



HM Prison &
Probation Service

Action Plan: HMP Bedford

Action Plan Submitted 21 January 2019

A Response to the HMIP Inspection 28 August to 06 September 2018

Report Published 22 January 2019

INTRODUCTION

HM Inspectorate of Prisons (HMIP) and HM Inspectorate of Probation for England and Wales are independent inspectorates which provide scrutiny of the conditions for, and treatment of prisoners and offenders. They report their findings for prisons, Young Offender Institutions and effectiveness of the work of probation, Community Rehabilitation Companies (CRCs) and youth offending services across England and Wales to Ministry of Justice (MoJ) and Her Majesty's Prison and Probation Service (HMPPS). In response to the report HMPPS / MoJ are required to draft a robust and timely action plan to address the recommendations. The action plan confirms whether recommendations are agreed, partly agreed or not agreed (see categorisations below). Where a recommendation is agreed or partly agreed, the action plans provides specific steps and actions to address these. Actions are clear, measurable, achievable and relevant with the owner and timescale of each step clearly identified. Action plans are sent to HMIP and published on the HMPPS web based Prison Finder. Progress against the implementation and delivery of the action plans will also be monitored and reported on.

Term	Definition	Additional comment
Agreed	All of the recommendation is agreed with, can be achieved and is affordable.	The response should clearly explain how the recommendation will be achieved along with timescales. Actions should be as SMART (Specific, Measurable, Achievable, Realistic and Time-bound) as possible. Actions should be specific enough to be tracked for progress.
Partly Agreed	Only part of the recommendation is agreed with, is achievable, affordable and will be implemented. This might be because we cannot implement the whole recommendation because of commissioning, policy, operational or affordability reasons.	The response must state clearly which part of the recommendation will be implemented along with SMART actions and tracked for progress. There must be an explanation of why we cannot fully agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.
Not Agreed	The recommendation is not agreed and will not be implemented. This might be because of commissioning, policy, operational or affordability reasons.	The response must clearly state the reasons why we have chosen this option. There must be an explanation of why we cannot agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.

			<p>scanners and improved perimeter defences. The outcomes from this project will set a course for the rest of the estate, including HMP Bedford.</p> <p>HMP Bedford is awaiting the outcome of the above project to determine the level and type of investment available, particularly in relation to technological solutions. In the interim HMP Bedford will use available investment to improve physical security as follows;</p> <ul style="list-style-type: none"> • Funding has been secured to improve physical security through improvements to windows on some wings, with work commencing 10th December 2018. • A funding application will be submitted in relation to further windows that would benefit from this change. 	and Counter Terrorism HMPPS	April 2019
	Main recommendations				
	To the governor				
5.2	A time-bound action plan to reduce violence should be in place. This should include a range of sanctions and interventions to address violent behaviour and support victims, and actions should be monitored for effectiveness. (S62)	Agreed	<p>With Support from the National Team, HMP Bedford have developed a comprehensive Safety Strategy to address Violence Reduction, which includes a time bound Violence Reduction (VR) action plan:</p> <p>The Plan includes the following Interventions and Sanctions for prisoners;</p> <ul style="list-style-type: none"> • Psychology led one to one support • Keyworkers working alongside men to set objectives and support them in their change, along with supporting victims. • A Counselling service, to include a specific focus on victims of violence. • Expanding the use of CSIP to provide effective monitoring and support • Improving conflict resolution skills in staff • The Safety Diagnostic Tool will be used to identify the top 10 perpetrators for case management. • Violence Reduction Peer Representatives will be introduced. The Head of Safety will draft clear role briefs and ensure appropriate support is given to the representatives. • A review of Incentives and Earned Privileges (IEP) will take place to introduce a reward based approach for behavioural improvement and sanctions as appropriate. This will include incentives and rewards for 	Governor	Completed
				Governor	March 2019

	needs through a well-managed and effective casework approach. (S65)		<ul style="list-style-type: none"> The temporary reduction of operational capacity which has enabled refurbishment and increased staff focus on decency. Keyworkers will review decency, living conditions and access to regime in their regular discussions with prisoners. The Senior Management Team (SMT) will include at least 1 prisoner on ACCT in their daily cell checks of the 8 checked per day. Where prisoners lack the capacity to maintain decency independently, staff will identify a daily cleaning support visit as part of their care planning process. This will be checked weekly by the local Safety Team. <p>Issues underpinning isolation will be addressed by;</p> <ul style="list-style-type: none"> Case Managers will ensure that care maps include a reference to activities, regime and support to reduce isolation, underpinned by assurance checks. The Head of Residence will identify men at risk of self-isolation at the morning meeting, in order to raise awareness and address underlying causes. <p>Improvements to The ACCT Casework approach will be supported by;</p> <ul style="list-style-type: none"> All staff involved in the ACCT process will be provided with appropriate training and take up of this training will be actively monitored. Comprehensive quality assurance processes will be implemented. Safety Forums will be held with prisoners at least quarterly to understand the triggers for self-harm alongside what is currently working well for those who do not self-harm. <p>Progress and Outcomes against this recommendation will be assured through the Safer Custody Meeting with further actions identified as required.</p>	Governor	March 2019
				Governor	March 2019
				Governor	Completed and ongoing
5.5	Action should be taken to improve staff skills and knowledge. Staff should be skilled and confident in confronting and controlling poor prisoner behaviour	Agreed	<p>HMP Bedford will improve staff skills, knowledge and confidence by;</p> <ul style="list-style-type: none"> The provision of additional training hours facilitated by a temporary reduction in capacity to deliver the <i>Step-Up</i> training programme which includes training in dealing with basic prison issues, cleanliness, 	Governor	Ongoing and until July 2019

	and should be supported in undertaking their role. (S66)		<p>assertive behaviours, anti-conditioning practices and conflict resolution.</p> <ul style="list-style-type: none"> • Provision of a 'how to' guide, to provide basic information for frontline prison officers. • The Clean and Decent Project will also help train staff in cleaning and decency duties. <p>Staff will be supported in undertaking their role by;</p> <ul style="list-style-type: none"> • Provision of support by a Prison Officer Entry Level Training (POELT) mentor, alongside coaching by experienced local staff and Line Management. • The deployment of additional experienced staff on detached duty to provide on the job training and to support staff. <p>Progress and outcomes against this recommendation will be considered by the SMT with further actions identified as necessary.</p>	Governor	September 2019
				Governor	April 2019 and ongoing
5.6	All prisoners should live in clean and decent conditions. (S67)	Agreed	<p>HMP Bedford will improve living conditions for prisoners by;</p> <ul style="list-style-type: none"> • The temporary closure of accommodation which has enabled a rolling refurbishment programme; refurbishing showers on B and D wing, replacing flooring on A wing and undertaking minor refurbishment for C and B Wing. • Bedford will implement new cleaning schedules and painting programmes, & prisoners and staff will be coached and trained in their duties to improve standards with support from the national Clean and Decent Project • Keyworkers will promote and support decency in their regular contact with prisoners. • New kit exchange processes are being implemented to ensure access to basic kit. • Additional pest control has been commissioned and potential nesting sites have been identified and removed. • A new programme of decency checks will be implemented along with self-assurance processes. This will include the establishment of a fast fix party that will resolve decency issues as part of the daily decency checks. 	Governor	June 2019

			Progress and outcomes against this recommendation will be considered by the SMT with further actions identified as necessary. Should this fail to improve conditions the Governor and SMT will review the approach fully.	Governor	Ongoing
5.7	The importance of education, skills and work should be promoted and actively supported throughout the prison. All available activity places should be used, to maximise the number of prisoners attending learning and skills and work. (S68)	Agreed	<p>HMP Bedford will promote and support the importance of education, skills and work by;</p> <ul style="list-style-type: none"> • Ensuring that assessment for work, education and skills is included in the induction programme. • Advertising work opportunities within the prison on prisoner noticeboards and Wayout TV (television channel with locally curated content). • The introduction of additional Information, Advice and Guidance (IAG) workers throughout the prison under the new contract. • Keyworkers will support and promote education, work and skills in their regular contact with prisoners. <p>HMP Bedford will ensure all activity places are utilised by;</p> <ul style="list-style-type: none"> • Improving the allocation system and risk assessment processes. • Reviewing the IEP policy to incentivise engagement with work and learning • Ensuring that any prisoners missed for Basic Skills Assessment (those not on the Induction Unit) are assessed within 5 working days of their reception into the prison. <p>Progress and outcomes against this recommendation will be considered by the Quality Improvement Group (QIG) and SMT with further actions identified as necessary. We will continue to review attendance at the morning meeting.</p>	Governor Governor Governor	March 2019 April 2019 April 2019 and ongoing
	Recommendation				
	To HMPPS				
5.8	Prisoners should be able to apply for universal credit before they are released. (4.32)	Not agreed	<p>This recommendation is not agreed because prisoners cannot typically access the internet to make an advance claim on the Universal Credit system prior to their release from prison.</p> <p>Department of Work and Pensions (DWP) <i>Prison Work Coaches</i> provide support to prisoners, prior to their release, to make their claim to benefits. This includes support in gathering all the details and documentation needed to</p>		

			<p>make their Universal Credit claim and booking an appointment at the local jobcentre on the day of release so they can complete their claim and access financial support immediately through advance payments. Recent changes to Universal Credit means all claimants, including prison leavers can apply for an advance payment of up to 100% of their expected monthly entitlement from day one of their claim.</p> <p>HMPPS are working closely with colleagues in DWP to explore ways to deliver enhancements to the current benefit claim service with the aim of ensuring prison leavers have immediate access to financial support on the day of release where needed. This work sits within the context of a wider national partnership agreement to be established with the DWP, which sets out clear roles and responsibilities for the various bodies involved in getting more prisoners into employment in the future across England and Wales.</p>		
	Recommendations				
	To the governor				
	Early days in custody				
5.9	All new arrivals should be located in a clean, well-prepared cell and be regularly checked by staff on their first night at the prison. (1.8)	Agreed	<p>HMP Bedford will ensure that all new arrivals are located in clean cells by;</p> <ul style="list-style-type: none"> • Implementing a housekeeper role to ensure that rooms are in a decent condition before occupancy. • Room ready checks will be conducted by a prisoner and a member of wing staff prior to occupation. • Unacceptable cells will be taken out of use until brought to an acceptable standard. <p>Staff will complete regular visual checks on new arrivals on the first night, and record these in the Early Days in Custody (EDiC) booklet.</p> <p>Progress and outcomes against this recommendation will be assured by independent checks by the responsible manager, incorporated in establishment's wider decency strategy.</p>	Governor	January 2019
				Governor	Completed
				Governor	January 2019
5.10	All new arrivals should receive a full and prompt	Agreed	A full and prompt induction for all new arrivals where appropriate will be ensured by;	Governor	March 2019

	induction which is tracked to ensure completion. (1.9)		<ul style="list-style-type: none"> • Extending the induction programme to ensure that it is comprehensive. • A daily check of new prisoners located away from the first night centre will be conducted by Induction Unit Officers, supported by a weekly management check to ensure that they are escorted to induction as appropriate • Implementation of the new EDiC booklet, documenting and tracking completion of all key activities for individual prisoners, with management accountability for signing off induction as complete. • Those prisoners for whom a prompt and full induction may not be appropriate due to health, personal risk or behavioural issues will be provided with appropriate support to work through the EDiC booklet and support from their keyworker. <p>Progress and outcomes against this recommendation will be monitored at the SMT.</p>	Governor	June 2019
	Managing behaviour				
5.11	The adjudications process should be robustly managed, to increase the number of timely completions and ensure that it provides an effective deterrent to poor behaviour. (1.20)	Agreed	<p>Improvements to the management of the adjudication process will be implemented by;</p> <ul style="list-style-type: none"> • Increase of managerial oversight through the introduction of a CM post with responsibility for the segregation unit. • The introduction of a monitoring and challenge process on the timeliness of all adjudications by the deputy governor. • Adjudication tariffs will be reviewed to ensure appropriate deterrence. <p>Progress and outcomes against this recommendation will be tracked at the Segregation, Monitoring and Review Group (SMARG) meeting and reported to the SMT to ensure improvement.</p>	Governor Governor Governor	Completed March 2019 March 2019 and ongoing
5.12	Managerial oversight of the use of force should consider any use of batons or special accommodation. Patterns and trends should be identified and acted on,	Agreed	<p>Managerial oversight of the use of batons or special accommodation will be improved by;</p> <ul style="list-style-type: none"> • All baton usage will be reported to the Governor for consideration and review. • Each incident involving the deployment of batons will be fully reviewed at the Use of Force (UoF) meeting. 	Governor	February 2019

	to ensure that force is used only when justified and is always proportionate. (1.25)		<ul style="list-style-type: none"> Any use of special accommodation will be countersigned by the Deputy Governor or Governing Governor. Managers will regularly check as part of segregation rounds to ensure all special accommodation usage is fully documented. <p>We will identify and act upon trends and patterns by;</p> <ul style="list-style-type: none"> Specialist support has been provided to the prison to improve the reporting of patterns and trends to the SMARG and UoF meetings. The Governor will review UoF data regularly at the SMT meeting and take appropriate action. All Body Worn Camera and CCTV footage of spontaneous use of force incidents will be reviewed by the Deputy Governor or senior operational manager and documented as part of the Use of Force Committee Meeting to ensure that force is justified and proportionate. Appropriate follow up action will take place where necessary. <p>Progress and outcomes against this recommendation will be tracked at the Use of Force meeting and reported to the SMT to ensure improvement.</p>	Governor	February 2019
				Governor	February 2019
	Security				
5.13	All requested target searching and drug testing should be completed. (1.37)	Partly agreed	<p>This recommendation is partly agreed, as it is necessary to prioritise target searching and drug testing according to risk and resource availability. HMP Bedford will prioritise completion of target searching by;</p> <ul style="list-style-type: none"> Risk assessing all Intelligence Reports (IRs) on a Red Amber Green (RAG, High, Medium, Low) rating and ensure that all searches arising from Red IRs are actioned. Amber and Green will be prioritised as resources allow. Supplementary support will be provided by the group Dedicated Search Team located at HMP Bedford. <p>We will ensure that all random Mandatory Drugs Tests (MDTs) are completed by ongoing monitoring. Suspicion testing will be completed as resources provide and on a risk assessed basis.</p>	Governor	February 2019
				Governor	February 2019
	Safeguarding				

5.14	Action taken in response to recommendations from the Prisons and Probation Ombudsman (PPO) investigations of deaths in custody should be kept under review to ensure that improvements in practice are embedded. (1.43, repeated recommendation, 1.26)	Agreed	<p>We will monitor continues delivery against PPO recommendations through the following actions :</p> <ul style="list-style-type: none"> • The monthly Safer Custody Meeting will rotate a theme from the PPO action plan, to review progress and set up to date actions to progress or address any slippage. • The Regional Safety Team will review progress against PPO action plans on at least a quarterly basis and feedback will be provided to the Prison Group Director. • The Regional Safety Team will complete an unannounced check of continued compliance with PPO recommendations at least annually. 	Governor	Completed and ongoing
5.15	There should be sufficient Listeners for the population, and prisoners should have access to them around the clock. (1.44)	Agreed	HMP Bedford will increase the number of listeners available by continuing to negotiate with regional and national Samaritans to increase the provision of sufficient training places. We will ensure that prisoners have round the clock access.	Governor	March 2019
	Daily life				
5.16	Breakfast should be of sufficient quantity and issued on the morning it is to be eaten. (2.20, repeated recommendation 2.93)	Not agreed	<p>This recommendation is not agreed as the staffing profile and the regime do not facilitate the issuing of breakfast packs on the morning of the day it is to be eaten. These will continue to be handed out the day before, as this is a well-established practice across the prison estate and one which contributes to a swifter start to the morning regime, including start time for work and other activities. There would be resource implications if breakfast packs were issued each morning, which are not available.</p> <p>Breakfast packs are of a standard size and HMP Bedford chooses the pack that best suits the needs of prisoners at the establishment. Breakfast pack quantity will be reviewed in line with budget considerations in March 2019.</p>		
5.17	Applications should be tracked, to ensure that prisoners receive a timely response. (2.27)	Agreed	<p>We will introduce a system to track all applications. The management team will set timeliness standards and test the timeliness and quality of application responses by placing shadow applications and assessing completion by respective departments.</p> <p>Improvements to timeliness of application responses will also be supported by;</p>	Governor Governor	March 2019 and ongoing March 2019

			<ul style="list-style-type: none"> All personal applications will be resolved by landing staff where possible, reducing delays to responses. This approach will be underpinned by keyworker support and improving staff knowledge and skills through the step up programme. Frequently Asked Question responses (FAQs) will be printed and provided as part of the induction process. These will also be provided to staff on residential units. 		
5.18	All complaints, particularly those about staff, should receive a timely, thorough and polite response which addresses the issues raised. (2.28)	Agreed	<p>We will improve the quality of complaint responses by;</p> <ul style="list-style-type: none"> All complaints against staff will be independently responded to by an appropriate manager. Timeliness will continue to be considered by the Business Hub and will be considered by the SMT at the monthly performance meeting. <i>Step-up</i> training for staff will include appropriate responses to applications and complaints to improve quality. 10% of responses will be quality assured, to ensure quality of consideration, appropriateness of response and politeness of language. Targeted improvement of responses will be undertaken as a result of this assurance. 	Governor	March 2019
5.19	Prisoners on remand should be able to access support and guidance to apply for bail. (2.29)	Agreed	<p>We will improve prisoner access to support and guidance for bail applications by;</p> <ul style="list-style-type: none"> Providing prisoners on remand with additional guidance in the form of FAQs, including this as part of the induction programme. Providing signposting support through the keyworker function. Guidance in relation to bail, legal advice and Citizen's Advice will be clearly advertised on residential wings and via Wayout TV. The review to library stock to ensure that outdated texts are updated and that there are sufficient and appropriate legal tracts to accurately advise prisoners on their rights to request bail. 	Governor	March 2019
	Equality, diversity and faith				
5.20	Evidence of unequal outcomes for prisoners with protected characteristics should be	Agreed	<p>Unequal outcomes for prisoners with protected characteristics will be promptly considered and where appropriated addressed by;</p> <ul style="list-style-type: none"> The review of EMT data by the Equality Action Team. 	Governor	February 2019

	promptly addressed by managers and progress monitored. (2.33)		<ul style="list-style-type: none"> • Tasking through the Equality Action Team (EAT) meeting and fully minuting actions. • Actions for individual managers will also be tracked through bi-lateral meetings with Deputy Governor or Governor. <p>Progress and outcomes against this recommendation will be reviewed at the Equalities forums.</p>		
5.21	Incidents of alleged discrimination should be investigated thoroughly in a timely manner and receive independent scrutiny. (2.34)	Agreed	<p>Incidents of alleged discrimination will be investigated thoroughly in a timely manner by;</p> <ul style="list-style-type: none"> • Introducing a local target of five working days. • Implementation of a process to track quality and timeliness of response through the Business Hub. • Reviewing sample responses at the EAT meeting. <p>Independent scrutiny will be provided by the Independent Monitoring Board, who will quality check a minimum of three responses per quarter and provide feedback to the Governor.</p>	Governor	January 2019
				Governor	March 2019
5.22	The negative perceptions of staff expressed by black and minority ethnic and Muslim prisoners should be explored and addressed. (2.44)	Agreed	<p>HMP Bedford will explore and address the negative perceptions expressed by Black And Minority Ethnic (BAME) and Muslim prisoners by;</p> <ul style="list-style-type: none"> • Engaging prisoners through a forum chaired by the Deputy Governor and creating an action plan for each group. • Publishing an analysis of data on key outcomes such as IEP levels and adjudication outcomes and inviting views of prisoner groups on actions to address. • The co-ordinating chaplain will lead an independent review of perceptions and assist prison management in taking appropriate action to improve inclusion. <p>Progress and outcomes against this recommendation will be reviewed at the Equalities forums.</p>	Governor	March 2019
				Governor	March 2019
5.23	Staff should make greater use of the telephone interpreting service to	Agreed	<p>Improvements will be made to access of the interpreting service by;</p> <ul style="list-style-type: none"> • Two additional 'spider phones' will be purchased to improve capacity for telephone interpretation. 	Governor	February 2019

	communicate with foreign national prisoners with little English, and up-to-date prison information and notices, including reception material, should be translated into relevant languages and made freely available to prisoners. (2.45, repeated recommendation 2.34)		<ul style="list-style-type: none"> Ensuring all staff are trained to access the Big Word service as appropriate, via the Step-Up programme. <p>HMP Bedford will consider the use of Easy Read images where appropriate and key documents including reception material will be translated into the 12 most frequently spoken languages and made available to prisoners (commencing December 2018).</p> <p>The EAT meeting will review data obtained from the Big Word and undertake trend analysis in order to track improvements in levels of use.</p>	Governor	December 2019
				Governor	January 2019
5.24	Prisoners with disabilities should be identified and given good, consistent and organised support. (2.46)	Agreed	<p>Prisoners with disabilities will be identified through Prison Health/ Social care screening and supported by;</p> <ul style="list-style-type: none"> Provision of an appropriately resourced Supported Living Plan (SLP) which will be reviewed regularly, to ensure that the SLP is appropriately followed. A dedicated healthcare professional will be responsible for ensuring the implementation of SLP. 	Governor	March 2019
5.25	All prisoners should be able to attend corporate worship punctually, and all requests to attend services should be dealt with promptly. (2.50)	Partly Agreed	<p>This recommendation is partly agreed as there are circumstances where it may not be appropriate for individual prisoners to attend corporate worship due to operational risk considerations.</p> <p>We will improve the punctuality of attendance at worship and the prompt response to attendance requests by;</p> <ul style="list-style-type: none"> Ensuring that the relevant 'Unlock Lists' are available Monitoring timeliness and attendance of all religious services through the morning meeting. Through the Step-Up programme, staff will be supported and trained to understand the importance of prisoner access to religious services and to know how to ensure this is facilitated. A system for application for attendance at religious services will be implemented by the chaplaincy and attendance will be monitored by the Head of Residence. 	Governor	February 2019

	Health, well-being and social care				
5.26	Patient forums should be established, to allow prisoners to contribute to the development of health services. (2.60)	Agreed	Monthly healthcare forums will be introduced to allow prisoners to contribute to the development of health services. Healthcare will also continue to attend all monthly prisoner forums.	Northamptonshire Healthcare NHS Foundation Trust (NHFT)	April 2019
5.27	There should be a whole-prison strategy to support health promotion. (2.64)	Agreed	National Health Service England (NHSE) and the Governor will publish a new prison wide strategy for health promotion. This will include; <ul style="list-style-type: none"> • NHS led Health promotion activity. • General prison led health promotion activity. • Promotion of wellbeing by the PE department. • Consideration of differing health outcomes based on demographic need and needs related to protected characteristics. 	Northamptonshire Healthcare NHS Foundation Trust (NHFT) and Governor	March 2019
5.28	Prisoners should have timely access to all primary care clinics. (2.73)	Agreed	The prison shall ensure that prisoners have timely access to all primary care clinics by <ul style="list-style-type: none"> • Ensuring treatment officer is in place on a daily basis and appropriately briefed. • Monitoring the reasons for missed appointments, including the performance of treatment officers. • Review of attendance data periodically at the SMT Strategy meeting. <p>The majority of primary care clinics are in place and subject to ongoing review to ensure timeframes are within National Institute Clinical Excellence (NICE) and Quality Outcome Framework (QOF) guidelines.</p> <p>A podiatrist has been employed, commencing in December 2018, covering 3 prisons in the Bedfordshire area. Monthly podiatry clinics will recommence from January 2019. Monthly respiratory clinics are in place and to ensure that these are focussed on those with identified need, the criteria for referral will be reviewed.</p>	Governor Northamptonshire Healthcare NHS Foundation Trust (NHFT) Northamptonshire Healthcare NHS Foundation Trust (NHFT)	Completed and ongoing Completed February 2019
5.29	Non-attendance rates at clinics should be analysed	Agreed	Non-attendance rates are monitored daily and reported to SMT at morning meetings, where reasons for non-attendance are analysed and actions set as necessary. Trends in attendance are discussed at monthly contracts meetings.	Northamptonshire Healthcare NHS	Completed and ongoing.

	and action taken to reduce them. (2.74)			Foundation Trust (NHFT)	
5.30	Routine mental health referrals should be seen promptly, and prisoners with mild to moderate mental health problems should have access to a full range of support. (2.85)	Agreed	Northamptonshire Healthcare NHS Foundation Trust (NHFT) will adopt the new mental health service specification, with accompanied funding for additional posts. NHFT will continue recruiting in order to ensure access to a full range of support activities and the completion of an initial assessment within a 10-day target.	Northamptonshire Healthcare NHS Foundation Trust (NHFT)	May 2019
5.31	Transfers under the Mental Health Act to specialist secondary and tertiary mental health services should occur within the current Department of Health transfer time guidelines. (2.86. repeated recommendation 2.87)	Partly Agreed	<p>This recommendation is partly agreed. Although every effort is made to expedite transfers and assess patients promptly, transfers are dependent on several factors such as the completion of appropriate assessments, administrative processes within the NHS (National Health Service) and the availability of accommodation in mental health hospitals.</p> <p>NHS England is working with partners across the Criminal Justice and immigration removal system to improve and redesign services for offenders with mental health difficulties; this includes diverting them from custody, and ensuring timely and appropriate transfers of care both to and from Mental Health hospital and also through the gate into the community. NHS England anticipate going to full consultation on the refreshed Transfer and Remission Best Practice Guidance, with publication in early 2019-20.</p>	NHS England	May 2019
5.32	All prisoners testing positive for illicit substances should be referred to the substance misuse service. (2.95)	Agreed	<p>Psychosocial care provision is provided by Westminster Drug Project (WDP). Prisoners testing positive for illicit substances will automatically be referred to the psychosocial care services by MDT staff.</p> <p>Referrals will be tracked via the <i>MDT database</i>. Dip sampling will be undertaken in liaison with WDP, to ensure that referrals have been received and processed.</p>	Northamptonshire Healthcare NHS Foundation Trust (NHFT) Governor	December 2018. January 2019 and ongoing.
5.33	All prisoners requiring stabilisation and detoxification should be located on the dedicated drug treatment wing, to ensure consistent	Not agreed	This recommendation is not agreed, because the location of all prisoners is dependent upon an assessment of risk. Prisoners requiring stabilisation and detoxification will be located on the dedicated drug treatment wing as appropriate, based upon an assessment of risk. Regardless of location, consistent observation and monitoring is in place, audited monthly by the Integrated Drug Treatment System (IDTS) clinical lead.		

	observation and monitoring. (2.96)				
5.34	Pre-release harm reduction information should include naloxone training to manage opiate overdose in the community. (2.97)	Agreed	Training will be offered to all intravenous drug users. This will be provided by NHFT subcontractor, Westminster Drugs Programme, in advance of the patient's release. A protocol to ensure Naloxone is given to all relevant patients in reception on day of release will be published by end of March 2019.	Northamptonshire Healthcare NHS Foundation Trust (NHFT)	March 2019
5.35	All staff administering medicines should be assessed as competent do so. (2.105)	Agreed	All healthcare staff, including those directly employed and those subcontracted, that administer medication will complete a standard NHFT annual medication management competency checklist which will be signed off by their line manager. In addition, all NHFT staff undergo 3 yearly training in dispensing.	Northamptonshire Healthcare NHS Foundation Trust (NHFT)	January 2019
5.36	Medication administration should be supervised effectively by prison staff, to ensure confidentiality and compliance, and reduce the risk of bullying and diversion. (2.106)	Agreed	<p>We will improve the supervision of the administration of medication by;</p> <ul style="list-style-type: none"> Band 4 wing supervisors and residential CMs will ensure compliance with current operational procedures and to ensure that staff are supervising appropriately to reduce the risk of bullying and diversion. We will ensure confidentiality by making sure that only one prisoner at a time approaches the dispensary, reinforcing this procedure with appropriate signage, staff supervision and sanctions where appropriate. <p>Regular and random assurance spot-checks will be undertaken by the residential Custodial Managers (CM) and recorded in wing observation books</p>	Governor	April 2019
				Governor	June 2019
5.37	All drug refrigerator temperatures should be monitored, to ensure that medicines are stored at the correct temperature. (2.107)	Agreed	All fridges that are used to store medication are monitored and logged daily. This is audited once a month by a pharmacist and reported to head of healthcare.	Northamptonshire Healthcare NHS Foundation Trust (NHFT)	Completed
	Time out of cell				
5.38	Prisoners should have at least 10 hours out of their cells on weekdays,	Not agreed	This recommendation is not agreed, as it would require additional funding to achieve more time unlocked.		

	including some time in the evening. (3.8)		The current regime allows daily time out of cell, time in the open air, the opportunity for family contact (through phone calls) and access to domestics, whilst supporting activity attendance. A revised core day will be implemented in March 2019, which will maximise time spent out of cell. The Orderly Officer will continue to drive the regime to ensure compliance of the core day timings.		
5.39	Library usage data should be routinely analysed and used to understand gaps and increase use. (3.9)	Agreed	We will analyse data and increase usage of the library by; <ul style="list-style-type: none"> • Analysis of library usage data to inform the QIG with appropriate actions to drive up attendance rates. • Timetabling library periods for each residential unit at least weekly. In addition to this, library access will be offered during the working day from activity areas as well as to those who are unemployed. • Managers will review, to determine improvements in attendance at the library. 	Governor	April 2019
5.40	Accredited qualifications in PE should be introduced. (3.10, repeated recommendation 3.39)	Agreed	Accredited qualifications in PE will be introduced by March 2019.	Governor	March 2019
	Education, skills and work activities				
5.41	Quality improvement arrangements should be urgently implemented and progress should be monitored by senior education and prison managers over time. (3.19)	Agreed	Quality improvement arrangements will be enhanced by; <ul style="list-style-type: none"> • Increased frequency of QIG meeting. • A new Quality Assurance Framework will be designed and introduced with the support of the regional learning and skills manager, the learning & skills provider and the embedded Office for Standards in Education (Ofsted) inspection process. <p>The Regional Learning and Skills team will use the Ofsted common inspection framework, to conduct a biannual health check of services at HMP Bedford. Assurance visits will lead to actions being attenuated to the QIG action log.</p>	Governor Governor	February 2019 Completed and ongoing
5.42	All prisoners should attend the induction to education, work and skills, and have a prompt and thorough initial	Partly Agreed	This recommendation is partly agreed as attendance at the education, work and skills induction may not be appropriate or possible for all prisoners (for example those with severe mental health issues).	Governor	Completed

	assessment of their literacy and numeracy. (3.20)		<p>We will provide an induction to education, work and skills for prisoners with individual attendance assured through the new EDiC booklet to document and track completion of all key activities. The induction includes the Basic Skills Assessment and other key induction activity in relation to education, work and skills.</p> <p>The management team will assess completion of Basic Skills Assessments against the total population. The Learning and Skills Manager will conduct quarterly observations of induction discussions and feedback to the provider and the QIG.</p> <p>The Head of Reducing Reoffending will monitor completion of the basic skills assessment and ensure that numbers of completions are increased from the inspected 70% to at least 90%</p>	Governor	Completed and ongoing
				Governor	March 2019
5.43	The curriculum and qualifications available to prisoners should meet their identified needs and aspirations. (3.21)	Partly Agreed	<p>This recommendation is partly agreed as it is not possible within the available resourcing to offer every prisoner a curriculum which meets all of their individual needs and aspirations.</p> <p>The prison will review the qualifications available to prisoners within the available levels through the education contract by;</p> <ul style="list-style-type: none"> • Introducing increased IAG provision within the establishment to provide better career paths for prisoners. • Ensuring contractors complete Personal Development Plans for all offenders. <p>The provision of qualifications will be informed by Labour market intelligence, assessment and Personal Development Plan (PDP) management information that will lead to a review of the curriculum. A new curriculum will then be introduced that reflects the needs and aspirations of prisoners enrolled in educational provision.</p>	Governor	March 2019
				Governor	June 2019
5.44	Prisoners should receive effective information, advice and guidance in order to make informed choices about their next	Agreed	HMP Bedford will improve IAG provision by increasing numbers of IAG staff in line with the new contract arrangements and continuing to support and develop IAG representatives.	Governor	April 2019

	steps in education and employment. (3.22)				
5.45	The number of prisoners entering education, training or employment on release should be monitored and analysed to improve provision. (3.23)	Agreed	HMPPS will collect data to track prisoners' accommodation and employment on release and consider how to use it to measure the performance of both prisons and probation services and provide incentives for effective joint working. HMPPS are currently developing a measure for employment on release with the intention of adding this to the prison performance framework, subject to data quality.	Head of Performance Analytics and Contract Management	April 2019
5.46	The quality of teaching, learning and assessment should improve substantially. (3.33)	Agreed	<p>The quality of teaching, learning and assessment will be improved by;</p> <ul style="list-style-type: none"> • Introduction of a new Quality Assurance Framework (QAF). • Prison managers will be trained to undertake observation of in-class teaching and assessment. • The QAF will contain specific agreed processes to improve teacher development training and delivery, to be agreed with the Governor and education and provider. <p>Independent assessment of teacher quality will be undertaken by the Regional Learning and Skills Manager and (where possible) the embedded Ofsted Inspector. This will be reported at Group, establishment and provider level.</p>	Governor Governor	April 2019 March 2019
5.47	Prisoners with learning difficulties or disabilities should receive specialist support to make good progress and achieve. (3.34)	Agreed	<p>We will ensure that prisoners with Learning Difficulties or Disabilities (LDD) receive specialist support by;</p> <ul style="list-style-type: none"> • Ensuring that new providers abide by contract stipulations to assess and identify LDD issues. • The Governor will use the dynamic purchasing scheme to ensure additional specialist support for prisoners with LDD. <p>Provision will be assessed through the Quality Improvement Group.</p>	Governor Governor	April 2019 July 2019

5.48	Wing cleaners should receive appropriate training and be properly supervised at work. (3.35)	Agreed	We will ensure that wing cleaners are trained appropriately and prisoners will be appropriately supervised by trained cleaning officers with support from the national Clean and Decent project.	Governor	May 2019
			We will use training records and decency audits by SMT to assure that decency standards are maintained.	Governor	March 2019
5.49	A large proportion of prisoners who start a course should be able to complete it and have the opportunity to gain a qualification. (3.43)	Agreed	We will improve the proportion of prisoners who are able to complete a qualification by review with the learning provider the availability and provision of modular qualifications and the wider curriculum.	Governor	April 2019
5.50	Prisoners should gain demonstrable personal, academic and employment skills that are of value on release. (3.44)	Agreed	HMP Bedford will improve the outcomes achieved by prisoner learners, including the development of valuable skills in preparation for release by; <ul style="list-style-type: none"> • Embedding learning in every prison industry • Introducing the Passport to Employment • Embedding Maths and English into existing workshops. 	Governor	April 2019
			The provision of skills development opportunities will be informed by Labour market intelligence, assessment and PDP management information.	Governor	April 2019
	Children and families and contact with the outside world				
5.51	There should be a well-advertised point of contact, which is checked frequently, for visitors to report any concerns about prisoners. (4.6)	Agreed	HMP Bedford will provide better information to visitors regarding the Safer Custody point of contact by; <ul style="list-style-type: none"> • Production of cards for distribution to visitors. • Introducing refreshed publicity, ensuring that posters are clear, visible and well maintained in the visits centre, visits hall and legal visits. • Updating external website information. 	Governor	February 2019
			The contact number is regularly staffed and answerphone messages are picked up daily during the week. The prison will publish standards of timeliness to respond to calls from visitors and will monitor these at the Safer Custody meeting.	Governor	February 2019

	Reducing risk, rehabilitation and progression				
5.52	The reducing reoffending committee should meet regularly, their strategy should be based on a comprehensive needs analysis and progress should be measured against an action plan. (4.15)	Agreed	<p>The Reducing Reoffending (RR) committee will now meet monthly.</p> <p>A new comprehensive RR strategy will be launched, underpinned by a comprehensive needs analysis drawing upon the following sources;</p> <ul style="list-style-type: none"> • Prisoner questionnaire. • Prisoner forums. • Offender Assessment System (OASys) data including the Basic Custody Screening Tool (BCST). • pNomis data <p>The needs analysis will be reviewed annually and the strategy will be updated accordingly. The strategy will contain a Specific Measurable Achievable Realistic and Time bound (SMART) action plan which will form part of the Common Action Plan (CAP)</p>	Governor Governor Governor	Completed May 2019 May 2019
5.53	Critical tasks in the offender management unit (OMU) should be prioritised: all prisoners requiring offender supervision should have good levels of contact (4.16).	Agreed	<p>A critical task prioritisation list will be developed for OMU staff. This will be monitored by the Head of OMU.</p> <p>The new OMiC Case Management system will go live in September 2019. The Manage the Custodial Sentence (MTCS) Framework outlines that custodial sentences are co-ordinated and prisoners are helped to progress throughout the sentence. Prisoners requiring Offender Supervision, will be provided support through Case Management under OMiC resulting in improved levels of informed contact for eligible prisoners. The implementation of key workers will provide all prisoners with a dedicated member of staff. Training will be provided for key workers to sign post opportunities to meet sentence plan objectives.</p>	Governor Governor	March 2019 September 2019
5.54	All prisoners requiring an offender assessment system (OASys) assessment should have	Agreed	The numbers of offenders without an up to date OASys assessment will be reduced by the implementation of a new staffing profile in line with the MCTS Framework underpinning OMiC. This outlines that all prisoners who are in scope of OASys must be provided the opportunity to participate in their sentence planning. Prison Offender Managers will be trained in OASys and	Governor	September 2019

	an up-to-date risk assessment (4.17)		risk assessments will be subject to rigorous management monitoring. Trends will be discussed periodically at the SMT meeting		
5.55	Sentence calculations should be completed without delay and home detention curfew processes should be completed in a timely manner. (4.18)	Agreed	As part of the critical task review in Offender management, Sentence calculations and Home Detention Curfew (HDC) decisions will be prioritised. Sentence calculations and HDC will be subject to rigorous management monitoring and will be discussed periodically at the SMT meeting. The Head of Offender Management will introduce a set of timeliness checks to ensure performance is improved and maintained.	Governor	April 2019
5.56	Progression should be monitored to ensure that prisoners who need to complete offending behaviour work transfer from the establishment promptly. (4.20)	Agreed	Prisoner Progression will be monitored and improved by; <ul style="list-style-type: none"> • A fortnightly Population Management meeting chaired by an OMU Manager. • This will also be reviewed by the Head of Reducing Reoffending on a monthly basis to ensure that wherever appropriate prisoners requiring transfer to complete offender management work are being transferred in a timely fashion once a course becomes available. 	Governor	Completed
5.57	The interdepartmental risk management team meeting should consider high-risk prisoners due for release with sufficient time remaining to address any gaps in risk management. (4.24)	Agreed	The IRMT will consider all High-Risk prisoners no later than 21 days before release.	Governor	Completed
	Interventions				
5.58	The number of prisoners in permanent and sustained accommodation 12 weeks after release should be monitored, to understand need. (4.29)	Agreed	HMPPS will collect data to track prisoners' accommodation and employment on release and consider how to use it to measure the performance of both prisons and probation services to provide incentives for them to work together more effectively in the future. Through Prison reform, a performance measure will be piloted in 2018/19 to hold prisons to account for the number of prisoners in accommodation on release. HMPPS intend to add this joint performance measure (with Probation Providers) to the prison performance framework from April 2019.	Head of Performance Analytics and Contract Management	April 2019

			Data in relation to CRC supervised prisoners released to Bedfordshire, Northamptonshire, Cambridgeshire or Hertfordshire is available to the CRC and will be provided to the Head of Reducing Reoffending. The sharing of National Probation Service data is subject to national negotiation. Data on accommodation circumstance was published for offenders on release from custody and on community sentences in July 2018 on the government website. For the period Oct-17 to Mar-18, 50% of offenders released from Bedford were released into settled accommodation on their first night.	Governor	April 2019
5.59	There should be sufficient provision to help prisoners to find accommodation on release. (4.30)	Agreed	An enhanced specification will be introduced by the CRC at HMP Bedford to provide additional CRC resource to help offenders secure accommodation on release.	Governor	April 2019
5.60	There should be sufficient provision to help prisoners to continue benefits and manage debt on release. (4.31)	Agreed	An enhanced specification will be introduced by the CRC at HMP Bedford to provide additional CRC resource to provide offenders with advice in relation to benefits and debt on release.	Governor	April 2019
	Release planning				
5.61	Every prisoner should have their resettlement plan reviewed either 12 weeks before release or as soon after their arrival as possible, whichever is earliest, to ensure that resettlement needs are addressed effectively. (4.37)	Partly Agreed	<p>This recommendation is partly agreed, because CRCs are required to review resettlement plans 12 weeks prior to earliest date of release and reviews outside of this timescale are at their discretion. HMP Bedford will ensure that every prisoner has a resettlement plan 12 weeks before release by;</p> <ul style="list-style-type: none"> • Increased resource in CRC. • Keyworkers will ensure ongoing dialogue and review of resettlement goals with the offender concerned. • The CRC will publish a quality assurance framework for BCST2 and Resettlement Plans, which will include dip sampling of a proportion of assessments. • Quality Assurance outcomes will be reviewed monthly at Reducing Reoffending committee meetings. 	Governor	April 2019

Recommendations	
Agreed	50
Partly Agreed	7
Not Agreed	4
Total	61