



HM Prison &  
Probation Service

Action Plan: HMP Exeter

Action Plan Submitted: 28 February 2023

A Response to the HMIP Inspection: 31 October – 11 November 2022

Report Published: 16 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: HMIP REPORT

ESTABLISHMENT: HMP EXETER

1. Rec No	2. Concerns	3. Response Action Taken/Planned	4. Responsible Owner	5. Target Date
	<b>Priority concerns</b>			
1	<b>National leaders had failed to provide stability of leadership at the prison.</b> Exeter had had three governors, eight deputy governors and eight heads of safety since our previous inspection. This instability of leadership impeded progress at a high-risk site.	<p>To provide stability of leadership at HMP Exeter a business case has been approved to uplift specific Senior Management Team (SMT) grades to attract experienced candidates, and fill the remaining vacancies within the SMT. This has already seen an uplift to the Governor, Deputy Governor and Head of Safety grades who are all in post.</p> <p>Additionally, uplifts have also been approved for the positions of Head of Residential Services (recruitment campaign currently live), and Head of Reducing Reoffending (now in post). As HMP Exeter remains classed as a standard plus prison, the grades of SMT positions will be subject to ongoing reviews when a position becomes vacant, to consider if the uplift is still required.</p>	HMPPS - Head of HR Public Sector Prisons South/Prison Performance Support Programme/Devon and North Dorset Prison Group Director	<p>Complete</p> <p>May 2023</p>
2	<b>The number of self-inflicted deaths and incidents of self-harm was very high.</b> Care for prisoners who were vulnerable on arrival or those who were in crisis while in custody was poor.	<p>The Head of Safety will aim to reduce levels of self-harm, improve the care and support for the most vulnerable and those in crisis upon arrival at the prison, and throughout their time at HMP Exeter through the following:</p> <ul style="list-style-type: none"> <li>An additional interim Head of Safety will be recruited for twelve months. The additional position will oversee, and co-ordinate the coroners' inquests scheduled for 2023 and support the Head of Safety in aiming to reduce levels of self-harm and violence and improving the care and support for the most vulnerable.</li> </ul>	Governor/Health Provider	Complete



	<ul style="list-style-type: none"> <li>• Reviewing the current Induction and First Night Centre (FNC) process, including: <ul style="list-style-type: none"> <li>○ Ensuring all prisoners are located in the safest location appropriate to their needs, offence, and risk.</li> <li>○ All prisoners receive a full induction, so they understand and know how to access services, and receive an appropriate regime to access them.</li> <li>○ Phones numbers are added to prisoner accounts at the earliest opportunity. (See concern 11, maintaining family ties)</li> <li>○ All cells on the FNC are adequately equipped.</li> <li>○ All staff on the FNC and Induction group receive refresher training in the identification of risks and triggers.</li> <li>○ In order to embed, drive and Quality Assure (QA) the consistency of the Early Days in Custody provision, a temporary dedicated Band 5 Safety Officer will be recruited for twelve months to support the Head of Safety in working with Reception and Residential staff, Prisoners, and all relevant stakeholders.</li> </ul> </li> </ul>		April 2023
	<ul style="list-style-type: none"> <li>• The Health Provider will ensure all new receptions are fully screened, receive any medication without delay, and are appropriately observed if detoxing.</li> </ul>		April 2023
	<ul style="list-style-type: none"> <li>• All prisoners subject to Assessment, Care in Custody and Teamwork (ACCT) processes will be discussed at the weekly Safety Intervention Meeting (SIM), Chaired by the Head of Safety, with multi-disciplinary actions being formulated to ensure that appropriate support is in place for all prisoners in crisis.</li> </ul>		April 2023
	<ul style="list-style-type: none"> <li>• The Safety team will collate and review all data relating to self-harm and deaths in custody to identify trends and drivers of self-harm. This information will be discussed at the multi-disciplinary monthly Safety Custody Meeting where appropriate actions to reduce self-harm will be added to the consolidated safety action plan.</li> </ul>		April 2023



		<ul style="list-style-type: none"> <li>• A Safety Summit will now take place in March 2023, utilising the data and feedback from the prisoner forums. The outcomes of the Summit will inform the Safety Strategy for 2023/24 and generate actions to reduce self-harm and violence that will be incorporated into the consolidated safety action plan.</li> <li>• Two Band 4 ACCT safety 'Floorwalkers' funded for twelve months by the Prison Performance Support Programme (PPSP) took up post in February 2023. The Floorwalkers have commenced regular and thorough Quality Assurance (QA) of all ACCTs providing advice and guidance to all staff to improve the quality of ACCTs, and the level of care given to prisoners in crisis.</li> <li>• Monitoring the timescales, effectiveness, and impact of all the actions at the monthly Safer Custody Meeting, monitoring improvements through the consolidated safety action plan.</li> <li>• HMP Exeter will continue to upskill all staff in ACCT processes using training modules from the Safety Skills Package.</li> </ul>		<p>April 2023</p> <p>May 2023</p> <p>June 2023</p> <p>January 2024</p>
3	<p><b>The lack of clinical leadership and chronic staff shortages across the service had a detrimental impact on patient safety and the provision of care, particularly in the area of mental health.</b> This resulted in practice that did not meet national standards and unmet need for many patients.</p>	<p>To address the lack of clinical leadership and shortfalls of health care staff to ensure patient safety and provision of appropriate care at HMP Exeter, the Health Provider (Oxleas) will:</p> <ul style="list-style-type: none"> <li>• Monitor and ensure compliance against the contract including mental health provision, and resources and waiting times, are reported on, analysed, and discussed monthly between NHS England and the healthcare provider. Performance is also reviewed in the Local Delivery Quality Board (LDQB), where partners can escalate any challenges relating to delivery. Updates and escalation will go to the quarterly Prison Health Partnership Board attended by the Prison Group Director (PGD) and Head of Health and Justice Commissioning Southwest. Monitoring of delivery and improvements are ongoing; however, they will be reviewed in July 2023.</li> <li>• Head of Healthcare (HoH) is due to take up post in March 2023.</li> </ul>	Health Provider/ Governor	<p>Complete</p> <p>March 2023</p>



		<ul style="list-style-type: none"> <li>• Develop and recruit to a Devon Regional Manager post, whose focus will be HMP Exeter, the post holder is due to start in April 2023.</li> <li>• Ensure the Health Providers Project Manager is leading a full recruitment drive and rolling recruitment activity is taking place with vacancies listed on the 'NHS Jobs website'. Reviews of job specifications are taking place to make roles more appealing and dynamic. The health provider (Oxleas) has provided additional staff to HMP Exeter via mutual aid. A recruitment day took place in January 2023.</li> <li>• Mobilise the new healthcare contract and associated models, particularly mental health services. Oxleas Mental Health team will work alongside the HMPPS Neuro Diversity lead at HMP Exeter to ensure action is embedded.</li> </ul>		<p>April 2023</p> <p>May 2023</p> <p>July 2023</p>
4	<p><b>Many prisoners spent too long locked in their cells, purposeful activity was not prioritised, and few prisoners took advantage of what was offered, limiting their prospects of rehabilitation, and reducing reoffending.</b></p>	<p>The Head of Residential Services (HoRS) will increase the amount of time prisoners can be unlocked, prioritise purposeful activity, and promoting the benefits of engaging in an activity through the following:</p> <ul style="list-style-type: none"> <li>• The staff profiles and the core day regime have been reviewed, increasing the amount of time prisoners can spend out of their cell in domestic and purposeful activities.</li> <li>• Recruitment of a temporary dedicated Band 5 Regime Driver for twelve months, in order to embed, drive and quality assure the consistent allocation and attendance at all activity spaces.</li> <li>• Encouraging prisoners engaged in purposeful activities to apply to be located on Delta Wing (the enhanced prisoners wing) as an incentive, as they will benefit from increased time out of cell.</li> <li>• Discussing activity spaces and attendance at the morning operational briefing to determine any barriers to attendance, and by monitoring weekly attendance figures (locally and nationally) using the regimes dashboard to ensure there is an accurate data capture of attendance figures.</li> <li>• The Head of Reducing Reoffending (HoRR) and Head of Learning and Skills (HoLS) will review and improve the activity provision available, to provide a</li> </ul>	Governor	<p>Complete</p> <p>Complete</p> <p>March 2023</p> <p>April 2023</p> <p>May 2023</p>



		<p>more engaging regime. This will include reviewing the Annual Delivery Plan (ADP) for education.</p> <ul style="list-style-type: none"> <li>• Endeavouring to regularly have at least 80% of the eligible population allocated to an activity, with a minimum expected attendance rate of 85% of those allocated.</li> <li>• The Regime Driver will work with staff so they understand the benefits of prisoners attending an activity, who in turn will promote the benefits through their interactions with prisoners.</li> <li>• The Regime Driver will ensure Residential Officers adhere to the published core day timings, including a continued focus on activity attendance. Activity attendance figures will be monitored weekly, through assurance checks by the B5 (CM) regime lead.</li> <li>• The Incentives Policy will be reviewed, with a particular focus on increasing the offer available to prisoners who engage in activities, rehabilitation, and reducing reoffending work.</li> <li>• Strategic monitoring of attendance will be discussed at the quarterly Reducing Reoffending meeting to monitor improvements and raise actions to identify and address any barriers to attendance.</li> </ul>		<p>May 2023</p> <p>June 2023</p> <p>July 2023</p> <p>July 2023</p> <p>August 2023</p>
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	Key concerns			
5	<p><b>The level of violence at the prison was high and leaders were unaware of many of the causes.</b> Investigations into violent incidents were inadequate and did not inform an action plan to identify and reduce violence among prisoners.</p>	<p>To identify the drivers behind violence, and reduce the levels of violence at HMP Exeter, the Head of Safety will introduce the following:</p> <ul style="list-style-type: none"> <li>• Ensure all prisoners being supported by Challenge, Support, and Intervention Plans (CSIP) are discussed at the weekly SIM meeting, with multi-disciplinary actions being formulated to ensure that appropriate support and targets are put in place.</li> <li>• As part of the HORS review of the Incentives Policy, ensure it focuses on encouraging good behaviour. They will also ensure it is applied appropriately and that staff continue to challenge low level behaviour. The HORS and residential Custodial Managers (CMs) will monitor its application through weekly QA checks.</li> <li>• Ensure prisoners who are self-isolating are reported daily and discussed at the managers morning meeting and weekly SIM, to ensure they are receiving the appropriate support. Recording of access to a regime will be implemented and checked daily by the ACCT floor walkers or wing Supervising Officers (SOs).</li> <li>• Ensure CSIP Investigations are screened and allocated as soon as possible from the referral being submitted. Intel gained from the investigations will be utilised to improve our understanding of the drivers and causes the violence, so pro-active measures can be put in place to reduce violence levels. The Head of Safety will monitor the quality and timeliness of investigations and provide a monthly report monthly to the Performance and assurance meeting.</li> <li>• Ensure the Safety team collate and review all data relating to violence, including intel from investigations, to improve the understanding of causes and drivers of violence, for discussion at the multi-disciplinary monthly Safety Custody Meeting where appropriate actions to reduce violence will be generated and added to the consolidated safety action plan. The timescales, effectiveness, and impact of all the actions will be monitored at the meeting.</li> </ul>	Governor	<p>Complete</p> <p>March 2023</p> <p>March 2023</p> <p>April 2023</p> <p>April 2023</p>





		<ul style="list-style-type: none"> <li>• Ensure the Safety Team will recruit and train Violence Reduction Representatives who are prisoner peer mentors to promote the Governors vision of a Safe, Decent and Secure Environment, utilising them to support with mediation on residential units.</li> <li>• Ensure HMP Exeter will continue to focus efforts on embedding CSIP so the most violent individuals and those who are being supported by CSIP as victims receive the appropriate support, and understand the targets set to improve their behaviour and reduce our levels of violence. The prison will also continue to improve staff awareness and competence of the process, and how they can contribute to and support the process.</li> </ul>		<p>April 2023</p> <p>June 2023</p>
6	<p><b>There was no key worker scheme, staff-prisoner relationships were mostly transactional, and prisoners were frustrated by the inability of staff to meet legitimate requests.</b></p>	<p>HMP Exeter will improve the delivery of key work and provide prisoners with the information and responses to their requests by:</p> <ul style="list-style-type: none"> <li>• Reviewing the staff profiles to allow for an increase in non-flexible staff hours to increase key worker provision and delivery.</li> <li>• Allocating a key worker to complete an initial key work session for all new inductions.</li> <li>• Ensuring all prisoners receive a full induction, so they understand and know how to access services and regimes.</li> <li>• Identifying Key Worker champions, who will specialise in Foreign Nationals, veterans, and those with neurodiverse needs.</li> <li>• Introducing monthly meetings with Residential Managers, Heads of Residence and Offender Management Unit (OMU) Managers on keyworker progress, ensuring constructive relationships are being developed fostering positive behaviours. Supported by a 10% monthly Quality Assurance (QA) check of key worker notes by Residential CMs, with the Heads of Offender Management Unit Services and Delivery checking 10% of the CM's checks.</li> <li>• Rolling out a revised Key Worker Strategy and action plan, including a new keyworker allocation process, that will include the upskilling and development of staff groups involved in Offender Management in Custody (OMiC) and</li> </ul>	Governor	<p>March 2023</p> <p>March 2023</p> <p>March 2023</p> <p>April 2023</p> <p>May 2023</p> <p>July 2023</p>



		<p>Keyworker strategies. The quality and delivery of keyworker, including frequency, purposeful and rehabilitative conversations will be monitored by the Head of Offender Management Services and reported at the monthly performance and assurance meeting.</p>		
7	<p><b>The standard of the cells was poor.</b> Many had no glass in the windows, exposed electric wires, floors in need of repair and some contained mould.</p>	<p>The Head of Residential Services will improve the living environment of HMP Exeter, through the following:</p> <ul style="list-style-type: none"> <li>• Reporting all defects to the Facilities Management (FM) provider GFSL, with progress against actions recorded and monitored at the monthly Tri-partite meeting, chaired by the Deputy Governor, and attended by GFSL, FM Contract Manager, Health Safety and Fire representative, and the Area Property Operations Manager. Monitoring of improvements are ongoing; however, they will be reviewed in August 2023.</li> <li>• The Clean and Decent CM will complete assurance checks and provide a monthly report of findings to the HoRS, whilst also ensuring immediate action is taken as identified.</li> <li>• Introduce 'room ready' inspections of all new reception cells, ensuring the cells meet the required standards and have all the necessary basic equipment prior to occupancy. Wing Supervising Officers (SO) will carry out daily assurance checks to ensure the correct standards are being met.</li> <li>• In addition to daily Accommodation Fabric Checks (AFCs), a decency policy has been implemented that incorporates weekly SO and monthly CM checks, to ensure accommodation meets the required standards. Records will be maintained to evidence the policy has been embedded through assurance checks.</li> <li>• The HoRS will quality assure 10% of the CM's checks, and the Governor/Deputy Governor will carry out monthly checks of communal areas and living accommodation. Findings from all the compliance checks will be monitored at the monthly Residential and Performance and Assurance meetings.</li> </ul>	<p>Governor/Facilities Management Provider</p>	<p>Complete</p> <p>March 2023</p> <p>March 2023</p> <p>Complete</p> <p>June 2023</p>



		<ul style="list-style-type: none"> <li>The appointment of a temporary clean and decent Custodial Manager (CM), which is a new role following the recent review of staffing, will be in place from February 2023. The CM will drive improvements in residential areas and carry out a local decency audit of all living accommodation, with any missing and/or damaged furniture identified as part of the audit being replaced, to ensure every cell is fit for purpose. The audit will also identify any cell flooring that requires replacement, that the GFSL/refresh party will replace as part of their funded work programme. An action plan of improvements will be created, with progress and compliance monitored at the monthly tripartite meetings.</li> </ul>		June 2023
8	<p><b>The education, skills and work curriculum was not fit for purpose. It did not provide meaningful or relevant learning or training opportunities which met prisoners' varied needs.</b></p>	<p>The Governor and the Education Provider will review the Education, Skills, and Work (ESW) curriculum to ensure it is fit for purpose and meets the needs of the population through the following:</p> <ul style="list-style-type: none"> <li>Completing a needs analysis to identify the learner needs against Labour Market Information to support the development of a revised curriculum offer at HMP Exeter.</li> <li>Ensuring the new Annual Delivery Plan (ADP) and delivery timetable provides an innovative learning environment. This will include ensuring increased screening for those with Learning Difficulties and Disabilities, to provide appropriate support where identified.</li> <li>Ensuring Weston College work closely with Shannon Trust to provide a combined approach to supporting prisoners who cannot read and write.</li> <li>Delivering education courses that will include functional skills and increased access to Information Technology, based on prisoner educational levels and assessments, taking into consideration the length of time available to complete courses due to the high remand population.</li> <li>Installing 'Way2 Learn' onto the in-cell TV system, to assist in-cell learning.</li> <li>Embedding the revised creative curriculum which has been designed with the contracted education provider and regional leads, that will incorporate interactive informal learning in workshops and communal settings to stimulate learning.</li> </ul>	Governor/Education Provider	<p>Complete</p> <p>April 2023</p> <p>April 2023</p> <p>April 2023</p> <p>April 2023 May 2023</p>



		<ul style="list-style-type: none"> <li>• Incorporating education within our industry workshops where English and Maths form part of the curriculum, by having educational teachers deliver English and Maths through linking theory to their industry course.</li> <li>• Monitoring and tracking improvements and progress through the Continuing Professional Development (CPD) tracker at the monthly Education Performance Meeting (EPM). Monitoring of the education providers provision, including data, delivery, and improvements, will be via the monthly QIG (Quality Improvement Group) and quarterly Prison Education Framework (PEF) governance meetings.</li> <li>• The ESW Progress Partnership will work collaboratively with the prison for a period of 6-12 months to maximise sustained improvement in education, skills, and work provision. With a specific focus on allocation processes, this will involve up to twenty working days on-site to support the development, implementation and embedding of allocations policies within the Activities Hub and wider prison. Support will be reviewed in June 2023 to determine if it should be continued for a further six months.</li> </ul>		<p>May 2023</p> <p>June 2023</p> <p>June 2023</p>
9	<b>Leaders and managers had not dealt with the long-standing inadequacies of induction and allocations to education, skills and work.</b>	<p>The Head of Education Skills and Work will improve the quality of the ESW induction and allocation assessments through the following:</p> <ul style="list-style-type: none"> <li>• It will be ensured that language line will be provided for those prisoners where English is not their first language.</li> <li>• In order to embed, drive and quality assure the consistent allocation to, and attendance at all activity spaces, a temporary dedicated Band 5 Regime Driver has been recruited for twelve months.</li> <li>• The Contract Management Team (CMT) will review the Information Advice and Guidance (IAG) specification ensuring the contract is fit for purpose and sufficiently resourced to meet identified need. Delivery will include Digital Personal Learning Plans for all prisoners using Virtual Campus.</li> <li>• The induction process will be reviewed to ensure it is comprehensive and multi-disciplinary and includes representation and input from Education, Information Advice and Guidance, and Prison staff. The review will also</li> </ul>	Governor/Education Provider	<p>Complete</p> <p>Complete</p> <p>March 2023</p> <p>March 2023</p>



		<p>ensure it includes screening for prisoners with Learning Difficulties and Disabilities, and that there is prompt information sharing of information so that all learners can make the best use of the services available and obtain the appropriate support needed for progression.</p> <ul style="list-style-type: none"> <li>• Ensuring all prisoners are offered an activity, and actively encouraged to attend and engage in the activity. Where/if there are exceptional reasons why a prisoner cannot be assigned an activity, these will be documented with the reasons clearly recorded.</li> <li>• Reviewing the timetable for inductions and ensuring that all eligible prisoners are allocated to activity within seven days.</li> <li>• Recruitment of a temporary dedicated Band 5 Induction CM for twelve months, to embed, drive and quality assure the consistent delivery of induction services. The CM will carry out weekly QA checks and provide a monthly assurance report for review on progress at the monthly performance and assurance meeting.</li> <li>• Where it is identified that the person is unable to read, the induction process will be delivered in a way that is accessible to the person by appropriately trained staff and peer supporters.</li> <li>• Improvements and progress will be monitored and tracked through the Continuing Professional Development (CPD) tracker at the monthly Education Performance Meeting (EPM). Monitoring of the education providers provision, including data, delivery, and improvements, will be via the monthly QIG (Quality Improvement Group) and quarterly Prison Education Framework (PEF) governance meetings. Monitoring of improvements are ongoing; however, they will be reviewed in June 2023.</li> <li>• The ESW Progress Partnership will work collaboratively with the prison for a period of 6-12 months to maximise sustained improvement in education, skills, and work provision. With a specific focus on allocation processes, this will involve up to twenty working days on-site to support the development,</li> </ul>		<p>March 2023</p> <p>April 2023</p> <p>April 2023</p> <p>May 2023</p> <p>June 2023</p> <p>June 2023</p>
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		implementation and embedding of allocations policies within the Activities Hub and wider prison.		
10	<b>The role of the quality improvement group and its impact were now slight, and leaders and managers did not use available data well to monitor and manage the quality and impact of the provision.</b>	<p>The Head of Education Skills and Work will improve the effectiveness of the QIG (Quality Improvement Group) by:</p> <ul style="list-style-type: none"> <li>• Ensuring that the monthly QIG utilises accurate data to drive discussions and agree appropriate actions that improve outcomes, that are monitored for timely completion.</li> <li>• Refreshing the agenda of the QIG so it has a distinctive role, and that there is a quorum of mandatory attendance.</li> <li>• Ensuring that the new Learning and Skills Manager (recruitment currently in progress) will be supported by the ESW Lead to develop their skillset in analysing, to create meaningful actions form the Quality Improvement Group meeting.</li> </ul>	Governor	<p>April 2023</p> <p>June 2023</p> <p>July 2023</p>
11	<b>Support to maintain family ties was not sufficiently focused on the outcomes experienced by prisoners.</b> There were no family days, nothing to mitigate delays in adding numbers to prisoners' pin phone accounts, basic interim visits provision and supervising staff who were not confident about visits times.	<p>The Heads of Safety and Reducing Reoffending will improve the support available to maintain family ties by:</p> <ul style="list-style-type: none"> <li>• Continuing to run family days which recommenced in December 2022, with one family day per month scheduled for the year, with dates published to staff and prisoners.</li> <li>• The HoRR will continue to monitor the provision available for prisoners to maintain family ties, including the commitments in response to this concern, through the monthly Reducing Reoffending meeting. Actions to address any shortfall in provision will be raised and monitored through the meeting.</li> <li>• Pin phone requests will be actioned within 48 Hours for new prisoners unless there are public protection issues, or the numbers given cannot be verified. If there any delays experienced in adding numbers, welfare calls will be offered.</li> </ul>	Governor	<p>Complete</p> <p>Complete</p> <p>Complete</p>



		<ul style="list-style-type: none"> <li>• All new prisoners will be given a call on the first night and a pin phone account within 48 hours unless there are exceptional reasons not to do so. If this is the case, they will be informed in writing with the reason documented and recorded by the prison.</li> <li>• Ensuring all staff are aware of the start and finish times of visits, and that they adhere to the times.</li> <li>• Planning family days in collaboration with the family services contract Prison Advice and Care Trust (PACT), with signage promoting the family days being displayed in reception and other key areas of the prison.</li> <li>• The PACT team will feature in the new induction package, to support prisoners in maintaining family ties.</li> <li>• Promoting email-a-prisoner and secure video calling processes to help prisoners maintain family ties.</li> <li>• The new visits centre (due to open in July) will develop the range of services available. In the interim provisions have been implemented to provide hot drinks in the temporary visit's facilities.</li> </ul>		<p>March 2023</p> <p>April 2023</p> <p>May 2023</p> <p>June 2023</p> <p>July 2023</p> <p>August 2023</p>
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