



HM Prison &
Probation Service

Action Plan: HMP Swaleside

Action Plan Submitted: 28th March 2022

A Response to the HMIP Inspection 18–19 and 25–29 October 2021

Report Published: 22nd February 2022

Actions with future target dates may 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, 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.

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ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMP SWALESIDE

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				
7.1	<p>Key concern 1.48: A staffing shortfall was limiting the ability to reinstate purposeful activity and support prisoners' progression.</p> <p>Only around three-quarters of prison officers were available and there was a severe shortage of workshop instructors, programme delivery facilitators, health care staff, probation officers, operational support grades and caterers. Leaders had been proactive in trying to address the high level of</p>	Agreed	<p>Efforts are being taken, and will continue, to recruit sufficient numbers of officer to all prisons on the Isle of Sheppey to meet the projected need. At present this is not delivering in sufficient numbers in spite of a range of measures aimed at boosting the number of applicants. These include a market facing supplement and increased marketing and advertising of posts.</p> <p>At the local level of HMP Swaleside the 'Swaleside Ambassador' will provide support and guidance to all staff in their transition into employment and beyond and provide the Senior Leadership Team (SLT) with a greater insight into any issues relating to retention, well-being and the working environment by holding quarterly Staff forums for all staff. The findings from these forums will be presented to the monthly SLT meeting and actions will be allocated to drive improvements and to support staff retention at all bands.</p> <p>Feedback from recently employed officers has been used to develop a new bespoke training package for the 2-week induction period following the external New Officer Apprentice (NOA) training and this has now been implemented.</p>	<p>HMPPS</p> <p>Governor</p> <p>Governor</p>	<p>December 2023</p> <p>June 2022</p> <p>Complete</p>

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	<p>attrition and inexperience among prison officers by, for example, recruiting a 'Swaleside ambassador' to support new recruits, but wider systemic issues relating to recruitment and retention needed to be addressed by HMPPS.</p> <p>Recommendation: There should be support and clear measures implemented as a matter of urgency to recruit and retain sufficient operational and specialist staff to reinstate purposeful activity and support prisoners' progression. (To HMPPS and the governor)</p>		The Development Manager has a good working relationship with the local job centres to help drive and promote employment opportunities at HMP Swaleside	Governor	Complete
7.2	<p>Key concern 1.49: Although leaders spoke of their aims for the future, strategic thinking supported by a</p>	Agreed	The Monthly Performance & Assurance Report (MPAR) and Quarterly Performance & Assurance Review (QPAR) processes are now embedded within the assurance framework and meeting structure at HMP Swaleside. This provides the Head of Function and establishment level of assurance for data quality and compliance with key processes.	Governor	Complete

Actions with future target dates may be delayed due to Covid-19 related disruptions to service delivery

	<p>robust data and evidence-based governance arrangements to give them assurance that work is taking place on time, that progress is monitored, and that there are clear lines of accountability. In addition, there should be a robust process for reviewing plans.</p> <p>(To the governor)</p>				
7.3	<p>Key concern 1.50: New arrivals, particularly those isolating because of COVID-19, spent long periods locked up with little to do during their induction period. First night cells were shabby and did not give a positive first impression of the prison. Initial assessments involving the discussion of personal information were not conducted in private. Additional first night checks did not</p>	Agreed	<p>The new induction strategy will be completed by May 2022, with Terms of Reference (ToR) already in place alongside the delivery strategy.</p> <p>The induction process has been realigned and now sits under the Safety function. There will be a new induction timetable that will be delivered in collaboration with the Employability Hub, which will ensure that every new arrival has a full induction covering all aspects of the prison regime and an assessment of their needs. This process will also be available to those self-isolating.</p> <p>The current induction booklet will be reviewed and will be updated to include relevant sections that meet the needs of young adults and those with neurodiversity needs.</p> <p>The Prisoner Journey Project is will provide a seamless transition from Reception to Induction and right through to Resettlement. When new arrivals enter Reception there will be a flow through to the Induction wing, after prisoners have been seen by a Healthcare nurse and</p>	<p>Governor</p> <p>Governor</p>	<p>May 2022</p> <p>July 2022</p> <p>July 2022</p> <p>July 2022</p>

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<p>always take place. In our survey, only around a third of respondents said that induction covered everything they needed to know about the prison. Prisoners described issues with telephone credit and numbers, and property that they could not resolve while spending so much time locked up. Some of these weaknesses were a consequence of COVID-19 arrangements intended to keep staff and prisoners safe, but they needed to be addressed.</p> <p>Recommendation: All new arrivals should be able to access good-quality, proactive and consistent support and advice from staff and peer workers during their induction period, following a thorough, private</p>		<p>Induction staff, ensuring they have the opportunity for assessment and to discuss personal information in private.</p> <p>Induction staff and Insiders will have all relevant information, which will be accessible on reception and throughout the induction process. This will ensure staff have the ability to provide the appropriate level of support and advice to prisoners.</p> <p>A profile review will extend the Induction staff's working day to ensure that all prisoners will have access to the appropriate services on their first night in HMP Swaleside.</p> <p>Funding has been agreed for new furniture and a painting program is in place for all dedicated first night in prison cells.</p>		<p>July 2022</p> <p>July 2022</p> <p>May 2022</p>
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Actions with future target dates may be delayed due to Covid-19 related disruptions to service delivery

	assessment of their needs. (To the governor)				
7.4	<p>Key concern 1.51: Levels of violence were high and were on an upward trajectory. The number of assaults against staff was higher than at similar prisons and many were serious. In our survey, more than a third of prisoners said that they currently felt unsafe. There were limited incentives to encourage positive behaviour.</p> <p>Recommendation: Leaders should introduce effective measures to reduce violence and improve the safety of prisoners and staff. (To the governor)</p>	Agreed	<p>The performance data and associated analysis for trends used in the MPAR process and the monthly safety meetings have been drawn in line to ensure consistency in reporting and adequate monitor of violence within the establishment and to identify the drivers for violence and how to address them. The resulting improvement actions will be monitored monthly through MPAR and safety meetings.</p> <p>The violence strategy will be reviewed in April 2022 as part of the yearly review process and on an ad-hoc basis as needed.</p> <p>The Safer Prisons function have a dedicated Safety Community Team consisting of operational officers that provide support and guidance to the residential units with all areas of safety and violence reduction. The team also assure the quality and consistency of delivery.</p> <p>The safety team are currently working towards the sign off for CSIP in June 2022, including working closely with the group safety lead. Safety intervention Meetings (SIM) will continue to take place weekly and all CSIP plans will be reviewed and quality assured. The effectiveness of the CSIP process will be analysed and monitored via the violence statistics, which are presented in the safety meetings.</p> <p>During the monthly partnership meetings held with the Head of Security, Head of Drug Strategy & Healthcare and the Head of Safer Prisons the trends in the safety data, Incident Reports and drug related intelligence are reviewed and the drivers for violence are identified. During the meetings plans are created to introduce effective measures to reduce violence by addressing the root cause(s) and actions are allocated to ensure the plans implementation. The actions from these meetings are added to the relevant functional action plans and monitored during the monthly assurance process.</p>	Governor	<p>June 2022</p> <p>Complete</p> <p>Complete</p> <p>June 2022</p> <p>June 2022</p>

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			A Terms of Reference (TOR) will be issued to review the Incentives policy to include incentives for encouraging good behaviour.		June 2022
7.5	<p>Key concern 1.52: The level of self-harm had almost doubled since the previous inspection and had been rising in the 12 months prior to this inspection. Data were not used well enough to inform work to reduce self-harm. There were gaps in the quality of support delivered by staff through assessment, care in custody and teamwork (ACCT) case management and too few prisoners in crisis felt supported by staff.</p> <p>Recommendation: The prison should develop and implement an effective plan supported by specific measures to reduce self-harm and deliver consistently good care</p>	Agreed	<p>The performance data and associated analysis for trends used in the MPAR process and the monthly safety meetings have been drawn in line to ensure consistency in reporting and adequate monitor of self-harm within the establishment. The resulting improvement actions will be monitored monthly through MPAR and safety meetings.</p> <p>The self-harm strategy has been reviewed and will be reviewed again in April 2022 as part of the yearly review process and on an ad-hoc basis as needed.</p> <p>The safety team are working closely with the group safety lead and national safety teams with regards to additional training on ACCT version 6, in order to ensure that all staff have a better understanding of the process and can provide the appropriate support to prisoners.</p> <p>Quality assurance checks of the ACCT documents will be completed by wing managers, to ensure the ACCT's are of good quality and provide the appropriate support to the prisoner. Additional quality assurance checks will be completed by the Safety team post closure of an ACCT.</p> <p>The Heads of Safety, Security and Drug Strategy meet on a monthly basis to assess the trends and themes identified by the analysis of IR's, safety data and drug related intelligence. This information provides a holistic understanding and identifies the drivers for self-harm, at the time of each meeting. Plans are then created to effectively reduce self-harm and actions are allocated to implement the plans, which are added to the functional action plans and monitored through the monthly assurance process.</p>	Governor	<p>May 2022</p> <p>Complete</p> <p>May 2022</p> <p>May 2022</p> <p>Complete</p>

Actions with future target dates may be delayed due to Covid-19 related disruptions to service delivery

	for at-risk prisoners. (To the governor)		The safety team at HMP Swaleside will work with the national and regional resource to create a plan to reduce self-harm based on information and trends from across the whole estate, to ensure that larger scale drivers are also being addressed.		May 2022
7.6	Key concern 1.53: The promotion of equality lacked a plan and there was little clarity about how outcomes and well-being among minority groups resident in Swaleside might be improved. There was a poor understanding of needs and priorities, data analysis was weak and consultation with prisoners with protected characteristics very limited. Recommendation: The prison should develop and implement a comprehensive equality strategy, including clear milestones for delivery that is informed by the views and experiences	Agreed	<p>The equality strategy and policy on a page has been reviewed and implemented and will be reviewed a minimum of annually but also on an ad-hoc basis as needed.</p> <p>In addition, an equalities action plan has been developed that will enable better oversight of priorities that HMP Swaleside identify for the equalities department. The action plan will form part of the monthly MPAR meetings with the Head of Safer Prisons.</p> <p>The leads for protected characteristics have been reviewed and allocated and extra support will be provided by a deputy for those areas that are most relevant to the population at HMP Swaleside.</p> <p>A prisoner forum calendar will be developed to ensure each protected characteristic has the opportunity to raise issues or concerns in a safe and measured way. The issues raised will then be investigated and will form the basis of actions to drive improvements to the strategy. These actions will be monitored via the functional action plan.</p>	Governor	<p>Complete</p> <p>June 2022</p> <p>Complete</p> <p>July 2022</p>

Actions with future target dates may be delayed due to Covid-19 related disruptions to service delivery

	of prisoners. (To the governor)				
7.7	<p>Key concern 1.54: The primary care service often operated below the set staffing level. Consequently, to cover essential services, the interim head of health care often had to carry out clinical duties and could not always focus on the strategic aspects of her role. Managerial supervision was lacking, and complaints were not always responded to on time. There were no nurse-led long-term condition clinics and few such prisoners had a care plan.</p> <p>Recommendation: The prison should work with the local delivery board, in conjunction with NHS England and Improvement, to make sure that there are sufficient health care staff to meet the</p>	Agreed	<p>The current healthcare staffing pressures have been added to the establishment risk register and are currently assessed as a critical risk. There is an action plan and contingency plan in place which is reviewed monthly.</p> <p>The critical risk has been highlighted to commissioners and to the PGD and an application for military medical support has been submitted.</p> <p>The Head of Drug Strategy & Healthcare will attend the South East Health & Social Care Partnership Board and will contribute and monitor the implementation of the contract mobilisation. This will include requesting updates on recruitment and retention data. Where the data raises concerns regarding the ability to effectively deliver healthcare services, this will be raised with commissioners and PGD, should the risk remain assessed as being “critical”.</p> <p>Oxleas are due to commence contract delivery from April 2022 and delivery of services in accordance with the contract, including nurse-led long-term condition clinics, which will be monitored and reviewed on a monthly basis at the Operational Healthcare meeting. Where there are barriers to delivery, the clinical Head of Healthcare and the Head of Drug Strategy & Healthcare will decide upon and deliver a joint action plan to ensure the health needs of the population are met.</p> <p>The timeliness of responses to Healthcare complaints will form part of the service level agreement with the new provider. These will be monitored by the Head of Drug Strategy & Healthcare and concerns will be raised with provider in a timely manner.</p>	Governor	<p>Complete</p> <p>Complete</p> <p>October 2022</p> <p>October 2022</p> <p>October 2022</p>

Actions with future target dates may be delayed due to Covid-19 related disruptions to service delivery

	health needs of the population. (To the governor)				
7.8	<p>key concern 1.55: Several aspects of medicines management were poor. There was no pharmacy input into any clinics because of staff shortages. Some risk assessments for in-possession medicines had not been updated when circumstances changed, or on a regular basis. The prescribing of medicines liable to abuse was high and some were given in-possession, against national guidelines, which increased the risk of diversion. The inconsistent management of the medicine queues also posed a risk for diversion. The method of transporting medicines to the wings was unsafe, and</p>	Agreed	<p>A process for the safe administration of medication, in accordance with clinical guidelines, has been developed and implemented.</p> <p>A Pharmacist will be available daily to provide input into clinics and prisoners on wings without a suitable hatch will receive their medication by attending a pharmacy led central medication hatch located within the healthcare department.</p> <p>Medication hatches are to be installed on Alpha and Delta Wings and a second hatch to be installed on Echo Wing for Integrated Drug Treatment System (IDTS), thus allowing the medication hatch on Golf Wing to be utilised for healthcare medication.</p> <p>An independent external review is underway of the prescribing of opiate based medication and once published the report and recommendations will be reviewed and implemented in conjunction with Oxleas.</p> <p>A Standard Operating Procedure (SOP) for in-possession medication spot checks has been agreed with Oxleas and will be implemented in April 2022.</p> <p>A review of evening medication has taken place by the pharmacy, with the view to ensuring safe and appropriate prescribing.</p> <p>A quality assurance process to monitor safe medication administration will be agreed with Oxleas in April 2022.</p> <p>The current re-profile exercise that is ongoing will consider the level of staffing required for the safe and effective management of medication queues.</p>	Governor	<p>Complete</p> <p>July 2022</p> <p>July 2022</p> <p>April 2022</p> <p>Complete</p> <p>Complete</p> <p>April 2022</p> <p>June 2022</p>

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	<p>secondary dispensing and a lack of a second checker for controlled drugs were not in line with national professional standards. The lack of a prescription chart and the administration of medicines at the cell door or through a gate which was in constant use were inappropriate and unsafe.</p> <p>Recommendation: The prison should work with the local delivery board, in conjunction with NHS England and Improvement, to make sure that prisoners receive their medication safely and in full accordance with correct clinical standards. (To the governor)</p>				
7.9	<p>Key concern 1.56: Although at stage 2 of the recovery plan, time unlocked for many</p>	Agreed	<p>HMP Swaleside will maximise purposeful activity spaces and time out of cell in line with national guidelines. During COVID recovery, prisoners will have access to purposeful activity on a rotational basis, with the aim to deliver purposeful activity to 50% of the prison population as soon as</p>	Governor	March 2023

Actions with future target dates may be delayed due to Covid-19 related disruptions to service delivery

<p>prisoners remained limited, at around three and a half hours a day on weekdays. Employed prisoners could be unlocked for around five hours a day, but few prisoners were engaged actively in any purposeful activity for any length of time. Leaders had not maximised the opportunities to increase places for activities, and during an afternoon session of the inspection we found just one prisoner engaged in any work in the vocational workshops. While in-cell worksheets had proved a success for many, they took far too long to be provided and subsequently assessed.</p> <p>Recommendation: Leaders should prioritise urgently increasing time</p>		<p>possible. As the restrictions are eased the delivery of purposeful activity will be expanded to include face-to-face education, industrial workshops, interventions, programmes, and other purposeful activities. The recommendation is agreed but the speed of recovery will be subject to staff resources and COVID restrictions.</p> <p>To increase the time unlocked and the provision of purposeful activity the following actions will be taken:</p> <ul style="list-style-type: none"> • Increase speed of the Work Risk Assessment (WRA) process. • Re-assess workshops and allocate accordingly • Specialist roles to receive individual WRA. • Review the number of in-cell education packs to streamline the time that this process takes. 		
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Actions with future target dates may be delayed due to Covid-19 related disruptions to service delivery

	unlocked and the provision of regular education, skills and work activities. (To the governor)				
7.10	<p>Key concern 1.57: The strategic management of reducing reoffending remained poor and had not improved since the last inspection. In our survey, only 44% of respondents said that their experience at the prison had made them less likely to reoffend.</p> <p>The offender management unit (OMU) continued to be under-staffed, which affected all aspects of its work. Too many prisoners did not have an up-to-date assessment of their risk and needs, which meant that sentence plans were often out of date.</p> <p>The amount of meaningful in person contact that prisoners</p>	Agreed	<p>The Offender Assessment and Sentence Management (OASys) process is used to identify and classify offending related needs, assess and assist with the management of the risk of harm (to self and others) and indicate any need for further specialist assessments, so as to protect the public and reduce re-offending.</p> <p>The outstanding backlog of OASys reviews will be collated and monitored using a new tool that has been developed and implemented, to improve the data quality and the analysis of trends. Issues that are identified during the analysis process will be reported in the monthly MPAR reports and improvement actions will be allocated and monitored via the action plan.</p> <p>A new process has been implemented to schedule and monitor Prison Offender Manager's (POM's) workloads, including OASys reviews, categorisation reviews, parole reports and prisoner contact. The process will maximise prisoner's contact with their offender manager and ensure reports, including OASys reports, are prioritised and completed on time. Improved analysis of workloads will ensure the appropriate allocation of caseloads to maximise efficiency and productivity and reduce the backlog of outstanding OASys reports.</p> <p>A new resettlement Hub will be implemented to identify resettlement needs with prisoners and to assist them with making arrangements for their release such as accommodation, employment and bank accounts.</p>	Governor	<p>June 2022</p> <p>June 2022</p> <p>June 2022</p> <p>June 2022</p>

Actions with future target dates may be delayed due to Covid-19 related disruptions to service delivery

	<p>had with their prison offender manager was insufficient, and among the worst we have seen. Both of these issues hindered a prisoner's ability to feel included in their rehabilitation and progression, as well as making it difficult for prisoners to demonstrate progress against their sentence plan.</p> <p>Recommendation: The prison should understand fully the needs of its prisoners across all resettlement pathways and support them to reduce. (To the governor)</p>				
7.11	<p>Key concern 1.58: We were not confident that recategorisation decisions were sound, proportionate, fair or consistent. Prisoners expressed concern about recategorisation decisions and were not</p>				

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<p>involved routinely in the process. Once recategorised, prisoners were not moved promptly to lower security establishments because of space shortages and the prison's poor management of transfer holds.</p> <p>Recommendation A: Prisoners should be moved promptly to the appropriate lowest security prison (To HMPPS and the governor)</p>	<p>Partly Agreed</p>	<p>Recommendation A: This recommendation is partly agreed because factors out of HMP Swaleside' control prevent the prompt movement of prisoners to lower category prisons in some cases. The Covid-19 pandemic is having a lasting impact on the adult male estate. To support reception prisons, maximise available capacity and ensure prisoners are accessing the required offending behaviour courses, some prisoners in the resettlement cohort are required to remain in training prisons in the interim. Where progressive prisoner moves can occur, however, these are consistently completed in line with the flows to a success rate of approximately 90%. The Probation Service provides commissioned rehabilitative services for sentenced prisoners wherever they are held and released.</p> <p>There are complex and wide-ranging issues involved in transferring prisoners and allocation decisions must reflect both the specific needs and circumstances of the prisoner, as well as the operating environment and range of services at the receiving prison. Within the context of these often competing operational and logistical demands, the Population Management Unit seeks to ensure that prisoners who have been accepted for transfer are moved as soon as is practical.</p> <p>Swift and efficient transfers between prisons, particularly progressive transfers to open and resettlement prisons, are necessary and desirable</p>	<p>HMPPS</p>	
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Actions with future target dates may be delayed due to Covid-19 related disruptions to service delivery

	<p>Recommendation B: Recategorisation decisions should be based on the professional judgement of risk factors. (To the governor)</p>	Agreed	<p>because they ensure that space remains within local/reception prisons. They also ensure that prisoners are held in prisons providing an appropriate level of security as well as the appropriate interventions to allow them to progress with their sentence plan.</p> <p>Recommendation B: Recent changes to the re-categorisation process include prisoner contribution forms, categorisation boards and standardisation meetings. The re-categorisation boards and standardisation meetings are now embedded and databases and spreadsheets for recording the data have been implemented by the OMU department. These will provide evidence of the consistency and fairness of re-categorisations.</p> <p>Communication with prisoners will be improved in terms of allowing prisoners to contribute in writing to their re-categorisation review. Letters explaining the decisions and reasons will be sent to prisoners from the Head of Offender Management and the OMU department will hold personal meetings with prisoners.</p>	Governor	<p>Complete</p> <p>May 2022</p>
7.12	<p>Key concern 1.59: Group programmes had stopped in March 2020 and had not yet restarted on a large scale. Only a small number of prisoners had access to one-to-one work, and most would not be able to access any accredited medium-</p>	Agreed	<p>Recruitment campaigns have been undertaken to address the staffing shortages. National training is due to recommence in April 2022 and staff will be trained as soon as is possible in order to ensure the re-implementation of program delivery. Prisoners will be prioritised according to their needs.</p> <p>The Programmes Manager position has been allocated to a member of staff with previous experience and a proven track record in the role.</p> <p>Category C prisoners will be allocated to intervention programmes whilst they are waiting to be transferred.</p>	Governor	<p>March 2023</p> <p>March 2023</p>

Actions with future target dates may be delayed due to Covid-19 related disruptions to service delivery

<p>intensity group programmes until at least April 2022 because of staffing shortages. There was a lack of analysis of whether the prison was offering the right interventions, and large groups – for example, category C prisoners – were excluded from waiting lists, which meant that we could not assure ourselves that there would be enough programme spaces. Most prisoners, therefore, had been unable to access interventions that were important for their rehabilitation and progression.</p> <p>Recommendation: Prisoners should have timely access to the right interventions to aid rehabilitation and progression throughout their</p>		<p>A needs analysis has now been completed identifying offender requirements and a programme review will be completed to explore a broader delivery model.</p> <p>Prisoners deemed unsuitable for accredited programmes due to low scores are being targeted by the Offender Management Unit to be involved in the development of wing-based group work. This will not be accredited but is being supported by Probation.</p> <p>This is a pilot project and will assist prisoners with the following needs:</p> <ul style="list-style-type: none"> • Thinking skills • Effective communication • Attitude to violence • Goal setting • Handling conflict • Consequential thinking • Their identified needs <p>A digital tool has been developed to track prisoner’s progression during the application process through to completion of the programme and their future progression. Feedback from prisoners and staff will also be recorded using the tool, to assess and monitor the effectiveness of the project.</p>		<p>Complete</p> <p>March 2023</p> <p>March 2023</p>
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Actions with future target dates may be delayed due to Covid-19 related disruptions to service delivery

	sentence. (To the governor)				
	Recommendations				
7.13	Recommendation 3.20: Managerial oversight of disciplinary procedures should make sure that all hearings are held fairly and completed within a reasonable time.	Agreed	<p>The Adjudication Standardisation meetings have been reinstated from January 2022 and will be held on a quarterly basis. These meetings will ensure that adjudication hearings are fair and appropriate.</p> <p>A Segregation administrator has been put in place to assist with the monitoring and administration of adjudications to ensure they are held within the time limits and have the required paperwork and evidence.</p> <p>In order to reduce the backlog of remanded adjudications, at least 4 remanded adjudications will be held on a daily basis and a program of extra sessions being held on Monday and Wednesday afternoons will be in place until March 2022.</p>	Governor	<p>Complete</p> <p>Complete</p> <p>Complete</p>
7.14	Recommendation 3.27: Use of force data should be monitored in well-attended meetings and any emerging patterns should be identified and acted on.	Agreed	A Custodial Manager has been allocated to oversee Use of Force (UoF), working alongside the safety team to ensure data is appropriately recorded and analysed to identify emerging patterns/trends. This information is then presented appropriately at the monthly UoF trend analysis meeting. The meetings will be action focused and actions from previous meetings will be monitored as part of the agenda. The Terms of Reference (ToR) for the meeting have been reviewed to assure the required attendees, it has been added to the establishment meeting schedule and invitations have been added to the required attendees outlook calendars, to ensure it is well attended.	Governor	Complete
7.15	Recommendation 4.5: There should be visible leadership on the wings, to support inexperienced staff and model appropriate	Agreed	The daily assurance checks of the wing diaries and observation books by Senior Officers, Custodial Manager and Head of Functions will be conducted. This will provide staff with feedback and support on processes and provide a mechanism for instilling appropriate standards.	Governor	April 2022

Actions with future target dates may be delayed due to Covid-19 related disruptions to service delivery

	standards. (Repeated recommendation 2.4)		<p>Management led operational staff daily briefings will be delivered prior to unlock, to ensure key messages are communicated and staff have the opportunity for face to face time with the Senior Leadership Team.</p> <p>The role of the HMP Swaleside Ambassador will improve the support network for members of staff from their arrival as a New Officer Apprentice (NOA) and continuing through their time at HMP Swaleside.</p> <p>The role of the Band 5 Support and Development manager will support members of staff in their personal and professional development.</p>		<p>April 2022</p> <p>Complete</p> <p>Complete</p>
7.16	<p>Recommendation 4.12: There should be enough prison-issue clothing and bedding for prisoners who require it, with an effective exchange process in place.</p>	Agreed	<p>Managerial oversight of stock levels has been implemented which will ensure there is sufficient kit available.</p> <p>The budget process will be reviewed, and wings will be able to collect kit monthly, in accordance with their allocated budget.</p> <p>A standardised process for kit exchange will be implemented, guidelines will be sent to all wings and work will be undertaken to embed the process, so that kit exchange takes place on Fridays for all wings.</p> <p>Cleaning Officers will record the kit exchanges on the laundry documentation, and this will be included in the weekly quality assurance checks conducted by the CMs.</p>	Governor	<p>March 2022</p> <p>March 2022</p> <p>March 2022</p> <p>March 2022</p>
7.17	<p>Recommendation 4.37: There should be a designated focal point to coordinate and monitor the prison's work with foreign national prisoners.</p>	Agreed	<p>The Head of Offender Management will be the focal point to coordinate and monitor the prison's work with foreign national prisoners.</p>	Governor	Complete

Actions with future target dates may be delayed due to Covid-19 related disruptions to service delivery

7.18	<p>Recommendation 4.52: The prison should work with the partnership board to reduce non-attendance rates for both internal and external appointments to optimise use of clinical time, reduce waiting times and improve outcomes for patients.</p>	Agreed	<p>The Head of Drug Strategy & Healthcare will review the non-attendance rate data from all health providers to identify and analyse the underlying causes of non-attendance.</p> <p>Bespoke actions will be agreed with health stakeholders and will be implemented and monitored on a monthly basis at the Operational Health Meeting.</p> <p>Taking into consideration the mobilisation of a new contract and provider from April 2022, it is anticipated that there will be a period of several months to embed and deliver measurable positive outcomes for patients.</p>	Governor	<p>July 2022</p> <p>July 2022</p> <p>July 2022</p>
7.19	<p>Recommendation 4.53: Health care services should have access to appropriate space on the wings to carry out assessments and interventions.</p>	Not Agreed	<p>At present there are insufficient spaces on every wing to create suitable locations for healthcare assessments and interventions without having a detrimental impact on other services.</p> <p>A medical dispensing hatch will be installed on every wing but these are for administration of medication and they will not be suitable for assessments and interventions.</p>		
7.20	<p>Recommendation 4.54: Cleaning and infection prevention and control standards should meet NHS requirements.</p>	Agreed	<p>The Head of Drug Strategy & Healthcare and the clinical Head of Healthcare will work together to ensure that cleaners understand the clinical standard of cleaning required in the areas they are responsible for.</p> <p>Checklists will be implemented, and signatures will be required for completed work, to aid monitoring and ensure accountability.</p> <p>An assurance and escalation process will be created and implemented to monitor the standards and take action when compliance issues are identified.</p>	Governor, NHS England and NHS Improvement	<p>July 2022</p> <p>July 2022</p> <p>July 2022</p>

Actions with future target dates may be delayed due to Covid-19 related disruptions to service delivery

7.21	Recommendation 4.55: Emergency resuscitation equipment should be kept in good order, with regular itemised, documented checks.	Agreed	The Business Hub will check the equipment in accordance with the manufacturer's guidance and the Provision and Use of Work Equipment Regulations 1998 and will therefore be on a weekly basis. A record of the checks will be kept to ensure the equipment is itemised and in good order. This will be included in the Business Assurance MPAR report to assure compliance.	Governor	May 2022
7.22	Recommendation 4.63: A prison-wide systematic approach to promoting prisoner well-being should be outlined within a whole-prison health promotion strategy which is monitored regularly.	Agreed	The Head of Drug Strategy & Healthcare will draft a Swaleside Healthcare Strategy in consultation with all healthcare providers. Empowering People : Inspiring Change (EP:IC) will contribute prisoners' input via consultation. The strategy will include what a prison-wide systematic approach to prisoner well-being means, how it will be delivered and monitored. This will be a live strategy that is reviewed monthly at the Operational Healthcare Meeting. The proposed timeframe takes account of the healthcare contract and provider changes which will take place in April 2022, it allows for a three month period of embedding should this be required.	Governor, NHS England and NHS Improvement	July 2022
7.23	Recommendation 4.70: Patients on the inpatient unit should have access to a range of therapeutic activities to support their well-being and recovery. (Repeated recommendation 2.75)	Agreed	The Head of Drug Strategy & Healthcare will work with all healthcare providers to agree a menu of suitable and deliverable therapeutic activities that can be made available to patients in the Inpatient unit. The uptake and engagement with activities will be monitored and measured by the clinical Inpatient manager and the Custodial Manager for Healthcare. Reviews will be conducted at the Operational Healthcare Meeting and the menu refreshed if required.	Governor, NHS England and NHS Improvement	July 2022 July 2022 July 2022

Actions with future target dates may be delayed due to Covid-19 related disruptions to service delivery

			The proposed timeframe takes account of the healthcare contract and provider changes which will take place in April 2022, it allows for a three-month period of embedding should this be required.		July 2022
7.24	Recommendation 4.74: Trained and supervised peer support workers should be reinstated, to reduce safeguarding risks.	Agreed	<p>Carers from the Blossom agency support the establishment and assist prisoners who have been identified as requiring safeguarding support.</p> <p>During January 2022 wing-based Care Buddies have been appointed and trained by the Blossoms staff. They have a clear job description to ensure they only assist with the relevant identified needs. In addition,</p> <p>Wing care buddies will be managed by the Equalities team and will receive monthly meetings, support and guidance.</p>	Governor	<p>Complete</p> <p>Complete</p> <p>Complete</p>
7.25	Recommendation 4.86: Prisoners should have timely access to counselling services. (Repeated recommendation 2.87)	Agreed	<p>The Head of Drug Strategy & Healthcare will obtain the current waiting times for counselling services and will work with Oxleas and Bradley Therapy to understand and analyse the contributory factors to the waiting times.</p> <p>Actions to reduce waiting times will be agreed at the Operational Healthcare Meeting and progress will be monitored on a monthly basis.</p>	Governor	October 2022
7.26	Recommendation 4.87: The transfer of prisoners to hospital under the Mental Health Act should take place within agreed NHS England and Improvement timescales.	Partly Agreed	<p>This recommendation is partly agreed. In the Reforming the Mental Health Act White Paper the Government have committed to introduce a statutory time limit of 28 days for transfers to mental health hospitals. This is to be commenced once revised National Health Service England and Improvements (NHSEI) guidance has been fully embedded in practice.</p> <p>Prison teams will continue to ensure that local referrals for mental health inpatient provision are made on time and access is facilitated for NHS clinician assessment.</p>	Governor, NHS England and NHS Improvement	<p>Complete</p> <p>Complete</p>

Actions with future target dates may be delayed due to Covid-19 related disruptions to service delivery

			The Head of Drug Strategy & Healthcare and the clinical Head of Healthcare will continue to work with the transfer co-ordinator to ensure that where bed spaces are available, transport and escorts are arranged immediately to ensure delays do not arise for operational reasons.		Complete
7.27	Recommendation 5.27: Leaders should make sure that prisoners receive appropriate information, advice and guidance, so that they can make informed choices about their education, skills and work activities. Advice and guidance staff should take into account prisoners' sentence plans, aspirations and abilities in devising useful plans for their activities while at the prison.	Agreed	<p>An Employability Hub will be created to provide a working space for employability/resettlement services and partner agencies.</p> <p>A review of the Induction process will be completed and will be delivered within the Employability hub. As part of the induction process multi-disciplinary sequencing of the men will take place to identify their needs and appropriate planning and allocation will take place to address individual requirements and this will be monitored through an individual prisoner portfolio.</p> <p>Information And Guidance (IAG) has recently changed and is now being provided through partnership with the Forward Trust. The IAG workers assist the activities and education departments by assessing prisoner needs and providing information, advice and guidance to prisoners so that they can make informed choices about their education, skills and work activities.</p>	Governor	<p>June 2022</p> <p>June 2022</p> <p>June 2022</p>
7.28	Recommendation 5.28: Managers should make sure that that prisoners' requests for education, skills and work activities are responded to swiftly. Teachers in education should provide useful	Agreed	<p>Prisoners' making requests for education, skills and work will be sent an acknowledgement on receipt of their request and informed of the outcome, whether they are allocated a position or placed on to a waiting list for a specific work placement. These will be logged and tracked by the Reducing Re-offending function.</p> <p>Prisoners will be issued with In Cell packs, or informed that they are on a waiting list. When submitting their work they will be notified that the pack has been received and feedback will be sent to them within 14 days.</p>	Governor	June 2022

Actions with future target dates may be delayed due to Covid-19 related disruptions to service delivery

	feedback to prisoners on their work more promptly.		These will be recorded by the Reducing Re-offending function and response times will be monitored at the Education Weekly Assurance Meeting (EWAM).		
7.29	Recommendation 5.29: Leaders should make sure that there is sufficient support available to meet the needs of prisoners with the lowest levels of English and mathematics. They should make sure that the opportunities for prisoners to receive accreditation for their learning and skills development are broader, particularly for those in workshops and work roles in the prison.	Agreed	<p>Prisoners needs in English and mathematics will be identified by Education staff as part of the Induction screening process.</p> <p>A review of the in-cell pack delivery will ensure that more accredited education is being delivered.</p> <p>The Shannon Trust are a partner agency that provides a reading programme that enables prisoners access to education and training to those prisoners with low levels of English and maths. The mentors provide everything needed for someone to learn to read, including the reading resource "Turning Pages". Sessions are one-to-one and take place outside of formal education and learners work at their own pace.</p> <p>A further expansion of the Shannon Trust mentors will be delivered. A trainer has been scheduled.</p> <p>A new education delivery proposal has been developed and sent to Milton Keynes College HQ and HMPPS for approval, which includes additional accredited course delivery.</p> <p>Individuals identified as being neuro-divergent and requiring additional support with literacy and numeracy are able to access the following:</p> <ul style="list-style-type: none"> • Long term or short term loans of a Digital e-reader pen • Information in an adapted format including large print and spacing, as well as coloured paper • Specific equipment including coloured overlays and pen grippers • Individualised Support and Learning plans identifying reasonable adjustments for the learner including breaks from learning, simplified formatting, use of specialist equipment to assist learning, additional time to complete work, support with any exams and adapted format of workbooks. 	Governor	<p>June 2022</p> <p>June 2022</p> <p>Complete</p> <p>June 2022</p> <p>Complete</p> <p>June 2022</p>

Actions with future target dates may be delayed due to Covid-19 related disruptions to service delivery

			<p>Individuals with Low literacy and numeracy are also encouraged to participate in discussion groups including Philosophy which incorporates 'stealth learning'.</p> <p>All Instructional officers have received training focusing on neurodiversity and are supported with adapting their delivery of information to specific individual needs and to accommodate all learning styles.</p>		<p>Complete</p> <p>Complete</p>
7.30	<p>Recommendation 5.30: Leaders and managers should introduce a meaningful curriculum to help prisoners develop their understanding and knowledge in relation to personal development. Managers and instructors should make sure that prisoners' progress is monitored and tracked in unaccredited activities. Teachers and instructors should help prisoners to further their understanding of the importance of wider topics, such as values of tolerance and respect, equality and inclusivity.</p>	Agreed	<p>The Accelerator Project lead will embed new groups into the establishment for the prisoners to engage with. These include Philosophy, Fine cell work, Book clubs and creative writing groups.</p> <p>The Digital Learning Platform (DLP) will be completed within the workshops to support personal development by providing a personal development plan for each prisoner, which will be monitored by the instructors. Instructors will work collaboratively with learners to support their ongoing personal development.</p>	Governor	<p>June 2022</p> <p>June 2022</p>

Actions with future target dates may be delayed due to Covid-19 related disruptions to service delivery

7.31	<p>Recommendation 6.6: There should be increased access to social visits, including at weekends.</p>	Agreed	<p>The social visits capacity will be at least doubled during the weekdays and weekend social visits will be reintroduced subject to staffing levels and Covid risk assessments.</p> <p>The current re-profile exercise that is ongoing will consider AM and PM visits. (Tuesday to Thursday AM and PM, Weekends PM only).</p> <p>The staffing levels at the weekends will be reviewed to ensure there is sufficient staffing for the visits centre and Enhanced Gate Security (EGS).</p> <p>Visits surveys will be completed to identify where improvements can be made.</p> <p>The weekend staffing of the Visits Hall tea bar will be reviewed, which will include a bid from Spurgeons Children's charity for family services and the staffing of the visits centre.</p>	Governor	<p>July 2022</p> <p>July 2022</p> <p>July 2022</p> <p>October 2022</p> <p>July 2022</p>
7.32	<p>Recommendation 6.18: The needs of indeterminate and lifer prisoners should be explored, and they should be provided with adequate support to help with sentence stability and progression.</p>	Agreed	<p>The Prison Reform Trust are attending the establishment and meeting with groups of prisoners serving over 10 years as part of the Building Futures project. During these meetings the Building Futures group will provide support to the prisoners with their sentence stability and progression. The meetings will also provide an avenue for the prisoners to give feedback that will contribute towards policy reform, as part of the work done by the Prison Reform Trust.</p> <p>There are currently 5 long term prisoners in the group, however due to the high level of interest this will be increased to 12. Those who aren't selected for the Building Futures group will be recorded and will offered the opportunity to participate in other Prison Reform Trust projects in the future.</p> <p>A policy review will be completed to consider additional education opportunities for long term prisoners. At present only those within the</p>	Governor	<p>Complete</p> <p>June 2022</p> <p>June 2022</p>

Actions with future target dates may be delayed due to Covid-19 related disruptions to service delivery

			last 6 years of their tariff are able to apply to study with the Open University.		
7.33	Recommendation 6.23: Telephone and mail monitoring arrangements should be robust, to make sure that the prison can make sound decisions about their implementation and continuation.	Agreed	<p>The mail and PIN phone monitoring processes will be reviewed.</p> <p>A team review will be conducted to merge the phone and mail monitoring departments, which will increase the resources available for both departments.</p> <p>The backlog of calls will be recorded and reported and monitored in the monthly MPAR report.</p>	Governor	<p>June 2022</p> <p>June 2022</p> <p>June 2022</p>

Recommendations	
Agreed	31
Partly Agreed	2
Not Agreed	1
Total	34¹

¹ Recommendation 7.11 is separated into recommendation A and B, hence the total number of recommendations is 34

Actions with future target dates may be delayed due to Covid-19 related disruptions to service delivery