



HM Prison &  
Probation Service

Action Plan: HMP Swaleside

Action Plan Submitted: 22<sup>nd</sup> January 2024

A Response to the HMIP Inspection: 11<sup>th</sup> – 21<sup>st</sup> September 2023

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## 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 Swaleside

1. Rec No	2. Concerns	3. Response Action Taken/Planned	4. Responsible Owner	5. Target Date
<b>Priority concerns</b>				
1	<p>Fourteen prisoners had died at Swaleside in the previous two years, including seven whose deaths were self-inflicted. Ongoing weaknesses included inconsistent support for prisoners at risk, a failure by some night staff to carry anti-ligature knives, slow responses to cell bells and inadequate reviews of Coroners' and PPO recommendations.</p>	<p>The Safety department has reviewed the model and has employed an additional psychology resource to ensure that a dedicated joint approach is taken for those prisoners that need further support.</p> <p>The supervisory checks of the Assessment, Care in Custody and Teamwork (ACCT) paperwork has been added to the daily management checklist for the residential areas.</p> <p>There is a renewed focus on the data quality of the ACCT documents and a monthly assurance process is ensuring that 25% of check A's (the first 72 hours after being opened) and 50% of check B's is now being completed. This is compiled by the Safety Custodial Manager and improvement actions assigned to residential managers where appropriate. Common issues and themes are being addressed at the Safety Strategy meetings and repeated non-compliance is discussed with Custodial Managers during the performance appraisal process.</p> <p>Scheduled Case Reviews for ACCTs are now shared with the Head of Healthcare to ensure healthcare staff attend the first review and subsequent reviews where input is required. Performance is monitored through the ACCT quality assurance process and reported at the Safety Strategy meeting.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor / Head of Healthcare</p>	<p>Complete</p> <p>Complete</p> <p>Complete</p> <p>Complete</p>



	<p>A new quality assurance process has been implemented for self-isolated prisoner documents to ensure that they are of the required quality and feedback will be provided to the member of staff where appropriate.</p>	Governor	Complete
	<p>From January 2024, Bi-monthly staff training days will be implemented and will include refresher training on ACCTs and specifically for the creation of care plans and other forms of support that are available to prisoners. These training days will also include refreshers on managing those who are self-isolating, to ensure that appropriate support is being offered.</p>	Governor	January 2024
	<p>Advice has been reissued to all staff on the importance of prioritising and answering cell bells in a timely manner.</p>	Governor	Complete
	<p>The Residence administrative support staff will complete a monthly analysis of the cell bell recording system data to highlight areas where there is repeated non-compliance. This will be shared with the relevant area Custodial Manager and the Head of Function to discuss with their staff and set clear expectations of the required levels of performance.</p>	Governor	March 2024
	<p>The importance of staff on night shifts collecting and carrying an anti-ligature tool has been communicated to staff and additional tools are now in response kits. An additional Governor night visit each month has been implemented, which includes a new audit to assure improved compliance with staff having tools on their person.</p>	Governor	Complete
	<p>An establishment wide Prison and Probation Ombudsman (PPO) action plan has been developed to track and monitor the progress and continued compliance with recommendations raised by the</p>	Governor	March 2024



		PPO and Coroners reports. This will feed into the new bi-monthly PPO recommendations meeting, that will be chaired by the Head of Safety.		
2	Levels of violence remained high and investigations into violent incidents were often delayed and of poor quality.	<p>Safety forums are being held on residential wings to identify drivers for violence and to allow prisoners an additional avenue to air concerns and are targeted at groups identified by trends in the violence data.</p> <p>The Safety team will conduct debriefs after use of force incidents where resource allows, whilst this is not directly to investigate violent incidents, these conversations often include information relevant to investigations into violent incidents and this information is shared with relevant parties.</p> <p>The current safety model that has assisted in the reduction of self-harm will be replicated to assist with the reduction of violence. This will include the communication of the Challenge, Support and Intervention Plan (CSIP) process to staff and the implementation of the new CSIP assurance checks to assure delivery targets, timely reviews and that data quality is of the required standard.</p> <p>From January 2024, Bi-monthly staff training days will be implemented and will include refresher training on the CSIP process and specifically for the creation of plans and other forms of support that are available to prisoners.</p> <p>The Safety Custodial Manager responsible for CSIP will quality assure 10% of CSIP's and ensure that the review is multi-disciplinary, as well as creating effective targets and exploring the root cause of violence.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Complete</p> <p>Complete</p> <p>June 2024</p> <p>January 2024</p> <p>March 2024</p>



		The HMP Swaleside Outreach Service will broaden their caseload to ensure they are working effectively with as many violent and complex individuals as possible, staff within this team will offer support to their peers on residential units so that a similar approach can be taken when working with prisoners on CSIP.	Governor	March 2024
3	Many staff lacked confidence and assertiveness in their management of prisoners. Supervising officers did not provide sufficient visible support on many wings.	<p>A new establishment Training Needs Analysis (TNA) provides a platform to direct specific safety and other mandatory training to the staffing groups, at all levels. Starting in January 2024, a program of six shut down training days will allow the establishment to tailor and focus training sessions to those staff most in need of a confidence and competence upskill. Staff surveys conducted throughout the year will assist with the review process for the TNA.</p> <p>Wing managers and supervisors will conduct an improved range of weekly and monthly assurance checks of key performance measures and will provide support in those areas that their staff feel the least confident in. Findings from assurance checks and staff surveys will be discussed in performance appraisal meetings (Bi lats) and staff forums.</p> <p>An Aspiring and Developing Managers Portfolio training package has been developed and implemented for grades Band 3 to Band 5, for personal and continuous professional development.</p> <p>The Supervising Officer group have commenced a pilot period of self-rostering to provide them with the autonomy to develop their knowledge of time management and rostering, to undertake training and to develop their confidence, visibility and assertiveness when managing the Residential Officers. The effectiveness of this pilot will be assessed in January 2024.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Complete</p> <p>March 2024</p> <p>March 2024</p> <p>January 2024</p>



		The establishment Incentives and Privileges Framework policy has been amended, incorporating feedback from both staff and prisoners to provide clear boundaries and consequences for poor behaviour and a greater distinction between the incentive levels.	Governor	Complete
4	Prisoners' attendance rates at education, skills and work had not improved over time and were too low. Too few prisoners developed positive attitudes towards education and work.	<p>Labour allocation boards are now taking place on residential units weekly to improve access for prisoners to attend and be included in the allocation process, this will develop more positive attitudes towards education and work.</p> <p>The Reducing Reoffending and Security departments have collaborated to improve the timeliness of the activity allocation risk assessment process, by identifying those in need of reviews to ensure all prisoners have an up-to-date risk assessment recorded on the National Offender Management Information System (NOMIS).</p> <p>The range and availability of purposeful activity on the Drug Recovery Unit has been increased.</p> <p>The 'Unemployment Plus' payrate, which was introduced during the Covid-19 pandemic due to the closure of purposeful activity, has been removed for those prisoners that have been afforded the opportunity to engage in work and education. This will address feedback of a lack of procedural justice for non-attendance.</p> <p>The payrates will be amended to ensure that all purposeful activity is attractive to prisoners and foster positive attitudes to work and education.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Complete</p> <p>Complete</p> <p>Complete</p> <p>Complete</p> <p>March 2024</p>



		<p>The new Careers Information, Advice and Guidance (CIAG) service provider is now embedded at HMP Swaleside and are assisting prisoners with the completion of Personal Learning Plans (PLP), which provide prisoners the opportunity to be involved in their sentence progression and therefore, help to develop positive attitudes to education skills and work (ESW). At least 80% of prisoners will have an up-to-date PLP by the end of June 2024.</p> <p>A Regime Scrutiny Tool has been implemented to provide a greater level of assurance and accountability for the challenging of prisoner's non-attendance at purposeful activity. The prisoners that have not attended their scheduled activity are added to a live document to inform the residential staff, who then complete the reason for non-attendance after discussing this with the prisoner. This information is then used to assure NOMIS records are accurate, and a trends analysis is reported during the Reducing Re-offending meeting so appropriate actions can be taken to improve attendance.</p>	<p>Governor</p> <p>Governor</p>	<p>June 2024</p> <p>February 2024</p>
5	<p>There were few progression opportunities, and many category C prisoners were unable to transfer to a more suitable prison because of national population pressures. There was inadequate one-to-one work to mitigate these systemic problems.</p>	<p>HMPPS continues to strive to maintain offender flows despite the ongoing population pressures felt across the adult male prison estate. Because of the ongoing pressures on the prison population, category B and category C training prisons continue to hold certain cohorts of prisoners so spaces in the resettlement estate can be prioritised for use by reception prisons. The request for flexibility is a short-term measure which should be mitigated by the continued ramp up of HMP Fosse Way and other recent initiatives to relieve some of the pressure experienced in the prison population. More recently HMP Swaleside has seen an increase in category C transfers into the category C resettlement and training estate and</p>	<p>Custodial Capacity, HMPPS</p>	<p>Ongoing</p>





		<p>the number of category C prisoners in the prison has significantly reduced in recent months.</p> <p>The transfer of category C prisoners will remain a priority and HMP Swaleside will continue to transfer prisoners to an appropriate establishment with the support of the Population Management Unit.</p> <p>The Offender Management Unit will contact prisoners that have been awaiting transfer for a prolonged period, to provide them with regular updates on the progress of their application and to allow them the opportunity to request a transfer to an alternative establishment.</p>	<p>Governor</p> <p>Governor</p>	<p>Complete</p> <p>January 2024</p>
Key concerns				
6	<p>The routine use of strip-searching, alongside the use of a body scanner, was sometimes excessive and unnecessary.</p>	<p>The risk assessment for the reception of prisoners into the establishment, including hospital escorts, transfers and new receptions, will be reviewed to ensure that it is fully compliant with the national framework and that the use of full search is appropriate and not excessive.</p> <p>X-Ray body scanner and full search data will be discussed at the monthly Security Local Tasking meeting and the Tactical Tasking Committee Group to ensure that the use of full search is being applied appropriately and only when necessary.</p>	<p>Governor</p> <p>Governor</p>	<p>February 2024</p> <p>January 2024</p>
7	<p>Drugs were too easy to obtain and measures to reduce supply were not comprehensive or effective.</p>	<p>Quarterly multi-disciplinary meetings between the leads for Drug Strategy, Security, Safety and other key stakeholders will be reintroduced to ensure that gathered intelligence and data analysis is shared appropriately and that there is a joint tactical approach to interrupt the supply of drugs.</p>	<p>Governor</p>	<p>January 2024</p>



		<p>Random Mandatory Drug Testing (MDT) has been reinstated and additional posts have been advertised for staff to become trained to provide a greater level of business continuity and resilience.</p> <p>The Enhanced Gate Security staff and visitor searching will be prioritised and additional quality assurance testing has been implemented to maintain standards as well as a quarterly assurance return.</p> <p>Collaboration will take place with the Directorate of Security to ensure future improvements are evidenced based, with a strong multi-disciplinary governance structure in place.</p> <p>The Drug Strategy will be reviewed to include a whole prison approach with a focus on reducing demand and supply, whilst supporting recovery.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>February 2024</p> <p>Complete</p> <p>March 2024</p> <p>March 2024</p>
8	<p>Key work sessions were increasing in number but most lacked substance or quality and many were little more than occasional welfare checks.</p>	<p>Bi-monthly staff training days will commence from January 2024 and will include sessions on how to effectively deliver a keywork session and the support / programmes that are available to prisoners.</p> <p>Custodial Managers have been given guidance and performance targets for the delivery and quality assurance of keywork sessions for their respective areas of responsibility.</p> <p>Prisoners that are a priority (as identified by the Keywork Tool) for keywork sessions will be identified by the Residential team and the quality assurance process has been made a higher priority to ensure Keyworkers are receiving the feedback they need to improve the quality of the sessions and associated record keeping.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>January 2024</p> <p>February 24</p> <p>January 2024</p>



		An analysis tool has been developed to monitor how many keywork sessions prisoners have received each month and to highlight which staff are experiencing difficulties with delivery, so that remedial action can be taken.	Governor	February 2024
		'Reserve' Keyworkers will be assigned to prisoners, to ensure that keywork sessions can continue to be delivered during staff absences.	Governor	February 2024
9	Nearly all wing kitchens were closed, depriving the predominantly long-term prisoner group of the incentive of self-catering and the opportunity for developing life and social skills.	The self-cook area on F wing has re-opened and funding has been secured to re-open the self-cook areas on E wing and the West spur of G wing.  Once the refurbishment has been completed the self-cook areas will be opened at the weekends for a trial period and if this is successful, then the possibility of expanding the availability will be included in future regime planning.	Governor  Governor	Complete  September 2024
10	Work to support fair treatment and inclusion remained weak. The experiences of the diverse prisoner group were poorly understood and disproportionality was not systematically identified or addressed.	A population demographic analysis tool has been developed and implemented for use by the Equalities team and will assist in identifying disproportionality in the experiences of groups of prisoners based on a range of protected characteristics.  The quality assurance process for the Diversity Incident Reporting Form (DIRF) submissions has been improved to assure that investigations, responses and outcomes are thorough and appropriate. 100% of submissions will be assured by the Equalities Lead and 20% by the Head of Function.  The HMP Swaleside Equalities Strategy will be rewritten to provide clear targets and the methods for measuring delivery and progress.	Governor  Governor  Governor	Complete  Complete  February 2024



		<p>A Senior Leader has been identified for each protected characteristic and will chair the appropriate wing forums.</p> <p>Prisoner forums will take place on a fortnightly basis, with one protected characteristic represented on a rolling basis and the schedule will be communicated to prisoners to ensure awareness and facilitate attendance. The feedback provided during the forums will be collated and trends will be reported during the monthly Equalities meeting and associated actions will be monitored through a designated action plan.</p>	<p>Governor</p> <p>Governor</p>	<p>Complete</p> <p>February 2024</p>
11	<p>Some aspects of clinical governance were weak and did not ensure patient safety. Record keeping was poor, medicines administration and regimes did not meet national guidance, and some Prison and Probation Ombudsman recommendations had not been embedded.</p>	<p>Care plans for patients with long term or mental health conditions have been reviewed and the patients have been included to ensure they are personalised and appropriate. This is now an on-going process managed by the Head of Healthcare.</p> <p>Healthcare staff have been set the expectation that discussions are held with all patients that do not collect their medication and that a record is made on the SystemOne computer system.</p> <p>All patients receiving an evening medication delivery have been risk assessed and now most patients with in-possession medication collect their evening medication during the day. This ensures that medication delivery is not being affected by the reduced staffing levels in the evening.</p> <p>The PPO recommendations will be monitored and reported during the new bi-monthly PPO meeting that will be chaired by the Head of Safety.</p>	<p>Head of Healthcare</p> <p>Head of Healthcare</p> <p>Head of Healthcare</p> <p>Governor</p>	<p>Complete</p> <p>Complete</p> <p>Complete</p> <p>June 2024</p>



12	Prisoners did not have access to an adequate range of psychological therapeutic interventions and waiting times for those that were available were too long.	Vacancies in the Therapies Team at HMP Swaleside have been recruited, which has resulted in the following improvements: <ul style="list-style-type: none"> <li>• A new counselling service.</li> <li>• Capacity for up to 10 “high need” patients to receive a one-to-one psychological intervention per week with a specialist practitioner.</li> <li>• New Psychoeducational therapy groups on the residential units and one-to-one support to prisoners by an Assistant Psychologist and an Occupational Therapist.</li> </ul>	Governor	Complete
		A range of Third Wave evidence-based therapy groups, such as Compassion Focused Therapy, have been made available to prisoners.	Governor	Complete
		Delivery of a High Intensity Modular group on “understanding trauma and Dialectical behavioural skills” (DBT) commenced in December 2023.	Governor	Complete
		Vacancies in the therapy delivery staffing group will be recruited. This includes a “dual diagnosis worker” who will be able to offer specialist psychological therapies.	Governor	June 2024
		“Bank” shifts and long-term secondments will be arranged to provide additional counselling staff, to support with the delivery of psychological therapies.	Governor	June 2024
13	The daily regime was restricted because of staff shortages, and a lack of teachers and instructors significantly impacted prisoners’	An improved Prison Officer national recruitment campaign, with enhanced communication and marketing was launched in September 2023, which aimed to drive awareness and interest in frontline roles thereby increasing applications, whilst also building pride and confidence among staff with the aim of improving	MoJ Resourcing	January 2024



<p>engagement with work and activities.</p>	<p>retention. HMP Swaleside featured in the highest tier of support. A further round of enhanced communication and marketing will be launched in January 2024.</p> <p>In addition to standard recruitment campaigns, new Prison Officers are also recruited through two national schemes that bring new Prison Officers in from around the country, one of which pairs the prison with other prisons to leverage their more buoyant applicant pipeline and the other that includes HMP Swaleside as part of a national campaign but restricted to the hardest to recruit to prisons. These incentivised recruitment schemes will see new Prison Officers move temporarily to HMP Swaleside (and other high priority sites) for the first 23 months of their service to reduce the prisons vacancy position.</p> <p>HMP Swaleside also benefitted from an uplift to red+ market supplement in late Summer 2023. This uplift in pay is reflected in recruitment campaigns to make the total enhanced package more attractive to future applicants.</p> <p>Local job fayres have been attended in 2023 and more are planned in 2024. Focus is on all areas of work within the establishment, including Prison Officers, Teachers and Instructional Officers.</p> <p>HMP Swaleside has a rolling advertisement for Instructional Officers, and this will continue until all the posts are filled.</p> <p>The education staffing group is now fully recruited to, and the Head of ESW is holding monthly meetings with the education provider to manage the contract and assure performance.</p>	<p>MoJ Resourcing</p> <p>MoJ Resourcing</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Complete</p> <p>Complete</p> <p>Complete</p>
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		HMP Swaleside will continue to submit Business Cases, on a quarterly basis, for detached duty Prison Officers and Operational Support Payment schemes to mitigate the negative impact of the Prison Officer vacancies.	Governor	March 2024
14	Careers information, advice and guidance were ineffective and did not inform a coherent plan for prisoners to help develop the knowledge, skills, and behaviour prisoners needed to be successful in their progression. New arrivals to the prison waited too long to be allocated to education, skills or work.	<p>Performance data is now being reported on the Quality Improvement Plan (QIP) and is a standing agenda item on monthly Quality Improvement Group (QIG) meeting. Feedback is provided from the monthly quality assurance checks of the CIAG service, to improve the quality of the advice provided.</p> <p>Over 80% of prisoners will have a comprehensive PLP by the end of June 2024, including a sequenced pathway for their progression and the development of their knowledge, skills and behaviours.</p> <p>New receptions are now seen by the CIAG team within two working days to conduct PLP interviews, they are then added to the activity waiting lists based on their choices and eligibility. Within two weeks they attend a multi-disciplinary Activities Allocation Meeting, in which PLP's and ESW needs and aspirations are discussed and sequenced.</p> <p>All prisoners within the resettlement window will have a comprehensive PLP review with the CIAG service and the PLP will form part of their resettlement passport.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Complete</p> <p>June 2024</p> <p>Complete</p> <p>June 2024</p>

