



HM Prison &  
Probation Service

Action Plan: HMP Huntercombe

Action Plan Submitted: 27<sup>th</sup> November 2023.

A Response to the HMIP Inspection: 14<sup>th</sup> – 24<sup>th</sup> August 2023

Report Published: 13<sup>th</sup> November 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 His 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 HUNTERCOMBE

1. Rec No	2. Concerns	3. Response Action Taken/Planned	4. Responsible Owner	5. Target Date
	<b>Priority concerns</b>			
1	<b>Delayed Home Office decision-making resulted in many prisoners being held beyond their earliest removal or release dates. The delays caused frustration and distress, and hindered release planning.</b>	<p>Since January 2023 casework resource has increased, with a dedicated Custodial Decision Team established to focus on ensuring decisions are made early in the process to drive up removals directly from prison. The FNO Returns Command makes every effort to ensure as many FNOs as possible are deported during their Early Removal Scheme (ERS) window. This is one of FNORC's clear priorities, which is demonstrated by the fact that the largest proportion of our staff work on custodial cases, despite custodial FNOs accounting for less than 30% of our total case holding.</p> <p>The Immigration Prison Team (IPT) attends the prison on average 6 days per week, and each new arrival is inducted by them on their second day in HMP Huntercombe. During this induction, in addition to personal details being obtained and welfare checks being covered, IPT also ask if they wish to be deported or not. In cases where prisoners wish to be deported, caseworkers are notified and the Voluntary Departure Spreadsheet is updated. This enables caseworking teams to be able to identify these cases easily and ensure they can focus on prisoners who can be deported during their ERS window.</p> <p>It should be noted however that the delays in removal close to ERS dates can be caused by many factors, many of which are out of our control, for example, but not restricted to, late asylum applications, prisoners changing their mind about their intentions, legal challenges, prisoners arriving in HMP Huntercombe when they are already in their ERS window, NRM (human trafficking claims). IPT work closely with prison colleagues and in particular with the Offender management Unit and they will continue to further seek ways to strengthen ERS removal performance.</p>	<p>Strategic Improvement Operations, Borders and Enforcement, FNO Returns Command, Home Office.</p> <p>Strategic Improvement Operations, Borders and Enforcement, FNO Returns Command, Home Office.</p> <p>Strategic Improvement Operations, Borders and Enforcement, FNO Returns Command, Home Office.</p>	<p>Completed.</p> <p>Completed</p> <p>Completed</p>



2	<p><b>We received numerous reports of unhelpful staff who did not understand prisoners' concerns as foreign nationals. Wing managers did not sufficiently address dismissive staff attitudes, and staff training in the needs of foreign national prisoners was inadequate.</b></p>	<p>HMP Huntercombe have taken immediate steps to consult with colleagues in the Learning and Development Team in HMPPS to ascertain the training opportunities available to staff in meeting the needs of foreign national prisoners. Options available will be progressed via the weekly staff training sessions. To further enhance this offer, HMP Huntercombe will use the expertise of the on-site Home Office Chief Immigration Officer to deliver briefing sessions to staff. Outcomes and actions will be managed at the weekly Residential Meeting, chaired by the Head of Residence.</p> <p>HMP Huntercombe have taken immediate steps to ensure residential leaders and managers lead by example on each wing, challenging dismissive attitudes and ensuring staff responses are supportive and procedurally just.</p> <p>Feedback from prisoners will be actively sought through revised monthly wing and prisoner forums, led by prison officers, which will be more action and outcome focussed. Actions arising, and outcomes delivered, will be managed at the weekly Residential Meeting, chaired by the Head of Residence.</p> <p>HMP Huntercombe will use the role of the New Colleague Mentor to review the induction process for new prison officers so, at the earliest opportunity, new staff arriving at HMP Huntercombe receive training in meeting the needs of foreign national prisoners.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>April 2024</p> <p>November 2023</p> <p>April 2024</p> <p>April 2024</p>
3	<p><b>There were not enough full-time activity places for the population and staff shortages meant they were not used fully.</b></p>	<p>The total number of activity spaces reflects overall resourcing which is beyond the control of HMP Huntercombe. However, the prison will continue to maximise the use of those activity places which are available to ensure that prisoners have access to as wide a variety of activities as possible including work, education, orderly and mentoring roles. It is recognised that staff shortages have impacted the activity spaces available and, since the inspection, all 13 instructor vacancies have now been recruited to, with one person awaiting vetting. Building work across the site has also impacted on available activity space but this should be complete by the end of the calendar year and will result in twenty-four full-time activity spaces coming back online.</p> <p>HMP Huntercombe have taken immediate steps to ensure the activities allocation process is robust and effective with attendance outcomes managed and driven forward daily by the Industries Manager and Head of Reducing</p>	<p>Governor</p> <p>Governor</p>	<p>January 2024</p> <p>Complete</p>



		<p>Reoffending. This includes an Allocations Board, which takes place each week where allocations are discussed.</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 to maximise the chances of filling vacancies. Outcomes will be monitored at the monthly Education Contract Meeting, chaired by the newly appointed Head of Education, Skills, and Work.</p> <p>HMP Huntercombe will take further action to ensure allocation outcomes are clearly communicated to both prisoners and staff, including during keywork sessions, with outcomes monitored at the weekly allocation board meeting, chaired by the Head of Education, Skills, and Work.</p>	<p>Milton Keynes College/Head of Education, Skills, and Work</p> <p>Governor</p>	<p>January 2024</p> <p>January 2024</p>
4	<p><b>Most recategorisation decisions were based solely on Home Office interest rather than a full consideration of individual risk factors.</b> This meant prisoners were wrongly prevented from going to open conditions regardless of the progress they had made.</p>	<p>Following the inspection HMP Huntercombe have implemented measures to ensure that categorisation reviews now contain robust evidence, based on individual risk factors, to support recategorisation decisions. This includes categorisation decisions for foreign national prisoners with immigration appeal rights remaining. Prison Offender Managers (POMs) now base, and document, their decisions on specific supporting evidence, such as risks of harm or abscond and the Risk Management Plan, alongside Home Office interest. Recategorisation decisions are discussed with prisoners and outcomes are reviewed and assessed by the Head of Offender Management Delivery (HoMD).</p>	Governor	Complete.
	<p><b>Key concerns</b></p>			
5	<p><b>Reception processes were slow and not sufficiently well managed, which meant that some prisoners waited for long periods in holding rooms or in vehicles.</b></p>	<p>Since the inspection HMP Huntercombe have taken steps to review and change reception processes, which has resulted in prisoners moving from vehicles and into reception within a few minutes. It is recognised that prisoners arriving at HMP Huntercombe may have to wait in reception holding rooms whilst they await to see a healthcare practitioner, but this time will be minimised whilst allowing new receptions to meet Listeners, Orderlies, and staff to ensure any support needed is immediate and effective.</p>	Governor	Complete.



		HMP Huntercombe will trial a new Operations Supervising Officer post responsible for overseeing the management of Reception to ensure reception processes are efficient. This will include updating information for new arrivals and making the space more welcoming.	Governor	January 2024
6	<b>Data were not being used effectively enough to determine the specific causes of violence.</b>	<p>HMP Huntercombe will revise and refresh the Quarterly Safety Meeting to place a greater emphasis on the use of data to determine the specific causes of violence and to take action to drive improved outcomes for prisoners. Outcomes and actions will be monitored through this meeting which is chaired by the Head of Safety.</p> <p>The Challenge, Support, and Intervention Plan (CSIP) process will be revised to ensure improved support is available for victims of violence, including the provisions of mediation services as appropriate.</p> <p>A Quality Assurance process will be introduced to ensure CSIPs are not open for too long and record keeping is thorough and appropriate, with training and coaching being provided by the Safety Team to help embed these improvements as required. The process will be managed at the weekly Safety Intervention Meeting, chaired by the Head of Safety.</p>	Governor  Governor  Governor	January 2024  January 2024  January 2024
7	<b>The basic level of the incentives scheme was used too punitively.</b> Prisoners were often placed on that level for 28 days without any meaningful review, and some remained on the basic regime even when related adjudication charges had been dismissed.	<p>HMP Huntercombe will ensure the application of the Incentives Policy Framework is applied on an individual basis, ensuring its use continues to be in line with national policy. This will include the promotion of positive behaviour, improved documentation and ensuring appropriate context is given to circumstance and behaviour when a decision is made to change a prisoners incentive level.</p> <p>Supervising Officers will conduct a substantive review after 7 days and at other appropriate intervals during the 28 days in which a prisoner is placed on the basic level if behaviours improve and when related adjudication charges have been dismissed. These reviews will be subject to a quality assurance process and discussed at a new performance orientated Residential Meeting which will be chaired by the Head of Residence.</p>	Governor  Governor	February 2024  February 2024
8	<b>Staff usually failed to use body-worn video cameras during incidents.</b>	Since the introduction of body-worn video cameras, HMP Huntercombe have been focusing on ensuring that these cameras are switched on during incidents. This has included, but is not limited to, reminders issued over the radio net during responses, staff briefing sessions, notices to staff, emails highlighting good practice and improved signage around the establishment.	Governor	Complete



		Outcomes will continue to be reviewed, and action taken as appropriate at the Quarterly Use of Force Meeting, chaired by the Head of Safety.		
9	<b>Despite the small number of prisoners in the segregation unit, the regime was limited and inconsistent, and paperwork was not always completed in full.</b>	<p>HMP Huntercombe continue to offer the daily minimum regime for prisoners in the segregation unit as set out in national policy and although there is an ambition to deliver more, such as in-cell activity and in-cell education, this is resource dependent.</p> <p>A Quality Assurance process will be introduced to ensure paperwork and reintegration plans are completed in full for prisoners who have been segregated with outcomes and actions reviewed at the quarterly Segregation Monitoring and Review Group (SMARG) meeting, chaired by the Head of Safety. Findings will be shared with staff and any training needs identified will be taken forward locally.</p>	Governor  Governor	February 2024  February 2024
10	<b>Routine strip-searching alongside the use of a body scanner was excessive and unnecessary.</b>	<p>HMPPS has gained justification to use X ray body scanners on prisoners under the <a href="#">Justification of Practices Involving Ionising Radiation Regulations 2004 (as amended)</a>. Approval from the Justifying Authority has been issued on the condition that a set of Requirements for Practice for Prisons are complied with. These state that each scan must only be conducted based on intelligence or reasonable suspicion that an item is being secreted on the person <b>that could not be revealed by any other method</b>. Therefore, it is necessary to conduct a full search prior to an X ray scan to ensure the contraband is not secreted within the clothing or externally on the body.</p> <p>If the Requirements for Practice are not complied with, there is a possibility of warning notices being served by the Justifying Authority. The Justifying Authority may withdraw HMPPS' approval to use X-ray body scanners if a warning notice is not complied with in the specified time frame. The Body scanner Governance and Support team conduct regular assurance and training visits to establishments to ensure all scans are compliant with the policy.</p> <p>HMP Huntercombe will not routinely strip-search prisoner alongside the use of the body scanner unless local, intelligence-led security decisions deem it to be appropriate, as outlined in the Local Security Strategy.</p>	Risk and Capabilities Unit (RaCU) Directorate of Security, HMPPS.  Risk and Capabilities Unit (RaCU) Directorate of Security, HMPPS.  Governor	Completed.  Completed & Ongoing.  Complete.



11	<b>Recent price rises in the shop had sharply reduced the number of items that prisoners could buy.</b>	HMP Huntercombe have recently reviewed the local Prisoner Pay Policy, which has resulted in wage rises for prisoners in activity. Whilst the wage rises do not cover price increases in full, prisoners continue to have opportunity to contribute to reviewing the items listed on the canteen sheet. Feedback from prisoners will be actively sought through revised wing and prisoner forums, led by prison officers, which will be more action and outcome focussed. Actions arising, and outcomes delivered, will be managed at the weekly Residential Meeting, chaired by the Head of Residence.	Governor	Complete
12	<b>Psychological provision was too limited for a population that was disproportionately likely to have had traumatic experiences as a result of torture and modern slavery.</b>	<p>A business case has been written by Oxford Health Foundation Trust, to increase the psychological staffing provision at HMP Huntercombe, from one staff member to five. This is being considered by Practice Plus Group, and NHS commissioners.</p> <p>Subject to approval, a recruitment drive can take place, with the view of Oxford Health expanding the therapies and interventions to allow more access to psychological interventions in line with NICE Guidelines to the whole prison population, with a strong focus on trauma informed care which includes people that have had traumatic experiences because of torture and modern slavery.</p> <p>Once the recruitment commences, an initial three-month target would be set for staff to be in post.</p> <p>Group work has commenced for Managing Emotions and once further space has been identified further group interventions can be considered.</p> <p>Trauma Informed Care Training will be delivered to Prison Staff, this will increase awareness of how past trauma can impact on the individuals under our care's ability to feel safe and will support staff to understand individuals presenting behaviours.</p>	<p>Practice Plus Group</p> <p>Practice Plus Group</p> <p>Practice Plus Group</p> <p>Practice Plus Group</p> <p>Practice Plus Group</p>	<p>January 2024</p> <p>February 2024</p> <p>May 2024</p> <p>January /2024</p> <p>January 2024</p>
13	<b>Prisoners did not benefit from a suitable curriculum to meet their needs, nor could they access effective careers information, advice and guidance.</b>	HMP Huntercombe have conducted a new needs analysis to ensure prisoners at the establishment have access to a suitable curriculum that, so far as possible within available resources, meets their needs. Since the inspection HMP Huntercombe have appointed a new Head of Education, Skills, and Work	Governor	Complete





		<p>(HoESW) who monitors delivery of the curriculum at the monthly Education Contract meeting which they chair.</p> <p>HMP Huntercombe have also introduced a new Home Office Reintegration and Engagement Service which operates in eleven different countries to provide careers information, advice, and guidance alongside other reintegration services such as access to temporary accommodation and possible funding.</p> <p>HMP Huntercombe have also ensured current instructors have undertaken Teaching Assessor Quality Assurance training, which will enable staff to deliver non-accredited qualifications. This will also be a requirement for completion for newly appointed staff. HMP Huntercombe recognise that vocational qualifications are not always recognised in other countries and instructors collaborate with prisoners to produce portfolios of work to evidence their achievements and improve job prospects for those being deported.</p> <p>HMIP and Ofsted in part acknowledged the shortcomings in provision reflected financial pressures as HMP Huntercombe's education funding has reduced by £200k over recent years. These would be ameliorated to an extent if the prison was funded as an (overseas) resettlement prison rather than a category C trainer. This case needs to continue being made.</p>	Governor	Complete
			Governor	Complete
			Governor	Ongoing
14	<b>Phone call monitoring for public protection reasons was not consistent or sufficiently robust.</b>	<p>HMP Huntercombe continue to endeavour to resource a full-time Public Protection role to ensure phone monitoring is implemented efficiently and effectively, which will include ensuring calls in a foreign language are translated as appropriate.</p> <p>The role helps ensure that phone call monitoring for public protection reasons is consistent and robust with outcomes reviewed, and further action taken as required, at the monthly Inter-departmental Risk Management Meeting (IRMT) chaired by the Head of Offender Management Delivery (HoMD).</p>	Governor	Complete

