



HM Prison &
Probation Service

Action Plan: HMP Coldingley

Action Plan Submitted: 9th May 2022

A Response to the HMIP Inspection: January 2022

Report Published: 20th April 2022

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.



ACTION PLAN: HMIP REPORT

ESTABLISHMENT: HMP COLDINGLEY

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: In our survey, 38% of prisoners said drugs were easy to get hold of at the prison and most safety issues related to debt were associated with the use of illicit substances. Drug testing and aspects of searching were inadequate. The prison lacked an effective multidisciplinary strategy to reduce the supply of drugs and manage associated problems.</p> <p>Recommendation: Leaders should develop a coordinated prison-wide strategy to detect and reduce the supply of illegal drugs and associated debt, bullying and violence. (To the governor)</p>	Agreed	<p>The Security department will review the drug strategy and provide a more co-ordinated approach to reduce the ingress of illicit substances. A monthly Drug Strategy meeting will be held to discuss Restricting Supply, Reducing Demand and Building Recovery, with a regularly reviewed action plan. The monthly meeting will have clear terms of reference, identifying appropriate attendees to support an effective multidisciplinary approach.</p> <p>The greater use of technology, such as a Body Scanner and Enhanced Gate Security practices, will support this work.</p> <p>Additional training and awareness sessions for Band 3, 4 and 5 staff regarding searching and Mandatory Drug Testing (MDT), will be regularly scheduled throughout the year to ensure capability.</p>	Governor	September 2022
7.2	<p>Key concern: The quality of some assessment, care in custody and teamwork (ACCT) casework management documents for at-risk prisoners was poor. Actions agreed at case reviews were not always identified</p>	Agreed	<p>The Safer Custody department will implement 100% assurance checks, for all ACCT documents. The checks will be completed daily, by the Custodial Managers (CMs) as well as a 100% check each week by the Duty Governors. This work will be</p>	Governor	June 2022



	<p>on care plans, which left staff ill equipped to follow them through. The quality assurance system and subsequent action plan had not addressed the problem.</p> <p>Recommendation: A robust quality assurance system should make sure that actions agreed at assessment, care in custody and teamwork (ACCT) reviews are clearly recorded on care plans and then completed by staff to help prisoners through their period of crisis. (To the governor)</p>		<p>monitored and noted within the safer Custody meeting monthly.</p> <p>The Safer Custody department will facilitate developmental sessions to prisoner facing staff to ensure capability and greater quality is delivered.</p>		June 2022
7.3	<p>Key concern: Over half the prisoners lived on the older wings in poor conditions. The outdated sanitation system meant there were no toilets or running water in cells. Prisoners faced long waits to use the communal toilets or were forced to use buckets in their cells with no facilities to wash their hands. Cells were cramped, dingy and cold, which was compounded by broken and moulding windows.</p> <p>Recommendation: All prisoners should live in in suitable accommodation with reliable heating, a toilet and hand washing facilities. (To the governor)</p>	Partly Agreed	<p>This recommendation is only partially agreed as whilst the outdated sanitation system remains and the timeline for completion is outside of the Governors control.</p> <p>Funding has been secured for a 5-year programme of works commencing April 2022, to improve the living conditions of prisoners at HMP Coldingley.</p> <p>Over this period there will be a replacement of the heating ring-main, replacement of all cell windows, replacement of the emergency cell call system and all cells on A-D wings will have in-cell sanitation installed.</p>	Governor	April 2027
7.4	<p>Key concern: Work to ensure equality at the prison had not been prioritised during the pandemic. Leaders did not monitor disproportionality, the equality action plan had been closed and</p>	Agreed	<p>The Diversity and Inclusion meeting will be held Bi-Monthly to ensure service delivery meets the needs of prisoners and disproportionality is explored and addressed. The Equalities Action Plan will be</p>	Governor	August 2022



	<p>consultation with prisoners with protected characteristics was very limited.</p> <p>Recommendation: There should be effective consultation and monitoring to make sure that the needs of prisoners with protected characteristics are identified and met, and that disproportionate outcomes are addressed. (To the governor)</p>		<p>reviewed at this meeting and maintained as a live document.</p> <p>Key equalities dates will be published, and forums/activities will be delivered throughout the year which will include staff, prisoner and wider stakeholder engagement.</p> <p>The needs of prisoners with protected characteristics will be identified on Reception and relevant support identified. This will be recorded on NOMIS and managed by the Safer Custody Department</p> <p>The Safer Custody team will ensure a live action plan tracks our progress and outcomes on a monthly basis.</p>		
7.5	<p>Key concern: Psychological therapy provision did not meet patient need, with staff shortages resulting in approximately 40 waiting for their treatment to start, some for many months.</p> <p>Recommendation: Patients diagnosed with a need for psychological therapy should be treated promptly. (To the governor)</p>	Agreed	<p>Additional resources from within the wider Central and North West London (CNWL) psychology team will be mobilised to support and reduce the number on the waiting list.</p> <p>All vacant psychology posts will be recruited into</p> <p>Healthcare will review all current psychology waiting lists and will ensure that all patients are receiving ongoing support and care. All patients identified will be reassessed by the Consultant Psychologist to review if needs have changed during the waiting period.</p> <p>All waiting lists will be reviewed monthly and presented at the local quality board and NHSE Contract Review meetings to ensure that, post COVID-19, waiting times are being addressed.</p>	Governor	August 2022



7.6	<p>Key concern: Leaders and managers had not considered the quality of teaching and assessment, the appropriateness of the content of learning programmes or how effectively education and training courses were designed. No effective action had been taken to make sure that the quality of education, skills and work improved, and too many prisoners were not successful in their learning.</p> <p>Recommendation: Leaders should identify accurate areas for improvement in teaching and assessment practices, and in curriculum design and content. They should also identify and implement actions to make sure that teachers and instructors improve their skills in teaching, and enable prisoners to build on, and make progress in, developing their skills and knowledge. (To the governor)</p>	Agreed	<p>An action plan has been developed and the prison and education provider will work collaboratively to drive improvement in teaching, quality of provision and qualifications achieved. This will be monitored via the monthly Education Performance Meeting. The Education Provider will establish a structured programme of Continuous Professional Development (CPD) for teaching staff. Members of their Quality Team will undertake weekly visits to monitor staff progress in line with time specific targets.</p> <p>The Learning, Skills and Employment Needs Analysis, completed in late 2021, is forming the basis of decisions regarding educational and work offers and will be developed further.</p> <p>Focused support will be provided for teaching staff to target the quality and ongoing use of Individual Learning Plans.</p>	Governor	September 2022
7.7	<p>Key concern: A high proportion of prisoners chose not to attend their allocated education, skills or work activity, and too many remained unemployed and not engaged in any purposeful activity.</p> <p>Recommendation: Leaders and managers should ascertain the reasons why prisoners do not wish to engage in education and work and take effective action to improve attendance and the proportion of prisoners allocated to appropriate activities. Prison staff should consistently promote the</p>	Agreed	<p>Quality Improvement Group (QIG) meetings will be utilised to address barriers to engagement. The team will ensure a SMART delivery and self-assessment plan is available to all key stakeholders to monitor actions and outcomes on a Bi-Monthly basis.</p> <p>The Reducing Reoffending function will improve communication between all agencies, notably Residential Staff, Education and Skills Staff and the Offender Management Unit (OMU). A process will be implemented to drive attendance, monitor reasons for non-attendance and to appropriately challenge prisoners who chose not to attend activities.</p>	Governor	June 2022



	<p>benefits of education to prisoners in their rehabilitation and future employability. (To the governor)</p>		<p>Personal Learning Plans (PLP) will be on the Shared Drive and available to all staff. This information will be utilised by all Key Workers and Prison Offender Managers (POMs) to encourage and engage the prisoners on their caseload.</p> <p>Key workers will be involved in the conversations around engagement, and guidance on how to manage these conversations in Key Worker Sessions will be provided.</p> <p>Support and deployment of both Peer and Shannon Trust Mentors will target attendance and engagement.</p>		
7.8	<p>Key concern: The prison induction did not provide prisoners with useful information about their options for activities at the prison and to make informed and appropriate choices. Prisoners did not receive impartial careers advice and guidance to establish their aspirations or help make suitable choices about future employment.</p> <p>Recommendation: Information about prisoners' aspirations and long-term employment goals should be used to inform allocations to education, skills and work activities, and they should receive impartial advice and guidance that promotes career development. (To the governor)</p>	Agreed	<p>The induction process will be reviewed to ensure it places a focus on engagement with the prison regime and access to activities.</p> <p>Individual Learning Plans will be completed within the first two weeks of arrival and will be reviewed by the teacher/Instructor leading on the learning activity attended. To ensure they are of a high quality CXX (service provider) will quality assure 10% of plans monthly.</p> <p>A newly appointed full-time advisor from CXX is in place to support prisoners' long term employment goals.</p> <p>A dedicated Advice, Information and Guidance (AIG) worker will partner with our education provider to support this process, complimenting the induction process for all new arrivals.</p>	Governor	June 2022



7.9	<p>Key concern: There was no effective oversight of education, skills and work and the quality of prison-led activities was not monitored. Most prisoners in prison-led workshops were not challenged by their work roles and instructors did not help them to learn new skills. The progress that prisoners made in these areas was not recognised or recorded effectively, and too few prison-led activities resulted in accreditation.</p> <p>Recommendation: The quality of prison-led activities should be monitored. Prisoners should be sufficiently challenged in all workshops, instructors should recognise and record the progress they make, and the number of accredited programmes in prison-led activities and prisoners who achieve these should be increased. (To the governor).</p>	Agreed	<p>The Learning and Skills Manager (LSM) will work closely with the Head of Industries, both for oversight and to explore and develop accreditation opportunities. The LSM will ensure that all work areas deliver nationally recognised qualifications that are transferrable on release.</p> <p>A review will be completed to identify options for increasing both accredited programmes and prisoner achievement.</p> <p>The Skills Progress in Workshops document will be implemented. This is an individualised learning plan, to monitor progress, targets and achievements of each individual working within the Industries area. The LSM will ensure a 10% QA process is implemented each calendar month</p> <p>All Industries staff will attend training in Progress Tracker, to ensure that each plan is fit for purpose and appropriate to the individual learner/worker.</p>	Governor	December 2022
7.10	<p>Key concern: The prison lacked an adequate needs analysis to clearly identify the resettlement needs of the population. The reducing reoffending strategy and associated meeting did not identify and drive actions to make sure that support was available across all pathways. There was no evidence that data were used to monitor and improve outcomes.</p> <p>Recommendation: Leaders should identify and understand the resettlement needs of the population and make sure that interventions and</p>	Agreed	<p>A new Employment Hub will be established, and an employment-specific needs analysis will be undertaken. This will be in partnership with our Information Advice and Guidance service provider.</p> <p>A '20 weeks to Departure' package will be developed and delivered to all prisoners reaching their final 20 weeks in custody, prior to release. The resettlement package information will include the following elements: Basic Parenting, Money management, Health & Safety in the home and workplace, Housing applications, Mobile Phone contract management.</p>	Governor	July 2022



	services are provided to meet those needs. (To the governor)				
7.11	<p>Key concern: There was insufficient focus on, and opportunities for, sentence progression by prisoners. Coldingley had stopped delivering accredited offending behaviour programmes and prisoners were not transferred to complete these elsewhere. There was little one-to-one offending behaviour work with prisoners, and sentence plans often failed to identify specific offending behaviour targets. Some prisoners had not reduced their risk of harm or reoffending sufficiently before release.</p> <p>Recommendation: Prisoners' offending behaviour needs should be identified and met to reduce their risk of reoffending on release. (To the governor)</p>	Partly Agreed	<p>HMP Coldingley does not run Offending Behaviour Programmes (OBPs), so are only able to partly agree the recommendation on the basis that offending behaviour needs should be identified, and those requiring OBP will be prioritised for transfer to an appropriate establishment.</p> <p>Prison Offender Managers (POMs) will be briefed about sentence plan objectives reflecting identified risk and need, and the requirement for all sentence plans to include at least one offending behaviour target in order to reduce risk of reoffending.</p> <p>All prisoners who meet the criteria for accredited programmes will be screened by POMs using the HMPPS Intervention Services Suitability Criteria Guide. A local system will be maintained to identify the outcomes of all screenings.</p> <p>HMP Coldingley will continue to adhere to the national OBP COVID prioritisation which is a national directive. Until these restrictions are eased it will severely limit the number of prisoners who can access programmes.</p> <p>POMs will be developed to deliver one-to-one work which will be explored for all prisoners who meet risk/need for accredited programmes and offered the opportunity to complete it.</p>	Governor	<p>December 2022</p> <p>March 2023</p>
	Recommendations				



7.12	Recommendation: Use of force scrutiny meetings should fully analyse the data presented to monitor trends, identify good practice and learn lessons. (To the governor)	Agreed	At the monthly Use of Force (UoF) meeting detailed analysis will be carried out on all UoF incidents to identify trends and good practice, with actions implemented in order to further reduce the application of UoF.	Governor	July 2022
7.13	Recommendation: Effective staff supervision in all residential areas should enable staff to detect and challenge low-level poor behaviour. (To the governor)	Agreed	Wing managers and Duty Governors will ensure that staff supervision levels are correct in all areas and effective in their duties. This will be evidence in the daily wing diaries and operational briefings. The Incentives & Earned Privileges (IEP) Scheme will be reintroduced in addition to wing-based compacts. This will enable staff to challenge low-level poor behaviour.	Governor	June 2022
7.14	Recommendation: Prisoners should be supported by a named keyworker to support their well-being and sentence progression. (To the governor)	Agreed	All prisoners will be allocated a named Key Worker to support their welfare and sentence progression at HMP Coldingley. The quality assurance process will be managed by the Head of Offender Management Unit. 10% of all Key Work entries will be Quality Assured by the Probation team.	Governor	June 2022
7.15	Recommendation: Responses to prisoner complaints should be prompt and fully address the issues raised. (To the governor)	Agreed	The Business Hub and Head of Business Assurance will track complaints daily. 5% of complaints will be quality assured weekly by the SMT to ensure complaints are fully addressed and timescales are met.	Governor	May 2022
7.16	Recommendation: The prison should track prisoners' application forms so that leaders are clear about the nature of the problem, promptness and quality	Agreed	A comprehensive review of the current prisoner application process will be completed in order to improve the provision.	Governor	May 2022



	of responses. (To the governor)		A robust quality assurance process will be introduced to ensure prompt replies and high-quality responses in all instances. This process will be managed and driven by the Business Hub team, with outcomes and actions delivered at the monthly performance meeting.		
7.17	Recommendation: Patients should be able to make a confidential complaint or application for a health care appointment. (To the governor)	Agreed	Healthcare have implemented a complaints and application process, giving prisoners secure access to submit confidential correspondence. The new process will enable prisoners to escalate comments or concerns to CNWL. This process will be separate to the internal mail process to always ensure confidentiality.	Governor	Complete
7.18	Recommendation: All patient care should be recorded on SystemOne to maintain the integrity of a single clinical record. (To the governor)	Partly Agreed	This recommendation is Partly Agreed as there is a national requirement to use the National Drug Treatment Monitoring System (NDTMS), for the Research Team to be able to effectively process and analyse information and data to improve services, and SystemOne is unable to do this. To ensure information is correctly recorded, Forward Trust will escalate this matter and work proactively with the national rollout of linking SystemOne with NDTMS. Regular management checks (a minimum 10% of all current caseload) will be undertaken by Forward Trust Service Management to ensure that information is recorded correctly on a monthly basis	Governor	March 2023 May 2022



7.19	Recommendation: Patient access to external appointments, assessment and treatment should not be delayed by the lack of escorts. (To the governor)	Agreed	The People Hub will detail escorts appropriately and will be monitored through the monthly work force planning meeting. Resources will be ring-fenced to enable uninterrupted access to external appointments.	Governor	Complete
7.20	Recommendation: Prisoners should have an up-to-date assessment of risk and need. (To the governor)	Agreed	The Offender Management Unit will develop and introduce a plan to address the number of prisoners who have not had an OASys review in line with the Offender Management in Custody policy (OMiC). Priority will be given to those whose sentence progression may become hindered due to a lack of up to date OASys. All Prison Offender Managers will be set a monthly target to complete initial OASys assessments. Surrey Probation Delivery Unit will continue to fund overtime for sessional and agency staff to support the reduction of the OASys backlog. The Offender Management Unit will scrutinise data to establish prisons transferring prisoners with an overdue OASys and raise with relevant Head of Offender Management	Governor	September 2022
7.21	Recommendation: the lifer forum, information day and family visits should be resourced properly and take place regularly. (To the governor)	Agreed	The Lifer forum will be reintroduced and will be scheduled at regular intervals. Family day visits for Life Sentenced prisoners will recommence.	Governor	May 2022



7.22	<p>Recommendation: Prisoners should be moved promptly to category D prisons once they have been assessed as suitable for open conditions. (To the governor)</p>	Agreed	<p>Progressive transfers of prisoners are subject to space in the appropriate part of the prison estate becoming available. The speed of transfers reflects this constraint, and HMPPS recognises concerns in this area.</p> <p>The availability of Category D spaces has been impacted by the requirement to close a number accommodation blocks in the open estate over the course of 2021 which no longer met statutory fire safety standards. The impact on the overall open estate has been managed through replacing some of these places, particularly in the south, with existing temporary accommodation which was on some sites already as part of our COVID contingencies and in other sites, with new temporary accommodation. We are also investing £3.8 billion over the next three years to deliver 20,000 additional, modern prison places including 2,000 temporary prison places across England and Wales by the mid-2020s. This project will deliver 660 additional places through expansion of the Category D estate at a number of sites across the country.</p> <p>HMP Coldingley will continue to request drafts to the open estate and ensure spaces are filled to capacity when allocated.</p>	Governor	May 2022
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Recommendations	
Agreed	19
Partly Agreed	3
Not Agreed	0
Total	22

