



HM Prison &  
Probation Service

Action Plan: HMP/YOI Portland

Action Plan Submitted: 16 January 2020

A Response to the HMIP Inspection August 2019

Report Published: 16 January 2020

## 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, Measurable, Achievable, Realistic and Time-bound) as possible. Actions should be specific enough to be tracked for progress.
Partly Agreed	Only part of the recommendation is agreed with, is achievable, affordable and will be implemented. This might be because we cannot implement the whole recommendation because of commissioning, policy, operational or affordability reasons.	The response must state clearly which part of the recommendation will be implemented along with SMART actions and tracked for progress. There <b>must</b> be an explanation of why we cannot fully agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.
Not Agreed	The recommendation is not agreed and will not be implemented. This might be because of commissioning, policy, operational or affordability reasons.	The response must clearly state the reasons why we have chosen this option. There <b>must</b> be an explanation of why we cannot agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.



## ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMP/YOI Portland

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	<b>Key concerns and recommendations</b>				
	<b>Directed to: Governor</b>				
S45	Key concern: Levels of violence were high. The strategic management of violence was weak. Management scrutiny of violence reduction work, segregation and adjudications lacked rigour. A failure to ensure the collection and systematic analysis of reliable data meant that managers lacked the necessary information to assess the effectiveness of practice, identify opportunities for improvement or address weaknesses.	Agreed	<p>HMP Portland will improve key safety processes by:</p> <ul style="list-style-type: none"> <li>The prison Safety Strategy will be informed by the outcomes of a prison safety summit. Going forward it will focus on identifying and analysing the underlying drivers of violence to inform actions. Delivery will be led by a Senior Manager and measured through the Violence Reduction Meeting.</li> <li>The Head of Residence and Safety will ensure there is greater governance of violence, through structured monthly Safer Custody and quarterly Safeguarding Meetings. The monthly meetings will be chaired by the Deputy Governor, where data from the Safety Diagnostic Tool (SDT), the Violence Diagnostic Tool (VDT), monthly Use of Force and Incident Reporting System (IRS) data will be scrutinised to identify trends and key themes. The data will be used to determine any appropriate actions and referrals, it will also focus on how data will be used to reduce violent incidents and inform the ongoing Violence Reduction strategy.</li> <li>The Self - Isolation Strategy will continue to be developed and will include the development of a supported living unit. This strategy will capture support processes, and will be monitored via the monthly Safety Meeting and weekly Safety Intervention Meeting (SIM), where the numbers of self-isolators will be tracked and recorded. The Safety Meeting will monitor effectiveness and measure the impact of these initiatives.</li> </ul>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>April 2020</p> <p>April 2020</p> <p>February 2020</p>



	<p><b>Recommendation:</b>  <b>Key safety processes, including violence reduction, segregation and adjudication, should be scrutinised regularly and effectively and this should be underpinned by the interrogation of routinely collected, reliable and comprehensive data which inform effective actions, the success of which can be judged by less violence.</b></p>		<ul style="list-style-type: none"> <li>• Segregation and adjudication statistics and analysis will be reviewed monthly at the Segregation Monitoring and Review Group (SMARG) meeting. The SMARG meeting minutes will be included in the monthly safety Senior Management Team (SMT) assurance report, and will be quality assured by the deputy governor. In addition, 10% of adjudications are quality assured monthly by the deputy governor.</li> <li>• The prison will monitor and record the effectiveness of actions taken to help reduce levels of violence through the Safer Custody meeting, chaired by a member of the SMT.</li> </ul>	<p>The Governor</p> <p>The Governor</p>	<p>February 2020</p> <p>April 2020</p>
S46	<p>Key concern: Measures to encourage positive behaviour were not well implemented and did not help prisoners work towards changing habits and attitudes to assist in achieving rehabilitation. The incentives and earned privileges (IEP) scheme was not applied consistently, low-level poor behaviour frequently went unchallenged and prisoners felt that negative decisions were made arbitrarily. Decisions to reduce a prisoner to the basic level were often taken with no face-to-face discussion or explanation. Targets to improve were too often generic</p>	Agreed	<p>HMP Portland will apply behaviour management systems consistently by;</p> <ul style="list-style-type: none"> <li>• The current Incentives and Earned Privileges Scheme will be reviewed in line with the new Incentives Policy Framework, with the emphasis being on rewarding positive behaviour. As part of their roll out, the evidence based team will be invited to attend the establishment to meet with staff unions and managers to explain the benefit of a reward culture, to ensure buy in from all stakeholders including prisoners.</li> <li>• Clear guidance will be provided to staff on the importance of consistent delivery of the local Incentive Policy Framework scheme.</li> <li>• Celebration of success processes will be implemented to include notice board displays, and a fortnightly event will be attended by the Governor or representative to give out certificates.</li> <li>• Key Workers will ensure that supportive professional relationships are formalised, to assist and reinforce prisoners in making positive changes in their behaviours. The Head of Offender Management Delivery will quality assure the delivery and effectiveness of key work. They will provide constructive and supportive feedback to the</li> </ul>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>February 2020</p> <p>February 2020</p> <p>February 2020</p> <p>February 2020</p>



	<p>and reviews were undertaken without the prisoner. Conversely, incentives within and outside the IEP scheme were inadequate, there were few positive entries in case notes and there was little peer support to reduce violence.</p> <p><b>Recommendation: Behaviour management schemes should be implemented consistently across the prison and should focus on incentivising and motivating prisoners.</b></p>		<p>key workers and their line managers, who will ensure key work is linked into the Incentive Policy Framework. Progress will be tracked and presented to the Monthly Reducing Reoffending Meeting</p> <ul style="list-style-type: none"> <li>Trends will be captured on Incentive Policy Framework levels via monthly management information data, submitted by the Head of Residence and quality assured by the HoBA (Head of Business Assurance). This data will be discussed and actioned at the residential managers meeting.</li> </ul>	The Governor	February 2020
S47	<p>Key concern: Use of force was high with inadequate scrutiny. Paperwork was not always comprehensively completed and not all video footage of planned incidents was available to view. Regular meetings had not been held and data and analysis were not yet being used sufficiently to highlight trends and take necessary action.</p> <p><b>Recommendation: Use of force documentation should be completed promptly and thoroughly, all planned incidents should be recorded and reviewed, data should be analysed and incidents</b></p>	Agreed	<ul style="list-style-type: none"> <li>HMP Portland has developed a Use of Force (UoF) Learning Panel which reviews video footage from BWC (Body Worn Camera) and CCTV (Closed Circuit Television), and identifies learning points that will feed into the monthly UoF meeting. Attendance at the UoF meeting is multi-disciplinary, the meeting will review strategy, trends, themes and good practice relating to UoF.</li> <li>The system for securing video footage will be improved, and CCTV will be regularly reviewed at the learning panel.</li> <li>A system will be implemented to record and collate all UoF paperwork within the timeframes required, and a quality assurance process will be introduced to drive up standards of written records.</li> <li>The record keeping process will be reviewed at the UoF learning panel to ensure the robustness of oversight, and governance on how force is used.</li> <li>A request will be submitted to be part of the pilot for the NOMIS (National Offender Management Information System) use of force application system which will support data analysis and improvement.</li> </ul>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>February 2020</p> <p>February 2020</p> <p>February 2020</p> <p>February 2020</p> <p>February 2020</p>



	<b>reviewed to monitor trends, identify good practice and learn lessons.</b>				
S48	<p>Key concern: The quality of ACCT documents was poor. There were gaps in key areas such as care maps and observations. The quality assurance process had failed to address these deficiencies. Prisoners on ACCTs were locked up for long periods on the main wings with little activity or support. This had the potential to be a driver for self-harm</p> <p><b>Recommendation: The ACCT process and its quality assurance should ensure that prisoners in crisis are safe and supported by adequate staff support, quality care maps and a regime that engages them.</b></p>	Agreed	<p>HMP Portland will improve the quality of ACCT's (Assessment, Care in Custody, Teamwork) to ensure the prisoners are supported adequately by:</p> <ul style="list-style-type: none"> <li>• The Group Safety team will deliver Risk Management and Defensible Decision training to ACCT Case Managers and SASH (Suicide and Self Harm) trainers.</li> <li>• The prison will implement a dedicated case management approach to improve accountability for the care of prisoners, as well as improving the quality of reviews by identifying those staff who require additional development and support in ACCT processes.</li> <li>• This will be supported by implementing an effective ACCT quality assurance process with support from the group safety team. This will focus on driving up standards of ACCT processes, sharing good practice and identifying themes and trends to improve outcomes, which will be overseen by the Safer Custody Team.</li> <li>• Required attendance at ACCT reviews will be clarified, which will include prison and healthcare staff as well as other relevant attendees such as the chaplaincy, substance misuse support and keyworkers. Attendance at reviews will be checked though the quality assurance process and managers will be made aware of a lack of attendance from their department, as well as highlighting examples of good practice.</li> <li>• The new regime encourages all prisoners to spend the maximum time out of cell engaged in purposeful activity. ACCT plans will consistently identify actions to support the prisoner, and encourage them to engage in purposeful activity and time out of cell.</li> </ul>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>February 2020</p> <p>March 2020</p> <p>March 2020</p> <p>February 2020</p> <p>February 2020</p>
S49	<p>Key concern: Responses to our survey were extremely negative about staff. Only 59% said that staff treated them with respect and 60% that they had someone they could turn to against respective comparators of 70%</p>	Agreed	<p>HMP Portland will provide proactive support and supervision of prisoners by:</p> <ul style="list-style-type: none"> <li>• Progressing the application for support from the Standards Coaching Team, to work with Portland to help improve staff/prisoner relationships.</li> <li>• Regular staff briefings and bulletins will be introduced to inform staff about expected standards of behaviour when dealing with prisoners</li> </ul>	<p>The Governor</p> <p>The Governor</p>	<p>April 2020</p> <p>February 2020</p>



	<p>and 71%. There was no personal officer scheme and the key worker scheme was not fully embedded or effective. The time that prisoners spent locked up hindered the development of healthy relationships with staff. We observed much poor supervision of prisoners. Many staff remained in offices on wings instead of supervising prisoners in their care. Rules were not appropriately enforced by staff.</p> <p><b>Recommendation: Staff should provide proactive support and supervision of prisoners at all times and enforce the rules consistently.</b></p>		<p>in a more positive and courteous manner, and highlight where this has been achieved. These briefings will support the prison values and promote a healthy culture where procedural justice and respect / decency are seen as non-negotiable.</p> <ul style="list-style-type: none"> <li>• Key workers will continue to support prisoners assigned to them, focusing on positive behaviour and their rehabilitation. Delivery of key work and the quality of entries through their sessions will be monitored by the heads of offender management delivery and residence.</li> <li>• Wing managers will ensure all prisoners are adequately supervised, and that rules are enforced consistently through positive interactions utilising the Incentives Policy Framework or the adjudication process if necessary. Data from the Incentives Policy Framework levels and adjudications will be scrutinised at the Residential Managers Meeting, to ensure it is applied consistently and not disproportionately.</li> </ul>	<p>The Governor</p> <p>The Governor</p>	<p>June2020</p> <p>April 2020</p>
S50	<p>Key concern: Most of the living accommodation had not improved since our last inspection. Seventy-eight cells designed for one were holding two prisoners. No cells had curtains and toilet screening in some shared cells was very poor. Most showers were filthy and in a dreadful state of disrepair. Most wings had some</p>	Agreed	<p>HMP Portland will ensure cells and living areas are clean, decent and correctly equipped by:</p> <ul style="list-style-type: none"> <li>• Developing a local Decency Programme/Strategy based on the elements for improvement contained within HMIP and PIP (performance improvement plan). This will include the quality of the shower provision, access to in-room basics such as curtains, furniture and privacy screening.</li> <li>• Undertake a prisoner cell and equipment audit to identify shortfalls in equipment and decency items, such as privacy screens, curtains etc.</li> <li>• Carry out daily Accommodation Fabric Checks (AFCs) to ensure that each cell is adequately equipped to maintain standards of decency.</li> <li>• The Decency programme will ensure that cell conditions are improved through the introduction of decency checks, a painting</li> </ul>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>February 2020</p> <p>February 2020</p> <p>February 2020</p> <p>February 2020</p>



	<p>working telephones, but not enough, and access to them was limited. There were no lockable cupboards in any cells and regular access to basic kit had only started just before our inspection.</p> <p><b>Recommendation: All living accommodation should be clean, decent and fit for purpose.</b></p>		<p>programme, cleaning schedules and replacement programme for missing or damaged in cell items, based on an agreed inventory. Residential Supervising Officers and Custodial Managers will carry out weekly quality checks in their respective areas, to ensure the decency programme is being adhered to. The Head of Residence will be responsible for the programme and will oversee progress to ensure standards are improved, and maintained, and that any identified issues preventing progress are escalated accordingly.</p> <p>The concern regarding crowding is noted, however there is no funded plan to reduce crowding at Portland.</p> <p>Whilst the average number of prisoners held in crowded conditions across the estate has fallen slightly, HMPPS recognises the ongoing concerns raised by HMIP (and others across the estate) in relation to the use of crowded cells. While these places meet HMPPS standards for crowded accommodation, holding two prisoners in a cell designed for one prisoner at Portland 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, we welcome the Government's recent announcement of up to £2.5 billion investment in new prison construction to create up to 10,000 additional uncrowded prison places and the opportunity this creates to take steps towards resolving crowding.</p> <p>Our 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 house block at HMP 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>		
S51	Key concern: Equality and diversity work was weak despite	Agreed	HMP Portland will improve the strategic management of equality by identifying and meeting the needs of those with Protected Characteristics (PC) by;		





	<p>some recent improvement. Support for prisoners from protected characteristic groups was underdeveloped, local policies needed review and prisoners had no reliable way to raise concerns either individually or as a group.</p> <p><b>Recommendation: Regular consultation and monitoring should inform provision for protected groups and ensure that outcomes are fair.</b></p>		<ul style="list-style-type: none"> <li>• Allocating every senior leader a protected characteristic that they will have responsibility for, and photographs of each lead will be displayed in key prisoner areas of the establishment to promote this. All PC meetings will be diarised and minuted, with any findings discussed at the monthly Equalities Meetings where actions will be captured on the overriding action plan. The Equalities Custodial Manager will monitor the outcomes and frequency of these meetings, highlighting any repeated actions to the responsible lead and deputy governor.</li> <li>• Using data collated during the Induction process, and demographic data available to identify prisoners with protected characteristics.</li> <li>• Analysing all available data via the monthly DREAT (Diversity Race Equality Action Team) meeting, to identify trends and monitor outcomes.</li> <li>• Holding regular protected characteristic forums to ensure regular consultation, attended by the relevant senior leader, so issues can be raised and resolved.</li> <li>• Ensuring an Equalities Analysis is done on all local policies to identify potential risk of disproportionate outcomes.</li> <li>• Improving the Discrimination Incident Reporting Form (DIRF) process by holding local forums and analysing data and outcomes through the monthly DREAT meeting, chaired by a member of the SMT.</li> </ul>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>February 2020</p> <p>February 2020</p> <p>April 2020</p> <p>February 2020</p> <p>February 2020</p> <p>February 2020</p>
S52	<p>Key concern: Prisoners had lost faith in the complaints and discrimination incident report form (DIRF) system. Far too many complaints were responded to late and many of the small number of DIRFs submitted in the previous six months were not responded to. Complaints made about staff were not taken seriously or investigated thoroughly. We</p>	Agreed	<p>HMP Portland will ensure complaint responses are based on a thorough investigation, and the prisoner has the opportunity to contribute, when appropriate, by:</p> <ul style="list-style-type: none"> <li>• Adhering to the new national Prisoner Complaints Policy Framework which enables prisoners to contribute as appropriate.</li> <li>• We will ensure that there are improved outcomes in relation to complaints against staff by triaging them all by the Deputy Governor or HOBA, to determine at which level they need to be addressed. The system for gathering the outcomes of the management enquiries, or formal investigations, will be improved to ensure that the final outcomes are known by the business hub. The business</li> </ul>	<p>The Governor</p> <p>The Governor</p>	<p>March 2020</p> <p>March 2020</p>



	<p>found an example of a prisoner who had made a serious allegation against a member of staff more than four months previously which had not been investigated. Investigations were not thorough enough, and in one investigation the prisoner was not spoken to about the complaint.</p> <p><b>Recommendation: All complaints, including those made against staff, should be taken seriously and investigated promptly and thoroughly.</b></p>		<p>hub manage will monitor the process to ensure that interim and final responses are delivered on time.</p> <ul style="list-style-type: none"> <li>• Increased governance of the DIRF process has been implemented and will be embedded to further improve outcomes. Improved tracking and monitoring systems will be implemented and DIRFS will be quality assured for timeliness, the quality of responses, and outcomes from the actions committed to.</li> <li>• An equalities Custodial Manager has been appointed, who will re-launch the DIRF process to improve confidence in the system. All DIRF's will be investigated by the equalities manager, unless against staff whereby they will be referred to the Deputy Governor to be investigated by an appropriate member of staff.</li> <li>• A 10% management check by a Senior Manager is in place for all complaints, this will include all complaints made against staff being checked by the Deputy Governor to ensure they have been investigated thoroughly and in a timely manner. Additionally, the DREAT team will try to secure an independent body to quality assure all DIRFS.</li> </ul>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>April 2020</p> <p>April 2020</p> <p>April 2020</p>
S53	<p>Key concern: A lack of strategic action had resulted in a health service that was not able to function effectively largely because the prison failed to facilitate consistent access to health services. Medication administration sessions were protracted, often poorly managed by officers, and some patients arrived late because of regime restrictions, reducing the time to run clinics. This affected the take-up of secondary health</p>	Agreed	<p>Portland will nominate a member of the SMT to link with the Head of Healthcare (Care UK), who will hold regular meetings to monitor prisoners who did not attend appointments with the Healthcare service. These meetings will link into the monthly partnerships boards. In the meetings concerns with access to health services, failure to attend rates, and the consistent approach of issuing medication will be discussed, and appropriate action taken when required.</p> <p>The delivery of access to health services and medication will be a key feature on the re-profile, to ensure that the staffing available is sufficient, and that timings are achievable. Supervision of the medical hatch on Raleigh Unit will be improved.</p> <p>A member of staff will supervise the queues to ensure that confidentiality is maintained, and that the risk of diversion and bullying is minimised. Healthcare</p>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>February 2020</p> <p>March 2020</p> <p>March 2020</p>



	<p>screening, immunisations and vaccinations and NHS health checks. There was a high failure-to-attend rate for mental health and dental services and a wasted clinical resource.</p> <p><b>Recommendation: Patients should have prompt access to health services, including sufficient officers to ensure safe and timely medication administration and prompt attendance at health clinics.</b></p>		<p>staff have been instructed not to administer any medication unless officer supervision is in place</p>		
S54	<p>Key concern: The limited time that prisoners spent unlocked was a real concern and was seriously undermining daily life in the prison. During our roll checks we found 44% of prisoners locked in their cells. The published regime was not fully adhered to and we observed considerable slippage. The prison had implemented a lock-down rota for all wings and it was concerning that on one unit prisoners could spend nearly 60 hours locked in their cells with no basic entitlements such as showers and telephones. Time in</p>	Partly Agreed	<p>This recommendation is partly agreed, as within current resources the prison is not able to provide 10 hours out of cell for Prisoners. Increasing time out of cell is a key priority for the Senior Management Team, as it will improve outcomes across all other healthy prison expectations, and an imminent reprofile will provide 8.5 hours of time unlocked. The key changes will be delivered as follows:</p> <ul style="list-style-type: none"> <li>• <b>Core day refresh</b> – a new core day will be written in Jan 2020 that will increase time out of cell for both employed and unemployed prisoners, and reduce the number of unemployed prisoners at Portland. The core day will also provide a different exercise period so that this does not clash with employment opportunities.</li> <li>• <b>Re profile</b> – we will profile all operational groups staff to deliver the core day and Keywork, this will be supported by revised Risk assessments and a new Regime Management Plan.</li> </ul> <p>In addition, we also commit to increasing the provision of part time activity for all prisoners who engage in the regime. This will be achieved via the following:</p> <ul style="list-style-type: none"> <li>• <b>Workplace availability</b> - The Head of Reducing Reoffending will continue to maintain strong partnership working with New Futures,</li> </ul>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>February 2020</p> <p>April 2020</p> <p>February 2020</p>



	<p>the open air was available each day but it was not appropriate that prisoners had to decide between attending activities or getting exercise.</p> <p><b>Recommendation: A decent regime should be implemented so that prisoners can spend at least 10 hours a day out of their cells, during which they can attend activities, spend time in the open air and access association.</b></p>		<p>Weston College and Public Sector Prison Industries (PSPI) to try and increase the amount of work available. A business case for additional industries staff will be considered.</p> <ul style="list-style-type: none"> <li>• <b>Workplace allocation</b> – we will revise the allocations process by ensuring prisoner needs are identified and prioritised. We will Increase the amount of part time work available until full time places have improved.</li> <li>• <b>Regime Planning</b> – The regime that is delivered on a weekly basis will be decided at the weekly regime planning meeting as directed by the Deputy Governor.</li> </ul>	<p>The Governor</p> <p>The Governor</p>	<p>February 2020</p> <p>February 2020</p>
S55	<p>Key concern: Leaders and managers had not focused sufficiently on increasing the number of activity places to accommodate the population. Prisoners' participation in education, skills and work was not sufficiently good and employment was an issue. Prisoners' punctuality was poor and the process of allocation to activities was weak. Leaders and managers had not focused sufficiently on improving the provision of skills and work areas across the prison.</p>	Agreed	<p>There are insufficient activity places to employ all prisoners on a full-time basis, we will however increase the provision of part time activity placements. This will ensure that there are sufficient activity places either full or part time, so that all prisoners can be engaged in purposeful activity which will be reflected in the core day and reprofiling of the prison.</p> <p>HMP Portland will maximise our activity placement provision in conjunction with Education and other relevant departments, including New Futures Network and by:</p> <ul style="list-style-type: none"> <li>• Exploring our current contract provision to ensure that we are meeting the employment needs of our population, and aligning that to employment opportunities in the community. This will be achieved via a full needs analysis.</li> <li>• Work placements will be allocated during the prisoner induction process, and course vacancies will be advertised on the wings. Each week the Heads of Reducing Reoffending and the Activity Hub will monitor the filling of vacancies, check attendance rates and they will focus on maximising activity placements. Keyworkers will also</li> </ul>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>April 2020</p> <p>April 2020</p> <p>April 2020</p>



	<p><b>Recommendation: Leaders and managers should ensure that there are sufficient purposeful activities for all prisoners, that prisoners are allocated quickly and arrive on time, and that there is focus on improving the provision of skills and work throughout the prison.</b></p>		<p>be continually briefed to promote participation and attendance at work activities.</p> <ul style="list-style-type: none"> <li>• Allocation and sequencing will place learners on pathways that enable them to raise functional skills levels, and progress into vocational employment or training. Achievement data will be monitored and discussed in the Quality Improvement group (QIG) and education contract meetings. Progression will be monitored at the QIG to ensure the right level of attainment is being achieved.</li> <li>• The prison will complete an assessment of the needs of all prisoners upon arrival into the establishment, to ensure they are appropriately sequenced into activities with functional skills English and Maths a priority.</li> <li>• Functional Skills outreach will be established in workshops, and the prison pay policy will incentivise those who have obtained qualifications in functional skills.</li> <li>• Current workshop provision and activity places are in the process of being reviewed. Consideration will be made to increase the number of prisoners we employ part time, until the increased provision of activity placements. New Future Networks is working towards inviting new enterprise opportunities into the prison which will lead to learning real skills, to assist in gaining employment upon release.</li> <li>• Induction is currently being reviewed with the current Head of Operations. The induction process will include an induction into purposeful activity for prisoners to ensure swift allocation to work/education. Assurance of the improvements will be captured in the Operations SMT Assurance report so that progress can be tracked.</li> <li>• The monitoring of activity capacity, allocation and attendance data is discussed daily at the Governors 0900 meeting, so issues can be identified and acted upon as necessary.</li> </ul>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>February 2020</p> <p>April 2020</p> <p>April 2020</p> <p>February 2020</p> <p>April 2020</p> <p>February 2020</p>
S56	<p>Key concern: Prisoners' initial assessment results were not used sufficiently by tutors and trainers to develop individual learning plans. Peer mentors did</p>	<p>Agreed</p>	<p>The results of prisoner's initial assessments will be recorded, and provided to Teachers/Instructors for application in their learning environment. Weston College will monitor and record the use of assessment information when planning individual learning, undertaking classroom observations and walkthroughs. These records will be discussed at the quarterly QIG.</p>	<p>The Governor</p>	<p>February 2020</p>



	<p>not receive enough direction and support from prison managers to ensure that they were able to support prisoners effectively. Tutors did not always correct prisoners' errors in English and mathematics work.</p> <p><b>Recommendation: Managers should ensure that teachers use prisoners' initial assessment results to identify clearly their starting points and that individual learning plans are used to identify learning objectives which improve prisoners' skills and preparation for employment and further promote the development of English and mathematics skills. Prison managers should ensure that peer mentors receive enough direction to enable them to give better support to prisoners.</b></p>		<p>Individual Learning Plans (ILP) will be implemented following a prisoner's initial assessment, they will identify and promote any further development required in English and Maths. The ILP will be used to determine activity allocation or education and updated by either the teacher or vocational instructor.</p> <p>The supervision and support for peer mentors will be improved. Weston College will train sufficient Peer Mentors to support prisoners in improving their educational and vocational skills. Regular team meetings will be held with the mentors to further support and develop them, in conjunction with Weston College.</p>	<p>The Governor</p> <p>The Governor</p>	<p>February 2020</p> <p>April 2020</p>
S57	<p>Key concern: Not enough work in the industries workshops was accredited.</p> <p><b>Recommendation: Managers should ensure that the development of all prisoners' skills is monitored, recorded</b></p>	Agreed	<p>HMP Portland will increase the number of instructors that are able to deliver qualifications. In addition, we will consider using DPS (Direct Purchasing Scheme) funds to use the PEF (Prison Education Framework) provider to increase the amount of qualifications in the workshops. Systems will be established to record prisoner's non- accredited skills and development via the provision of meaningful Individual learning plans. The QIG meeting will monitor progress and achievements.</p>	The Governor	May 2020



	<b>and accredited where appropriate.</b>				
S58	<p>Key concern: Despite improvements in the availability of offender supervisors and in their training and supervision, the levels of contact with prisoners and the quality of OASys assessments, on which these contacts were based, were not good enough.</p> <p><b>Recommendation: The prison should ensure that the quality of OASys assessments improves and that the plans produced are delivered through structured contact with prisoners.</b></p>	Agreed	<p>The OMU (Offender Management Unit) will continue to improve the quality and timeliness of OASYS (Offender Assessment Systems) assessments via the twice weekly learning and development sessions that have been established, this will be completed by the SPO (Senior Probation Officer). The SPO will monitor the quality of a percentage of OASys assessments.</p> <p>All prisoners coming into custody will have face to face OMU contact with a Prison Offender Manager (POM), who will explain the process upon their arrival on Collingwood as part of their induction.</p> <p>The prisoners POM will review each OASys in line with new OMiC guidelines, or as required due to any significant changes in circumstances. All OASys/Sentence plan meetings will be face to face, all other communication will be via the key worker or POM when necessary.</p>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>April 2020</p> <p>February 2020</p> <p>June 2020</p>
S59	<p>Key concern: The range and number of accredited programmes to address offending behaviour had suffered a serious decline. There were very few lower-level interventions to help prisoners reduce their risks.</p> <p><b>Recommendation: The prison should ensure that prisoners</b></p>	Agreed	<p>HMP Portland will ensure prisoners can benefit from a suite of interventions by:</p> <ul style="list-style-type: none"> <li>• Leaders will continue to rebuild the accredited programmes delivery offer to include TSP (Thinking Skills Programme), Resolve and Alcohol Related Violence in line with recruitment and training constraints.</li> <li>• The programme team and OMU will also develop lower level interventions to help reduce risk, to be delivered one to one or in groups.</li> </ul>	<p>The Governor</p> <p>The Governor</p>	<p>August 2020</p> <p>April 2020</p>



	<b>can benefit from a suite of interventions, including accredited programmes, to reduce the risks they present.</b>		<ul style="list-style-type: none"> <li>Continue to deliver the current suite of non- accredited interventions, to address offender behaviour identified on the prisoners OASys/sentence plan.</li> <li>Where Portland cannot provide an identified OBP (Offending Behaviour Programme), they will seek to transfer the prisoner to a prison that delivers the appropriate course.</li> <li>Complete a needs analysis on a yearly basis to ensure the current suite of accredited and non-accredited interventions are appropriate to the population being held</li> </ul>	The Governor	April 2020
				The Governor	February 2020
				The Governor	April 2020
	General recommendations				
	<b>Directed to: Governor</b>				
1.17	Managers should ensure that systems for changing poor behaviour and assisting vulnerable prisoners are implemented effectively.	Agreed	<p>A new local Incentive and Earned Privilege (IEP) scheme will be devised in line with the Incentives Policy Framework by January 2020. HMP Portland will scope out additional incentives to encourage positive behaviour which will be supported by Key Work.</p> <p>Challenge Support Intervention Plans (CSIP) will be relaunched and fully embedded. Vulnerable prisoners will be supported via the Self isolating strategy, safety Intervention meeting and the supported living unit.</p> <p>The outcomes of both systems will be reviewed quarterly once fully implemented.</p>	The Governor	February 2020
				The Governor	February 2020
				The Governor	July 2020
1.39	All security processes should be reviewed to ensure they are appropriate for Portland's role as a category C training prison.	Agreed	A full review of the Local Security Strategy(LSS) will be completed. All processes that directly affect the prisoners will be balanced to manage risk, and ensure that respect and decency is maintained in line with National Policy for a Category C prison. These processes will be reflected within the new core day, which will allow for an increased amount of time out of cell for purposeful activity.	The Governor	February 2020
2.10	There should be sufficient telephones for prisoners on all wings and they should afford suitable privacy.	Agreed	A full review has been completed and repairs works have been requested. Wing Supervising Officers(SO's) will be responsible via SPDR's (Staff Performance Development Record) for maintaining the working condition and the privacy hoods of the phones on their units. Any outstanding repairs will be	The Governor	February 2020





			<p>escalated to the GFSL (Government Services Facility Limited) meeting to ensure timely completion.</p> <p>We will progress our request for in cell telephones to be prioritised, as this will enable increased access to telephones.</p>	The Governor	April 2020
2.20	Prisoners' dissatisfaction with the food should be fully investigated and addressed.	Agreed	<p>The effectiveness of the current food comments process will be reviewed, including an assessment on how the feedback is received, considered and actioned, which will be communicated back to the prisoners. There will be monthly food forums held, and consideration will be made to developing food representatives, to include prisoners from a range of diverse backgrounds to work with kitchen staff to develop the kitchen menu. A hot meal will be served in the evening under the new profiles.</p> <p>A Custodial Manager(CM) will hold regular forums and surveys in relation to canteen provision, to determine if what is available meets the needs of the population.</p>	The Governor  The Governor	February 2020  February 2020
2.27	The application system should ensure that prisoners receive a timely response to their requests.	Agreed	A full review of the applications process has identified the causes of delay. A new process will be implemented that assures prisoners receive responses, or an interim response within a timely manner. The system will be monitored for timely responses and completion by the business hub.	The Governor	February 2020
2.64	There should be a whole-prison strategy and approach to support health promotion and well-being activities	Agreed	<p>A programme of health promotions days will be established that is supported and delivered by a multidisciplinary team, and underpinned by a health promotion strategy. There is a health promotion calendar, which is supported by the prison and updated each year. The gym staff will work with healthcare to develop a range of health and wellbeing promotion options for all prisoners wishing to access them.</p> <p>Healthcare will work with induction staff so that they can be included in the induction process, to promote health and wellbeing and also to develop the provision of leaflets which will be available in a range of different languages.</p>	The Governor  Care UK	February 2020  February 2020
2.81	Prisoners with mental health conditions should have prompt access to a comprehensive range of care-planned support that meets their identified needs, including group work and	Agreed	<p>To ensure prompt prisoners access to the correct support and interventions to meet their needs, Care UK have ensured that:</p> <ul style="list-style-type: none"> <li>The mental health team now have a patient engagement lead and an assistant psychologist.</li> </ul>	Care UK	Complete



	psychologically informed interventions.		<ul style="list-style-type: none"> <li>• They will develop care planned support for the prisoners. Mental health and Substance Misuse Services will be expanded to include weekend provision.</li> <li>• They have a full-time counselling psychologist.</li> <li>• Have commissioned a needs assessment to be completed by March 2020.</li> <li>• Can deliver a full range of interventions to meet identified needs once group rooms are made available.</li> <li>• Delivery of support, needs and interventions will be discussed and reviewed at the monthly quality delivery board.</li> </ul>	Care UK	February 2020
				Care UK	Complete
				Care UK	March 2020
				Care UK/Governor	April 2020
				Care UK	February 2020
2.90	The full range of prescribing options should be available, and prescribing decisions should be made on clinical need.	Agreed	<p>HMP Portland can now provide a full range of prescribing options which now includes buprenorphine, to meet the clinical needs of all eligible prisoners.</p> <p>EDP Drug and Alcohol Services continue to provide psychosocial support with the aim to increase the provision to the weekend.</p>	The Governor	February 2020
				The Governor	February 2020
2.91	There should be sufficient provision for prisoners with both mental health and substance-related conditions.	Agreed	<ul style="list-style-type: none"> <li>• Dual diagnosis prisoners will be supported by a strong partnership between EDP and Care UK providers.</li> <li>• Recruitment will be completed to ensure there is an appropriate provision of staff.</li> <li>• Collaborative working and communication continues between care UK and EDP, to ensure prisoners are provided with the correct service.</li> <li>• A local protocol will be produced to underpin the provision, which will be monitored through the contractual meetings with the provider.</li> </ul>	The Governor	April 2020
				Care UK/EDP	April 2020
				Care UK/EDP	April 2020
				Governor/Care UK/EDP	April 2020
3.11	The prison should ensure that all prisoners can, and are encouraged to, pursue constructive leisure activities through regular opportunities to attend the library and learning resource centre and gym.	Agreed	<p>The new core day and regime will allow for increased access to constructive leisure activities. Portland will discuss the provision of evening and weekend library access with Weston College. The gym programme will be reviewed in line with the new core day and regime, to increase the amount of gym sessions available to all prisoners.</p> <p>Library and gym attendance data will be gathered to track numbers, and identify those accessing the services which will be discussed at the SMT morning meeting.</p>	The Governor	March 2020
				The Governor	February 2020



			The Local Incentives Policy is designed to incentivise, and will encourage positive behaviour which includes increased gym sessions. Keyworkers will encourage the pursuit of constructive leisure activities.	The Governor	March 2020
3.22	Prison managers should make sure that the contract for careers information, advice and guidance is implemented urgently to ensure that prisoners are better informed about their career choices.	Agreed	IAG (Information Advice and Guidance) services have now been implemented, and their delivery time and space on induction has been agreed. A private interview room on Collingwood will also be established. The IAG will be promoted on all units to ensure accessibility for all.	The Governor	February 2020
4.9	Prisoners should be able to access working telephones to maintain regular contact with family and friends.	Agreed	A full review has been completed and repairs works have been requested. Wing SO's will be responsible via SPDR objectives for maintaining the working condition and privacy hoods of their phones on their units.  The new core day and regime will allow for increased time out of cell, this will increase the amount of time available to access telephones to maintain contact with family and friends.  We will progress our request for in cell telephones to be prioritised, as this will enable increased access to telephones.	The Governor  The Governor  The Governor	February 2020  March 2020  April 2020
4.21	The number and range of release on temporary licence (ROTL) opportunities should be improved.	Agreed	OMU managers will continue to work with the community to increase the ROTL (Release On Temporary Licence) opportunities, and the variety of work available.  ROTL will be better marketed to the population to increase the uptake. The timeliness of the ROTL process will be improved via regular dialogue with community offender managers.  Progress will be monitored and included in the OMU SMT assurance report, and discussed at the monthly reducing reoffending meeting.	The Governor  The Governor  The Governor	February 2020  February 2020  March 2020
4.27	All re-categorisation reviews should be completed on time.	Agreed	The system set up to improve timeliness of re-categorisation reviews will be embedded. This involves early identification by the OMU hub manager,	The Governor	February 2020



			notification to the POM's (Prison Offender Managers) and a system to track their progression to ensure people are progressed promptly.		
4.28	Prompt progressive moves should be arranged for prisoners who need them	Partly Agreed	<p>This recommendation is Partly Agreed as operational and population constraints can impact on the promptness of progressive moves within the estate.</p> <p>All transfer requests will be logged and tracked. Priority will be given based upon risk, release date and the need to address offending behaviour in consultation with their POM.</p> <p>Under the OMiC model and offender flows, all those requiring local release will be identified and a transfer request raised to the appropriate resettlement prison. The head of Offender Management Services will monitor and track the whole process and escalate any issues as necessary.</p>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>February 2020</p> <p>April 2020</p> <p>April 2020</p>
4.35	Joint working should be optimised so that resettlement needs and risks are addressed for prisoners in the time leading up to their release.	Agreed	<p>Prison Managers and the CRC (Community Rehabilitation Company) will deliver reintegration planning board meetings, which will coordinate the release planning for the prisoners. The IRMT (Interdepartmental Risk Management Team) will feed into this process ensuring that MAPPAs (Multi Agency Public Protection Arrangements) identified prisoners are adequately accounted for. HDC (Home Detention Curfew) will start earlier (14 weeks prior to release), to increase the amount of pre-release work particularly around suitable addresses that can be achieved.</p> <p>"HMPPS has implemented an enhanced 'Through the Gate' service for prisoners, to aid the provision of resettlement in all resettlement prisons including HMP Portland. 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. To support this, we have invested an additional £22m per annum over the remaining life of the CRC contracts and this provides approximately 500 additional CRC staff to deliver Through the Gate in resettlement prisons. HMPPS is also working collaboratively with other government departments and interested parties to help meet the accommodation needs for prisoners on their release."</p>	The Governor	March 2020



		<p>Under the Offender Management in Custody (OMiC) model, the handover from the Prison Offender Manager (POM) to the Community Offender Manager (COM) is critical. Careful thought has been given to ensure this handover is thorough and robust so that all identified risks can be appropriately managed in the community. Public protection, information sharing and relationship building between individuals and the Community Offender Manager, must be at the centre of each handover.</p> <p>As part of the handover process the COM will be expected to build a relationship with the prisoner and custodial staff and complete any necessary referrals. This should be facilitated through face to face contact with the prisoner as well as other methods of communication.</p> <p>For prisoners serving a Standard Determinate Sentence, the handover to the community team will happen 7.5 months prior to the individuals conditional release date which is sufficient to develop both relationships and sentence plans. A COM will be allocated the case and undertake pre-release tasks and then take responsibility for the case 4.5 months prior to the Conditional Release date (CRD)/HDC release or confirmation of MAPPA level 2.</p> <p>For prisoners serving an Indeterminate Sentence, they will be managed by the POM for the majority of the sentence. Handover to the community team will take place upon a move to open condition or 8 months prior to the tariff expiry date.</p> <p>CRC cases with over 10 months to serve at the point of sentence remain contractually the prisons responsibility until 12 weeks before the CRD.</p> <p>A small number of individuals with specific circumstances will require earlier allocation to the COM because of their risk and need profile. This is to allow for the additional time to arrange and undertake the various risk management tasks with other agencies to ensure robust risk management plans are in place, for example, early referral into MAPPA and planning for complex release arrangements for prisoners such TACT offenders and those that need to be managed at MAPPA level 3. Mandatory or discretionary Early allocation to the community for handover starts 18 months prior to the CRD and if accepted will become the community's responsibility at 15 months prior to CRD.</p>		
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Recommendations	
Agreed	29
Partly Agreed	2
Not Agreed	0
<b>Total</b>	<b>31</b>

