



HM Prison &
Probation Service

Action Plan: HMP Stafford

Action Plan Submitted: 29 July 2020

A Response to the HMIP Inspection

Report Published: 12th May 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 must be an explanation of why we cannot fully agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.
Not Agreed	The recommendation is not agreed and will not be implemented. This might be because of commissioning, policy, operational or affordability reasons.	The response must clearly state the reasons why we have chosen this option. There must be an explanation of why we cannot agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.



ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMP STAFFORD

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	Key Concerns and Recommendations				
	Directed to the Governor				
5.1	<p>Key concern (S45): Too many prisoners experienced breaks in medical treatment because of delays in supplying their routine, prescribed medicines. This potentially affected their health. (Directed to: the Governor)</p> <p>Recommendation: There should be no delays or gaps in prisoners receiving their routine, prescribed medicines.</p>	Partly Agreed	<p>This recommendation is partly agreed as a review and realignment of process and systems (including prescribing practices) delivered within current available resources will be undertaken alongside demand and capacity modelling. Following this, if additional investment is indicated this will be presented to NHS England (NHSE) and NHS Improvement for consideration.</p> <p>Changes have taken place to improve the supply of medication, as described below:</p> <ul style="list-style-type: none"> Two medication management workshops to identify more efficient medication processes. Senior Pharmacy Technician to manage and oversee the team. Incorporated reports within SystmOne (a centrally hosted clinical computer system) developed to flag medication due to run out to ensure it is ordered, if appropriate, in a timely manner. <p>The following changes have been made to the monthly medication process:</p> <ul style="list-style-type: none"> Pharmacy Technicians have now changed rotas / shift patterns to ensure each Pharmacy Technician is responsible for their own medication hatch, this will support the ordering / dispensing of in possession and non- in possession medications. A new monthly medication review process takes place to ensure medications are ordered at the correct specified time. 	<p>CEO Care UK and Governor</p> <p>CEO Care UK and Governor</p>	<p>Completed</p> <p>Completed</p>



			<ul style="list-style-type: none"> Review of in-possession monthly and weekly medication, and red, amber, green rate (RAG) these on basis of in possession risk assessment and prison security. <p>HMP Stafford are in the process of reviewing and implementing changes to the 12 hourly / 24 hourly medication prescribing processes, due to the high percentage of patients that require medication.</p> <ul style="list-style-type: none"> A review will be carried out on all non-in possession medication to ensure that where possible residences are prescribed medication once per day (as opposed to 12 hourly), to alleviate pressure on administration processes and avoid delay. As well as enabling patients to be prescribed appropriate levels of medication without delay, it will also enable medication queues to be managed more appropriately. HMP Stafford are in the process of reviewing and implementing changes to weekly and monthly in possession medication to ensure, where possible, the majority of patients receive in possession medication. <p>A business case will be submitted to NHSE and NHS Improvement to recruit additional Pharmacy Technicians to meet the increased demand of medication within the prison. HMP Stafford will monitor gaps through the Local Delivery Board to ensure action taken results in a reduction in waiting time to receive prescribed medication.</p>	CEO Care UK and Governor	December 2020
				CEO Care UK and Governor	December 2020
5.2	Key concern (S46): Senior leaders had not provided sufficient opportunity for prisoners to gain qualifications through work roles, or higher-level qualifications through education classes or vocational training. Prisoners working in supervisory roles did not have their skills recognised and accredited. (Directed to: the Governor)	Agreed	<p>Prisoners in supervisory roles will have their skills recorded in their personal employability progress record. It has been identified that instructors require additional training in target setting. Novus have agreed to deliver this training. All prisoners working in supervisory roles will have their skills recognised and accredited once this is in place, by December 2020 at the latest. HMP Stafford will source an accreditation for these roles during the year through a consolidation process.</p> <p>All prisoners working in the Industries workshops are now able to gain qualifications in Performing Manufacturing Operations. The qualification is delivered by Novus.</p>	Governor	December 2020
				Governor	Completed



	<p>Recommendation: Leaders and managers should ensure that prisoners are able to achieve qualifications in prison workshops and work roles within the establishment. Prisoners need more opportunities to achieve higher-level qualifications, and those working in supervisory roles should have their skills recognised and accredited.</p>		<p>Specialist qualifications will be delivered in the Tailoring and Laundry workshops. HMP Stafford are seeking to introduce a textiles qualification. A laundry tender will be submitted as soon as it is possible to do so.</p> <p>Prisoners are now able to gain Entry, Level 1, Level 2 and Level 3 qualifications, and the new curriculum provides progression. HMP Stafford will look to increase the number of Level 3 outcomes through the Dynamic Purchasing System according to the need.</p>	<p>Governor</p> <p>Governor</p>	<p>April 2021</p> <p>April 2021</p>
5.3	<p>Key concern (S47): Contact with prison offender managers was too infrequent, did not drive sentence progression and demonstrated little evidence of one-to-one work to challenge prisoners' offending behaviour. This was a particular gap for the large number of prisoners who were not eligible for an accredited programme. (Directed to: the Governor)</p> <p>Recommendation: All prisoners should have regular, meaningful contact with a prison offender manager which challenges their offending behaviour and drives sentence progression.</p>	Agreed	<p>Prison Offender Managers (POMs) are aware of the importance of the sessions in driving sentence progression and challenging behaviour. Compliance is being monitored through the quality assurance process that is already in place. Short falls in delivery are addressed by the Head of Offender Management Delivery, who is an experienced Senior Probation Officer.</p> <p>POMs are now allocated a caseload, and have established positive working relationships with prisoners. HMP Stafford have used the Offender Management in Custody (OMiC) workforce planning model guidance to ensure cases are allocated appropriately in accordance with risk to allow prisoners an opportunity to have regular, meaningful contact focussing on rehabilitation and resettlement needs with their POM.</p> <p>High-risk prisoners will have twelve sessions a year, medium risk nine sessions a year, and low risk four a year. POMs will evidence what was done and why in one-to-one sessions (linking to Sentence Plan objectives and sequencing of these) the sessions will be lead using the Structuring Skills model of Check in, Review, Implement, Summarise, and Set tasks to evidence.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>Completed</p> <p>December 2020</p>



			Prisoners identified on Risk Matrix 2000 as low risk and therefore ineligible for an accredited programme, but assessed as needing support work on areas of risk, will participate in appropriate one to one work with POMS.	Governor	December 2020
5.4	<p>Key concern (S48): Planning for the release of high-risk prisoners lacked good oversight. The monthly multidisciplinary risk management meeting did not routinely consider all high-risk prisoners approaching release, in order to confirm that their risks would be properly managed in the community. (Directed to: the Governor)</p> <p>Recommendation: All high-risk prisoners approaching release should be discussed at a multidisciplinary meeting in sufficient time to address any gaps in risk management planning.</p>	Partly Agreed	<p>This recommendation is partly agreed as the monthly Interdepartmental Risk Management Team (IRMT) meetings will not routinely discuss <u>all</u> high-risk prisoners approaching release. Cases for discussion, as a minimum include Level 2 and 3 Multi-Agency Public Protection Arrangements (MAPPA) cases.</p> <p>POMs and Custodial Offender Managers have a checklist to identify whether prisoners should be referred to the IRMT meetings. All IRMT referral decisions are reviewed and signed off by the Head of Offender Management Delivery and recorded.</p> <p>All existing MAPPA Level 2 and very high-risk prisoners will be automatically listed for panel. All accepted referrals will be panelled at the next available IRMT meeting or according to priority.</p>	<p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>August 2020</p>
	General Recommendations Directed to the Governor				
5.5	<p>Recommendation (1.20): The proportion of adjudications dismissed or not proceeded with should be routinely monitored and reduced over time. (Directed to: the Governor)</p>	Partly Agreed	<p>This recommendation is partly agreed as it is not certain that the practicalities around the adjudication process can lead to a reduction in the number of dismissals over time.</p> <p>Through the use of existing quality assurance processes, 15% sample checks will be undertaken. Where these identify procedural errors or a lack of evidence leading to a higher number of dismissals, learning points will be addressed with adjudicating governors and other staff as necessary. This</p>	Governor	December 2020



			<p>will be monitored through monthly Segregation, Monitoring and Review Group (SMARG) and adjudication standardisation meetings chaired by either the Deputy Governor or Governor and direct conversations held with Adjudicating Governors where errors have been made.</p> <p>Individual coaching and mentoring will be offered to managers. The frequency of the standardisation meetings will initially be held bi-monthly and then quarterly to maintain a consistent approach to adjudicator variations.</p>	Governor	December 2020
5.6	<p>Recommendation (1.24): Documentation and video footage of any use of force should be routinely scrutinised by managers, to ensure that staff take every opportunity to deescalate conflict. (Directed to: the Governor)</p>	Agreed	<p>Video footage of spontaneous and planned Use of Force (UoF) incidents are now routinely watched as part of the monthly UoF meetings, in addition to the already embedded scrutiny of documentation. Learning points are then cascaded as necessary to either individuals or groups of staff.</p>	Governor	Completed
5.7	<p>Recommendation (1.39): The strip-searching of any new arrivals and segregated prisoners should be determined by an individual dynamic risk assessment. (Directed to: the Governor)</p>	Partly Agreed	<p>This recommendation is partly agreed as there are circumstances in which prisoners are required to be routinely full-searched as a matter of routine, as set out in Prison Service Instruction 07/2016, "Searching of the Person" which includes full searches of all new arrivals. Full searching is an essential method used to find items of contraband secreted on the person and to prevent its 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>HMP Stafford will however only conduct full searches of segregated prisoners subject to a full dynamic risk assessment, as opposed to taking place routinely. The Local Security Strategy has been updated to reflect this.</p>	Governor	Completed
5.8	<p>Recommendation (1.40): All intelligence should be reported accurately and promptly, to allow the prison to</p>	Agreed	<p>All staff will be advised of the requirement to submit intelligence reports promptly and accurately. The Security Hub weekly overview is now shared with staff. In addition, HMP Stafford will identify a Security Liaison Officer on each wing to promote awareness of good practice and security issues.</p>	Governor	October 2020



	understand any potential threats. (Directed to: the Governor)		HMP Stafford will monitor the effectiveness of intelligence gathering processes through the monthly strategic threat assessment process and monthly Security Committee meeting.		
5.9	Recommendation (1.47): All staff should be trained to identify prisoners at risk of harm, abuse or neglect. (Directed to: the Governor)	Partly Agreed	<p>This recommendation is partly agreed as this training not considered necessary for all staff, such as non-operational / non-prisoner facing staff to be trained to identify those at risk of harm, abuse or neglect and people who require safeguarding.</p> <p>Unified grades have undertaken both Five Minute Intervention and Key Worker training in a classroom setting. In addition to this, Key Worker learning leaflets have also been shared with all staff covering a wide range of learning material to help safeguard prisoners whilst offering advice on how to support them. These are accessible to all staff to use a reference guide.</p> <p>Prisoner facing staff have received Suicide and Self Harm (SASH) and local Safeguarding training. HMP Stafford will continue to deliver SASH training to all new directly and non-directly employed staff. Staff who require this will be upskilled and training literature will be provided. An objective will be set to manage those of risk of harm, abuse or neglect and captured in staff performance development report. Staff will have an opportunity to receive training from Staffordshire Councils Safeguarding Lead.</p>	Governor	Completed
5.10	Recommendation (2.7): All staff should receive comprehensive training to understand the risk of conditioning and to work effectively with prisoners convicted of sexual offences. (Directed to: the Governor)	Partly Agreed	<p>This recommendation is partly agreed as this training is not considered necessary for all staff, such as non-operational / non-prisoner facing staff. Training will be provided to staff that are considered to be potentially vulnerable to conditioning or where specific needs have been identified through the formal appraisal processes.</p> <p>By the end of March 2021 HMP Stafford will deliver appropriate training to staff who require conditioning training. This will include all new staff in prisoner facing roles, and staff identified through line management processes as needing additional support in this area. In addition to this, a locally developed training package specific to the challenges of working with prisoners convicted of sexual offences is being delivered to new staff in</p>	Governor	March 2021



			prisoner facing roles. HMP Stafford will look to implement a wider roll-out across the staffing group.		
5.11	Recommendation (2.24): The prison should help prisoners diagnosed with dementia to arrange for an enduring power of attorney while they still have mental capacity. (Directed to: the Governor)	Partly Agreed	<p>This recommendation is partly agreed because due to the nature of their offence, a lasting power of attorney (LPA) may be more difficult to arrange with friends and family.</p> <p>Care UK will ensure, where possible, this is implemented and the prisoner is aware of the need to consider a LPA. Assistance will be provided by the Safeguarding, Older prisoners and Social Care team where required.</p>	CEO Care UK and Governor	September 2020
5.12	Recommendation (2.30): There should be regular consultation with all protected groups. (Directed to: the Governor)	Agreed	Forums for all protected characteristic groups (covering age, religion, gender reassignment, pregnancy, sexual-orientation, race, foreign nationals, gypsy roma traveller communities, veterans, disabilities, gender and marriage) will take place quarterly, as a minimum. Strand leads will produce a monthly report which will feed into the monthly Equalities meeting. Minutes will be shared with the relevant users.	Governor	September 2020
5.13	Recommendation (2.31): Data suggesting unequal outcomes for any protected groups should be investigated and, when inequality is identified, remedial action should be taken. (Directed to: the Governor)	Agreed	<p>Data from SMARG meetings will be reviewed in consultation with the prisoner equalities representatives, and the protected characteristic leads will investigate identified actions. A locally developed consultation exercise will take place wherever data suggests unequal outcomes for protected groups. Feedback from data investigations will be fed into equalities forums and the monthly equalities meeting to share findings, identify issues and task further exploration or actions to be taken, to better understand or resolve the potential inequality. The Head of Safety, Equalities and Admissions will monitor progress and ensure necessary actions are taken and recorded on the equalities action plan where identified.</p> <p>As well as the Equalities Monitoring Tool already in use at HMP Stafford, an Equality Health Check Tool will be used by staff to help identify inequality issues so action can be taken to address these.</p>	Governor Governor	September 2020 September 2020
5.14	Recommendation (2.44): The specific needs of black and minority ethnic prisoners,	Agreed	UK Border Agency surgeries take place every six weeks for foreign national prisoners. A proportionate number of foreign national wing representatives are in place and bi-monthly foreign national meetings are held.	Governor	Completed



	foreign national prisoners and younger prisoners should be identified and met. (Directed to: the Governor)		<p>Regular forums with prisoner representatives will take place quarterly, as a minimum (at an appropriate frequency agreed) with the Head of Safety, Equalities and Admissions. These groups will identify any issues and feed into the Equalities action plan and meetings. Compliance with required frequency and content of forums will be monitored by the Equalities Lead and any concerns fed into the Head of Safety and Equalities for remedial action.</p> <p>In addition to holding regular forums, due to HMIP inspection findings, a comprehensive consultation exercise will take place to explore and identify specific needs of black and minority ethnic prisoners, (BAME), foreign national prisoners, prisoners with disabilities, and younger people, with actions identified where required and monitoring progress through monthly forums and the monthly Equalities meeting and action plan. All prisoners under the age of 25 will complete the Maturity Screening Tool assessment with their POM.</p>	Governor	September 2020
				Governor	September 2020
5.15	Recommendation (2.45): Prisoners with disabilities who require a ground floor cell should not be located on upper landings. (Directed to: the Governor)	Agreed	Prisoners that have been medically assessed by an independent general practitioner (GP) as requiring a ground floor cell are accommodated accordingly. Those with limited mobility don't always require a ground floor cell but can request for a medical assessment to be undertaken. Arrangements are made to accommodate this on an individual case basis.	Governor	Completed
5.16	Recommendation (2.85): The handling and transportation of medicines within the prison should always be undertaken securely. (Directed to: the Governor)	Agreed	The handling and transportation of medicines at HMP Stafford now involve the use of Pelicases with padlocks and movement of medication is completed with as minimal patient movement. All controlled drug medications are transported in additional Bristol maid cases inside Pelicases to ensure safe transportation.	CEO Care UK	Completed
5.17	Recommendation (3.12): Retired prisoners should not	Agreed	Residential staff are all aware, following a republishing of a Community Notice outlining that all retired prisoners are to be unlocked during the core	Governor	Completed



5.20	Recommendation (3.37): Novus managers should take effective, measurable action to increase the proportion of prisoners who achieve their functional skills qualifications in English and mathematics. (Directed to: the Governor)	Agreed	HMP Stafford's Allocations department works closely with Novus to ensure those requiring the functional skills programme have access to it promptly to enhance their progression.	Governor	Completed
			The Functional Skills action plan will be updated with a range of measures specially targeted to achieve qualifications. Through these measures, HMP Stafford will hold the education provider accountable to achieve their target of an increase in the rate of achievement for those taking English and mathematics functional skills qualification to 85% rising to 95% in line with contractual compliance.	Governor	March 2021
			A process of continuous improvement will be implemented to enable further quality assurance of the delivery of the action plan. This will be reviewed by the Head of Learning and Skills and Education Manager at the weekly Teacher Quality Management Plan, monthly Education Progress Meetings and bi-monthly QIG meetings.	Governor	March 2021
5.21	Recommendation (4.22): A comprehensive population needs analysis, based on a broad range of reliable data, should inform provision to reduce reoffending. (Directed to: the Governor)	Agreed	A Needs Analysis survey covering all the designated pathways was sent to prisoners to complete in April 2020. The data has been collated and is now being analysed by a trainee psychologist who will prepare a report on the findings. This report will be combined with segmentation data, and sentence planning targets identified through Offender Assessment System assessments. The conclusions and outcomes of the report will be fed into HMP Stafford's strategy refresh and a revised strategy published by end of September 2020.	Governor	September 2020
5.22	Recommendation (4.29): Decisions to amend prisoners' child contact restrictions, in order to allow them to have telephone, mail or social visits contact with named children, should be reviewed annually. (Directed to: the Governor)	Agreed	When an individual has restrictions applied against them for child contact a full review will be conducted. This will be reviewed every 12 months in consultation with the prisoner and the outcome will be discussed with the Key Worker and POM who will explore any emerging issues.	Governor	September 2020
	Directed to HMPPS				



5.23	<p>Recommendation (4.33): When prisoners need a transfer, either to open conditions or to their local resettlement prison, this should occur promptly. (Directed to: HMPPS)</p>	Agreed	<p>The Agency recognises that there is currently an imbalance of places within the estate with too many local places and too few training and resettlement places. Between February 2020 and the end of 2023, HMPPS will gradually introduce new Offender Flows to move men to the right prison at the right time, this will include for some men spending a longer time in a resettlement prison closer to home.</p> <p>The Offender Flows support the OMiC model and will align with the new case-management approach. By matching people in custody to the function(s) that a prison fulfils, each establishment will be able to deliver the right outcomes, and people in prison will be better supported to turn their lives around. To support the transformation of the adult male prison estate, HMPPS have developed evidence-based Models for Operational Delivery (MODs), which recognise the need to consider the varying requirements of prisoners.</p> <p>HMPPS remains committed to, wherever possible, releasing prisoners from a resettlement prison (which may also be an open prison, rather than necessarily a local prison) allocated to their 'home' community rehabilitation company. Progressive transfers of prisoners are, however, subject to space in the appropriate part of the prison estate becoming available. The speed of transfers reflects this constraint. Consequently, there may be occasions where a prisoner starts their resettlement journey in a non-resettlement establishment.</p>	Executive Director, Prison Supply Directorate	December 2023
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Recommendations	
Agreed	16
Partly Agreed	7
Not Agreed	0
Total	23

