



HM Prison &  
Probation Service

Action Plan: HMP Bullingdon

Action Plan Submitted: 10<sup>th</sup> March 2023

A Response to the HMIP Inspection: 24<sup>th</sup> October – 03<sup>rd</sup> November 2022

Report Published: 20<sup>th</sup> February 2023

## 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, 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 priority and key concerns. Action plans provide specific steps and actions to address the priority and key concerns, that are clear, outcome focussed, measurable, achievable, and relevant with the owner and timescale of each step clearly identified. Action plans are sent to HMIP and published on the GOV.UK website. Progress against the implementation and delivery of the action plans will also be monitored and reported on.



ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMP BULLINGTON

1. Rec No	2. Concerns	3. Response Action Taken/Planned	4. Responsible Owner	5. Target Date
	<b>Priority concerns</b>			
1	<b>Staff shortages were debilitating and had a major impact on outcomes for prisoners.</b>	<p>HMP Bullington will revise their People Plan &amp; People Strategy to focus on recruitment, retention and capability with the aim to lower the current attrition rate within the next 12 months, therefore retaining a greater number of staff. This will include further embedding innovations such as contacting new recruits currently undergoing vetting and arranging pre-visits to the establishment for successful applicants locally run job fairs and prison open days. Outcomes from actions taken will be monitored at the monthly Workforce Planning Meeting, chaired by the Head of Business Assurance. HMP Bullington has seen attrition improve since the inspection however the staffing levels remain similar to that at the time of the inspection</p> <p>A re-profiling exercise will be undertaken to ensure HMP Bullington are delivering the best possible regime with the staffing resource available; giving greater consistency to staffing groups and prisoners, including increased and more consistent time out of cell, and ensuring it is purposeful and effective. This includes a flexible working offer for staff and fixed rest days which will better aide staff retention and support consistency of staffing profiles and regime delivery including the delivery of Mandatory Drug Testing and removing phone call restrictions for prisoners identified for monitoring. This will also include a monthly training day which will ensure staff are equipped with the necessary skills and knowledge to drive improved outcomes for all. Outcomes from actions taken will be monitored at the Weekly Regime Planning Meeting, chaired by the Head of Business Assurance.</p> <p>As staffing and regime delivery at HMP Bullington improves, the delivery of Keywork throughout the establishment will increase. The increased staff-prisoner interaction that Keywork and a greater regime offer brings gives more opportunities to model consistent good behaviour. This, and ensuring staff are supervising and actively engaging with prisoners on the landings will be driven</p>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>June 2023</p> <p>May 2023</p> <p>September 2023</p>



		<p>by Unit Custodial Managers (CMs). Outcomes will be monitored with prisoners via the monthly Prisoner Council which is chaired by the Head of Residential Services.</p> <p>Milton Keynes College (MKC) will continue to take a proactive approach to vacancy recruitment. This will include joint interviewing of potential candidates across prisons in order to maximise the chances of filling vacancies. Several posts have been recruited to post-inspection and MKC are now actively recruiting to vacant positions for the next contract year.</p> <p>Since the inspection HMP Bullingdon have continued to be supported through several national schemes, which has included Public Interest Transfer (PIT) funding for an additional 10 Officers, National Detached Duty &amp; continued use of the Bonus scheme.</p>	<p>Milton Keynes College</p> <p>The Governor</p>	<p>April 2023</p> <p>Complete</p>
2	<b>Prisoners spent too much time locked in their cells with little to do.</b>	<p>HMP Bullingdon will conduct a full review of the core day with a view to increasing the time out of cell for all prisoners, which include prisoners in work, unemployed, retired and those with disabilities. This will be aligned to the re-profiling exercise to ensure HMP Bullingdon are delivering the best possible regime with the staffing resource available; giving greater consistency to staffing groups and prisoners and ensuring it is purposeful and effective. Outcomes from actions taken will be monitored at the Weekly Regime Planning Meeting, chaired by the Head of Business Assurance.</p> <p>In line with the Future Regime Design work, more purposeful on wing activity will be introduced which will include Education Reading Groups, supported by the Shannon Trust and Teacher Reps on each wing to help promote and encourage activity and education attendance.</p>	<p>The Governor</p> <p>The Governor</p>	<p>September 2023</p> <p>September 2023</p>
3	<b>Leaders and managers had not designed an appropriate education curriculum that met the needs of the prison population, especially vulnerable and non-sentenced prisoners.</b>	<p>HMP Bullingdon have recruited a permanent Head of Education, Skills and Work in January 2023 who will provide a strategic focus on learning, skills and qualifications in all areas of Education, Skills and Work, ensuring that sequencing of activities is purposeful and directed towards maximising prisoners' opportunities to access employment, education and training on release.</p>	<p>The Governor</p>	<p>Complete</p>



		<p>Full needs analysis will be completed by both Milton Keynes College (MKC) and the Head of Education Skills and Work to ensure a curriculum is in place that meets the needs of the prison population; this will include Shannon Trust Maths and English, Personal Social Development and Employability courses for vulnerable and remand prisoners across the establishment. This will include the effective use of management information to shape priorities and strategies including managing the progress for prisoners who need to improve their English and mathematics skills, those with additional learning needs and those who are non-readers. MKC are now actively recruiting to vacant positions for the next contract year. Progress on delivery of these priorities will be managed via the Annual Delivery Plan (ADP) which will be monitored through the monthly Education Performance Meeting (EPM), co-chaired by the Head of Education, Skills and Work and the Head of Reducing Reoffending.</p>	The Governor	September 2023
4	<p><b>Leaders and managers did not identify the education, vocational training and commercial work starting points of individual prisoners.</b> Prisoners did not engage in meaningful education and workplace activities, which had a detrimental impact on their attitudes to learning and attendance at their lessons and therefore their ability to progress.</p>	<p>The Induction process has been reviewed to ensure Careers Information Advice and Guidance (CIAG) provision is deployed earlier on in a prisoner's sentence, to ensure education, vocational training and commercial work starting points of individual prisoners provided upon arrival. This has included an increase in the allocation of appointments to meet the needs of prisoners at HMP Bullingdon. HMP Bullingdon will obtain an input into providing continuity in the advice and coaching provided, which includes the awareness of and allocation to, new career pathways. This information will be shared with instructors in workshops and industries to enable them to assess the starting points of the prisoners effectively and more effectively evidence the progress prisoners make in their work activities. Where appropriate this will involve activities being delivered modularly to help incentivise and support learners to progress.</p> <p>HMP Bullingdon will review the allocation process to ensure effective and appropriate arrangements are in place, based on prisoner need. The Reducing Reoffending department will introduce a process to communicate allocation outcomes to prisoners to improve attendance at activities. Outcomes on progress and allocation will be monitored through the monthly Education Performance Meeting (EPM), co-chaired by the Head of Education, Skills and Work and the Head of Reducing Reoffending.</p>	The Governor	May 2023
			The Governor	April 2023



5	<b>Leaders and managers had not ensured that all prison and education staff knew how they could support prisoners to become more interested in reading and develop their reading skills.</b>	HMP Bullingdon will use the strategy for the development of reading that is currently in place to create a precise plan of implementation, which will include ensuring it has been embedded in workshops.	The Governor	May 2023
		A suitable learning environment will be made available which will enable Shannon Trust mentors to meet non-readers appropriately and will better support the progress of prisoners in their reading. Outcomes on progress against the plan will be monitored through the monthly Education Performance Meeting (EPM), co-chaired by the Head of Education, Skills and Work and the Head of Reducing Reoffending.	The Governor	June 2023
	<b>Key concerns</b>			
6	<b>Leaders and staff had low expectations about what prisoners could be trusted to do or achieve and didn't do enough to motivate prisoner engagement in purposeful activity.</b>	HMP Bullingdon will be offering a monthly training day which will ensure staff are equipped with the necessary skills and knowledge to drive improved outcomes for all. This will include the delivery of Standing Firm Training and Stoicism with both packages aimed at supporting staff with changing attitudes and culture. Training delivery and outcomes will be monitored at the monthly Training Committee Meeting, chaired by the Head of Business Assurance.	The Governor	May 2023
		As staffing and regime delivery at HMP Bullingdon improves, the delivery of Keywork throughout the establishment will increase. The increased staff-prisoner interaction that Keywork and a greater regime offer brings gives more opportunities to model consistent good behaviour. This, and ensuring staff are supervising and actively engaging with prisoners on the landings will be driven by Unit CMs. Outcomes will be monitored with prisoners via the Prisoner Council which is chaired by the Head of Residential Services.	The Governor	September 2023
7	<b>The use of force was not always proportionate, and some staff did not do enough to de-escalate incidents before using force.</b>	Due to staffing constraints, at the time of the inspection, 30% of operational staff had not completed refresher training in control and restraint (C&R) techniques. This has now been improved and more instructors have been trained and more courses are being offered to proactively manage this. There is a rolling programme in place to ensure national agreed targets are met and maintained	The Governor	Complete
		HMP Bullingdon will be offering a monthly training day which will include the delivery of Standing Firm Training. This will better equip staff with the tools and skills they need to de-escalate situations. Training delivery and outcomes	The Governor	May 2023



		<p>will be monitored at the monthly Training Committee Meeting, chaired by the Head of Business Assurance.</p> <p>The Orderly Officer Group at HMP Bullingdon now reviews every single Use of Force Incident. Learning from reviews is taken to the monthly Learning and Development meeting where actions, such as speaking personally to individuals or investigating an incident, are taken by the panel. Reviews include ensuring a consistent approach to the quality of documentation and driving the use of Body Worn Video Cameras, ensuring they are turned on at the earliest opportunity. These reviews take place at the monthly Use of Force Meeting which is chaired by the Head of Safety.</p> <p>HMP Bullingdon have implemented a robust training plan in place to ensure all staff have been properly trained in the use of PAVA incapacitant spray and Spontaneous Protection Enabling Accelerated Response (SPEAR). 50% of the training has been completed by the end of February 2023. Training delivery and outcomes will be monitored at the monthly Training Committee Meeting, chaired by the Head of Business Assurance.</p>	<p>The Governor</p> <p>The Governor</p>	<p>Complete</p> <p>April 2023</p>
8	<p><b>ACCT case management for prisoners at risk of harm did not always evidence targets and interventions that were tailored to their individual circumstances.</b></p>	<p>HMP Bullingdon have introduced in November 2022, a robust quality assurance process to improve the quality of Assessment Care in Custody and Teamwork (ACCT) documents. This includes a new process map for the completion of ACCT documentation and a weekly report on outcomes by the Safety CM with actions from this being taken forward by the Heads of Residential Services. Outcomes for all prisoners who are being supported by ACCT case management are discussed at the weekly Multi-disciplinary Safety Interventions Meeting (SIM) which is chaired by the Head of Safety. The morning briefing provides a daily update of where open ACCTs are located and which prisoner is required to have a review that day</p>	<p>The Governor</p>	<p>Complete</p>
9	<p><b>Living conditions on the main A-D accommodation were poor.</b></p>	<p>HMP Bullingdon have revised the decency checking process and this now includes the repainting and refreshing of closed wings where project work is taking place. As part of this the prison has introduced Prisoner Decency parties who undertake painting and decorating activities and minor repairs. Progress against decency checking outcomes and actions is managed and monitored by Wing CMs with a monthly assurance check undertaken by the Heads of Residential Services.</p>	<p>The Governor</p>	<p>Complete</p>



		<p>Heads of Residential Services at HMP Bullingdon will ensure there is better management representation at localised wing and prisoner forums to ensure prisoners lived experience of the accommodation conditions across the site are recognised and acted on in an appropriate and timely way.</p> <p>HMP Bullingdon will continue to use the mechanisms available to them, such as the Major Maintenance processes, to bid for funding to improve living conditions in the prison which will include bids to improve the inpatient facility. All showers will be refurbished as part of the ongoing Fire Safety Improvement (FSI) project. B wing showers target date for completion is September 2023, All other units will be completed as they progress this work through the establishment</p>	The Governor	May 2023
			The Governor	September 2023
10	<b>Prisoners had too little contact with their prison offender managers (POMs) and there were too few opportunities for prisoners to progress during their sentence.</b>	<p>HMP Bullingdon will revise their People Plan &amp; People Strategy to focus on recruitment, retention and capability with the aim to lower the current attrition rate within the next 12 months, therefore retaining a greater number of staff. As the number of operational staff improve, This will help mitigate the cross-deployment of operational prison offender managers (POMs). There are currently no prison POM vacancies at HMP Bullingdon.</p> <p>The Heads of Offender Management Delivery (HoOMD) will ensure that all prisoners are allocated to a POM and will produce a clearly defined plan for how to meet the demand of completing OASys assessments following the withdrawal of the additional national resource. Assurance will be obtained by monthly dip testing</p> <p>The HoOMD will introduce a Quality Assurance (QA) process for prisoner sentence plans which will help ensure better achievement of targets in education, training and employment. Progress against progression will be added as an agenda item to the monthly Reducing Reoffending meeting which is chaired by the Head of Reducing Reoffending.</p> <p>The HoOMD has taken steps to ensure that, in cases that were nearing release, prisoners will be managed as required by the Pre-Release and Resettlement Policy with evidence of communication between the Prison Offender Manager (POM) and Community Offender Manager (COM) about managing risk on release is recorded on NOMIS.</p>	The Governor	September 2023
			The Governor	May 2023
			The Governor	April 2023
			The Governor	Complete





		Probation vacancies will be filled when staff qualify into roles and there is sufficient capacity. Vacancies are monitored monthly at the SouthCentral Probation and prisons senior leaders forum (SLF)	South Central Probation Service.	Ongoing, reviewed monthly
11	<b>Public protection arrangements were not robust enough to assure leaders that risk was managed properly.</b>	<p>All high-risk prisoners being released will be discussed at the Inter-departmental Risk Management Meeting (IRMT) at nine, six and three months prior to release to ensure suitable restrictions are in place. The Head of Offender Management, in conjunction with other leaders at HMP Bullingdon, will ensure that other relevant departments are appropriately represented at the meeting and written updates are provided. There is clear evidence that these updated are acted upon.</p> <p>All Offender Managers have been given access to a Multi-Agency Public Protection Arrangements (MAPPA) website which has a forum for questions and allows the sharing of best practice. This will increase knowledge of risk, monitoring options, increase confidence and legal framework guidance.</p> <p>The HoOMD will ensure that the process for consideration of phone and mail monitoring is improved so that decisions can be made more quickly. This will include ensuring that prisoners arriving straight from the court and those subject to a restraining order are considered fully. Weekly checks completed and evidenced for compliance with Head of Offender Management Unit Services and Public Protection Unit.</p>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>March 2023</p> <p>Complete</p> <p>Complete</p>
12	<b>Outcomes for remand prisoners were worse than convicted prisoners in key areas, including education, careers guidance and support for resettlement.</b>	<p>HMP Bullingdon will ensure that there is an improved employment support offer for remand and sentenced prisoners, and they are offered careers information, advice and guidance although this requires further work to embed fully. Progression will be discussed at the monthly contract review meeting, chaired by the Head of Reducing Reoffending.</p> <p>Ingeus accommodation service have now recruited to two full time posts who will work with short sentenced and remand prisoners to support gaining accommodation on release. A Strategic Housing Specialist will support improving housing outcomes for prison leavers and prisoners. Their role will</p>	<p>The Governor</p> <p>The Governor</p>	<p>April 2023</p> <p>Complete</p>



	<p>strengthen and support partnership working between the prison, all relevant housing stakeholders and other key resettlement agencies.</p> <p>As part of the changes made for the unification of Probation in June 2021, contracts were let in each Probation Region (including the South-Central Region within which HMP Bullingdon is located) to providers of Accommodation services for sentenced prisoners. These Commissioned Rehabilitative Service (CRS) providers are mandated to have a presence in the resettlement prisons (including Bullingdon) in their region. Although these Accommodation services were initially only available for sentenced people in Bullingdon, an extension to the South-Central Probation Region CRS Accommodation contract commenced in October 2022 to provide a service to those on remand at HMP Bullingdon.</p> <p>Under the new resettlement approach all resettlement prisons including Bullingdon, have an embedded pre-release provision delivered by the Probation Service. Embedded pre-release teams identify and address immediate resettlement needs and provide pre-release support for all people in prison (including the unsentenced). The minimum is to screen for resettlement needs via a Basic Custody Screening Tool completion, signpost to specialist services within the prison, such as Prison Banking Administrators and Healthcare, and provide pre-release services not currently available via Commissioned Rehabilitative Services (CRS) suppliers.</p>	<p>CRS Providers</p> <p>Head Of Operations, South Central Probation Service.</p>	<p>Complete</p> <p>Complete</p>
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