



HM Prison &
Probation Service

Action Plan: HMP Belmarsh

Action Plan Submitted: 2 December 2021

A Response to the HMIP Inspection: 26–27 July and 2–6 August 2021

Report Published: 12 November 2021

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 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.

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ACTION PLAN: HMIP REPORT

ESTABLISHMENT: HMP BELMARSH

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	Key concerns and recommendations				
	To the Governor				
7.1	<p>Key concern 1.38: Levels of violence had continued to increase since the last inspection and too many prisoners felt unsafe. Despite available prison data, leaders did not analyse the indicators of violence in detail. The prison's strategy and associated action plan did not reflect the risks it faced and there had been no formal strategic meeting to address violence for over 18 months.</p> <p>Recommendation: Safety data should be used to inform a strategy and action plan to reduce increasing levels of violence, which leaders monitor and drive effectively.</p>	Agreed	<p>A monthly meeting incorporating Drug Strategy, Security and Violence Reduction was introduced in August 2021, to which all functions within the establishment and external stakeholders are invited to attend. The agenda and minutes for the meetings are published. Safety data is scrutinised at this meeting and the strategic action plan is updated, which is reviewed monthly.</p> <p>The Violence Reduction strategy will be reviewed by January 2022 and then annually thereafter.</p> <p>A Band 8 Head of Decency (HoD) role has been created, which will ensure a level of assurance that the establishment regimes and policies are being conducted and delivered in a fair and decent manner in suitable and appropriate conditions. The HoD will be responsible for ensuring that any required support is available and learning development opportunities are allocated, actioned and regularly reviewed.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Complete</p> <p>January 2022</p> <p>Complete</p>

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7.2	<p>Governance of use of force had lapsed. Most incidents were spontaneous, but staff did not routinely activate body-worn video cameras. Despite good local data, there was no effective analysis or detailed scrutiny of force to make sure that incidents were necessary, justified and proportionate.</p> <p>Recommendation: There should be robust scrutiny of the use of force, including data, camera footage and staff statements, to make sure that force is necessary, justified and proportionate.</p>	Agreed	<p>HMP Belmarsh reintroduced monthly Use of Force (UoF) meetings in October 2021, where UoF data and staff reports are scrutinised by a multi-disciplinary team. The strategic action plan is reviewed and updated at this meeting.</p> <p>A weekly meeting at which Body Worn Video Camera (BWVC) and Closed-Circuit Television footage is to be introduced, to review and assess all available recordings by a multi-disciplinary team, including those who recorded the evidence, to ensure that force is necessary, justified and proportionate. The meeting will identify and monitor trends in relation to the drawing and activation of BWVC. The Head of Security will review the BWVC policy.</p>	<p>Governor</p> <p>Governor</p>	<p>Complete</p> <p>December 2021</p>
7.3	<p>The quality of case management support for prisoners at risk of suicide and self-harm was weak: risk was not always assessed correctly; some case reviews were too infrequent; and care plans were missing or poorly completed. Records of prisoners' interactions were often missing. It was clear that staff had struggled to implement the new version of ACCT.</p> <p>Recommendation: Prisoners at risk of suicide and self-harm should receive additional</p>	Agreed	<p>The Safer Custody Team will continue to deliver local ACCT Version 6 training to all staff.</p> <p>All Staff identified as Case Coordinators will be enrolled on the new Module 9 Safety support Case Review Team Training which has replaced the ACCT Version 5 Case manager training. This will develop and improve staffs understanding and Implementation of the New ACCT documentation.</p> <p>Weekly assurance checks are conducted by the Safer Custody Team and operational managers, and any identified non-compliance fed back for action to individuals and functions, as required. Any trends identified will be raised at the monthly Safer</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Complete</p> <p>December 2022</p> <p>Complete</p>

	<p>support through the use of good quality assessment, care in custody and teamwork (ACCT) case management that includes an accurate assessment of their risk, sufficiently frequent case reviews, appropriate support actions recorded in a care plan and a consistent record of their daily interactions.</p>		<p>Custody meetings and further support/training will be given where necessary.</p> <p>A new process will be introduced regarding investigations and learning following incidents of serious assault or Self-harm in line with PSI 15/2014. These incidents will be identified and investigated by the safety team and any learning Disseminated out to the wider staffing group via the SIM Meeting and NTC.</p>	Governor	December 2021
7.4	<p>Constant supervision arrangements for prisoners at the highest risk of suicide and self-harm were unsafe. Staff read newspapers rather than observing the prisoners, who were also sometimes left unsupervised and unobserved. Supervising staff worked long shifts, which affected their concentration, and they did little to encourage prisoner interaction and participation in anything purposeful.</p> <p>Recommendation: Constant supervision arrangements should keep prisoners at risk safe and encourage them to engage with a purposeful regime wherever possible.</p>	Agreed	<p>All constant watch staff are given a mandatory thirty-minute break at the four- and eight-hour points in their shift. Daily management checks are completed by the Supervising Officers in the Inpatient Healthcare Unit (IPU) and by the Night Orderly Officer to ensure compliance.</p> <p>Prior to commencing constant observations all staff are briefed by the duty Healthcare Supervising Officer, detailing requirements regarding their level of engagement and encouragement in purposeful activities for the person in prison.</p> <p>A funding bid for CCTV to cover the area in Healthcare where the gated cells are located will be submitted.</p>	Governor Governor Governor	Complete Complete December 2021

7.5	<p>There were substantial weaknesses in equality work. The equality strategy was out of date and there was no multidisciplinary meeting to develop and drive action planning. There was limited consultation of prisoners in protected groups and little consideration of equality monitoring data.</p> <p>Recommendation: Equality data and effective consultation should inform an effective strategy and action plan that leaders drive proactively to address disproportionate outcomes for prisoners from protected groups.</p>	Agreed	<p>The Head of Safety will review the Equality Strategy, utilising all available data and feedback from Equality Strand Meetings.</p> <p>Equality Action Groups for both people in prison and staff restarted in October 2021 and are now held monthly, where equality data is discussed and actions to address identified issues are raised and circulated.</p> <p>Equality Strand Meetings with people in prison, chaired by members of the Senior Management Team restarted in October 2021 and will be held quarterly, with minutes and actions being published.</p> <p>A Band 8 Head of Decency (HoD) role has been created, which will ensure a level of assurance that the establishment regimes and policies are being conducted and delivered in a fair and decent manner in suitable and appropriate conditions. The HoD will be responsible for ensuring that any required support is available and learning development opportunities are allocated, actioned and regularly reviewed.</p>	Governor Governor Governor Governor	April 2022 Complete Complete Complete
7.6	<p>Prisoners who were not working spent up to 23 hours a day locked in their cells. Only 23% prisoners were engaged in out-of-cell purposeful activity. Most prisoners had around 45-50 minutes outdoor exercise each day, although some got as little as 30 minutes. Association had not been available</p>	Agreed	<p>HMP Belmarsh has reviewed its core day provision, and a new regime was implemented in November 2021. The new regime allows all people in prison to access exercise, domestic tasks, structured on wing activities, purposeful activity and access to the gymnasium and library to assist with the rehabilitation of people in prison and to improve their well-being.</p>	Governor	Complete

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	<p>in the main prison since the restricted regime commenced in March 2020. The library remained closed and there were no developed plans to reopen it. Unlike in other prisons, the gym was still closed.</p> <p>Recommendation: The core day should provide adequate time out of cell for purposeful activity, domestic tasks and recreation to assist with the rehabilitation of prisoners and to improve their well-being.</p>				
	To HMPPS				
7.7	<p>The decision to stop resettlement workers providing advice and support to unsentenced prisoners was a significant loss to these prisoners, who made up almost 60% of the population. While the decision was outside the control of the prison, it had not put in place any measures to mitigate this.</p> <p>Recommendation: All prisoners, including those who are unsentenced, should be able to access resettlement advice and support to prepare them for their release into the community.</p>	Agreed	<p>On 26th June 2021 the National Probation Service and Community Rehabilitation Companies (CRC's) unified to become the Probation Service, responsibility for the delivery of resettlement services moved to the Regional Probation Directors (RPDs) and their Commissioned Rehabilitative Service (CRS) providers. Accommodation, Education Training and Employment (ETE) and Personal wellbeing services that were previously delivered by CRCs will now be provided by the CRS supplier. Probation pre-release teams will provide pre-release services not available via CRS including Finance, Benefit and Debt services and support services to the people in prison which includes supporting tenancy sustainment and contacting local boroughs etc to name but a few. HMP Belmarsh will establish with partners what services</p>	HMPPS	Complete

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			<p>remain available and communicate this to those in our care.</p> <p>The CRS services are available to all convicted individuals released from Belmarsh, HMPPS are currently looking into what additional accommodation and rehabilitative support could be provided to unconvicted people in prison. The probation pre-release teams will provide immediate resettlement needs and pre-release support for unconvicted people in prison. The minimum will be to assess under Basic Custody Screening Tool 2 (BCST2) and undertake specialist immediate needs work around accommodation and debt. Teams will also provide a pre-release service for out of area people in prison. The minimum will be to assess under BCST2, undertake specialist immediate needs work around accommodation and debt, liaise with the Community Offender Manager or Short Sentence Function as allocated and provide a point of contact for CRS suppliers seeking to engage with the individual.</p>		
	Recommendations				
7.8	Recommendation 3.12: All new arrivals should have a private interview with a member of prison staff on their first night. (To the governor)	Agreed	The establishment will review how interviews are carried out to ensure they are conducted in private.	Governor	December 2021
7.9	Recommendation 3.13: Listeners should be able to carry out their role throughout the reception, first	Agreed	The establishment will ensure listeners are available to new arrivals. Listeners will be allocated to Reception and the First Night Centre and will be identifiable by a Listener t-shirt.	Governor	Complete

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	night and induction processes. (To the governor)				
7.10	Recommendation 3.14: Induction from peer workers should be overseen by a member of staff. (To the governor)	Agreed	The initial induction PowerPoint/group meeting will be conducted by a member of staff in conjunction with a peer mentor.	Governor	Complete
7.11	Recommendation 3.38: The regime in segregation should be improved so that all prisoners can have at least one hour's exercise, a shower and a phone call every day. (Repeated recommendation 1.35). (To the governor)	Not Agreed	<p>This recommendation is not agreed as National policy (PSI 75/2011 Residential Services), states that people in prison are afforded a minimum of 30 minutes in the open air daily as opposed to the one hour recommended by the Inspectorate. This provision is mandatory subject to weather conditions and the need to maintain good order and discipline.</p> <p>The functional head for the Segregation Unit will review the regime to ensure that all segregated people in prison receive their full entitlement of applications. As per PSI 75/2011 the previous mandatory requirement for people in prison on restricted regimes to have 60 minutes in the open air is withdrawn. However, Governors will be required by their Service Level Agreement/Contract to continue to provide a minimum of 60 minutes activity for such people in prison, of which at least 30 minutes must be in the open air.</p>	Governor	January 2022
7.12	Recommendation 3.60: Prisoners defined as adults at risk of harm, abuse and neglect should be systematically identified and	Agreed	The Head of Safety, in conjunction with Head of OMU and Senior Probation Officer, will review all safeguarding procedures. A new safeguarding policy will be put in place that staff will receive	Governor	January 2022

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	protected. (To the governor)		awareness of and adhere to. An assurance process will be put in place to ensure compliance. OMU Case workers / Offender supervisors / Key workers / Safer Custody staff will identify and identify those at risk and refer them in line with the new policy.		
7.13	Recommendation 4.4: Staff should be trained and supervised to make sure that they relate with prisoners in a way that contributes to a rehabilitative culture. (To the governor)	Agreed	<p>The establishment will ensure that all employed operational staff are trained in Five Minute Intervention, Being Trauma Informed and Resilience. Staff training will be ongoing, with shutdown training days being implemented from January 2022 that will cover all mandatory training.</p> <p>Key workers will be upskilled in the Choices for Change programme and will receive supervision from their line managers who will regularly quality assure their work, this is ongoing work that was implemented in 2021.</p> <p>Staff training sessions will be delivered to embed understanding of the establishment's vision and how their work and behaviours contribute toward this, which is ongoing work that was implemented in 2021.</p>	Governor Governor Governor	January 2022 Complete Complete
7.14	Recommendation 4.5: Key work should be resumed at the earliest opportunity. (To the governor)	Agreed	On the 13 th of September 2021, the establishment returned to delivering key work sessions.	Governor	Complete
7.15	Recommendation 4.21: Prisoners should have access to clean sheets every week. (To the governor)	Agreed	A full review of bedding and kit exchange will be conducted by the Head of Residence. Weekly bedding exchange will occur, and assurance	Governor	January 2022

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			processes will be added to ensure compliance moving forward.		
7.16	Recommendation 4.22: There should be a process to track and monitor the receipt of parcels and catalogue orders to make sure that prisoners receive their goods promptly. (To the governor)	Agreed	A new system has now been implemented which tracks all orders from the time they are placed until the items are received by the person in prison. Assurance checks are completed monthly by the Reception Custodial Manager to ensure improvements are maintained.	Governor	Complete
7.17	Recommendation 4.23: There should be more opportunities for self-catering, particularly for enhanced-status prisoners. (To the governor)	Not Agreed	The prison infrastructure does not support self-catering.	N/A	N/A
7.18	Recommendation 4.30: The applications system should provide prompt and helpful responses to prisoners, with tracking in place, and be subject to robust checks by managers. (To the governor)	Agreed	A full review of the application system will to be completed, and policy created that will include the introduction of management checks and the tracking of applications.	Governor	December 2021
7.19	Recommendation 4.42: The prison should consult prisoners in protected characteristics groups to understand and meet their specific needs. (To the governor)	Agreed	HMP Belmarsh will ensure that Equality Strand Meetings are chaired by nominated members of the Senior Management Team and are held quarterly with a representative number of people in prison from the Strand.	Governor	Complete
7.20	Recommendation 4.73: Admission to the inpatient unit should be for clinical reasons only. (Repeated recommendation 2.57) (To the governor)	Agreed	There is an admission process to ensure all admissions to inpatients unit must be agreed by the inpatient's manager or senior nurse during the day or at night.	Governor/Head of Healthcare	Complete

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7.21	Recommendation 4.85: The transfer of patients to hospital under the Mental Health Act should occur within current Department of Health guidelines. (Repeated recommendation 2.69) (To the governor)	Partly Agreed	<p>This recommendation is partly agreed, as NHS bed space is subject to factors outside of the direct control of HMP Belmarsh, such as the waiting lists in suitable facilities.</p> <p>Since April 2021, the NHS England and NHS Improvement Health and Justice National Team have developed a portal to report all transfers to hospital, so that referral rates, response times, timeliness of assessments, and admission timescales can be monitored.</p> <p>In the London region, a monthly prison mental health transfer and remission meeting has been established. This is led by NHS England and NHS Improvement, and is attended by prison healthcare providers. The meeting aims to monitor transfers and remissions on a regional basis. Where risks are identified through the meeting around extended waiting times beyond current guidance timescales, these cases are proactively followed up with mental health provider collaboratives in order to progress transfer of patients. Where barriers to timely transfer of patients remain, arrangements can be made to source privately funded beds where NHS beds are not available.</p>	Governor/Head of Healthcare	Complete
7.22	Recommendation 5.10: The prison should make sure that prisoners can immediately access the library and gym. (To the governor)	Agreed	<p>The library re-opened in October 2021.</p> <p>The gym will re-open from December, once the shower refurbishment has been completed.</p>	Governor Governor	Complete December 2021
7.23	Recommendation 5.24: The amount of classroom-based	Agreed	Classroom based teaching has recommenced since HMIP's inspection, with continued blended learning.	Governor	Complete

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	teaching available to prisoners should be rapidly increased. (To the governor)		Teaching schedules are being reviewed to increase physical attendance in line with Exceptional Delivery Model (EDM) Stage 1 Covid regimes at the end of November 2021.		
7.24	Recommendation 5.25: There should be a rapid expansion in the number of prisoners from all areas of the prison who participate in education, skills and work. (To the governor)	Agreed	HMP Belmarsh have moved to Stage 2 of the national Exceptional Delivery Model (EDM) since inspected by HMIP, which has allowed an increase in the numbers of people in prison attending workshops, the commencement of face to face classroom-based activities and access to education. When regimes progress to EDM stage 1 attendance at activities will increase further.	Governor	January 2022
7.25	Recommendation 5.26: More prisoners should complete and return the education induction packs, including the initial assessment, so that staff can provide support and allocate them to activities more effectively. (To the governor)	Agreed	All people in prison are issued with initial assessment packs. Currently education allocate a member of the team to collect completed packs which has seen an increase in returns, there remains a consistent number of people in prison who refuse to engage in the process. Induction to be conducted in the education facility with the introduction of the regime opening up further.	Governor	December 2021
7.26	Recommendation 5.27: Staff in education, skills and work should support prisoners to develop their interpersonal skills and record these developments. (To the governor)	Agreed	HMP Belmarsh will re-introduce employability booklets in the workshops, that will enable activities staff to record progress and development. The booklet links together education, industries, keyworkers and people in prison and will include self-assessments, review records and target setting to enable and assist in developing necessary skills.	Governor	January 2022
7.27	Recommendation 6.5: The prison should involve families in	Agreed	A full review of families' interventions will be conducted by Head of Decency, which will include	Governor	January 2022

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	casework and family interventions to support the rehabilitation of prisoners. (To the governor)		enquiries into the advantages and disadvantages of involving families in procedures such as ACCT reviews and parole hearings. These can then be considered on an individual, case by case basis. A full review of family's interventions will be conducted by the Head of Decency.	Governor	March 2022
7.28	Recommendation 6.18: The reducing reoffending strategy should be informed by a comprehensive and up-to-date population needs analysis. (To the governor)	Agreed	The results from the needs analysis are being analysed and will be incorporated into the new strategy due in March 2022. The Reducing Re-offending Strategy will then be reviewed annually.	Governor	March 2022
7.29	Recommendation 6.19: All phone calls by prisoners covered by public protection monitoring should be listened to promptly to identify risk. (To the governor)	Agreed	A review of the staff resource in this area will be carried out to ensure that appropriate staffing levels are in place.	Governor	January 2022

Recommendations	
Agreed	26
Partly Agreed	1
Not Agreed	2
Total	29

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