times is subject to funding.		



			<p>HMP Littlehey will submit a bid for an up to date electronic cell-bell check system.</p> <p>A manual cell bell check system will remain in place until at least April 2020 and as determined by the outcome of the above capital bid thereafter. This is reviewed at the Safer Custody meeting.</p>	<p>Governor</p> <p>Governor</p>	<p>January 2020</p> <p>April 2020 and ongoing</p>
2.25	Responses to complaints should comprehensively address the issues raised.	Agreed	<p>HMP Littlehey will improve the response to complaints by:</p> <ul style="list-style-type: none"> • Introduce an advice package for staff completing complaint responses. • Monthly 10% quality checks will continue and feedback will be provided to line managers. • The Quality Assurance process will be updated to ensure that issues are effectively resolved. Quality will be assessed by introducing a scored system to assess responses. Heads of Function will be responsible for taking action on consistently low scoring completers. • Outcomes from quarterly complaints forums will be fed back to Heads of Function. • Heads of Function will be held to account for the quality of complaints responses through Performance and Development Reviews and bi-lateral meetings. 	Governor	July 2020
2.85	Patients requiring care under the Mental Health Act should be transferred promptly and in accordance with NHS guidelines.	Partly Agreed	<p>This recommendation is partly agreed as waiting times are subject to factors outside of the direct control of HMP Littlehey, such as the availability of bedspace in appropriate facilities. Healthcare staff at HMP Littlehey will continue to ensure that all referrals are made within the national timeframes and will continue to liaise with NHS providers to facilitate subsequent transfer.</p> <p>NHS England continues to work with partners across the criminal justice system to improve services for offenders with mental health difficulties and has reviewed and consulted on the current Prison Transfer and Remission Guidance published by the Department for Health in 2011. A focus of this work has been to ensure that the most appropriate timescales are implemented in relation to prison transfers and remission, considering clinical urgency and need.</p>	<p>Head of Healthcare, Northamptonshire Healthcare NHS Foundation Trust (NHFT)</p> <p>NHS England</p>	<p>Completed and Ongoing</p> <p>January 2020</p>



			Consultation closed at the end of July 2019 with the final guidance anticipated imminently.		
3.9	Where appropriate, all eligible prisoners should be purposefully active during the working day.	Partly Agreed	<p>This recommendation is partly agreed because there is insufficient capacity to provide full time employment / activity to all prisoners; significant capital investment would be required to fully achieve this recommendation.</p> <p>We accept however that the establishment should do all it can to optimise use of the available activity spaces. HMP Littlehey will review all purposeful activity within the establishment and identify an Action Plan to address concerns including further opportunities to expand work and improve attendance.</p>	Governor	March 2021
3.10	The practice of curtailing the regime for two days a month should cease.	Not Agreed	This recommendation is not agreed due to the need to offer the appropriate level of professional support to staff, to reflect the complex nature of work at HMP Littlehey. Current arrangements will continue, ensuring that curtailments are kept to the minimum required to effectively deliver the significant training requirement for staff.		
3.20	Sufficient work should be provided for the full population, with effective systems to identify and meet the demand for education and training, including at level 3.	Partly Agreed	<p>This recommendation is partly agreed because there is insufficient capacity to provide full time employment to all prisoners; significant capital investment would be required to fully achieve this recommendation. HMP Littlehey will provide an opportunity for all of the population to access education and training up to Level 3 from April 2020.</p> <p>Taking into account non-accredited spaces, training is offered in all activity places. People Plus will develop their curriculum to include Level 3 qualifications.</p> <p>HMP Littlehey will use the induction system to identify the needs of all residents, including those that will realistically be suitable to progress to level 3 learning. This will be monitored through existing sequencing processes and, with the support of the Information Advice and Guidance provider, residents will be progressed through education and training accordingly.</p>	<p>Head of Learning and Skills, People Plus</p> <p>Head of Learning and Skills, People Plus</p>	<p>April 2020</p> <p>April 2020</p>



3.21	The recently appointed careers information, advice and guidance service should be rapidly implemented, and prison managers should identify its impact by monitoring the employment, training and education destinations of prisoners on release.	Agreed	The careers, information, advice and guidance service has been implemented at HMP Littlehey.	Governor	Completed
3.30	Prisoners with learning difficulties and disabilities should be well supported by trained staff.	Agreed	<p>HMP Littlehey will better support residents with Learning Difficulties and Disabilities (LDD) by:</p> <ul style="list-style-type: none"> • Introducing <i>Do-IT</i> (web-based profiler, providing screening tools in relation to LDD) to better inform need. • Training existing Learning Support Assistants to at least level 3. • Providing additional training and support to workshop instructors. <p>HMP Littlehey will develop a jointly owned training plan with People Plus for all staff engaged in learning and educational activities.</p> <p>Managers will assure progress through a standing agenda item in the bi-monthly Quality Improvement Group meetings.</p>	<p>Governor and Head of Learning and Skills, People Plus</p> <p>Governor and Head of Learning and Skills, People Plus</p> <p>Governor</p>	<p>November 2020</p> <p>March 2020</p> <p>Completed and bi-monthly</p>
3.37	More prisoners should achieve qualifications in English and mathematics at level 2 where they are able to.	Agreed	<p>HMP Littlehey will improve achievement rates for English and Mathematics at Level 2 by:</p> <ul style="list-style-type: none"> • Adopting an annual 10% improvement target. • Assessing motivational factors underpinning non-compliance by residents. • Implement reward schemes to recognise and encourage achievement. • Ensuring there is sufficient provision within the establishment. <p>This will be included in a new Functional Skills Strategy, to be developed by April 2020.</p>	<p>Governor and Head of Learning and Skills, People Plus</p> <p>Governor</p>	<p>March 2020</p> <p>April 2020</p>



4.6	Prisoners should be able to access interventions to improve parenting and relationship skills.	Partly agreed	<p>This recommendation is partly agreed as full completion is subject to funding and the need to overcome potential obstacles to third sector provision due to nature of HMP Littlehey's population.</p> <p>HMP Littlehey will:</p> <ul style="list-style-type: none"> • Support residents in addressing relationship skills as identified in their Sentence Plan, including through completion of the Intimate Partner Violence strand of Kaizen for those assessed as suitable. • Seek to identify a third-party provider to deliver interventions to improve parenting and relationship skills. 	Head of Reducing Re-Offending	December 2020
4.34	There should be sufficient places on the Healthy Sex Programme to meet the needs of prisoners.	Partly Agreed	<p>This recommendation is partly agreed as Healthy Sex Programme (HSP) provision is managed centrally, taking account of competing resource for Offending Behaviour Programme (OBP) provision across the East of England and nationally. National allocation of places is used to ensure fair access to HSP for those assessed as likely to benefit, irrespective of where an individual is based.</p> <p>National allocation of places has reduced waiting times and has supported an increase in the number of places available as demand has been better understood. HSP provision has increased significantly over recent years and remains under annual review. Nationally, there are 121 HSP starts with 120 completions planned for 2019/20. HMPPS will provide spaces, where resource allows, as part of the coming OBP planning round for 2020/21.</p> <p>The Governor and Prison Group Director will discuss provision specifically to meet the needs of residents at HMP Littlehey, with support from the Head of Psychological Services.</p>	<p>Head of Psychological Services</p> <p>Governor</p>	<p>March 2020</p> <p>March 2020</p>



Recommendations	
Agreed	18
Partly Agreed	8
Not Agreed	2
Total	28

