



HM Prison &  
Probation Service

Action Plan: HMP Wormwood Scrubs

Action Plan Submitted: 30<sup>th</sup> January 2020

A Response to the HMIP Inspection: 16<sup>th</sup> September – 4<sup>th</sup> October 2019

Report Published: 11<sup>th</sup> February 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 WORMWOOD SCRUBS

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:</b>				
	<b>The Governor</b>				
S40 (1)	<p>Key concern: Violence against both staff and prisoners had risen since the previous inspection. While serious violence was investigated well, other incidents were managed less thoroughly and there was no formal support for victims. Residential staff did not use challenge, support and intervention plans (CSIPs) well enough.</p> <p><b>Recommendation: The prison should challenge and reduce violence, offer greater support for victims and ensure that residential staff use the challenge, support and</b></p>	Agreed	<p>The prison will challenge and reduce violence by:</p> <ul style="list-style-type: none"> <li>Embedding the Challenge Support Intervention Plans (CSiP) ensuring that those who are involved in violence are robustly managed to progress towards more positive behaviour. CSiP Case Management will be rolled out to residential managers, who will be expected to chair reviews and lead on the individual management of CSIP cases for their area. The timeliness and quality of reviews will be monitored through the weekly Safety Intervention Meeting (SIM) chaired by the Head of Safety. The CSiP plans will be tailored to the individual through the SIM and communicated with wing staff.</li> <li>All violent incidents will be investigated by the Safety Team</li> <li>The prison Safety Team will implement a system to monitor and follow up with victims. Victims will be spoken to by a member of the team following incidents of violence and then again within 6 weeks to offer support</li> </ul> <p>The prison will work with the Mayor's Office for Policing and Crime (MOPAC) to implement five funded projects to support the reduction of violence:</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>May 2020</p> <p>March 2020</p> <p>May 2020</p>



	<b>intervention plan process effectively.</b>		<ul style="list-style-type: none"> <li>• 'Catch 22' will screen all men on arrival at the prison to understand potential conflicts in the prison, with a focus on gangs. Those with gang affiliations will have support individual plans.</li> <li>• 'Belong' will provide a mediation and conciliation service for men involved in conflicts.</li> <li>• 'Safety Box' will deliver nine group courses for cohorts of younger BAME men (under age 30) involved or at risk of being involved in violence; these courses will be supported by one-to-one psychotherapy.</li> <li>• A full time detective constable police officer will be based at the prison to improve the investigation of violent crime in the prison..</li> <li>• A further mindfulness programme is funded for 2020/21.</li> </ul> <p>The impact of these initiatives will be evaluated formally by the Evaluation and Insight team at MOPAC.</p>	Governor	Completed
				Governor	Completed
				Governor	Completed
				Governor	Completed
				Governor	April 2020
				Governor	April 2021
S41 (2)	Key concern: While the mandatory drug testing (MDT) rate had reduced to a level now similar to other prisons, survey results, finds and positive test results all indicated that drugs were easily available. Many positive tests were not referred to adjudication. Skilled staff were frequently redeployed and MDT officers had insufficient time to complete follow-up work or suspicion testing. Some completed tests were not submitted for analysis at all. These factors undermined the MDT	Agreed	<p>We will ensure that the MDDT process is sufficiently resourced and that appropriate procedures are followed by:</p> <ul style="list-style-type: none"> <li>• The prison will ensure that all staff within the Security Group are Mandatory Drug Testing (MDT) trained in both administering the testing and processing the results. MDT closures will be managed in line with the Regime Management Plan (RMP). By increasing the number of sessions that MDT is open staff will have sufficient time to complete follow up processes and carry out suspicion tests.</li> <li>• The Drug Strategy Meeting will monitor the number of tests completed and follow up on action taken.</li> <li>• Positive MDT outcomes will be adjudicated and the monthly Drug Strategy Meeting will monitor the number of tests completed and follow up on action taken. The overall outcomes will be monitored through the Adjudication Standards Meeting chaired by Deputy Governor. A quarterly summary of results will be published to staff and prisoners.</li> </ul>	Governor	March 2020
				Governor	February 2020
				Governor	February 2020



	<p>process as a deterrent to substance use, as well as the legitimacy of published MDT positive test rates.</p> <p><b>Recommendation: The mandatory drug testing (MDT) process should be sufficiently resourced to provide assurance that it is a deterrent to the use and supply of drugs.</b></p>				
S42 (3)	<p>Key concern: The level of self-harm was high. The prison had taken too long to address significant weaknesses in its management of self-harm prevention, but there had been very good work since the beginning of 2019. The quality of case management documentation was improving, but was still not consistently good enough.</p> <p><b>Recommendation: There should be an ongoing and strong focus on reducing self-harm and improving support for prisoners in crisis. Outcomes should be reviewed and evaluated and, where necessary, actions should be</b></p>	Agreed	<p>We will maintain a strong focus on reducing self-harm and improving support by:</p> <ul style="list-style-type: none"> <li>• Implementing an effective Assessment, Care in Custody and Teamwork (ACCT) quality assurance process. This will focus on driving up standards of ACCT processes, sharing good practice and identifying themes and trends to improve outcomes and individual development needs. Learning from serious incidents and near misses will be shared at the monthly Safety Meeting.</li> <li>• The Head of Safety will carry out a full and comprehensive review of all ACCTs quarterly. The feedback and analysis of this quality assurance will be actioned through the monthly Safety Meeting, which is chaired by Head of Safety with actions for improvement allocated and recorded. As part of this quality assurance senior managers will be expected to take an active interest in ACCTs and attend case reviews; this will be tested in the quarterly review by the Head of Safety.</li> </ul>	<p>Governor</p> <p>Governor</p>	<p>March 2020</p> <p>March 2020</p>



	<b>adapted to ensure maximum impact.</b>				
S43 (4)	<p>Key concern: Staff-prisoner relationships were adversely affected by a large number of inexperienced staff, a lack of consistency of wing staff and high sickness rates. Fewer than 40% of prisoners had a key worker to support welfare and progression. A number of staff told us they needed, but had not received, mental health training. All of these factors affected staff knowledge about prisoners in their care.</p> <p><b>Recommendation: The prison should ensure that wing staff understand the needs of prisoners they are supporting, and have the knowledge and skills to do this effectively.</b></p>	Agreed	<p>The prison will ensure that wing staff understand and have the skills to meet the needs of prisoners they are supporting by:</p> <ul style="list-style-type: none"> <li>• Allocating prison officers into smaller groups to improve the consistency of staff in the different areas of work.</li> <li>• The key work scheme will be rolled out. All men will be allocated a keyworker and have a regular key work meeting.</li> <li>• The Standards Coaching Team (SCT) will be deployed to the prison to mentor and support inexperienced staff for a period of 8 weeks. Each member of the SCT will work closely with a small individual cohort of newer staff during their deployment. Apprenticeship coaches and line managers will continue to provide support for inexperienced staff following the departure of the SCT.</li> <li>• The prison will implement structured communication to improve briefings and inform actions taken by staff on wings to respond to prisoner needs. Structured communications was piloted at HMP Isis and takes communication design principles used in aviation and in health settings to improve the way in which information is communicated and actions are taken. The roll out at the prison will start with checklists for staff briefings across the prison. The second phase will put the emphasis on prison officers making recommendations for actions to more senior staff. The third phase will be to better support communication between staff and prisoners.</li> </ul>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>April 2020</p> <p>April 2020</p> <p>February 2020</p> <p>April 2020</p>
S44 (5)	<p>Key concern: The promotion of equality and diversity had improved, but at the time of inspection there was no member of staff with a dedicated role to develop it further. Many</p>	Agreed	<p>The prison will review the Equalities Strategy and Equalities Action Plan for 2020 building on the existing progress and setting specific priorities and targets. In addition:</p> <ul style="list-style-type: none"> <li>• The prison has commenced recruitment to fill the vacant post of Equalities Advisor</li> </ul>	<p>Governor</p> <p>Governor</p>	<p>April 2020</p> <p>February 2020</p>



	<p>of the improvements were relatively recent, and largely sustained by day-to-day senior management engagement rather than embedded in the prison's life. Some groups of prisoners, particularly foreign nationals and gay and bisexual prisoners, were not yet receiving adequate support.</p> <p><b>Recommendation: The equality strategy and action plan should set specific priorities and targets to ensure that equality work becomes part of the prison's daily business, and improves outcomes for all minority groups.</b></p>		<ul style="list-style-type: none"> <li>• All senior leaders are champions for a protected characteristic and in this capacity they will do more to engage with men who identify with their allocated protected characteristic through monthly forums and lead on a calendar of celebratory events across the year.</li> <li>• During the reception process, men will be asked about their protected characteristics. The recording of this data will allow HMP Wormwood Scrubs to carry out a more in depth investigation of needs and identify and disproportionality.</li> <li>• All new local policies will be subject to a prisoner-led Equality Analysis to identify potential risk of disproportionate outcomes.</li> </ul>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>April 2020</p> <p>April 2020</p> <p>Completed</p>
S45 (6)	<p>Key concern: There had been slight improvements in the predictability and continuity of the regime but not in the amount of time prisoners spent out of their cells, despite improved staffing levels and a reduction in population. Restricted access to the gym, exercise yards and library indicated the need to provide the level of regime found in most local prisons.</p>	Agreed	<p>The prison will re-profile to improve the regime for men. This re-profile will include greater access to evening association for full time workers and men who have achieved enhanced under the Incentives scheme. The re-profile will introduce evening visits. The staff levels allocated to work on the residential wings will increase. The delivery of this new regime including access to PE, exercise and library, will be monitored at a weekly regime meeting to ensure action is swiftly taken to maximise the level of regime provided.</p>	Governor	June 2020



	<b>Recommendation: The prison should implement a core daily programme that gives prisoners reasonable access to all important facilities, together with realistic allocation of staff, and should monitor outcomes for prisoners to correct any failings.</b>				
S46 (7)	<p>Key concern: Too many prisoners were not engaged in purposeful activity, and too many of those with an activity did not attend. Industry workshops did not provide opportunities for prisoners to gain a vocational qualification, or to have their employability skills recognised and recorded. Quality improvement measures were not yet fully developed to be effective in raising standards in teaching and learning.</p> <p><b>Recommendation: All prisoners should have their learning needs assessed, and be allocated to activities that meet their needs. Managers should further</b></p>	Agreed	<p>All eligible men will be allocated an initial assessment session in the prison Education Department to assess their learning needs. This process will be supported by a learning support tutor. HMP Wormwood Scrubs will continue to improve attendance at initial assessment induction in the Education Department, monitoring daily and analysing reasons for non-attendance to improve the process. The induction process will be restructured to prioritise and support attendance at initial assessment. The Information Advice and Guidance (IAG) service will be introduced to enhance the initial assessment of learning needs and to link these to employment pathways.</p> <p>The Activities Hub will take on responsibility for all allocation (including education) and will as far as possible, allocate men to activities on their chosen pathways which will have been identified in the initial assessment. All men will have access to at least part time activity placement.</p> <p>The prison will introduce an attendance meeting to troubleshoot attendance issues at operational level, chaired by the Activities Hub manager. Daily figures will be monitored and shared with managers in the morning operational meeting and analysed in the attendance meeting. A monthly summary of allocation, attendance, equality of access and outcomes will be overseen and analysed by the QIG. The Quality Improvement Action Plan will be revised by April 2020.</p> <p>Key Workers and Wing Officers will be instructed to follow up non-attendance and motivate, challenge and encourage men to attend allocated activities regularly. Those who attend regularly will be rewarded through the new incentives framework.</p>	<p>Governor and NOVUS</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>April 2020</p> <p>April 2020</p> <p>April 2020</p> <p>July 2020</p>





	<p><b>develop their ongoing work to engage all prison areas in improving prisoners' attendance to their allocated activity. Opportunities for the accreditation of prisoners' skills should be introduced in all appropriate areas. Quality improvement processes should be rigorous and make full use of all the data available, including that on prisoners' destinations, to identify strengths and areas for improvement.</b></p>		<p>Accredited learning in the Industries workshops will be prioritised with the development of a learning plan (curriculum) along with a timetable for the introduction of qualifications/ certificates. The learning plan for Industries will be linked clearly to employment pathways identified in initial assessment through introduction of a "Pathways passport" for our men.</p>	Governor	July 2020
S47 (8)	<p>Key concern: Too much teaching in education was not effective. Some classroom activities were not successful in helping prisoners to learn, and some teachers did not set targets for prisoners to help them understand what was required and make progress. Teachers' deployment of prisoner classroom assistants was not always well planned. Prisoners in work and training were not sufficiently aware of the importance of employability skills, and these were not</p>	Agreed	<p>We will ensure that learning is improved by:</p> <ul style="list-style-type: none"> <li>• The quality of learning will be monitored by the Quality Improvement Group (QIG) and in regular contract meetings with the education provider NOVUS with representation from Head of Reducing Reoffending. The QIG will set the frequency of learning walks across all areas, sample learner plans and decide the percentage of skills tracker reviews required by managers. They will review details of key themes emerging from these and recommendations will be shared.</li> <li>• The performance of teachers will be overseen by the Education Manager and discussed in weekly meetings with the Learning and Skills Manager, with achievements and concerns reported to the monthly QIG and contract meetings. Outcomes for teachers will include individual support plans. Progress against individual support plans will be monitored through QIG.</li> <li>• There will be a review of the curriculum for 2020 and this will be informed by the quality of learning and outcomes 2019. The curriculum</li> </ul>	<p>Governor and NOVUS</p> <p>Governor and NOVUS</p> <p>Governor and NOVUS</p>	<p>April 2020</p> <p>April 2020</p> <p>July 2020</p>



	<p>recorded.</p> <p><b>Recommendation:</b>  <b>Tutors' planning of learning and assessment should be effective in engaging all prisoners in the class and helping them to learn. Managers should monitor the quality of learning documents to ensure that prisoners are set realistic targets for learning and that these are monitored. In workshop and industry areas, instructors should encourage prisoners to recognise the skills they are developing and see them as progressing towards employability after release.</b></p>		<p>will be developed for industries that includes more opportunities for accredited industry standard learning with a timetable for implementation. Skills tracking in workshops will be clearly linked to initial assessment of need and employment pathways and will also capture softer skills in the workplace. There will be a programme of themed employment events linked to the industries and education offer. These will be driven and delivered in partnership with NOVUS works.</p>		
S48 (9)	<p>Key concern: Too few prisoners made progress and achieved a qualification in English and mathematics. A minority of prison work was mundane and made little impact on prisoners' prospects for employment after release.</p> <p><b>Recommendation:</b>  <b>Prisoners on all education courses should be able to</b></p>	Agreed	<p>Outcomes and retention rates on education courses, accredited learning and skills tracking will be closely monitored and pass rates reviewed in monthly QIG chaired by Head of Reducing and Re-offending. These will also be discussed at the contract management meetings with the education provider to drive improvement.</p> <p>Skills tracking will be improved in industries workshops to provide a consistent approach that recognises vocational learning. Waste Management Industry Training and Advisory Boards (WAMITAB) will be rolled out across Industrial cleaning, Recycling and Waste Management teams.</p> <p>Targeted support will be provided for those who require it through individual learning plans. There will be recognition for those who successfully complete courses.</p>	<p>Governor and NOVUS</p> <p>Governor and NOVUS</p> <p>Governor and NOVUS</p>	<p>February 2020</p> <p>July 2020</p> <p>July 2020</p>



	<b>achieve good pass rates. All workshop areas should replicate, as far as possible, the standards and resources that apply in industry outside the prison.</b>		English and Maths will be promoted during Education induction and by Key Workers.	Governor and NOVUS	March 2020
S49 (10)	<p>Key concern: The strategic management of reducing reoffending work was weak. The reducing reoffending strategy was not informed by a comprehensive needs analysis and there was no action plan to drive progress. The reducing reoffending meetings were not effective, with limited analysis of performance data to enable the prison to determine if it met the resettlement needs of prisoners, and no link to the strategy or action plan, and actions raised at the meeting were rolled over with little or no progress.</p> <p><b>Recommendation: The strategic management of reducing reoffending work should be effective and focus sufficiently on outcomes for prisoners to drive improvements across the resettlement pathways</b></p>	Agreed	<p>We will improve focus on reducing reoffending outcomes by:</p> <ul style="list-style-type: none"> <li>Developing a needs analysis which will inform a revised Reducing Reoffending strategy and action plan. The Reducing Reoffending Committee will monitor the action plan and consider monthly data and analysis in order to drive an improvement in outcomes – focussing on strategic priorities of Accommodation and Education Training Employment outcomes.</li> <li>Within this the Families and Significant Others strategy and action plan will be revised and will now fall under strategic management of the Reducing Reoffending function.</li> </ul>	<p>Governor</p> <p>Governor</p>	<p>March 2020</p> <p>March 2020</p>



S50 (11)	<p>Key concern: Many prisoners did not know whether they had a custody plan or what it contained. A quarter of eligible prisoners did not have an up-to-date assessment of their risk and needs, and the prison was not doing enough to ensure that all prisoners had an up-to-date custody plan.</p> <p><b>Recommendation: All eligible prisoners should have an up-to-date assessment of their risks and needs.</b></p>	Partly Agreed	<p>This recommendation is partly agreed as following the review of the Offender Management in Custody (OMiC) model the resource for OASys report completion will move into the training/resettlement estate. As part of the implementation, prisons are being asked to develop a plan to reduce their OASys backlogs for those assessments they are responsible for.</p> <p>The implementation of OMiC case management will mean a suitably trained Prison Offender Manager (POM) will ensure effective coordination of the sentence during the custodial stage of the sentence for selected prisoners.</p> <p>All men are written to by their POM at the point of allocation. Men are offered copies of their OASys and sentence plan objectives. This will be recorded on NOMIS.</p>	Governor	Completed
S51 (12)	<p>Key concern: Many prisoners said that no one was helping them to achieve their custody plan and did not know who their prison offender manager (POM) was. Contact between POMs and prisoners was irregular and reactive, with little one-to-one work. There was no management oversight of contact levels, and prison officer POMs were often</p>	Agreed	<p>The implementation of OMiC case management will mean a suitably trained Prison Offender Manager (POM) will ensure effective coordination of the sentence during the custodial period for selected prisoners. Active management of the case will transition to a Community Offender Manager (COM) in readiness for release. A Community Offender Manager (COM) will be assigned for the important pre-release period.</p> <p>The prison will implement a system to diary and monitor monthly contact between the Prison Offender Manager (POM). The quality of contact will be assured through records made on NOMIS. This will be undertaken by the Senior Probation Officer (SPO) as part of POM supervision (at 6 – 8 week intervals). A dip test will be carried out quarterly to monitor progress. Findings to be discussed at monthly Omu meeting chaired by Deputy Governor.</p>	Governor  Governor	June 2020  June 2020



	<p>redeployed to other areas of the prison.</p> <p><b>Recommendation: Prison offender manager contact with prisoners should be regular and meaningful.</b></p>				
S52 (13)	<p>Key concern: The inter-departmental risk management meeting was not sufficiently focused on risk, and actions raised there were not always followed up promptly. There was an inadequate escalation process to ensure that prisoners' multi-agency public protection arrangements (MAPPA) levels were confirmed six months before their release, which meant that some high-risk prisoners could be released without a robust risk management plan.</p> <p><b>Recommendation: Public protection procedures should ensure that there is a robust risk management plan in place well in advance of the prisoner's release.</b></p>	Agreed	<p>In accordance with the Public Protection Manual HMP Wormwood Scrubs has a local Inter-Departmental Risk Management Team (IRMT) set up in order to monitor relevant cases while in custody.</p> <p>The prison have improved the attendance at the Interdepartmental Risk Management Team (IRMT) meeting to ensure effective and appropriate controls are in place to manage risk of prisoners being released into the community. The IRMT will confirm community information such as MAPPA levels six months prior to release. Where this information is not available there is now a three-step escalation process to ensure that men are not released without a full assessment of risk and appropriate plans for release.</p>	<p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>Completed</p>
	General recommendations				



	<b>Directed to:</b>				
	<b>The Governor</b>				
1.8 (14)	New arrivals should only be strip searched on the basis of an individual risk assessment.	Not Agreed	<p>All searching of new arrivals at HMP Wormwood Scrubs is conducted in line with the National Security Framework (NSF) and Local Security Strategy (LSS), which mandates full searching of all new arrivals at the prison.</p> <p>Full searching is an essential method used to find contraband secreted on the person and to prevent the importation into establishments. HMPPS has a duty of care to prevent and deter illicit items from entering establishments which could be used by a prisoner to harm themselves or others.</p> <p>The body scanner is a useful tool to support searching for weapons and mobile phones, when these items are suspected to have been secreted but it cannot identify organic matter (such as drugs or tobacco) reliably.</p>		
1.9 (15)	The delivery of induction should be effectively monitored to ensure that all new arrivals complete it.	Agreed	<p>When men have completed the induction programme this is recorded in their Early Days in Custody passport and on NOMIS by the induction officer. The Wing Manager will follow up on non-completions and provide recommendations about individuals. Daily reporting will include the number of men new to the prison and those attending the induction programme to provide assurance that this is taking place. The Early Days passport will only be endorsed for men to move off the induction unit once the induction programme has been completed.</p> <p>The Early Days in Custody function has been reconfigured to include the detox unit which holds men in their first days in custody to better prioritise their access to induction.</p>	Governor	April 2020
				Governor	Completed
1.17 (16)	Managers should review and revise the approach to the incentives and earned privileges scheme, in consultation with prisoners, to ensure that it provides genuine incentives and promotes positive behaviour.	Agreed	<p>HMP Wormwood Scrubs will develop a new Incentives scheme working closely in consultation with the men who attend the Incentive forum. The focus of this new policy will be on improving incentives in line with the new national Incentives Policy Framework.</p> <p>A review will take place to consider extending the implementation of Incentivised Substance Free Living (IFSL) units on A and C Wings in line with the refurbishment programmes.</p>	Governor	March 2020
				Governor	April 2020



1.21 (17)	Comprehensive data should be collected, analysed and acted on to ensure that adjudications are conducted promptly and to a demonstrably high standard, and only for suitable cases.	Agreed	Adjudication data is now being recorded, analysed and discussed at the quarterly Adjudication Standards Meeting and bi-monthly Segregation Monitoring and Review Group (SMARG), which is chaired by Head of Safety. The adjudication process will be revised to more effectively manage those adjudications that are remanded by hearing them within 6 weeks in line with national policy.	Governor	April 2020
			The existing quality assurance by the Governor and Deputy Governor will include a review of paperwork and provide improvement feedback to managers where appropriate.	Governor	Completed
			The prison will promote the new Incentives scheme as an alternative to adjudications for lower level matters. A form signed off by Custodial Managers for adjudications to proceed will triage for lower level matters and redirect staff to the Incentives scheme.	Governor	March 2020
			All prison officers working in the Segregation Unit will be trained Adjudication Liaison Officers (ALO) in order that they can fully support the adjudication process and provide advice to other staff where appropriate.	Governor	October 2020
1.38 (18)	Security intelligence meetings should address identified actions, and analyse and monitor the outcomes.	Agreed	Actions that are agreed at the Security Intelligence meetings will be formally tasked to named individuals with timescales. These tasking sheets are updated when actions are completed. These returns are reviewed and the impact of the actions taken are monitored through subsequent meetings.	Governor	Completed
2.4 (19)	Every prisoner should have regular contact with trained key workers who can support their welfare needs and progression goals.	Agreed	The prison will fully roll out the key work scheme to all men. Key work sessions are recorded on NOMIS. During the ramp-up period 100% of entries are being quality assured and once rolled out to all men 10% of entries will be quality assured monthly by residential managers.	Governor	April 2020
2.12 (20)	The painting and refurbishment programme should be completed and managers should ensure that decent living conditions are maintained.	Partly Agreed	This recommendation is partly agreed as there is no funded plan to fully refurbish Wormwood Scrubs within a reasonable timeframe.  However we recognise the need to make all possible progress in improving decency at HMP Wormwood Scrubs and the prison is committed to the rolling programme of light refurbishment by prisoners, supported by prison officers and overseen by a member of the industries team. The resources for this programme are being met by the prison. All cells across the prison will be refurbished on this	Governor	October 2020



			<p>basis. The programme of work is being supported by a temporary reduction in operational capacity allowing two landings to be closed for this work to take place on a rolling basis.</p> <p>The prison will implement pre-occupancy checks across all living accommodation and continue to carry out a full monthly audit of conditions and facilities in all living accommodation.</p> <p>The Prison Performance Support Programme (PPSP) have committed to funding a further disability access cell on B-Wing and the full refurbishment of two further showers.</p> <p>HMP Wormwood Scrubs is a “Red Site “for the national HMPPS Clean and Decent programme. Under this programme the prison has been resourced with two additional managers to implement improved processes for cleaning including cleaning schedules, stock control, training and supervision of cleaners.</p>	Governor	May 2020
				Governor	April 2020
				Governor	July 2020
2.13 (21)	Two prisoners should not be held in cells designed for one person.	Not Agreed	This recommendation is not agreed. Prison cell occupancy is determined by establishments and certified by the Prison Group Director (PGD) in accordance with Prison Service Instruction (PSI) 17/2012, which provides clear guidelines for determining cell capacities. Cells will only be shared where a PGD has assessed them to be of an adequate size and condition. All accommodation is compliant with the certified cell certificate. For the foreseeable future, and in common with other prisons, it will be necessary for HMP Wormwood Scrubs to operate with an operational capacity that involves a level of crowding above its Certified Normal Accommodation.		
2.14 (22)	An electronic cell bell monitoring system should be introduced and used to ensure that staff are responding promptly to cell call bells.	Partly Agreed	<p>This recommendation is partly agreed as whilst a bid has been submitted there is no funded plan to introduce an electronic cell bell monitoring system at the prison within a reasonable timeframe..</p> <p>However, within current resources a monthly data capture of local cell bell data will take place. This data will be captured using covert testing. This data will be analysed at the monthly safer custody chaired by Head of Safety meeting with any trends being shared with residential managers.</p>	MoJ Estates	
				Governor	February 2020





			<p>The prison will work with prisoner forums to understand the reasons for the volume and trends of cells bells and work to put systems in place to reduce those activated for routine or non-emergency reasons.</p> <p>Staff will be reminded of the importance of responding to cell bells within 5 minutes at wing briefings.</p>	Governor	February 2020
				Governor	February 2020
2.15 (23)	Prisoners should be able to access their property promptly following request.	Agreed	HMP Wormwood Scrubs will implement changes to the property system, which will include the opportunity for families to hand property in through visits at least twice during the week and men will be able to access their property from the property store weekly. Access to the property store will be twice weekly for men on the induction unit during their early days in custody.	Governor	April 2020
2.22 (24)	Prisoner complaints about food should be understood and addressed through a range of measures, including regular and effective consultation, later service of lunch (not before 12pm) and dinner (not before 5pm), and adherence to hygiene regulations.	Partly Agreed	<p>This recommendation is partly agreed because within the current times of the core day the recommendation not to serve lunch prior to 12pm and dinner before 5pm cannot be met. Whilst men are given their lunch prior to 12pm it is a cold lunch and may be eaten later. The prison has introduced times for food to be collected from the kitchen to ensure that meal times do not move earlier into the day.</p> <p>HMP Wormwood Scrubs will introduce a monthly catering forum with prisoner representatives. The catering manager will supervise meal service and listen to feedback at every service point once a month, this will include adherence to food hygiene standards. A catering survey will be carried out with results shared with catering forum.</p>	Governor	March 2020
2.27 (25)	There should be robust tracking to monitor the timeliness of responses to applications.	Agreed	HMP Wormwood Scrubs will develop an applications and prisoner information policy, which will cover how the Prisoner Information Desks operate. Prisoner representatives will follow up with men who have submitted applications to ensure that they have received a response and/or whether or not the issue(s) has been resolved. Outstanding responses will be brought to the Information Apps Workers meeting chaired by Head of Residence. Resolutions and responses will be recorded.	Governor	March 2020
2.39 (26)	The prison should affirm LGBT identities in practical ways so that all prisoners	Agreed	HMP Wormwood Scrubs will enhance support to Lesbian, Gay, Bisexual and Transgender (LGBT) identities by sensitively capturing this information at reception and recording this information on NOMIS. Where this is not disclosed	Governor	April 2020



	feel able to speak openly about their sexuality if they so wish.		during the induction processes Key Workers will follow up during their sessions. The prison will promote positive messaging about LGBT identities through the equalities newsletter, posters and forums led by the Senior Management Champions. HMP Wormwood Scrubs will be holding events to celebrate Pride Inside.		
2.66 (27)	All prisoners should receive a comprehensive secondary health assessment within seven days of arriving at the prison.	Agreed	Healthcare will continue to have nurses on the First Night Centre (FNC) to complete secondary health assessments and the prison will ensure that the unit is staffed to ensure that nursing staff can access patients for assessment.  Healthcare will work with the prison to ensure that patients that have not received their secondary screening prior to moving from FNC will be identified and secondary screening will be picked up within 7 days.	Governor and Care UK  Governor and Care UK	Completed  March 2020
2.67 (28)	Prisoners with long-term health conditions should receive regular reviews, informed by an evidence-based care plan.	Agreed	All men are screened on entry to the establishment. Those identified with a long-term condition will be placed on the healthcare ledger and then seen in a specific long term condition clinic. A review of their clinical needs will be identified and outcomes placed in a care plan to ensure continuity of care and compliance with NICE Guidance.	Care UK	March 2020
2.75 (29)	Patients requiring admission to hospital under the Mental Health Act should be transferred within current Department of Health guidelines	Partly Agreed	This is partly agreed as it is subject to the availability of National Health Service (NHS) bed spaces which is outside of the prison's control.  Every effort is made to transfer patients within agreed national timescales and the prison is proactive in promoting a timely transfer of prisoners. If patients are not accepted within the agreed timescales this is escalated to NHS England and the prisoner has to remain within the prison setting.  The prison have a weekly telephone conference between Care UK and NHS England to discuss with NHS England any issues with transfers. Arrangements are made where appropriate to source privately funded beds where NHS beds are not available.	National Director of NHS England (NHSE) / Care UK  National Director of NHS England (NHSE) / Care UK  National Director of NHS England (NHSE) / Care UK	Completed  Completed  Completed
2.87 (30)	Prison officers should fully supervise all medicine administration to ensure patient confidentiality and	Agreed	A member of staff will supervise the queues and collection of medicines to ensure that confidentiality is maintained and that the risk of diversion and bullying is minimised.	Governor	April 2020



	reduce the risk of diversion.		<p>Staff will be briefed properly through regular continued professional development 'Jailcraft' session on what to observe (diversion and bullying) and how to intervene, if appropriate, at the point of observing diversion or misdirection of medication and in taking any follow up action required.</p> <p>Managers will conduct spot checks on medicine queues to ensure officers are maintaining patient confidentiality and are alert to any attempts of bullying and diversion</p>	Governor	March 2020
				Governor	March 2020
	<b>HMPPS</b>				
4.6 (31)	Visitors should always be notified if their visit is cancelled.	Agreed	<p>A joint review will be carried out with Family Services and HMP Wormwood Scrubs which considers all stakeholders in the bookings process (including bookings involving child restrictions as the current process is potentially causing an increase in booking errors)</p> <p>Family Services will devise a flow chart and share it with staff to ensure the correct processes are followed.</p> <p>All staff will be reminded to notify visitors of any changes to their visit and all local access to NOMIS will be removed to ensure that overbooking doesn't occur, which has previously lead to cancellations. We will monitor access to reception visits through the Reducing Reoffending meeting and share the data with relevant partners</p>	Head of Family Services & The Governor	February 2020
				Governor	February 2020
	<b>The Governor</b>				
4.21 (32)	Recategorisation reviews should be completed on time.	Agreed	Recategorisation reviews will be started earlier and decisions approved at a fortnightly meeting chaired by the Head of OMU or Senior Probation Officer (SPO). The timeliness of re-categorisation decisions will be monitored through the monthly Offender Manager meeting chaired by the Deputy Governor.	Governor	February 2020
	<b>HMPPS/The Governor</b>				
4.22 (33)	The transfer of prisoners to other establishments should be prompt and	Agreed	Regular transfers are provided to HMP Wormwood Scrubs to move their bulk category C population into the training estate. At the time of the inspection there had been limited transfers for category B prisoners and only very limited	PECS	January 2020



	underpinned by a custody plan.		<p>opportunities for them to transfer. However, as part of our reconfiguration of the estate we have been creating more category B places and HMP Woodhill began its transition into a category B prison in mid-September. Consequently, since November we have been able to transfer 44 category B prisoners and more moves will be planned for 2020 to help clear the backlog.</p> <p>A fortnightly transfer and sentence progression meeting has commenced, which ensures that the prison prioritises transfers for men to enable positive progression. Men are only transferred once any assessments that are required, have been completed. Holds against transferred are all end-dated and reviewed at the monthly Offender Management meeting chaired by Deputy Governor</p>	Governor	Completed
	<b>The Governor</b>				
4.27 (34)	The prison should monitor and analyse accommodation outcomes for all prisoners on release to ensure that its accommodation support is adequate for the needs of the population.	Agreed	<p>HMPPS collect data to track offender's accommodation and employment status on both custodial and community sentences, from the point of release and throughout community supervision. New performance measures have been included in the frameworks for both prisons and the National Probation Service for 2019/20. These assess status on the first night of release and six weeks after release for prisons (for accommodation and employment respectively) and at termination of supervision for the NPS. Additional measures are being considered for future probation frameworks. We are also encouraging and supporting prisons and probation providers to work together more effectively in the future and monthly data is now available to prisons and probation providers to support these actions.</p> <p>Data on accommodation and employment circumstance was published in July 2019 on Gov.uk as part of the Community Performance Statistics, covering the period 2017/18 and 2018/19. The data show accommodation status for offenders on the first night of release from custody and at the start of community sentences and employment status for offenders six weeks post-release and at the start of community sentences. Data on prison's performance against their accommodation and employment targets for 2019/20 will be published as part of the Annual Prison Performance Ratings in July 2020. NPS performance against the at termination of supervision targets for employment and accommodation are now being published as part of the Community Performance quarterly statistics release.</p>	PPAS  PPAS	Completed  July 2020



		<p><a href="https://www.gov.uk/government/statistics/community-performance-quarterly-update-to-june-2019">https://www.gov.uk/government/statistics/community-performance-quarterly-update-to-june-2019</a></p> <p>London CRC will provide information on accommodation on release for all men. The CRC Resettlement Team record accurate information about men released from HMP Wormwood Scrubs.</p> <p>Accommodation outcomes will be monitored monthly in the Reducing Reoffending meeting chaired by Head of Reducing Reoffending. Gaps in provision will inform how we design and deliver services going forward. NFA numbers will be monitored and reasons for this explored to inform needs analysis.</p>	<p>London CRC</p> <p>Governor</p>	<p>April 2020</p> <p>April 2020</p>
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Recommendations	
Agreed	27
Partly Agreed	5
Not Agreed	2
<b>Total</b>	<b>34</b>

