

Action Plan: HMP Highpoint

Action Plan Submitted 27<sup>th</sup> January 2020

A Response to the HMIP Inspection 12<sup>th</sup> to 23<sup>rd</sup> August 2019

Report Published 22<sup>nd</sup> 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 Measureable, Achievable, Realistic and Time-bound) as possible. Actions should be specific enough to be tracked for progress.		
Partly Agreed	Only part of the recommendation is agreed with, is achievable, affordable and will be implemented. This might be because we cannot implement the whole recommendation because of commissioning, policy, operational or affordability reasons.	The response must state clearly which part of the recommendation will be implemented along with SMART actions and tracked for progress. There <b>mus</b> t 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 HIGHPOINT

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				
	To the Governor				
S45	Key concern: Access to illicit drugs remained too high. The positive MDT rate, including for new psychoactive substances, was 18%, and 36% of prisoners in our survey stated that it was very or quite easy to obtain illicit drugs. The prison's own data showed that drugs were linked to violence and debt. Recommendation: The prison should introduce additional measures to deal with drugs	Agreed	<ul> <li>A revised drug strategy was launched in September 2019, focusing on reducing demand and building recovery. Measures to deal with drugs entering the prison and reduce drug use will include;</li> <li>A streamlined monthly multidisciplinary drug strategy meeting, focused on outcomes for residents.</li> <li>An increased number of staff searches by the Security Team.</li> <li>Compact Based Drug Testing on open units.</li> <li>A 100% mail drug testing pilot conducted on the North site in January 2020.</li> <li>HMP Highpoint will increase intelligence in relation to drugs and</li> </ul>	Governor Governor	March 2020 February 2020
	entering the prison and reduce the positive MDT rate.		associated violence, including through exit interviews with residents, conducted by the Police Intelligence Officer.		
		The reduction of drug supply forms a standing agenda item at the monthly multi-disciplinary security meeting, chaired by the Governor or Deputy Governor. Recent finds, current threats, areas of potential weakness, other intelligence and actions to be taken to mitigate concerns are considered.	Governor	Completed and ongoing	
			HMPPS continues to explore new methodologies to develop mandatory and voluntary drug testing frameworks, enabling a responsive approach to the changing patterns of drug misuse in	Executive Director for Security, HMPPS	April 2020 and ongoing

			prisons. This includes the misuse of prescribed medication, and the dynamic market in psychoactive substances. HMP Highpoint are being considered for drug supply reduction technology investment, subject to funding limitations.		
concerned t attendance activity sess consistently many were	Key concern: We were concerned that prisoners' attendance and punctuality at activity sessions were not consistently good enough. Too many were unoccupied throughout the core week and could not again the gualitications	Partly Agreed	This recommendation is only partly agreed as HMP Highpoint and its education provider are unable to provide sufficient activity spaces to ensure that all residents are fully employed. The need to maximise timely attendance however is recognised and in response to this HMP Highpoint will conduct a review of employment and ensure that all opportunities for employment are maximised e.g. through part time working	Governor	Complete and ongoing
	could not gain the qualifications and skills they needed prior to			Governor	April 2020
	Recommendation: Managers should ensure all prisoners attend sessions as planned and are fully employed so that they can gain the skills and qualifications they need for successful resettlement.		<ul> <li>Managers will ensure that all residents attend sessions as planned by;</li> <li>Daily monitoring of attendance rates by the Activities Custodial Manager, who will ensure that all non-attendance has a registered outcome, such as a Behavioural Warning or removal from work as appropriate.</li> <li>Attendance for the previous day is discussed at the daily operational briefing, attended by all managers, to ensure that there is a whole-prison approach to improving attendance.</li> <li>The Reducing Reoffending team meet weekly with the Governor and Deputy Governor to discuss trends in more detail and ensure that corrective actions are taken.</li> </ul>		
			<ul> <li>HMP Highpoint will ensure that residents are employed where possible and can gain the skills and qualifications they need for successful resettlement by;</li> <li>The Head of Reducing Reoffending is undertaking a review of movement to and from activities to improve punctuality.</li> <li>Changes to movements designed to improve punctuality will be trialled.</li> <li>A review will be conducted of the work available on the standard units, to ensure that employment and development opportunities are maximised where possible.</li> </ul>	Governor	Complete and ongoing

			Attendance and employment rates will be monitored on a monthly basis through the Prison and Performance Tool and at the Senior Leaders Performance meeting, where remedial actions will be set as appropriate.	Governor	Complete and ongoing
S47	Key concern: We were concerned that education tutors did not deliver reliable high- quality taught sessions that focused on promoting prisoners' progress or addressing their specialist needs. Production workshops and work rarely promoted prisoners' English, mathematics and/or personal development skills. Recommendation: Prisoners should be able to participate in high quality education sessions and receive appropriate support during all activities to help build their English, mathematics and/or personal development skills.	Agreed	<ul> <li>HMP Highpoint will ensure that residents are able to participate in high quality education sessions and receive appropriate support by;</li> <li>Joint work with the education provider to introduce an <i>Advanced Practitioner</i> role, to support lecturers in attaining a minimum of a grade 2 in their quality of teaching and learning.</li> <li>The newly introduced <i>Advanced Practitioner</i> role will provide a planned programme of support, including a series of learning observations.</li> <li>Introduction of a new peer mentoring training programme; all peer mentors have passed specific, assessed training to help them appropriately support learners.</li> <li>The Reducing Reoffending team have now agreed the 2020/2021 curriculum, which includes an increase in access to functional skills (e.g. Maths and English) on the North, South Industries and Residential locations.</li> <li>The above actions will be assured through the quarterly Quality Improvement Group and through learning walks and teaching &amp; learning observations by both the education provider and the Prison's Learning and Skills team.</li> </ul>	Governor and Education Manager (People Plus) Governor and Education Manager (People Plus) Governor and Education Manager (People Plus)	March 2020 Complete Complete and ongoing
S48	Key concern: Prisoners with a declared learning difficulty achieved qualifications at a lower rate than other prisoners. Prisoners working in production workshops were not offered enough opportunities to gain	Agreed	<ul> <li>HMP Highpoint will ensure that the support needs of residents with learning disabilities are fully understood and addressed to promote achievement by;</li> <li>A learning support practitioner role will be introduced, supported by the regional Special Educational Needs and Disabilities manager. The Learning support Practitioner will undertake learning disability screening and identify</li> </ul>	Governor and People Plus	March 2020

	relevant qualifications, restricting their future employment options. Recommendation: The support needs of prisoners with learning disabilities should be fully addressed to promote achievement and all prisoners should be able to gain appropriate accredited qualifications regardless of which activity they attend.		<ul> <li>individual needs. They will map appropriate support, barriers to learning, reasonable adjustments and progress.</li> <li>The Learning and Skills Manager will take a lead on conducting a series of resident surveys, with the support of the Psychology team, to explore the needs of residents with learning difficulties and inform curriculum delivery.</li> <li>To extend the opportunity for residents to gain appropriate accredited qualifications regardless of which activity they attend, HMP Highpoint has run Dynamic Purchasing System campaigns and awarded contracts for the delivery of a variety of qualifications. From April 2020, an additional campaign for the provision of a horticulture qualification and gym qualifications will be run.</li> </ul>	Governor	April 2020 and ongoing
			Progress will be assured and monitored as part of the agenda items at the Quality Improvement Group, where qualifications and attainment are discussed.	Governor	Ongoing
S49	Key concern: Ten percent of the population did not have an OASys report outlining their risks and needs or a sentence plan, which impeded their progression and access to interventions. A further 30% had an assessment that was more than 12 months	Partly Agreed	This recommendation is partly agreed as HMPPS Offender Assessment System (OASys) prioritisation guidelines and the Offender Management in Custody (OMiC) guidelines do not provide for annual OASys reviews. Assessments will be kept up-to-date through reviews in response to a significant change in risk/circumstances.		
	old and therefore did not reflect their recent behaviour in custody. The absence of effective assessments for so many prisoners undermined work to reduce their reoffending.		Phase 2 of OMiC 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.	Executive Director, Safety & Rehabilitation	March 2020
	Recommendation: All eligible prisoners should have an up- to-date OASys assessment to inform their progression and access to interventions.		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. HMP Highpoint will receive an uplift in the NPS staff complement to meet OMiC obligations.	SEE NPS Divisional Director	April 2021

			<ul> <li>HMP Highpoint will further ensure that all eligible residents have an up to date OASys by;</li> <li>Secondment of additional Officers into the Offender Management Unit to mitigate the number of vacant Prison Offender Management (POM) roles.</li> <li>Monitor POM performance and the maintenance of up to date assessments through supervision by the Heads of Offender Management Delivery.</li> <li>Embed a new tracking system to identify when assessments are due for review.</li> <li>Prioritise reviews on the basis of the OMiC model and the risk of harm posed.</li> <li>The Head of Offender Management Delivery will develop an action plan to address the OASys backlog.</li> </ul>	Governor	February 2020
			Trends in relation to completion of OASys are monitored and challenged through the monthly Senior Leaders Team Performance meeting.	Governor	Complete
S50	Key concern: There were far too few probation offender supervisors to manage high-risk prisoners, who made up half of the prison's population. Prison offender supervisors held most	Agreed	The National Probation Service are actively recruiting into vacant Prison Offender Manager posts to enable regular contact in line with the OMiC model. In the interim, HMP Highpoint have seconded additional Officers into the Offender Management Unit (OMU) to mitigate the number of vacant Prison Offender Management roles.	Governor and SEE NPS Divisional Director	Complete and April 2021
	of the high-risk cases. Their caseloads were very high and they lacked support and training. Levels of contact between offender supervisors and prisoners were low, and in some		As an interim measure, the establishment will conduct a review to determine a contact schedule in line with current and projected staffing levels, on the basis of the level of risk and need. Dip testing will take place to ensure that these contact levels are being met.	Governor	February 2020
	cases non-existent, which undermined sentence progression.		HMP Highpoint will ensure that all eligible residents have regular contact with an appropriately trained Prison Offender Manager, to drive sentence progression by;	Governor	August 2020
	Recommendation: All eligible prisoners should have regular contact with an appropriately		<ul> <li>Co-location of HMPPS POMs and the National Probation Service POMs on the South side of the prison to increase visibility and access.</li> </ul>		

	trained offender supervisor to drive sentence progression.		<ul> <li>Provision of an office space on the North site, to allow for regular contact with residents located away from the main OMU base.</li> <li>All Prison POMs will undertake the training stipulated within the OMiC model.</li> <li>The Head of Offender Management Delivery will provide structured supervision to all POMs to support them in their role.</li> </ul>		
S51	Key concern: Evidence did not demonstrate that offender supervisors and community- based offender managers were regularly in contact with each other to plan for the release of high-risk prisoners. The IRMT meeting did not review all high- risk prisoners approaching release to address any gaps in risk management planning. Recommendation: The IRMT meeting should review all high-risk prisoners due for release promptly enough to address any gaps in risk management planning.	Agreed	<ul> <li>HMP Highpoint will review all high-risk residents due for release promptly enough to address any gaps in risk management planning by;</li> <li>In consultation with other key areas (including security and drug treatment providers), the Prison Offender Manager will gather key information in relation to high risk receptions and discharges.</li> <li>All high-risk cases are to be robustly sifted prior to the Interdepartmental Risk Management Team (IRMT) meeting by an IRMT sub-committee comprising the Head of Offender Management Services.</li> <li>The Head of Offender Management Delivery will conduct structured supervision with all Prison Offender Managers, including a review of high risk cases as a standard agenda item.</li> </ul>	Governor	May 2020 February 2020
S52	Key concern: Some basic public protection processes were weak. Arrangements for conducting and reviewing telephone monitoring were ineffective. Calls were not listened to promptly and those in foreign	Agreed	<ul> <li>HMP Highpoint will ensure that public protection processes are effective in managing residents' risks to the public while they are in custody by;</li> <li>Public Protection processes are being assessed by the Head of Offender Management Delivery to ensure that they are fully compliant with HMPPS policy and that the</li> </ul>	Governor	February 2020

	languages were not translated. Child contact restrictions were not consistently enforced, potentially allowing contact between the victim and prisoner by mail. Recommendation: The prison should ensure that its public protection processes are effective in managing prisoners' risks to the public while they are in custody.		<ul> <li>processes are effective in managing residents' risks to the public while they are in custody.</li> <li>The IRMT meeting will discuss and agree all public protection mail and pin phone monitoring arrangements based on risk and intelligence and ensure that decisions are not unnecessarily risk adverse.</li> <li>IRMT meetings will ensure that enforcement action is taken where necessary and recorded as appropriate.</li> </ul> The Offender Management unit has explored the use of translation of mail and phone calls for foreign national men who are subject to 100% public protection monitoring through the use of <i>The Big Word</i> translation service. A prioritisation document is under development, which will incorporate the management of this process. Implementation will be monitored through the IRMT meeting and cross-referenced to invoices to demonstrate use of translation services where required.	Governor	February 2020
S53	Key concern: There was no comprehensive population needs analysis in place to underpin the provision of accredited offending behaviour programmes. There were currently not enough places on these programmes to meet the needs of the large population. <b>Recommendation: The prison</b> <b>should have enough places on</b> <b>accredited offending</b> <b>behaviour programmes to</b> <b>meet the needs of the</b> <b>population.</b>	Partly Agreed	This recommendation is partly agreed because offending behaviour programme targets are agreed nationally based on consideration of effective use of resources to meet need across the country. It is not affordable to resource each establishment to meet the programme requirements of its specific population. Residents will continue to be able to access courses at other establishments where necessary at the appropriate point in their sentence. HMP Highpoint will undertake a needs analysis of the population based on data taken directly from OASys, to inform the Reducing Reoffending delivery plan. To ensure full delivery of HMP Highpoint's programme commitment, there is active recruitment and training into vacant facilitator positions.	Governor Governor	April 2020 April 2020

	General Recommendations				
	To the Governor				
1.34	All suspicion drug tests should be completed as requested.	Partly Agreed	<ul> <li>This recommendation is partly agreed, as due to volumes it is sometimes necessary to prioritise suspicion drug tests based on risk and resource availability. Staff capacity to conduct testing however will be increased by;</li> <li>An expression of interest exercise to identify additional Officers to undertake mandatory drug testing.</li> <li>The Mandatory Drug Team Co-ordinator will complete a <i>train-the-trainer</i> event and (subject to successful completion) will cascade internal training to Officers.</li> </ul>	Governor	May 2020
1.41	More work should be done to determine why the number of ACCTs opened had increased dramatically and was now very high.	Agreed	<ul> <li>HMP Highpoint will undertake the following work to determine why the number of ACCT's opened had increased dramatically at the time of the inspection;</li> <li>The Safer Prisons team will review Assessment, Care in Custody and Teamwork (ACCT) assessments, reviews, post-closure documentation and other ACCT data (quantitative and qualitative) since 2015 to identify trends.</li> <li>The Safer Prisons team will conduct a comparison with other establishments to help understand trends at HMP Highpoint and identify any areas of best practice.</li> <li>The Head of Safer Prisons will present these findings at the Safer Custody meeting and the Senior Leaders Team Performance meeting, where outcomes and actions will be discussed and agreed upon. There will be a standing agenda item at these meetings to discuss the monthly use of ACCT data to ensure that actions taken are having an impact and identify any areas of potential concern.</li> </ul>	Governor	March 2020
2.12	Prisoners should not share cells designed for one person.	Not Agreed	This recommendation is not agreed as there is no funded plan to reduce crowded accommodation at HMP Highpoint. Whilst the average number of residents held in crowded conditions across the estate has fallen slightly, HMPPS recognise 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 designed for one resident in order to accommodate national population pressures is not desirable. The wider problem of crowding in prisons is a longstanding issue that will not be easily addressed. However the Government's recent announcement of up to £2.5 billion investment in new prison construction is welcomed, creating up to 10,000 prison places and creates an opportunity to take steps towards reducing crowding. 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 and 206 uncrowded places in a house block at HMP Stocken. There is also a commitment to construct modern, decent, uncrowded prisons at the former HMP Wellingborough and HMP Glen Parva sites, due to open in 2021 and 2023, respectively, and a new prison will be built at HMP Full Sutton alongside the existing establishment.		
2.13	Prisoners should have prompt access to their property.	Agreed	<ul> <li>HMP Highpoint have ensured that residents have prompt access to their property by;</li> <li>Residents can book appointments to attend reception four mornings a week to access their property.</li> <li>An orderly position is in place to enable residents to swap and send out their property.</li> <li>Reception liaison officers on all residential units are trained on the use of property cards, so that they can issue property directly to residents.</li> <li>Reception staff visit sending establishments each week to pick up any property that residents were not able to bring with them to HMP Highpoint.</li> </ul>	Governor	Complete

			The establishment will also explore how to facilitate reception appointments during the evening.	Governor	February 2020
2.24	Responses to applications should be tracked to ensure they are all addressed.	Agreed	<ul> <li>HMP Highpoint will ensure that responses to applications are tracked and addressed by;</li> <li>A pilot will be introduced where all units will have a folder to record all applications being sent out and being received in.</li> <li>Folders will be subject to weekly assurance checks by the unit Custodial Manager. Where responses are outstanding, the Custodial Manager will contact the department in question to obtain a response. This will be recorded in the folder and the resident informed.</li> <li>The Heads of Residence will conduct staff briefing sessions to introduce the pilot scheme and reinforce the importance of the applications system. This will also be presented to the Senior Leaders Team at the monthly Performance Meeting to ensure buy-in from all functional heads.</li> <li>The number and type of complaints will be tracked at the monthly Senior Leaders Performance Meeting. This will provide insight as to whether the applications process is working or if changes are needed.</li> </ul>	Governor	March 2020
2.25	Responses to all complaints should be timely, comprehensive and polite.	Agreed	<ul> <li>HMP Highpoint will ensure that all responses to complaints are timely, comprehensive and polite by;</li> <li>A full-time member of staff has been transferred to the Business Hub with responsibility for the complaints system.</li> <li>A <i>Communication to Colleagues</i> has been issued to instruct staff on how to appropriately respond to complaints, including the tone and level of investigation required.</li> <li>The Head of Business Assurance is reviewing the complaints system and will devise a process to chase and monitor complaints that are due and are outstanding. This will include moving to an "online" complaints response system.</li> </ul>	Governor	February 2020

			<ul> <li>Complaints are subject to a 10% quality assurance process. Where required, individual feedback is provided to respondents.</li> <li>The complaints picture is discussed at the monthly Senior Leaders Team Performance Meeting. This includes trends in complaint subject and where the complaint has originated from, as well as identifying how many complaints were responded to on time.</li> </ul>	Governor	Complete
2.26	Legal visits should be carried out in private.	Not Agreed	This recommendation is not agreed as the cost of introducing video link facilities or changing the fabric and layout of both visit halls is prohibitive. HMP Highpoint will ensure that official visits from legal advisers take place within sight but out of hearing range of staff, other residents and their official visitors. Staff will ensure that there is sufficient space between the tables so that conversations cannot be overheard.		
2.39	Professional interpretation services should be used when needed particularly when dealing with sensitive or personal information.	Agreed	<ul> <li>HMP Highpoint will ensure that professional interpretation services are used when needed by;</li> <li>A Communication to both Colleagues and Residents has been issued to highlight the availability of translation services. Staff have been reminded to use formal translation services when dealing with sensitive or personal information.</li> <li>The Safer Prisons team conduct a 100% check on all ACCT documents to ensure that there is no instances of inappropriate use of residents for translation.</li> <li>The Business Hub will monitor billing from our translation provider and if there is a lack of usage this will be raised at the monthly Senior Leaders Team performance meeting to task functional heads, including to ensure that there has been no inappropriate use of residents for translation.</li> </ul>	Governor	Complete
2.40	Foreign national prisoners should have access to independent immigration advice.	Agreed	HMP Highpoint will, on request, provide a list of Office of the Immigration Service Commissioner (OISC) registered advisors to	Governor	February 2020

	(Repeated recommendation 2.32)		foreign national residents requiring access to independent immigration advice. Telephone calls and visits will be facilitated to ensure appropriate access.		
2.52	Managers should ensure there is effective oversight of clinical appointments.	Agreed	<ul> <li>CareUK will ensure that there is effective oversight of clinical appointments by;</li> <li>Clinic appointments are automatically flagged on SystmOne, to trigger oversight.</li> <li>A Local Operating Procedure has been written and is now in place for the management of dental patients who have moved between North and South sites. This includes the provision of regular assurance checks by the Head of Healthcare.</li> </ul>	Head of Healthcare, Care UK	Complete
2.53	The dental suite flooring on the South site must meet infection prevention control standards.	Agreed	Government Facilities Services Ltd have been tasked to complete cleaning as per infection control standards and ensure that there is an adequate cleaning schedule in place. The initial repair to the damaged dental suite flooring was not sufficient to meet infection control standards, so an improved programme for repair is being put in place between the dental service and Government Facilities Services Ltd.	Governor	February 2020
2.58	Suitably trained and supervised peer workers should be available to provide health and well-being support and information.	Agreed	Care UK are working with the <i>Patient Engagement</i> lead/coordinator to roll out the use of suitably trained and supervised peer workers to provide health and well-being support and information. Site information has been provided, informing a wider Care UK mapping exercise.	Governor / Head of Healthcare, Care UK	March 2020
2.65	All patients with long-term conditions should have a person-centred care plan.	Agreed	A Senior Nurse is leading a review of all patients with long-term conditions, to ensure they have a person-cantered care plan rather than using generic template plans. This work is being assurance checked by the Head of Healthcare.	Governor / Head of Healthcare, Care UK	April 2020
2.74	Patients requiring hospital admission under the Mental Health Act should be assessed and transferred expeditiously within current transfer guidelines.	Partly Agreed	This recommendation is partly agreed as waiting times are subject to factors outside of the direct control of HMP Highpoint, such as the availability of bed-space in appropriate facilities. Healthcare staff at HMP Highpoint will continue to ensure that all referrals are made within national timeframes and will continue to liaise with NHS providers to facilitate subsequent transfer. Refreshed	Head of Healthcare, Care UK	Completed and ongoing.

			NHS England Prison Transfer and Remission Guidance is anticipated imminently and the Head of Healthcare will ensure compliance.		
2.81	When appropriate, prisoners should have access to naloxone on release.	Agreed	A Local Operating Procedure for Naloxone has been written and discussions are taking place with Phoenix Futures to agree the roll out arrangements. This will ensure that when appropriate, residents will have access to naloxone on release.	Governor / Phoenix Futures	February 2020
2.91	Sedating medication should be administered at a clinically appropriate time.	Agreed	A Senior Nurse is reviewing all existing prescriptions for residents who are not allowed medication in possession, to ensure that the time of administration is clinically appropriate, including for sedating medication. All new prescriptions, are administered during the afternoon period as a matter of course.	Governor / Head of Healthcare, Care UK	February 2020
2.95	Dental waiting times should be equivalent to those in the community.	Agreed	<ul> <li>Head of Healthcare, Care UK will ensure that waiting times are equivalent to those in the community by;</li> <li>A review of dental waiting lists has been completed to ensure that those on the waiting lists are appropriate and are being seen within timescales.</li> <li>A process is in place for the management of new referrals, to ensure that all referrals are appropriate and based on a clinically indicated need.</li> <li>Patients who fail to attend appointments are now followed up.</li> </ul>	Head of Healthcare, Care UK	Complete
			Discussions are taking place with the Regional Manager and the Sub-Contractor Manager to ensure that sessions are maximised and the number of patients being seen during a session are increased	Head of Healthcare, Care UK	February 2020
4.26	Re-categorisation reviews for prisoners subject to immigration procedures who are eligible for open conditions should assess the prisoner's risk of absconding and where it is very low,	Agreed	<ul> <li>HMP Highpoint will consider granting category D status to eligible residents, including those subject to immigration procedures.</li> <li>Transparent and proportionate decision making will be supported by;</li> <li>Input from the Home Office is requested for all foreign national residents being considered for a move to Category</li> </ul>	Governor	February 2020

consider granting them category D status.	<ul> <li>D status, to ensure that decision makers have access to all relevant risk information.</li> <li>Decision makers have had additional internal training on how to assess risk and what Prison Service Policy stipulates with regards to foreign national residents moving to open conditions.</li> <li>The Head of Offender Management Delivery will conduct forums with foreign national residents, to discuss category D progression and prison service regulations around this.</li> <li>The Deputy Governor undertakes a 5% quality assurance check of all re-categorisation decisions to ensure that they are appropriate and not unnecessarily risk adverse. Individual and group feedback is provided.</li> </ul>	Governor	Complete
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Recommendations	
Agreed	20
Partly Agreed	5
Not Agreed	2
Total	27

