



HM Prison &
Probation Service

Action Plan: HMP Kirkham

Action Plan Submitted 31st December 2018

A Response to the HMIP Inspection 25th June - 5th July 2018

Report Published 6th November 2018

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, Measureable, 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.



ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMP

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	Main recommendation				
	To the governor				
5.1	A far higher priority should be placed on improving the quality of staff-prisoner relationships across the establishment. There should be clear, measurable actions over time to address and improve prisoners' perceptions of victimisation by staff and embed more respectful relationships, in order to promote the positive ethos of an open prison. (S53)	Agreed	<p>Improvements in staff-prisoner relationships will be driven by our Rehabilitative Culture strategy and related action plan which will be developed through a committee of staff, stakeholder partners and prisoners.</p> <p>We have completed a culture web consultation exercise across HMP Kirkham, gathering feedback from staff, stakeholder partners and the prisoners and this will be used to form a strategic level action plan to be signed off by the Rehabilitative Culture Committee (RCC). The RCC will meet on a monthly basis and will be the forum which will monitor the progress of the action plan. This will be chaired by the Governor.</p> <p>The action plans will have a six month target date and we will measure progress in August 2019 with a repeat of the culture web exercise. The progress against this will also be monitored by our assurance arrangements with HMP Kirkham's group director. The assurance process will include the Quarterly Performance Agreement Meeting (QPAM), within which we monitor the HMIP action plan, the risk register and rehabilitative culture is a standing agenda item.</p> <p>Commencing in January 2019, we will undertake a quarterly programme of surveys for both prisoners and staff to identify, manage and address the perceptions of staff whilst measuring cultural shifts. The surveys will be distributed by the Rehabilitative Culture champions, and the data will be analysed by the RCC as well as by the prisoner committees Kirkham Voice (KV) and Kirkham Recovery Voice (KRV). The surveys will capture information related to key issues identified by the culture web exercise and the HMIP inspection,</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>August 2019</p> <p>May 2019</p> <p>August 2019</p> <p>January 2019</p>



			<p>including perceptions of victimisation, procedural justice and respectful interactions between prisoners and staff.</p> <p>Staff learning and development will involve increased delivery of Five Minute Intervention training (which teaches staff to use ten specific skills in their conversations, shaping them into an opportunity for positive reinforcement or challenge), and 'time to talk' sessions with staff across the prison will also be utilised.</p>	Governor	May 2019
5.2	Progress in changing the staff culture should be monitored by objective means and involve external scrutiny (S53)	Agreed	<p>We will contact the national Measuring the Quality of Prison Life team to determine when HMP Kirkham will be visited, with the intention of utilising their results as an objective vehicle to evaluate the cultural development work undertaken at HMP Kirkham.</p> <p>Locally, we will invite the Independent Monitoring Board (IMB) to the RCC to provide additional external scrutiny.</p>	Governor Governor	February 2019 February 2019
	Recommendations				
	To HMPPS				
	Reducing risk, rehabilitation and progression				
5.3	Multi-agency public protection arrangements (MAPPA) management levels should be confirmed before a prisoner begins ROTL. (4.31)	Partly Agreed	<p>This action can only be partly agreed as the statutory MAPPA Guidance, issued by the Secretary of State does not require mandatory assignment of MAPPA levels for the purposes of releasing a prisoner on temporary licence (ROTL). Additionally, the consideration for ROTL does not automatically trigger the MAPPA level setting process. However, the absence of a MAPPA level should also not restrict managers and decision makers having risk discussions outside of the established MAPPA arrangements. HMPPS ROTL policy requires the prison governor to consult both probation and police before agreeing ROTL in relation to MAPPA eligible offenders and, where a Violent or Sexual Offender Register (ViSOR) record exists, it must be checked for risk related information/intelligence.</p> <p>Where a prisoner has less than six months before his/her full release and the prison have not yet received confirmation of the MAPPA level - the prison will use the MAPPA escalation process (MAPPA S) to establish the level. This will</p>	Governor / Head of MAPPA	Complete & ongoing



			be used to inform ROTL and pre-release planning. The MAPPA escalation process will be embedded in public protection practice and records maintained for MAPPA Responsible Authority accountability.		
	Interventions				
5.4	All prisoners with outstanding offending behaviour needs should be able to access accredited programmes in the community through ROTL. (4.37)	Not Agreed	<p>HMP Kirkham is unable to agree this action as Offender Managers (OMs) are currently unable to secure places on groups due to oversubscription. There are also commissioning issues as CRCs are not funded to deliver interventions for individuals who are still in custody and so are no longer accepting Non-Statutory Intervention referrals for custody cases. Contract Package Areas (CPAs) are also a factor as only Lancashire/Cumbria prisoners will be considered for a place on a programme in Preston by Sodexo, meaning that often prisoners are released before a place can be agreed.</p> <p>The commissioning arrangements are not within our control, and with a number of our prisoners being from other geographical areas, as well as having to compete for spaces with prisoners that the CRCs are funded for, this recommendation is unachievable.</p>	Executive Director Community Interventions	
	Recommendations				
	To the governor				
	Early days in custody				
5.5	Prisoners should not be routinely transferred to open conditions in cellular vehicles. (1.7, repeated recommendation 1.5)	Not Agreed	<p>Transferring prisoners to the open estate remains a nationally commissioned service and, as such, remains an issue for contractor services. This is beyond the control of HMP Kirkham, but we continue to commit to decent treatment of prisoners on arrival.</p> <p>Prisoners Escort Contractor Services may provide non-cellular transport for the movement of Cat D offenders, but this is subject to availability and operational requirement. As specified within the contract, these vehicles may also need to be utilised for the movement of pregnant prisoners, those with health or mobility issues, or those at risk of self-harm and this will impact on availability.</p>	Prisoner Escort Contractor Services (PECS)	
5.6	Staff should monitor and support prisoners on their	Agreed	HMP Kirkham will ensure prisoners are supported during their first night by ensuring they are aware of how to contact staff, and how to seek and access support overnight. This will be communicated via the Induction booklet, included	Governor	January 2019



	first night. (1.8, repeated recommendation 1.17)		<p>within the verbal induction package and reiterated by Listeners working within the induction setting.</p> <p>Monitoring of prisoners on their first night will be improved by introducing a welfare check by staff at the commencement of the night shift period, to check on wellbeing and feelings of anxiety, and to assess whether additional support is needed.</p>		
	Managing behaviour				
5.7	The different behaviour management approaches, including the incentives and earned privileges and Connect–Grow–Thrive schemes, should be integrated into a coherent motivational system with equal emphasis on positive and negative reinforcement. (1.18)	Agreed	<p>HMP Kirkham will utilise the opportunity presented by the IEP (Incentives and Earned Privileges) framework revision to unify this with the ‘Connect–Grow–Thrive’ scheme, ensuring that the resulting strategies are motivational and provide positive and negative reinforcement with equal priority. The scheme will be branded ‘Connect–Grow–Thrive’, allowing us to move away from negative connotations of IEP.</p> <p>The Terms of Reference for the review have been set by the Rehabilitative Culture Committee and functional heads will be responsible for the review and delivery.</p>	Governor	March 2019
5.8	Decisions to hold prisoners in segregation conditions should be based on an assessment of risks to the prison and the individual. (1.28)	Agreed	<p>HMP Kirkham will develop a secure holding room within the reception building, in which prisoners will be located prior to transferring to closed conditions. Once this is in place, the Secure Accommodation Unit (SAU) will only be used following dynamic risk assessment for those prisoners that present an increased risk.</p> <p>With immediate effect, men who are being returned to closed conditions will be risk assessed during the Risk Management Meeting (RMM) process and the decision of the Duty Governor to place in the Secure Holding Review and Assessment Building (SHRAB) will be noted in the minutes. There will be a quality assurance process for 10% of RMM minutes undertaken by the Deputy Governor or Governor.</p>	Governor Governor	March 2019 Complete and ongoing
5.9	Whenever prisoners are segregated, the secure holding rooms and assessment building should be adequately	Agreed	Currently, a Secure Holding Review & Assessment Building is in use at HMP Kirkham, rather than a Segregation Unit. This building is only used for short periods of time, with prisoners generally only being held there for around 3-4 hours before being returned to closed conditions. HMP Kirkham developed this holding area in line with a paper published in June 2016 titled “Developing a	Governor	March 2019



	staffed at all times, to ensure the prisoner's safety and immediate access to support services. (1.29)		Consistent Approach to Returning Prisoners from Open to Closed Conditions" and the building is not used for punishment or longer-term segregation purposes. However, HMP Kirkham are in the process of completing a new Secure Holding Room in Reception as an alternative place to hold prisoners awaiting transfer. In this area, there will be appropriate staffing levels and supervision for the short period of time it takes for paperwork to be completed and for transport to be arranged, and Healthcare staff will have access to all prisoners located here, as and when needed, as staff will be available to unlock as required.		
	Safeguarding				
5.10	The governor and the local director of adult social services and the local safeguarding adult's board should develop robust and effective safeguarding processes. (1.42, repeated recommendation 1.38)	Agreed	Current processes see a representative of the Cumbria and Lancashire Prison group attend the Local Safeguarding Adults Board. The Head of Community Safety at HMP Kirkham will review the current processes, and assess against identified good practice gathered from the regional safety team and advice from members of the local Safeguarding Adults board. Adult Safeguarding will be added to the Safety meeting agenda.	Governor	April 2019
	Daily life				
5.11	Prisoners working in the kitchen should complete all mandatory training and be able to achieve national vocational qualifications. (2.16)	Partly Agreed	<p>This recommendation is partly agreed due to there not being a present need within the kitchen area for NVQ qualifications. This area employs a large number of prisoners and not all will progress into employment within the catering industry.</p> <p>However, all prisoners will complete the industry standard Level 1 Food Safety qualification during their induction to the kitchens, with progression to Level 2 available if sentence length allows. This will be captured within a revised prison planning tool.</p> <p>Those men with relevant sentence plan targets and employment pathways can enrol on the NVQ programme, delivered in RAFTers (the staff canteen which offers activity spaces for prisoners). Outcomes in this area are monitored via the Quality Improvement Group (QIG).</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Complete and ongoing</p> <p>Complete</p> <p>Complete</p>
5.12	Prisoner applications should be tracked and	Agreed	HMP Kirkham will review the process of prisoner applications. This will be led jointly by the Head of Community Safety and the Head of Residence and will	Governor	June 2019



	answered within a reasonable time. (2.22, repeated recommendation 2.11)		<p>involve reviewing the tracking method and the response times in order to improve performance and confidence in this system.</p> <p>Prisoner consultation will take place via the existing prisoner committees, Kirkham Voice and Kirkham Recovery Voice, with input being considered and implemented.</p> <p>This will be followed by a prisoner survey in March 2019 to assess the impact and evaluate the changes made. Further amendments implemented as a result of the survey will be assessed and evaluated by June 2019. Due to the nature of the process and the number of stakeholders involved, target date is set at June 2019.</p>	Governor	December 2018
	Equality, diversity and faith			Governor	March 2019 & June 2019
5.13	Equality and diversity meetings should be routinely attended by managers from across the prison, and progress should be measured against a current action plan. Work should be informed by regular and thorough analysis of equality data and good consultation with prisoners from protected groups. (2.30)	Agreed	<p>HMP Kirkham will review the current terms of reference for EAT (Equality Action Team) meetings to identify the core membership. This review will be undertaken by the Chair and the Head of Community Safety. A review of the EAT agenda will be carried out and attendance will be monitored and managed via bilats.</p> <p>Equalities will be promoted through the monthly SMT meeting and morning briefings, and a communication strategy will be produced by the Head of Community Safety to maximise the effectiveness of existing methods of communication, and test and consider the effectiveness of new methods with the aim of raising the profile of equalities within HMP Kirkham. This will be widely published to all prisoners, staff and stakeholder groups in a variety of formats.</p> <p>The equalities action plan (EAP) will be reviewed and updated, and progress will be measured and recorded at the EAT meeting.</p> <p>The existing prisoner consultation meeting will have an equalities agenda item added to it and specific Protected Characteristic (PC) forums will be introduced relevant to the population at HMP Kirkham. These are likely to include forums for older prisoners, lesbian, gay, bisexual and transgender (LGBT) prisoners, disabled prisoners, and BAME prisoners. These forums, driven by the Safer Custody and Equalities staff and managers, will be introduced to ensure prisoners from PC groups are consulted and engaged. Functions will be asked to review their data collection processes to include equalities data to facilitate</p>	Governor	March 2019
				Governor	March 2019
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				Governor	March 2019



			effective analysis locally, which will inform the EAT and develop and direct the Equalities action plan. The Head of Community Safety will be responsible for this data analysis.		
5.14	Staff training needs should be determined in relation to each protected characteristic and a continuing training programme introduced. (2.31, repeated recommendation 2.26)	Agreed	<p>The Community Safety team at HMP Kirkham will inform the establishment training plan and offer equalities awareness sessions for staff utilising staff training days and/or wellbeing days. The training will be recorded using existing systems such as My Learning. Additionally, staff will complete the mandatory courses on Civil Service Learning and this will be managed by line managers and functional heads.</p> <p>HMP Kirkham will make contact with relevant outside organisations and invite them to visit HMP Kirkham and engage with our staff and prisoners. This has already occurred with community based LGBT representatives, as well as the HMPPS staff organisation Pride in Prison & Probation (PiPP). The Head of Community Safety has also met with an organisation to assist men with hearing impairments, and we are in now in contact with ReCoop regarding assistance for our older population.</p> <p>HMP Kirkham has a prison-wide calendar of diversity events to further raise awareness and develop inclusion.</p>	Governor Governor Governor	June 2019 February 2019 Complete
5.15	The day-to-day care needs of all prisoners with disabilities should be met. (2.41, repeated recommendation 2.36)	Agreed	<p>HMP Kirkham will introduce an improved system for identification and assessment for Personal Emergency Evacuation Plans (PEEPs) driven by the Community Safety Functional Managers, in partnership with residential managers, as residential staff will be undertaking the assessments. This will provide a greater understanding of the prisoners in our care and their individual needs. An individual care support plan will then be devised for those who need it, in partnership with our healthcare partners, and will include recommended adaptations to cells, where needed. The PEEPs and Support plans will be checked by the functional managers to ensure they are effective and kept up to date.</p> <p>Training for residential staff on the effective completion of PEEPs will be sourced from our Regional Health and Safety Advisors.</p> <p>Awareness of the Social Care Assessment process will be increased via leaflets</p>	Governor Governor Governor	March 2019 March 2019 March 2019



			<p>and posters so staff can signpost and support prisoners who may benefit from this additional support to meet their day to day needs.</p> <p>We will ensure that any peer-to-peer care is delivered in accordance with Prison Service Instruction <i>PSI17/2015 'Prisoners assisting other prisoners'</i>, and utilise the arrangements with Lancashire County Council (LCC) via our healthcare provider Spectrum, to ensure Adult social care needs are met.</p>	Governor	March 2019
5.16	The prison should ensure that every prisoner with a protected characteristic is identified on arrival. (2.42)	Agreed	<p>HMP Kirkham have recently introduced an equalities questionnaire completed by all new arrivals during the induction process, in order to capture equalities information and assist us in better understanding the needs of our population.</p> <p>Alongside the review of our documentation, we will introduce the Equalities Representatives and Over 50's Orderlies to the induction process for new receptions to encourage disclosure of equalities information. Information gathered will be collated and recorded on Prison NOMIS (electronic case management system) by Safer Custody and Equalities staff to ensure management information is accurate and effective for monitoring purposes.</p>	Governor Governor	Complete March 2019
	Health, well-being and social care				
5.17	Health reception screens should be completed in a safe and suitable environment. (2.58)	Agreed	<p>The large furniture items in the reception screening room have been removed to create a more suitable environment with additional space. A smaller workstation is in place, allowing improved positioning of the patient and nurse, reducing risk and giving the nurse free access to the exit.</p> <p>The nurse completing the reception screens carries a radio, has the option of a personal alarm and has access to the panic button on system 1 (a one patient, one record model of healthcare). Officers are also present outside of the room and are informed when nurses are in the room with patients/prisoners.</p>	Director of Spectrum Community Health CIC	Complete
5.18	Access to nurse and GP appointments should be equivalent to that in the community. (2.72)	Partly Agreed	This recommendation is partly agreed. Whilst it is accepted that in the community patients are able to make direct appointments to see a GP, the risk is that if this option were available, prisoners would only request GP appointments and would not utilise the Nurse, Nurse Practitioner (NP) or Advanced Nurse Practitioner (ANP) service. This would lead to increased GP waiting lists and risk	Director of Spectrum Community Health CIC	Complete & Ongoing



			<p>extensive delays for patients, and would not support the aim of delivering a predominantly nurse-led service.</p> <p>The nursing team are highly skilled in triage and many of the appointments can be successfully made with the NP and ANP, allowing the GP capacity to see more appropriate patients. Prisoners seen for triage are signposted to see the appropriate professional (including the GP) usually on the same day or at least within two days, due to the availability of protected appointments.</p> <p>The Triage system has been amended to include a daily 'urgent' access, drop in triage each morning, delivered by a qualified nurse.</p> <p>A new daily nurse appointment system has been implemented, which enables prisoners to request (using the application process) a direct planned nurse appointment. This ensures appointments are no longer on a 'first come, first served' basis. The evening drop in triage is still available for any non-urgent appointments or for prisoners who work out of HMP Kirkham through the normal working day.</p>	<p>Director of Spectrum Community Health CIC</p> <p>Director of Spectrum Community Health CIC</p> <p>Director of Spectrum Community Health CIC</p>	<p>Complete</p> <p>Complete</p> <p>Complete</p>
5.19	Formal arrangements for social care should be kept up to date, and the referral process and provision should be widely promoted to prisoners. (2.77)	Agreed	<p>Information to promote the referral process for social care will be available on notice boards within health care and around HMP Kirkham. This has also been placed on the agenda for the next prisoner forum to inform representatives. Staff and prisoner information notices will also be distributed to support this.</p> <p>A meeting will be scheduled between HMP Kirkham LCC to update the out of date formal Memorandum of Understanding.</p> <p>HMP Kirkham will invite LCC to our local delivery bi-monthly board meeting as a stakeholder, the minutes and agenda of which are monitored at quarterly performance meetings with the Prison Group Director.</p> <p>Adult Safeguarding will also be added to the monthly Safety meeting agenda.</p>	<p>Director of Spectrum Community Health CIC / Governor</p>	<p>January 2019</p> <p>March 2019</p> <p>March 2019</p> <p>Complete</p>
5.20	Medication should consistently be stored at an appropriate temperature. (2.96)	Agreed	<p>In the short term, a mobile air conditioning unit is now in place in the pharmacy, ensuring temperatures remain appropriate.</p> <p>Longer term plans to install a fixed permanent air conditioning unit are being</p>	<p>Director of Spectrum Community Health CIC</p> <p>Director of Spectrum</p>	<p>Complete</p> <p>January 2019</p>



			sourced. An additional Works request is being completed for this work to be costed.	Community Health CIC	
5.21	Prisoners should be able to access routine dental appointments within six weeks. (2.99)	Agreed	The healthcare provider, Spectrum, has agreed with the dental provider, Smart Dental, additional dental surgeries in order to 'catch up' and reduce waiting lists. An additional 0.5 session per week will run from December 2018. The additional dental sessions have been agreed until April 2019, at which point the waiting lists will be reviewed. If they are exceeding the recommended waiting times at this point, further discussion around permanent additional sessions will occur with commissioners.	Director of Spectrum Community Health CIC	May 2019
	Time out of cell				
5.22	Prisoners should be able to achieve gym-based qualifications to assist with employability on release. (3.7)	Agreed	In partnership with Achieve NW, HMP Kirkham will continue to provide access to through the gate partners to deliver internal gym based qualifications for suitable candidates in line with employment pathways. Prisoners have the opportunity through Achieve NW to apply for and enrol on the following courses, which are industry standard NVQ equivalent: Level 2 & 3 Gym Instructing and Personal Training Level 2 & 3 Personal Trainer/Gym Course Level 2 & 3 Fitness Instructor Level 2 & 3 Personal Trainer	Governor	Complete
	Education, skills and work activities				
5.23	College managers should improve the accuracy and reliability of their observations of teaching and learning, so that they have a better understanding of the overall quality of provision. (3.19)	Agreed	The Offender Learning & Skills Service (OLASS) Manager will quality assure and improve the teaching and learning observation process by completing a benchmarking exercise on the provision during the 2018/19 lesson observation process. This will then inform the development of a robust teaching and learning action plan, linked to staff appraisals. The OLASS Manager, in conjunction with HMP Kirkham's Learning & Skills Manager, will complete progress checks against the action plan three times a year in November, March & June, and this will be reported on and recorded at QIG meetings.	Chief Executive of Novus Governor/ Chief Executive of Novus	February 2019 June 2019



5.24	Training delivered by prison staff should be subject to rigorous quality assurance, to enable managers to understand the quality of this provision and improve it where necessary. (3.20)	Agreed	HMP Kirkham will implement a revised process to assure the quality of training delivered by prison staff and monitor impact through the Quality Improvement Group (QIG).	Governor	June 2019
			We will review the QIG and Reducing Reoffending Terms of Reference to provide focus on the quality agenda and enlist appropriate membership.	Governor	Complete
			We will implement data collection processes in non-OLASS areas to enable managerial oversight and analysis of success, retention, achievement and prisoner experience, broken down by course.	Governor	January 2019
			The OLASS Manager, in conjunction with HMP Kirkham's Learning & Skills Manager, will complete management checks of delivery three times a year in November, March & June, and this will be reported on and recorded at QIG meetings.	Governor/ Chief Executive of Novus	June 2019
5.25	The virtual campus should be used to help prisoners search and apply for jobs. (3.21)	Agreed	HMP Kirkham will enable prisoners to use the virtual campus to search and apply for jobs, and a Virtual Campus Coordinator will be appointed by Novus to support job search and application work by employment partners.	Chief Executive of Novus	March 2019
			The Head of Reducing Reoffending at HMP Kirkham will develop and implement an employment application policy.	Governor	July 2019
5.26	Work activities should develop prisoners' employability skills and be suitably challenging and purposeful. (3.30)	Agreed	HMP Kirkham will review its workplace activities to ensure that educational achievement, and the development and recording of employability skills, are embedded into workshop provision.	Governor	August 2019
			A planning tool has been developed and implemented to inform educational delivery in HMPPS workshops	Governor	Complete
			Role descriptions will be developed and systems of work reviewed to evidence the breadth of work activity and eliminate work that is neither challenging nor purposeful.	Governor	March 2019
			An effective recording system for employment skills developed in the workplace will be developed, to include an initial skills assessment in the workshops, and a process will developed to enable prisoners to access their development records upon release.	Governor	August 2019



5.27	Teachers should promote English and mathematical skills in vocational lessons and in prison industries by linking these skills to practical and vocational tasks. (3.31)	Agreed	<p>HMP Kirkham will ensure that English and maths is linked to practical and vocational tasks by developing joint working arrangements and responsibilities between prison instructors and teachers within prison industries.</p> <p>Schemes of work and lesson plans will be reviewed in all areas of delivery and amended, where necessary.</p> <p>The OLASS Manager and Learning & Skills Manager will complete joint management checks of delivery three times a year in November, March & June and report on progress at QIG meetings where improvement plans will be developed, as appropriate.</p>	<p>Governor/ Chief Executive of Novus</p> <p>Chief Executive of Novus</p> <p>Governor/ Chief Executive of Novus</p>	<p>August 2019</p> <p>March 2019</p> <p>June 2019</p>
5.28	Teachers should provide feedback to prisoners which enables them to build on what they do well and address their mistakes more effectively. (3.32)	Agreed	<p>HMP Kirkham will work with the education provider to develop a marking and feedback policy in line with current best practice, and communicate this to all relevant staff.</p> <p>The OLASS Manager and Learning & Skills Manager will complete joint management checks to ensure that the policy is embedded and is being used effectively in November, March & June. Findings will be reported at QIG meetings, and managers will provide direct feedback to staff, where required, via one-to-ones.</p>	<p>Chief Executive of Novus</p> <p>Governor/ Chief Executive of Novus</p>	<p>March 2019</p> <p>July 2019</p>
5.29	Prison managers should ensure that gym sessions do not affect prisoners' attendance at work (3.38)	Partly Agreed	<p>This recommendation can only be partly agreed due to HMP Kirkham not having the provision to provide All prisoners with access to the gym outside of the core day, However HMP Kirkham will review the Gym timetable to ensure minimal impact on activity areas during the core day. Any changes will be communicated via community notice, the KV and KRV, and will be made within the existing regime and gym provision.</p> <p>To maximise attendance in work areas, HMP Kirkham will ensure that no prisoner attends gym sessions unless he is on a registered session. This will be monitored by the Activities Custodial Manager through gym registers and workshop performance attendance figures.</p>	<p>Governor</p> <p>Governor</p>	<p>March 2019</p> <p>January 2019</p>
5.30	College managers should take action to improve achievement rates for level 1 mathematics. (3.42)	Agreed	The education manager will implement revised contractual arrangements and subsequent staffing in classroom based City & Guilds maths to improve success rates from 48% to the benchmark of 75% and in line with the performance of the remaining level 1 provision.	Chief Executive of Novus	July 2019



			HMP Kirkham will monitor impact through the QIG & routine reporting mechanisms.	Governor/Chief Executive of Novus	July 2019
	Children and families and contact with the outside world				
5.31	New arrivals should be able to have their first visit promptly. (4.7)	Partly Agreed	<p>This recommendation is partly agreed as without increased funding to support additional visits sessions, any change to visits provision will impact on the current population.</p> <p>However, HMP Kirkham will trial a system to reserve a number of visit spaces on each visits day for newly received prisoners. We will evaluate the uptake of these visits, and any impact they have on the rest of the population, to ensure outcomes are fair.</p>	<p>Governor</p> <p>Governor</p>	<p>March 2019</p> <p>March 2019</p>
	Reducing risk, rehabilitation and progression				
5.32	ROTL processes should be monitored across time, to understand performance, identify weaknesses and develop actions for improvement. Outcomes should be communicated regularly to prisoners. (4.19)	Agreed	<p>HMP Kirkham are ensuring all types of ROTL activities are monitored on a monthly basis. This forms part of the Senior Management Team (SMT) performance report and is a key contribution at the Reducing Re-Offending monthly meeting.</p> <p>There is an expectation, in accordance with ROTL policy, that all initial ROTL assessments are completed in sufficient time to commence ROTL on expiry of a prisoners 3 month assessment period. All ROTL boards are chaired by an Offender Management Unit (OMU) Manager; Band 5 for standard and Band 7 for restricted cases. Each manager is responsible for checking individual assessments to ensure there have been no unnecessary delays in process. The approach in each case is consistent, but outcomes will be subject to individual need and risk</p> <p>The RROM (Reducing Re-Offending Meeting) agenda will be updated to include the discussion of trends, areas of improvement and development activities relating to ROTL, to drive improvements.</p> <p>The Kirkham Chronicle will be utilised to provide an overview of ROTL to the population on a quarterly basis and provide updates on areas being developed.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Complete</p> <p>Complete</p> <p>Complete</p>



5.33	ROTL suspensions should be clearly linked to the prisoner's risk of harm to others in the community. (4.20)	Agreed	<p>HMP Kirkham has reviewed the ROTL suspension policy and communicated expectations to Offender Supervisors, these being that both Tier 1 and Tier 2 ROTL suspensions are to be considered in relation to risk of harm to others in the Community, and that consideration should also be given to risk of non-compliance to licence conditions when on release. Offender Supervisors are expected to evidence this when making recommendations for suspensions following adjudications.</p> <p>Assurance is provided by the ROTL suspension panel, which is chaired by the Head of OMU who countersigns all ROTL suspension decisions.</p>	Governor	Complete
5.34	All prisoners should have an up-to-date OASys assessment, which should be reviewed on arrival to ensure that risk management plans are current and appropriate. (4.29, repeated recommendation S46)	Agreed	<p>At the time of inspection, payment plus was in place and remains available for outstanding Offender Assessment System (OASys) assessments/reviews.</p> <p>All Prisoners are targeted to have their OASys reviewed within 3 months of arrival at HMP Kirkham and the log for assessments/reviews has been amended to include the "date a prisoner arrives" and "date to be completed". The log is regularly monitored by OMU managers to ensure all reviews are completed within the required timescales and there is currently no backlog of OASys within the establishment.</p>	Governor	Complete
5.35	Restricted ROTL boards should be multidisciplinary and, in the more complex cases, involve the prisoner. (4.30)	Agreed	<p>Currently, HMP Kirkham holds multi-disciplinary boards as all departments involved in the management of the prisoner are expected to provide a written contribution. Contributions are routinely received from Spectrum Substance Misuse Services and Psychology in the form of EBM reports (Enhanced Behaviour). Additional contributions are requested from departments such as Mental Health teams, as appropriate. Offender Supervisors are routinely included in all boards where a change of activity is requested.</p> <p>Probation Offender Supervisors for Restricted cases have regular 1:1 meetings with each prisoner they case manage, and fully discuss planned progression on ROTL both prior to, and during, the ROTL stages. This affords prisoners the opportunity to be involved and provide input.</p> <p>Each complex case will be assessed on its individual merits and, where appropriate, the individual prisoner will be more directly involved this will be achieved with them attending a 1-1 meeting with the ROTL Chair. This will be recorded in the ROTL 12 Risk Assessment Review.</p>	Governor Governor	Complete Complete



	Interventions				
5.36	Prisoners should be able to open a bank account routinely before release, unless there are exceptional circumstances. (4.36)	Agreed	In partnership with Shelter and the banking co-operation, HMP Kirkham has now developed a partnership with Halifax Bank to help prisoners open bank accounts prior to release. The achievement rates have significantly improved with us now seeing 95% of applications for bank accounts being approved. The number of accounts being opened is being monitored by both Shelter and HMP Kirkham, with figures being discussed and monitored at the Reducing Reoffending meeting.	Governor	Complete
	Release planning				
5.37	All resettlement plans should be reviewed 12 weeks before the earliest possible release date, in order to be effective. (4.40)	Agreed	<p>Management information reports have been amended to now show the earliest release dates as the Home Detention Curfew (HDC) eligibility date, rather than the Conditional Release Date (CRD). This allows us to commence resettlement activity at the appropriate stage and enables Shelter to measure and ensure the 12 week target is being achieved for all prisoners. The 12-week discharge report is run weekly to include any new transfers into the establishment and anyone with 12 weeks or less left to serve are prioritised and seen within one week of arrival. All resettlement plans are reviewed again 3 weeks prior to release to facilitate effective, continued delivery in the community by Probation.</p> <p>Current reporting processes are not sufficiently detailed to allow for an appropriate level of investigation into missed deadlines by the Head of Reducing Re-Offending, but this is currently being escalated to the Service Integration Group in order that improved reporting is received to enable investigation and challenge for missed deadlines.</p> <p>Head of Reducing Re-Offending will implement a quality assurance system which will check that the milestones outlined above are adhered to in a random sample of cases and challenge cases where they have not been met.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Complete</p> <p>May 2019</p> <p>May 2019</p>



Recommendations	
Agreed	30
Partly Agreed	5
Not Agreed	2
Total	37

