



HM Prison &  
Probation Service

Action Plan: HMP Parc

Action Plan Submitted: 03 June 2020

A Response to the HMIP Inspection: 11-22 November 2019

Report Published: 17 March 2020

Actions against target dates are likely to be delayed due to Covid-19 related disruptions to service delivery.

## 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.

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ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMP PARC

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>To the Director</b>				
S47	<p>Key concern: The level of need among the prison population appeared to have increased, and this placed greater pressure on support services. Despite evidence of a decline over the previous year, the level of self-harm remained very high and, combined with the relatively large number of self-inflicted deaths, continued to cause serious concern.</p> <p><b>Recommendation: Levels of self-harm should be reduced as a matter of urgency.</b></p>	Partly Agreed	<p>This recommendation is partly agreed, as to help to reduce the high levels of self-harm, additional funding into increased health resources will be required, especially around the identified increase in those reporting to have mental health issues, this will be raised with HMPPS, the Local Health Board and Welsh Government. This recommendation is linked with S48 as there is a need for increased resources to support mental health.</p> <p>Reducing self-harm continues to be a priority for HMP Parc, we will continue to take a more integrated approach, based on trauma-informed principles to reduce levels of self-harm. This will involve greater use of specialist staff, including a psychologist and a behaviour analyst, who provide guidance and advice to support operational staff.</p> <p>Every incident of self-harm is reviewed to establish the cause, and to explore potential solutions. Support workers are in place, who provide structured assistance to those offenders who engage in prolific self-harm. The outreach service will be reviewed to explore new ways to support men who self-harm, so they can receive extra support. Prisoners with additional needs can also be moved onto a specialist unit, where their concerns can be addressed.</p> <p>A clear recognition has been identified about the potential links between prisoners using drugs, getting into debt, and then resorting to self-harm. As a result, action has been taken to try to reduce the use of illicit drugs, including the introduction of a body scanner, as well as providing educational advice for</p>	<p>Director/HMPPS</p> <p>Director</p> <p>Director</p> <p>Director</p>	<p>June 2021</p> <p>January 2021</p> <p>January 2021</p> <p>January 2021</p>

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			<p>prisoners about the dangers of drug use. Measures have also been taken to try to prevent prisoners from accumulating debt, by providing a cash advance on admission.</p> <p>All Recommendations made by the Prisons and Probation Ombudsman are regularly reviewed by safer custody staff, as well as being monitored at the monthly safer custody strategy meeting.</p> <p>All Assessment, Care in Custody and Teamwork (ACCT) documentation will be quality checked by the safer custody team, to ensure assurance measures are in place, paying attention to the detail in care maps, observations and conversations. Any learning points and good practice identified will be fed back to case managers and staff.</p> <p>All ACCT case management will now be discussed and supported by the weekly Challenge Support Intervention Plan (CSIP) Safety Intervention Meeting, chaired by the Head of Residence and Safety.</p> <p>A review of all complex ACCT cases will be completed with the support of the Regional Safer Custody team, exploring reasons of self-harm, such as timings and triggers. All learning points will be incorporated into the Harm Reduction Policy action plan.</p> <p>An updated Harm Reduction Plan will be developed, utilising all available information gathered through prisoner self-harm de-briefs, which will contribute to identifying the main drivers behind self-harm. A multi-disciplinary approach has been incorporated to develop the plan, which will have timebound actions to address the causes. Where additional support is identified which requires additional funding, such as increased mental health resources, this will be raised in any discussions with HMPPS, the Local Health Board and Welsh Government as mentioned below and in recommendation S48.</p>	<p>Director</p> <p>Director</p> <p>Director</p> <p>Director</p> <p>Director</p>	<p>January 2021</p> <p>January 2021</p> <p>January 2021</p> <p>January 2021</p> <p>January 2021</p>
S48	Key concern: The demand for mental health services was high and service provision did not meet demand. Although the support available for mild to	Partly Agreed	<p>This recommendation is partly agreed as there will need to be an increase in service provision, and therefore increased funding to achieve this. HMP Parc and HMPPS will raise formally with Welsh Government the HMIP findings, and seek improvements and funding for increased Mental Health services. In the interim HMPPS will continue to liaise with Welsh Government about the current service provision available that can be provided to HMP Parc.</p>	HMPPS/Welsh Government	April 2021

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<p>moderate problems had improved, the range of specialist interventions and support for prisoners with more complex needs was inadequate and too many patients waited too long to access existing services.</p> <p><b>Recommendation: The mental health needs of the population should be established and the model of service should provide prompt assessment and timely access to integrated support and a full range of therapeutic interventions for all psychiatric conditions.</b></p>	<p>Part of any increased funding award will focus on the employment of additional mental health staff. The principle of the bid is based on the proposal to create an Integrated Mental Health Service, that will work closely with primary care to deliver services seven days a week. Any increased provision of health resources will allow HMP Parc to increase the necessary support through a range of interventions, based upon the individual's needs. This recommendation is linked with S47 as there is a need for increased resources to support mental health, in relation to assisting in reducing self-harm levels.</p>	HMPPS/Welsh Government	April 2021
	<p>A new specific health needs assessment relating to mental health will be requested from Welsh Government, to determine the increased amount of provision required to meet the needs of the population.</p>	HMPPS/Welsh Government	April 2021
	<p>Services are currently provided from Monday to Friday. Primary mental health services, and a designated team of mental health nurses ensure that prisoners screened at reception or self-referring are seen promptly, and can access self-help literature, peer support, one-to-one work and groups focusing on managing anxiety and low mood. Counselling support is also available, and any increased funding from Welsh Government will look to increase this provision.</p>	Director/Local Health Board/Welsh Government	December 2020
	<p>Those with moderate to severe mental health issues are assessed promptly by primary care, but then have a long wait to access secondary services which are provided by Swansea Bay University Health Board (UHB). It has already been identified through reception screening and Registered Mental Health Nurse (RMN) assessments that this cohort of men suffer from dementia issues, personality disorder, Attention Deficit Hyperactivity Disorder (ADHD) and psychosis, and must wait longer than they would in the community to access secondary care for treatment. There are identified resource issues within In-reach currently provided by Swansea Bay UHB, this information will be utilised as part of any discussions and bid to increase service provision with Welsh Government.</p>	Director/Local Health Board	April 2021
	<p>Mental health awareness training will continue to be delivered to staff, and the secondary mental health services will provide monthly refresher training.</p>	Director/Local Health Board	April 2021
	<p>HMP Parc will continue to engage in meetings with Cwm Taf Morgannwg University Health Board and Swansea Bay UHB, to develop the agreed service level agreement (SLA), to ensure the best possible service is delivered based on</p>	Director/Local Health Board	April 2021

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			<p>the current funding restrictions within Wales. The current SLA is due to be reviewed in December 2020.</p> <p>It is anticipated that the Partnership Board will be reinstated but at present there is no date for this, however when it commences any issues identified will be raised through this meeting in relation to service delivery. In the interim any issues will be raised through the quarterly meetings with the local health board.</p>	Director/Local Health Board	Ongoing
S49	<p>Key concern: Vulnerable prisoners on X unit could access only a single weekly dentist session, which could have resulted in them facing delays in receiving urgent care.</p> <p><b>Recommendation: All prisoners should have equitable access to dental care, including the provision of urgent care.</b></p>	Agreed	<p>All prisoners, regardless of their location have equitable waiting times which are equivalent to that of the community. Where it is identified that urgent care is required, these individuals are added to the dentist lists for that day.</p> <p>Waiting times will be monitored monthly by the Head of Healthcare to ensure they remain in line with community waiting times, and where it is identified that extra sessions are required to meet the need of the population, they will be requested.</p>	Director	December 2020
S50	<p>Key concern: Prisoners' individual learning plan targets were not consistently clear, or personalised to drive improvement planning. In a minority of cases, they were not specific enough to help prisoners focus on exactly what they needed to do in the shorter term to make the best progress they could.</p>	Agreed	<p>A new individual learning plan will be introduced, it will be personalised and specific to the prisoners needs to ensure they can achieve the best progress possible, especially in the shorter term. All teachers will receive specific training on how the plans must be completed. A quarterly assurance system will be introduced which will review consistency across all curriculum areas, and ensure that all plans contain personalised objectives.</p>	Director	December 2020

	<b>Recommendation: Prisoners' individual learning plan targets should be personalised to drive improvement planning.</b>				
S51	<p>Key concern: Seventeen per cent of Parc's population was convicted of a sexual offence but there were no specific interventions available there to address their offending behaviour. Instead, they had to transfer to other prisons to access interventions.</p> <p><b>Recommendation: Prisoners who are convicted of sexual offences should be able to access relevant offending behaviour interventions without the need to transfer to another prison.</b></p>	Not Agreed	<p>This recommendation is not agreed, as HMP Parc is a designated national resource as a remand and resettlement facility for prisoners charged with/convicted of sexual offences.</p> <p>Where a prisoner is identified as requiring specific interventions to address his offending behaviour, and as accredited programmes only target men with medium or higher risk of reoffending (currently there are only 6% of our population who would be eligible by risk), we would raise a transfer request so that he can be moved to an appropriate establishment that is resourced to deliver it, for any prisoner who would be eligible within this category.</p>	Director	
	<b>To HMPPS</b>				
S52	<p>Key concern: In spite of efforts made by the resettlement team and the prison, around 17% of prisoners released over the previous six months had left the prison without an address to go to, which</p>	Agreed	<p>HMPPS in Wales and the Welsh Government are co-producing and collaboratively funding several innovative initiatives, which are at various stages of implementation, testing and evaluation. They have collaboratively funded a unique secondment for a Criminal Justice Lead to work within Homelessness Prevention. The role supports the development of policy, specifically in relation to issues of prison leavers, and is crucial in supporting the understanding and implementation of Welsh Government policy amongst non-devolved criminal justice agencies. This post will see an all Wales Homelessness Prevention project board established, and co-chaired by HMPPS and Welsh Government.</p>	HMPPS Wales/Welsh Government	August 2021

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<p>undermined resettlement opportunities.</p> <p><b>Recommendation: HMPPS should work with the Welsh Government to ensure that accommodation is available for prisoners being released from custody.</b></p>	<p>Accuracy of recording has been a key feature of improvement work, and CMTs (Contract Management Team) undertook a data accuracy exercise earlier this year and findings were fed back, the exercise was repeated in November 2019 on a further sample to analyse the improvement, with findings to carry forward into National Probation Service (NPS) under Offender Management (OM) transfer. From December 2019, community offender management within Wales moved under the ownership of the NPS and the responsibility for accommodation recording, monitoring and data quality assurance will also follow. This will enable a more coherent and unified approach to accommodation recording and will also provide greater insights into sustainability of accommodation throughout the stages in the offender journey.</p> <p>The Wales Probation Resettlement Service team workers at HMP Parc will continue to support prisoners to find accommodation on release, including writing to local authorities to inform them of the impending release of prisoners who would be homeless. The team will communicate with community offender managers, to ensure that prisoners needs are met wherever possible. They have built up a list of public and private landlords they could approach to provide accommodation, and have information available on support agencies for rough sleepers. The prison will continue to develop its own project to help a small number of younger prisoners into accommodation.</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 Parc. This new specification includes the requirement that Community Rehabilitation Companies (CRC's) 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> <p>HMPPS intend to utilise the lessons learnt from both the Accommodation pilots in England, as well as the pilot in Rhondda Cynon Taff, alongside learning from similar voluntary sector schemes (subject to evaluation), to develop a long-term solution to support those with a history of offending to migrate towards long-term settled accommodation by:</p>		
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			<ul style="list-style-type: none"> <li>• Everyone leaving prison should have somewhere safe and secure to live; accommodation enables offenders to hold down a job and reduces the likelihood of them reoffending.</li> <li>• However, overcoming the many barriers offenders face to securing suitable accommodation is something that the Ministry of Justice cannot do in isolation.</li> <li>• Since October 2019, HMPPS in Wales have been working with the Welsh Government on a rapid rehousing pilot in Rhondda Cynon Taff, which replicates aspects of the accommodation pilot; an evaluation of this pilot will be undertaken in due course.</li> <li>• HMPPS in Wales are additionally working with Cardiff Council, as part of their Housing First project. The project supports all adult offenders released from custody and who have a history of homelessness linked to their offending.</li> <li>• Welsh Government funding also provides for an embedded individual from the Housing Option Team to be based within the HMP Cardiff, identifying and providing housing support to individuals prior to release.</li> <li>• Subject to evaluation, we will use the lessons from the Rhondda Cynon Taff pilot, together with the accommodation pilots in England (HMP Bristol, Leeds &amp; Pentonville) to inform future provision of accommodation for offenders, through the new Probation model.</li> </ul>		
	<b>General recommendations</b>				
	<b>To the Director</b>				
1.36	The segregation unit regime should be enhanced, to ensure that prisoners consistently get time outside and are able to contact their families at an appropriate time.	Partly Agreed	<p>This recommendation is partly agreed, due to insufficient resources being available to provide an enhanced regime when the unit is full, as many of the prisoners cannot be unlocked at the same time to access the facilities.</p> <p>Each prisoner that is segregated is risk assessed to determine who can associate and exercise together, and receive a bespoke regime dependent upon this and the reasons for their segregation, which includes daily access to a shower, exercise and to make a phonecall wherever possible. Their compliance to their bespoke regime determines entitlements, with the emphasis being on improving behaviour to progress back to normal location and a full regime. The Unit Manager monitors behaviour and compliance to the regime, and identify prisoners who are not progressing, and explore the reasons why in consultation with the prisoner.</p>	Director	Completed and Ongoing

			To enhance the regime a bid for in cell telephony will be submitted, as this would allow the staff to concentrate on delivering other aspects of the regime.	Director	December 2020
2.8	Emergency cell call bells should be answered within five minutes.	Agreed	<p>A new cell bell system has been installed which has a visual alarm and sounder. This will allow staff to identify when a cell bell has been pressed, and we will endeavour to answer all cell bells within 5 minutes. Ongoing monitoring will take place to review and improve compliance. HMP Parc will also:</p> <ul style="list-style-type: none"> <li>Remind staff of the importance of responding to cell bells within 5 minutes at wing briefings, and provide weekly safety team feedback at the daily morning briefings.</li> <li>Add cell bell usage to the monthly Prisoner forums to understand the reasons for usage.</li> <li>Ensure that a range of facilities are available prior to lock up, to reduce usage for non-emergency reasons.</li> </ul>	Director	December 2020
2.33	Information about prisoners who are on personal emergency evacuation plans should be clearly and prominently displayed on or near their cell doors and in the main office.	Agreed	The Assisted Living Policy will be reviewed and reissued to all residential Managers. This will set out the requirement to clearly identify those prisoners who are on Personal Emergency Evacuation Plans (PEEP's). All unit roll boards will highlight prisoners who are on a PEEP, it will be identified on their cell doors, and included in staff handover books. The Head of Residence will monitor compliance of this as part of local assurance themes.	Director	December 2020
2.34	Transgender prisoners should get easy and quick access to suitable clothes and make-up.	Agreed	<p>All transgender individuals in our care will be supported to express the gender with which they identify. An induction pack has been introduced for all transgender prisoners, which contains female underwear and toiletries. A parcel will be approved every six months, to allow for a personalised approach for the provision of female clothing and make-up. A female clothing stock is also available to supplement this process.</p> <p>HMP Parc will continue to hold review boards for transgender prisoners, to provide a multidisciplinary approach to developing and reviewing individual plans, and ensuring that their needs are met. A voluntary agreement will be facilitated at the earliest opportunity to clarify provision, and to provide access to the relevant facilities list. Clothing, hair, make-up and other accessories can be agreed through the voluntary agreement. Any restrictions imposed will be based on risk, security or operational assessments. The facilities list will be a discussion point in the transgender focus group to address any issues.</p>	Director	December 2020

3.49	Continuing professional development arrangements should be informed by robust identification of the strengths and shortcomings in teachers' skills.	Agreed	Supervision sessions will identify areas for continuing professional development. These will focus on individuals and the business need. New audit and observation forms will be introduced to ensure that there is a consistency of approach. A revised monitoring system will be implemented, to allow continuing professional development to be regularly monitored. Teachers who have identified strengths will share good practice with colleagues. Regular support and supervision sessions will be put in place for teachers with development needs.	Director	December 2020
3.50	Learners' and teachers' access to online learning resources should be improved.	Agreed	Learners and teachers now have access to the Virtual Campus (internet access for prisoners to community education, training and employment opportunities), giving them access to a wide range of learning opportunities. Further options will be explored to assist with the development of additional online resources, and learning, to expand and enhance the opportunities for digital learning.	Director	December 2020

Recommendations	
Agreed	8
Partly Agreed	3
Not Agreed	1
<b>Total</b>	12

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