



HM Prison &  
Probation Service

Action Plan: HMP Maidstone

Action Plan Submitted 17 April 2019

A Response to the HMIP Inspection 8 – 19 October 2018

Report Published 19<sup>th</sup> February 2019

## INTRODUCTION

HM Inspectorate of Prisons (HMIP) is an independent inspectorate which provide scrutiny of the conditions for and treatment of prisoners. They report their findings for prisons and Young Offender Institutions 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 <b>must</b> 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 <b>must</b> 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 MAIDSTONE

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	<b>Main recommendations to the Governor</b>				
5.1	<p>Reception and first night processes should ensure that prisoners' immediate vulnerabilities, needs and risks are thoroughly assessed through a private interview with prison staff to ensure that appropriate support is offered.</p> <p>Additional night time checks should be undertaken on new arrivals. <b>(Error! Reference source not found.)</b></p>	Agreed	<p>Newly received prisoners at HMP Maidstone are seen by Reception and Healthcare teams on arrival. A first night risk and vulnerability assessment, interview and checklist will be completed by first night staff who will record the assessment and checks forward a copy to safer custody.</p> <p>Reception staff will conduct a review of prisoners' cell sharing risk assessments (in line with Prison Service Instruction PSI 20/2015 – Cell Sharing) to check it is up to date and where necessary complete a new assessment if risk has increased following transfer from a previous establishment.</p> <p>Additional checks will be completed on men during their first night in the prison. Specific concerns will be logged on the form and in the observation book and if needed marked on the roll board for locations to let staff and night patrols make any further necessary checks to ensure the wellbeing of the men.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>April 2019</p> <p>April 2019</p> <p>Completed</p>
5.2	Sufficient investment should be made to ensure that the prison provides a safe and decent environment for prisoners and facilities which are fit for purpose. (S41)	Partly Agreed	<p>This recommendation is partly agreed as progress is dependent on funding which is not confirmed and for which there is very significant demand. The following improvements are however agreed:</p> <p>A new Laundry is under construction and will be operational in April 2019.</p> <p>Cell Windows on Kent and Thanet wings are due to be replaced as part of the national cell window replacement program next year.</p>	<p>Governor</p> <p>Governor</p> <p>National Service Management Team</p>	<p>April 2019</p> <p>April 2021</p>



			<p>Bids to refurbish the remaining showers in need of renovation will be submitted by the governor.</p> <p>Replacement of the existing Sports Hall facility is currently going through the MOJ approval process and will commence, subject to funding remaining available in early 2020.</p> <p>A Boiler replacement programme for Kent Wing and for Segregation Unit/Chapel Boiler services is scheduled to commence in April 2019.</p>	<p>Governor/HMPPS</p> <p>MOJ/National Service Management Team</p> <p>MOJ/National Service Management Team</p>	<p>Completed</p> <p>April 2020</p> <p>April 2019</p>
5.3	Leaders, managers and staff should focus relentlessly on implementing effective new continuous quality improvement arrangements which are informed by a comprehensive and accurate evaluation of all areas of weakness in education, skills and work. (S42)	Agreed	<p>The Quality Improvement Group will now meet monthly to drive improvements to the education provision. A new full time Education Manager is now in post to assist.</p> <p>Reducing Reoffending managers have undertaken quality improvement training and a quality assurance calendar is now in place to monitor provision throughout 2019.</p> <p>An improvement action plan is now in place and managers discuss progress weekly.</p> <p>The regional team will carry out Quality Assurance checks and a mock inspection is planned in September 2019 to measure progression and Learning Walks are planned to monitor the quality of teaching and learning.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Prison Group Director</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p> <p>September 2019</p>
5.4	Leaders and managers should ensure that all work activities develop prisoners' employment and personal skills and lead to qualifications and clear records of achievement. (S43)	Partly Agreed	<p>HMP Maidstone are piloting a scheme whereby Instructional Officers develop employment related skills, known as soft skills with prisoners in activity areas. This will be recorded on a 'Gateway skills to employment' booklet document, in consultation with each prisoner to measure learner progress although this will not always lead to a qualification.</p> <p>The prisons local preparation for release programme will help to identify prisoner's skills, needs and aspirations. They will be allocated to activities accordingly and progress recorded.</p> <p>HMP Maidstone is currently mapping out several structured pathways to employment. A clear flow chart of relevant employment related activities will be published by May 2019, making use of the Dynamic Purchasing System (DPS,</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>April 2019</p> <p>May 2019</p>



			an electronic framework agreement, but where new suppliers, such as for contractors, services and goods can join at any time)		
5.5	Leaders and managers should implement a thorough and accurate training needs analysis of the population, use it to implement a full curriculum review and ensure that the provision of activities meets the needs of the majority of prisoners, including the more able and experienced. (S44)	Agreed	<p>In response to low return rates to HMP Maidstone's attempt to carry out a needs analysis of the population by conducting and incentivising prisoner surveys, Functional Heads of Department will investigate obstacles to completion, encourage greater participation in the process and will commission a further needs analysis, broken-down into one pathway at a time incorporating accommodation, education and skills and health.</p> <p>Management Information reports will be reviewed via P-NOMIS (a prisoner database system) and OASys (an IT based offender assessment system) which, along with further surveys and consultation, will then be analysed to produce the overall needs analysis. This analysis will then be used to inform the curriculum review to ensure that wherever possible the provision meets the needs of the majority of prisoners.</p>	Governor	June 2019
				Governor	March 2020
5.6	Organisation and delivery of rehabilitation and release planning services should be integrated into a single coherent system that identifies and addresses the risks and needs of each prisoner throughout their time at Maidstone. In particular, all prisoners should have an up-to-date OASys assessment and sentence plan and should be supported and motivated by regular and meaningful contact with offender supervisors. (S45)	Partly Agreed	<p>This recommendation is Partly Agreed as some elements remain the responsibility of the prisoners' previous establishment(s) and external probation services. There are current population pressures which would impact sending establishment's ability to complete all Offender Assessment System (OASys) paperwork prior to transfer and operational constraints to be able to implement the recommendation as the Offender Management in Custody Model (OMiC) is in the process of being rolled-out nationally. HMPPS are currently working through the roll out schedule for the case management element of the model which will involve the deployment of additional probation officers into prisons. This element of the model and the transition period is being managed by Divisional implementation Boards, with a target to have the full model implemented by September 2019.</p> <p>HMP Maidstone continues to receive significant numbers of prisoners without an initial OASys and is not currently resourced to carry out this work, however the prison continues to prioritise higher risk prisoners and to carry out as much of this work as possible. OMiC case management is anticipated to be introduced in September 2019 where Prison Offender Managers (POMs) will be based in the establishment. This will see an increase in resources in the OMiC leading to better coordinated rehabilitation and release planning.</p> <p>The process to manage risk and prisoner need and conduct appropriate levels of meaningful contact has now been relieved with the addition of additional</p>	Governor	
				Governor	December 2019
				Governor	April 2019



			personnel. This will improve further with the roll-out of Key Workers, where it is expected that all prisoners will receive regular meaningful sentence guidance.		December 2019
	<b>Recommendation to the Home Office</b>				
5.7	Immigration caseworkers should make decisions about a prisoner's removal or release promptly to help target and maximise the effectiveness of resettlement work. (Error! Reference source not found.)	Agreed	<p>Foreign National Offender (FNO) cases are prioritised according to their Early Removal Scheme date (ERSD), the intention being to serve deportation decision before the ERSD where practicable and to remove immediately after ERSD, again where practicable.</p> <p>The Home Office (HO) has recently agreed a Service Level Agreement (SLA) with HMPPS where the aim is to serve the relevant establishment immigration detention notifications 30 days ahead of the Conditional Release date.</p>	<p>HMPPS Foreign National Team</p> <p>Home Office</p>	<p>Completed</p> <p>Completed</p>
	<b>Recommendation to the Home Office and HMPPS</b>				
5.8	There should be sufficient staff in the offender management unit to undertake regular, proactive casework with prisoners (4.20)	Agreed	<p>The process to manage risk and prisoner need and conduct appropriate levels of meaningful contact was exacerbated by the re-deployment of Offender Supervisor (OS) resources from the Offender Management Unit (OMU), however this has now been relieved with the addition of more staff.</p> <p>OMiC case management is anticipated to be introduced in September 2019 where POMs will be based in the establishment. This will see an increase in resources in the OMU leading to better coordinated rehabilitation and release planning.</p>	<p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>December 2019</p>
5.9	There should be sufficient Home Office immigration enforcement officers to undertake regular, proactive casework with all prisoners. (4.21)	Agreed	<p>The Home Office Immigration Enforcement (HOIE) Criminal Casework Prison Operations Team have recently recruited additional staff resource to bring the team up to a full complement.</p> <p>Criminal Casework in Home Office Immigration Enforcement operate a dedicated on-site operational team in HMP Maidstone embedded within the OMU. In addition, dedicated Criminal Casework Teams have been identified to work on European and on other Foreign National cases where the individual is held in the Custodial Estate.</p>	<p>Home Office</p> <p>Home Office</p>	<p>Completed</p> <p>Completed</p>



	Recommendation to HMPPS				
5.10	Foreign national prisoners should be risk assessed for category D status, open conditions, home detention curfew and release on temporary licence through processes which give them a fair chance of achieving these forms of progression in their sentence. <b>(Error! Reference source not found.2)</b>	Agreed	<p>A process is in place at HMP Maidstone to consider Home Detention Curfew on a case-by-case basis and several cases have been processed since the Inspection. All Re-categorisation is individually assessed and clearly documented in line with the relevant PSIs (Prison Service Instructions): PSI 37/2014 (Eligibility for Open Conditions) and for Release on Temporary Licence (ROTL) of Prisoners Subject to Deportation Proceedings and PSI 40/2011 (Categorisation and Recategorisation of Adult Male Prisoners). Foreign national prisoners should be assessed for HDC, ROTL and Category D in the same way as other prisoners except if they are being removed from the UK. In those cases specific provisions apply.</p> <p>For HDC, if a decision to deport has been notified, the offender is statutorily excluded from HDC by virtue of s.246 (4) (f) of the Criminal Justice Act 2003. If the removal process is live but has not reached this stage the policy (PSI 52/2011) is that they are presumed unsuitable for HDC but may be released in exceptional circumstances. The law and the policy reflect the fact that HDC is for those who are resettling in the UK. There is a separate early removal scheme for offenders who are being deported.</p> <p>Any offender who has a Deportation Order against them against which all rights of appeal within the UK are exhausted is prohibited by Prison Rule 9 (1A) / YOI Rule 5 (1A) from ROTL and by Prison Rule 7 (1a) / YOI Rule 4 (2) from open conditions. Such offenders are expected to be removed from the UK at the appropriate point in their sentence and do not therefore require the resettlement opportunities that are an integral part of open prisons and the ROTL system.</p> <p>Where deportation action is being pursued but the prisoner has not yet exhausted in country appeal rights they may be considered for open conditions and for ROTL but against the strengthened risk assessment set out in the relevant PSI (37/14 or 13/2015). The risk assessment must be undertaken on the assumption that deportation will take place. Each case will be considered on its individual merits, but the need to protect the public and ensure that deportation is not frustrated is paramount, and the presumption is that offenders who are liable for deportation will not be suitable for ROTL unless they are assessed as presenting a very low risk of seeking to avoid the intention to deport by failing to return.</p>	<p>Governor</p> <p>HMPPS/Sentence and Releasing Policy Unit</p> <p>HMPPS/Sentence and Releasing Policy Unit</p> <p>HMPPS/Sentence and Releasing Policy Unit</p> <p>Governor</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p> <p>Completed</p> <p>June 2019</p>



			Local ROTL policy will be rewritten underpinned with PSI 13/2015 Annex J that has been written to have a section explicitly on FNO which prevents ROTL in most cases and therefore limits severely those prisoners that are eligible.		
	<b>Recommendations to the Governor</b>				
	<b>Early days in custody</b>				
5.11	Prisoners on escort should be given adequate toilet breaks and this should be recorded. (1.9)	Agreed	The contractors are required to schedule comfort breaks into journeys every two and a half hours. The Prisoner Escort Record (PER) must be noted when comfort stops are offered and if declined by the prisoner. PECS Contract Delivery Managers conduct regular checks of PERs, including monitoring for the provision of comfort stops. Where these have not been offered and recorded on the PER, Contract Delivery Managers will challenge the Escort Contractor directly.	Prisoner Escort Contractor Services	Completed
5.12	Prisoners on the first night centre should be unlocked during the core day. (1.10)	Agreed	The induction program will be revised to provide appropriate activities through the working sessions of the core day to ensure that it mirrors the working day and prisoners on induction are unlocked comparably to prisoners employed in other activities. This will be monitored by the Head of Residential Services.	Governor	August 2019
5.13	The induction programme should be clear, concise and relevant and should provide all prisoners with enough knowledge to access fully services and activities at Maidstone. This should include contact with Home Office staff. (1.11)	Agreed	The induction program has been revised to ensure that it is more comprehensive. Specifically it now adds information on making a complaint or application, official prison visitors scheme and information on immigration processes. It also includes a session with HOIE (Home Office Immigration Enforcement team) staff subject to their resourcing. The Prison Operations and Prosecution (POP) team currently induct all new receptions at HMP Maidstone. The target date is within 5 days of arrival, but the reality is most are seen within 2 days.	Governor/Home Office Immigration Enforcement Team	Completed
	<b>Managing behaviour</b>				
5.14	Procedures to monitor perpetrators of violence or antisocial behaviour should address the underlying causes of violent and antisocial behaviour and set targets	Agreed	<p>The SAFE documenting system has been replaced by the mandated national roll-out of CSIP (Challenge, Support, Intervention, Plan) as part of the VR strategy to allow for early identification of likely perpetrators of violence, address causes of violence and manage their behaviour.</p> <p>Following roll-out of CSIP, each prisoner subject to a plan will have meaningful targets set which will be supported by Key Workers who will support and</p>	<p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>June 2019</p>





	specific to the prisoner. (1.20)		<p>challenge men to behave in a respectful manner and this will reinforce positive behaviours and conduct of individuals.</p> <p>Further monitoring and Quality Assurance (QA) of Key Work will be undertaken by residential CMs reviewing 10% of KW entries; QA of CSIP will be undertaken by the Safety Team.</p>	Governor	June 2019
5.15	Detailed analysis of adjudications should be carried out to identify themes or trends and to reduce the quantity of laid charges. (1.25)	Agreed	<p>The Quarterly Segregation Monitoring and Review Group (SMARG) and Adjudication Standardisation meetings Terms of References will be revised to include analysis of:</p> <ul style="list-style-type: none"> <li>• Equalities Monitoring (By Protected Characteristic of those on Adjudication)</li> <li>• Offence themes</li> </ul> <p>This will allow attention to be focussed on key areas to reduce the volume of charges if appropriate. This will be evidenced through the SMARG minutes and subject to dip testing of a monthly 10% sample by the Deputy Governor.</p> <p>The introduction of a rehabilitative culture will aim to provide alternative means to manage prisoner behaviour, but also provide an environment where prisoners are less likely to offend. This will be assured through the Incentives and Earned Privileges process which will be used to assess prisoner behaviours through a Yellow/Red card scheme before some adjudications are laid.</p>	Governor  Governor  Governor	June 2019  June 2019  Sept 2019
5.16	Prison managers should review and quality assure all incidents of force, associated video footage and documentation. (1.32)	Agreed	<p>All use of force documentation and associated video footage will be reviewed by the use of force co-ordinator (Custodial Manager) and this will be recorded on a form kept with the documentation pack.</p> <p>A sample of 10% will be selected at random and reviewed at SMARG meetings in addition to any cases that have been subject to a complaint.</p>	Governor  Governor	Completed  June 2019
5.17	The special cell should be made fit for occupation or taken out of use. (1.33)	Agreed	The cell has been taken out of use as it is not deemed suitable for occupation.	Governor	Completed
5.18	Good order or discipline and reintegration planning reviews should be attended by staff from relevant departments and	Agreed	The issue of prisoners not being routinely invited to segregation and reintegration planning reviews was rectified during inspection. All operational managers are aware that prisoners should be in attendance unless they refuse or in exceptional circumstances (which will be recorded).	Governor	June 2019



	should focus on the prisoner's individual circumstances. The prisoner should be invited to attend. (1.39)		The governor will ensure chaplaincy attend reviews and will raise the attendance of IMB and Healthcare providers with the respective organisations. Any other relevant departments will also be invited to attend on a case-by-case basis and individuals Key Workers will also be expected to attend.	Governor	Completed
5.19	Cells for prisoners requiring constant supervision should not be located in the segregation unit. (1.40, repeated recommendation 1.54)	Not Agreed	This recommendation is not agreed as it requires substantial funding which has not been approved.  A bid was submitted for consideration by the Asset investment board, to move the constant supervision cells to Weald wing but has been rejected.	Governor/HMPPS  Governor	
	<b>Security</b>				
5.20	The strip-searching of all men leaving the prison and the handcuffing of all prisoners going to hospital should be proportionate and based on an individual risk assessment. (1.47)	Agreed	The routine full searching of prisoners on release was ceased immediately during the inspection and is now only undertaken in response to a risk.  The escort risk assessment form has been updated to include a healthcare "suitability of handcuff's" assessment. This will be considered in all instances by the operational manager deciding the appropriateness of restraints which will be risk assessed balancing the needs of decency and security on all available evidence.	Governor  Governor	Completed  Completed
5.21	Intelligence-led searches should be carried out quickly in all cases where a need is identified. (1.48, repeated recommendation 1.33)	Agreed	A newly profiled Operations Group will ensure greater flexibility in the use of staff resources to ensure that wherever possible searching can be undertaken on any given day and therefore delivered punctually in response to intelligence generated at the Governors Morning Briefings.  Intelligence-led searches will be monitored by the Head of Security and at the monthly Security Committee meeting to assure delivery.	Governor  Governor	April 2019  April 2019
5.22	The MDT suite should have a separate key and should only be accessible to those undertaking MDT work. (1.49)	Agreed	The Mandatory Drug Testing (MDT) Suite was relocked to an individual key when initially raised during the inspection, restricting access to the area only to those undertaking MDT.	Governor	Completed
5.23	The MDT suite should be sterile and conducive to forensic testing. (1.50)	Agreed	The Head of Security at HMP Maidstone now ensures that the testing environment is clean and sterile.	Governor	Completed



5.24	The holding rooms should be refurbished and heating installed. (1.51)	Agreed	The MDT suite has been refurbished. Holding rooms are now clean and heated. Secure lockers are now being used to store testing kits.	Governor	Completed
5.25	Random mandatory drug tests should be unpredictable, and suspicion and risk-based testing should be completed promptly in relevant cases. (1.52, repeated recommendation 1.34)	Agreed	Shortages of staff is being addressed by increased staffing and re-profiling which will include an Operations Group who will have responsibility for random MDT. This will allow for greater flexibility in the use of staff resources to ensure that MDT can be undertaken on any given day and therefore delivered in an unpredictable pattern and also facilitate the timely completion of suspicion/risk tests.  This will be monitored by the Head of Security and at the monthly drug strategy meeting to assure delivery.	Governor  Governor	April 2019  April 2019
	<b>Safeguarding</b>				
5.26	ACCTs should be of a consistently good quality, ensuring that individual prisoners receive appropriate care and support. (1.59)	Agreed	Case Managers are responsible for ensuring individuals receive appropriate care and support by producing care maps for any prisoner deemed at risk of self-harm and they, as well as any other appropriate staff who supervise prisoners at risk of self-harm will ensure they entries they make in ACCT (Assessment, care in custody and teamwork case management of prisoners at risk of suicide or self-harm) documents are of good quality and are meaningful.  A new quality assurance process has been introduced whereby each ACCT is reviewed and quality assured by the Safer Custody Manager. These checks will be recorded in a log in the Safety department and any deficiencies will be highlighted to case managers.	Governor  Governor	April 2019  Completed
5.27	There should be a policy for the thorough investigation of all serious incidents of self-harm and action on learning points and recommendations. The policy should include implementation of recommendations in Prisons and Probation Ombudsman fatal incident reports, and these should	Agreed	The local Safer Custody policy will be revised to include the definition of serious self-harm and the requirement for an investigation, which will be recorded on a form that will include learning points and recommendations. These will be sent to the regional Safer Custody Lead for assurances and quality checks and monitored by the Prison Group Director's (PGD) Safety lead  Actions from Prison and Probation Ombudsman (PPO) reports (including those from the last 5 years) will be incorporated into the establishments Consolidated Action Plan (CAP). This will ensure that it is centrally monitored at Quarterly SMT meetings and subject to the PGD's scrutiny during assurance visits.	Governor  Governor/Prison Group Director	June 2019  June 2019



	be reviewed regularly. (1.60)				
5.28	There should be a coherent strategy to reduce self-harm, informed by the characteristics of the population at Maidstone, and meaningful analysis of data including contributions from key partners such as health care and the Home Office. (1.61)	Agreed	<p>The meeting schedule has been revised to ensure that key partners including health and the Home Office are involved in developing that strategy to reduce self-harm.</p> <p>The Terms of Reference for the meeting will include analysis informed by appropriate data and strategic action to reduce self-harm and will be evidenced through the minutes and assured by the regional lead. This work will feed into the Key Work framework in order to ensure all Key Workers will be able to understand their role in the potential for the reduction of self-harm.</p>	Governor  Governor	Completed  April 2019
5.29	Prisoners on ACCTs should be located in the segregation unit or special accommodation only as a last resort and in exceptional circumstances. When prisoners are located in this area, defensible decisions logs should show full justification for the reasons and alternatives that have been explored. (1.62)	Agreed	<p>Prisoners on ACCT will only be located on the Segregation Unit or Special Accommodation as a last resort or in exceptional circumstances.</p> <p>The defensible decision logs for segregation of prisoners on ACCT has been replaced with a best practice form from another establishment. This includes sections on each element that should be considered by the segregating operational manager as well as space for daily reviews and space to assess trigger points pertaining to each individual and their associated risks. Each log will be completed by a Senior Manager.</p>	Governor  Governor	Completed  Completed
5.30	All staff should be trained in safeguarding procedures and be aware of their responsibilities. (1.64)	Agreed	<p>The Head of Safer prisons will explore opportunities for safeguarding training for appropriate staff through the Kent council's adult safeguarding board.</p> <p>The local safeguarding policy will be drafted and incorporated into the Safer Prisons policy then communicated to all staff via global email and made available in a shared access folder.</p>	Governor  Governor	March 2020  September 2019
	<b>Staff-prisoner relationships</b>				



5.31	Officers should make regular, detailed and informative case note entries which comment on sentence plan progression and welfare. (2.7)	Agreed	The prison will roll out the OMIC model, including the introduction of the Key Worker role and resources. This will ensure that all prisoners have an identified Key Worker, with regular meaningful contact which is both recorded via Key Worker entries on P:NOMIS and will be used to provide evidence for sentence progression targets and reviews.	Governor	April 2019
	<b>Daily Life</b>				
5.32	All showers should be adequately ventilated and decorated. All toilets should have lids and seats and be appropriately screened. (2.15)	Not Agreed	This recommendation cannot be agreed at this time due to financial reasons as no budget has been allocated to undertake this work however a bid to refurbish the remaining showers in need of renovation will be submitted by the governor, as will a bid for the fitting of toilet seats on Weald Wing.	Governor	
5.33	Water should be at an appropriate and consistent temperature for taking showers. (2.16)	Partly Agreed	This recommendation cannot be fully Agreed due to financial reasons as a limited budget has been allocated for this work. A bid for a replacement boiler for Thanet wing has been submitted and a bid to refurbish the remaining showers in need of renovation will be submitted by the governor.  A boiler replacement programme for Kent Wing and Segregation will commence in April 2019.	Governor  MOJ Estates	  December 2019
5.34	Adequate laundry arrangements should be in place for all prisoners. (2.17)	Agreed	A replacement laundry facility had already been planned and agreed at the time of the inspection. The new facility is expected to be operational by the end of April 2019.	Governor	April 2019
5.35	Menus should be sufficiently varied and should be assessed for nutritional content. (2.23)	Agreed	The menu has been reviewed and nutritionally assessed. The 4 weekly cycle is now considered by the governor to be sufficiently varied and nutritious. It is acknowledged that fish is available as an option daily, but this is due to this being a particularly popular option with the population and therefore deemed appropriate as confirmed with prisoners following local consultation.  A folder containing an information sheet on nutritional content of each menu option will be made available on each wing.	Governor  Governor	Completed  Sept 2019



5.36	Meals should be served at times equivalent to those in the community. (2.24)	Agreed	<p>As HMP Maidstone nears full staffing and the work reprofile has been completed, food service will be changed back to the later time. HMP Maidstone is set to the National Core Day, and staffing and the regime are profiled around this. The serving of breakfast packs the evening before 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. The contents of the packs are suitable to be stored in prisoners' cells overnight. Lunch meal is a packed lunch, safe to be served in advance, which is served prior to lunch time wing patrol period for consumption between 12:30pm and 13:30pm.</p> <p>Until full staffing is achieved moving the meal time to after 5pm would require additional resources that are not available at this time and would impact on the evening regime reducing the opportunity for prisoners to attend sessions such as the Gym, Library, and religious events.</p>	Governor	April 2019
				Governor	Completed
5.37	All catering equipment should be repaired quickly. (2.25)	Partly Agreed	<p>This recommendation cannot be fully agreed locally due to commissioning considerations although Government Facility Services Limited (GFSL) have made significant inroads into deal with the supply chain that services catering equipment, this has reduced the time that equipment is off line.</p> <p>With regard to freezers and fridges that have been inoperable for some time, temporary plant is being used as an alternative while a long term solution is put in place by contractors. There is nothing more that could be done to expedite this within local control.</p>	Governor/National Service Management Team	
				Governor	Completed
5.38	Information peer workers should receive formal training with appropriate staff oversight to ensure that accurate and consistent information is provided to prisoners. (2.33)	Agreed	<p>Prisoners are now successfully completing the formalised Peer Mentoring course as part of the main education curriculum.</p> <p>The Head of Reducing Reoffending will publish a local peer support strategy by May 2019 which will include the direction on supervision and training needs that will be overseen and delivered by the Education provider, Weston College.</p>	Governor	Completed
				Governor/Weston College	May 2019
5.39	Complaint forms should be available in a range of languages next to complaint boxes which are clearly labelled and prominently located.	Agreed	<p>Complaint forms in the top 10 languages spoken, will be displayed on a notice board on each wing, with signposting in those languages advising prisoners how to get a form from staff. Alternatively, prisoners will be able to view the form in their language and fill in an English version if they would prefer not to discuss with wing staff. Key Worker will advise prisoners on the complaints process and act as points of contact for any general enquiries.</p>	Governor	April 2019



	Responses to complaints should be timely. (2.34)		<p>Complaints will be acknowledged within 5 working days and full or holding responses will be made within a further 5 working days.</p> <p>A spreadsheet detailing outstanding complaints will be distributed to all managers on Monday, Wednesday and Friday. This will allow all functional heads to assure that complaints are being answered punctually. The business hub will provide stats on late responses to the SMT monthly to allow any deficiencies by departments to be challenged and addressed. The SMT will monitor this.</p>	Governor	Completed
				Governor	Completed
5.40	Prisoners should be able to consult their lawyers in private. (2.35, repeated recommendation 2.42)	Agreed	An asset investment bid to provide a new legal visits facility has been approved and will be delivered in 2019/20. This will provide facilities for prisoners to be able to consult their legal representatives in private.	Governor	March 2020
	<b>Equality Diversity and Faith</b>				
5.41	Local data should be routinely analysed to identify unfair treatment of protected groups in key areas, and corrective action should be taken to address inequality. (2.43)	Agreed	<p>The reinvigorated bi-monthly Equalities meeting chaired by the Governor or Deputy Governor, now monitors protected characteristic data to ensure equality and investigate any apparent imbalance in outcomes and specific issues relating to equality are addressed in a timely manner when required.</p> <p>The recently appointed dedicated Equalities Manager will drive forward analysis in this area and will recommend and assume responsibility for appropriate actions.</p> <p>A forum was held to explore this with men who cited frustrations about dealing with immigration matters as a key driver. This will be assured through the minutes of the Equalities meetings and through the minutes of prisoner forums.</p>	Governor	Completed
				Governor	June 2019
				Governor	June 2019
5.42	Investigations into discrimination incidents should be timely and comprehensive and subject to robust independent quality assurance. (2.44)	Agreed	<p>A new process for the investigation of DIRF forms has been put in place by the Equalities Manager. Training has been provided to managers on how to complete a DIRF investigation and all responses are now timely with an acknowledgement within 5 working days and full or holding responses will be made within a further 5 working days. These new processes for the investigation of DIRFs at HMP Maidstone are in line with the current National review of DIRFs across all prison estates.</p> <p>All DIRF responses are now subject to a quality assurance process, signed off by the Governor or Deputy Governor.</p>	Governor	Completed
				Governor	Completed



5.43	Prisoners should be able to disclose their protected characteristics in confidence. (2.45)	Agreed	Upon roll out of OMIC at HMP Maidstone, Key Workers will be tasked with completing an initial interview that includes asking about protected characteristics in a confidential environment. This will replace the current system of the initial interview being conducted by prisoner peer supporters and will enable disclosure to be undertaken in privacy.	Governor	April 2019
5.44	Material in the most common foreign languages should be freely available and well signposted across the prison. (2.54)	Agreed	A catalogue of materials in key languages has been compiled. It will be available through staff offices, the prisoner information desks, library, and peer workers. A Notice to staff will advertise this and a sign for prisoners in multiple languages as well as posters to promote materials will be displayed on the wing to advise prisoners how to access these materials.	Governor	June 2019
5.45	Telephone interpreting should always be used for sensitive and confidential interviews. (2.55)	Agreed	Language-Line (a telephony based interpretation service) and telephones are available in all areas. A notice to staff will be issued to remind all staff of the need to maintain confidentiality and the appropriateness of prisoner translation. Usage will be monitored by the Head of Offender Management and the monthly Finance committee.	Governor	Completed
	<b>Health Wellbeing and Social Care</b>				
5.46	Regular clinical audits should be completed to assess and monitor the quality and safety of services. (2.68)	Agreed	<p>The Oxleas NHS Foundation trust clinical audit lead is working with the operational manager to develop a clinical audit schedule. This will include:</p> <ul style="list-style-type: none"> <li>• Long Term Conditions (LTC)</li> <li>• Infection control</li> <li>• Person Escort Records (PERS)</li> <li>• Care Plans</li> <li>• Special sick</li> <li>• Did Not Attends (DNAs)</li> <li>• Escorts and bed watches</li> <li>• Self-harm</li> </ul> <p>The schedule will cover each element in an annual cycle and will commence in April 2019</p>	Director, Oxleas NHS Foundation Trust	April 2019
5.47	A separate confidential health care complaints process should be clearly	Agreed	There is a separate healthcare complaints process and form, highlighted on induction. A poster is displayed on all wings notifying prisoners of how to complain to the healthcare department.	Oxleas NHS Foundation Trust	Completed





	advertised and available on the wings. (2.69)		There are identified areas on all wings with healthcare complaints forms. These are now stocked every weekend by healthcare staff.		
5.48	Cross-disciplinary integration and strategic oversight should be implemented to achieve integrated working and stronger governance arrangements. (2.70)	Agreed	<p>Three governance work groups have been established:</p> <ul style="list-style-type: none"> <li>• Patient Safety Group,</li> <li>• Patient Engagement Group</li> <li>• Clinical Effectiveness Group</li> </ul> <p>These are now embedded in West Kent covering Maidstone and East Sutton Park prisons. The membership includes primary care, mental health, forward trust and, by exception, prison staff. These groups provide integration and strategic direction which enhances the governance arrangements.</p> <p>The work groups took place initially in January 2019 and are held monthly thereafter. This forms a framework for the Quarterly Quality Board which is chaired by the Associate Clinical Director. In addition to all listed above, Governors and Social Care are integral members of the quality board.</p> <p>There is a process to further escalate to the Partnership Board when serious matters arise.</p>	<p>Oxleas NHS Foundation Trust</p> <p>Oxleas NHS Foundation Trust</p> <p>Oxleas NHS Foundation Trust</p> <p>Oxleas NHS Foundation Trust</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p> <p>Completed</p>
5.49	Health care clinical areas should be refurbished to meet infection control standards. (2.71)	Partly Agreed	<p>This recommendation is Partly Agreed due to commissioning and financial reasons. The identified deficiencies have been quoted for remedial action and this will be submitted as a bid by the governor. As it requires funding, it is not entirely within local control.</p> <p>Oxleas NHS foundation Trust completes routine and unannounced quarterly infection control audits. Oxleas will continue to monitor the areas that are not meeting the targets. The state of the rooms form part of their audit and we will continue to monitor.</p>	<p>Governor</p> <p>NHS England/Oxleas PCT</p>	<p>Completed</p> <p>Completed</p>
5.50	Emergency drugs and equipment should be in accordance with resuscitation council guidelines. (2.72)	Agreed	<p>The emergency response bag now includes all of the items and medicines identified and Patient Group Directions (PGDs) are in place.</p> <p>Monthly audits are undertaken by the Operational Manger to ensure compliance with resuscitation guidance.</p>	<p>Oxleas NHS Foundation Trust</p> <p>Oxleas NHS Foundation Trust</p>	<p>Completed</p> <p>Completed</p>



5.51	There should be an overarching health promotion strategy and multidisciplinary action group to inform activities. (2.75)	Agreed	A 12 monthly health promotion calendar now in place which is used to educate offenders of a different ailment each month also in line with what is going on nationally.	Director, Oxleas NHS Foundation Trust	Completed
			Multidisciplinary Group educational sessions are held and the information is also placed onto the offenders media channel which they can access in their cell. There is also yoga and mindfulness on this media channel.	Oxleas NHS Foundation Trust	Completed
5.52	Prisoners with long-term health conditions should receive regular reviews by appropriately trained staff, informed by an evidence-based care plan. (2.82)	Agreed	In reception, all patients are screened for LTCs. When identified they are now placed on a waiting list. This waiting list is reviewed daily by the LTC lead and arrangements are made for the patient to be seen in a LTC clinic run by the GP or the nurse.	Director, Oxleas NHS Foundation Trust	Completed
			At the LTC review, care plans are discussed and agreed with set review timeframes. An alert will be created on the system to enable the nurses to review care plan needs in a timely fashion.	Oxleas NHS Foundation Trust	Completed
5.53	There should be a whole-prison approach to improving the understanding and implementation of the social care pathway supported by a local memorandum of understanding. (2.85)	Agreed	The Head of Reducing Reoffending is currently working with key stakeholders, including the Kent County Council to create a local policy and update the existing Memorandum of Understanding by May 2019.	Governor	May 2019
			Access to the Social Care pathway will be overseen by the Head of Reducing Reoffending. Information will be published to staff and prisoners via a briefing and Key workers will play a pivotal role in identifying prisoners with social care needs.	Governor	June 2019
5.54	Transfers to hospital under the Mental Health Act should take place within Department of Health transfer target timescales. (2.93)	Partly Agreed	This is Partly agreed due to the availability of NHS Mental Health spaces. Oxleas NHS Foundation Trust has a dedicated transfer co-ordinator, working across all Kent prisons, who monitors all hospital transfers. All effort is made to transfer patients within agreed national timescales. If patients are not accepted within the agreed timescales it is escalated to NHS England. There is a scheduled weekly meeting with NHS England to discuss any delayed transfers. Arrangements are made where appropriate to sought privately funded beds where NHS Beds are not available.	Operational Mental Health Manager , Oxleas NHS Foundation Trust	Completed
			This is also reviewed fortnightly by the Clinical Director of Forensics and Prisons.	Director, Oxleas NHS Foundation Trust	Completed
5.55	Methadone should be supplied in an	Agreed	A secure gate was installed, following the last inspection to increase security and safety during delivery of the Integrated Drug Treatment System (IDTS)	Director, Oxleas NHS Foundation Trust	Completed



	environment that ensures the safety and security of staff. (2.100, repeated recommendation 2.80)		HMP Maidstone are currently reprofiling the work for Officers across the establishment and will include methadone supervision in this process.	Governor	April 2019
5.56	Prisoners with dual diagnosis or multiple pathologies should receive integrated care. (2.101)	Agreed	A monthly complex case meeting has been established since December 2018 between Primary care, Mental Health, Substance Misuse and Social Care providers. Action points and outcomes feed into integrated plans which are then cascaded to relevant departments.	Director, Oxleas NHS Foundation Trust / Director, Forward Trust / Kent County Council Social Care	Completed
5.57	All health staff responsible for administering medication should review and sign any relevant policies and patient group directions. (2.110)	Agreed	All staff permitted to work within the Patient Group Directions (PGD's) are now required to read and sign the relevant PGD's and policies to administer homely remedies and PGD specific medication.	Director, Oxleas NHS Foundation Trust	Completed
5.58	Prisoners should have access to routine dental appointments within six weeks. (2.114, repeated recommendation 2.86)	Agreed	The number of sessions available to prisoners is provided through a contract between the provider and NHS Commissioner however HMP Maidstone facilitates the delivery on site providing access to prisoners at point of service. The contract has now been reviewed.  The Governor will work with the provider to reduce inefficiency and waiting times through Did Not Attends (DNA's) to improve overall performance.	NHS Commissioner/Governor  Governor	Completed  May 2019
	<b>Time out of cell</b>				
5.59	All prisoners should be unlocked for both the morning and afternoon at weekends. (3.8, repeated recommendation 3.4)	Agreed	At the time of inspection, HMP Maidstone had recently moved back to a planned full regime at weekends, although it was not embedded and some curtailments were still frequent. This has now been embedded and all wings are open both AM and PM at weekends on most weekends and curtailments to this are only due to exceptional circumstances. Ordinarily, prisoners on the Basic (IEP) regime receive one hour association AM and PM at weekends.	Governor	Completed
5.60	Attendance at the library and gym should be monitored and analysed consistently to develop provision. (3.9)	Agreed	Monitoring and analysis of attendance will be developed by the end of May 2019  In order to develop the provision, HMP Maidstone's Equalities Action Team report on areas of over and under representation however the Reducing Reoffending function will put into place additional monthly recording processes of those who use the library and gymnasium via the management National Assurance Process report.	Governor  Governor	May 2019  May 2019



	<b>Education, skills and work activities</b>				
5.61	Leaders should ensure that the available data are analysed in depth and form the basis of effective performance management and monitoring. (3.20)	Agreed	The New Prison Education Framework (PEF) provider will offer national Management Information System (MIS) agreed data which will be monitored by the Learning & Skills Manager and Regional Head of Learning & Skills. Analysis will also take place via the monthly Quality Improvement Group (QIG).	Governor	June 2019
5.62	Staff absence or vacancies should be covered so that course cancellations are the exception. (3.21)	Agreed	HMP Maidstone's new Prison Education Framework requirements for the core provision are clear regarding covering absences and cancellations. Plans are in place to mitigate the risk of non runs due to vacancies and ad hoc sickness. The new provider, Weston College, have a clear policy that education management will cover any interim sickness to ensure non runs are kept to a very bare minimum. Weston College have a robust policy to recruit key posts through a variety of different routes to ensure that the prison education delivery is prioritised.	Governor	September 2019
5.63	Managers should ensure that appropriate and effective resettlement courses are available to all prisoners nearing release. (3.22)	Agreed	HMP Maidstone's main resettlement workshop has been revised several times following feedback from prisoners and the provider. 1-2-1 case work sessions are now offered and prison managers are trained in 'learning walk' quality improvement arrangements to observe effectiveness of the course provision and better inform existing practices.	Governor	Completed
			Monthly meetings with the provider of the programme are in place to support and monitor the resettlement offering.	Governor	Completed
5.64	Managers should gather information on prisoners' entry to employment, training or education after release. (3.23)	Partly Agreed	This recommendation is Partly Agreed because as a foreign national specialist prison it is difficult to measure these outcomes because the majority of the prison's population are removed from the UK and as such HMP Maidstone does not have the capability to research employment, training or education outcomes after release. An Enhanced Through the Gate service model, however, is being mobilised by the KSS (Kent, Surrey and Sussex) CRC and that the NPS are able to purchase Resettlement Services from the CRC's Rate Card.	Governor	September 2019
			As part of the prison's Reducing Reoffending strategy, it will be looked at how technology can be used to gather information on a number of pathway outcomes, post release, once the prison's preparation for release programme has been embedded. This will be achieved by giving details of the Reducing Reoffending functional mail box email address and by requesting individuals to provide updates with regards to progress in their community.	Governor	September 2019



5.65	Leaders and managers should ensure that the quality of teaching and learning improves rapidly and becomes at least good. (3.34)	Agreed	<p>The Reducing Reoffending management team have now completed 'learning walk' training to observe effectiveness of the course provision and better inform existing practices, supervision overseen by the Learning and Skills Manager will be undertaken daily and a quality assurance calendar for 2019 has been implemented./ with support from the Regional Learning team.</p> <p>Quality is monitored via the monthly QIG and Reducing Reoffending and partnership meetings. The new PEF provider has robust performance systems in place to monitor the quality of teaching and performance.</p>	Governor	Completed
				Governor	Completed
5.66	Leaders and managers should ensure that prisoners have good opportunities to develop their personal and employment skills and behaviour. (3.38)	Agreed	<p>HMP Maidstone is piloting a scheme whereby Instructional Officers discuss developing employment related skills, known as soft skills with prisoners in activity areas. This will be recorded onto a 'Gateways Skills to Employment' document to measure learner progress. This will then lead to the education provider rolling out functional skills (maths &amp; English) in activity spaces, such as prison workshops by May 2019.</p> <p>The prison's local Preparation for Release programme will help to record and monitor prisoner's developmental skills and behaviours.</p> <p>HMP Maidstone is currently mapping out several structured pathways to employment. A clear flow chart of relevant employment related activities will be published by May 2019, making use of the new Prison Education Framework and Dynamic Purchasing System.</p>	Governor	May 2019
				Governor	April 2019
				Governor	May 2019
5.67	Leaders and managers should ensure that prisoners value and participate fully in learning, skills and work and see it as the main route to rehabilitation. (3.39)	Agreed	<p>Once HMP Maidstone's structured Pathways to Employment initiative have been finalised, an awareness campaign through induction, and publication of posters and information, will be launched highlighting the importance and encouragement of participation and how this fits into the ETE Reducing Reoffending pathway and the overall Reducing Reoffending strategy. Key Workers, once fully embedded under the Offender Management in Custody (OMiC) model will provide personal promotion and encouragement towards education or work.</p> <p>Prisoners Council and Peer Support representatives are invited to the QIG and Reducing Reoffending meeting and their feedback is used to assist the raising of standards in the learning, skills and work provision.</p>	Governor	June 2019
				Governor	Completed



5.68	Leaders and managers should ensure that the great majority of prisoners on accredited courses start, complete and achieve their qualification. (3.43)	Partly Agreed	This recommendation is Partly Agreed for Operational reasons as both transfer rate and the decision to remove prisoners by the Home Office is out of the establishment's control.	Governor	
			HMP Maidstone will attempt to mitigate this by the Activities and Resettlement Hub considering the prisoner's length of stay and ERS (Early Removal Scheme from the UK for fixed date Foreign National prisoners) date when considering allocations. This will be more coordinated with structured pathways to employment guiding sequencing.	Governor	April 2019
			MIS data under PEF will be used to record success rates per course and progression for learners and will be monitored as part of monthly meetings and the Governance process.	Governor	April 2019
5.69	Leaders and managers should ensure that prisoners leave the prison better qualified and more employable than when they arrived. (3.44)	Agreed	Specific activities mapped out for prisoners as part of HMP Maidstone's structured Pathways to Employment initiative will ensure wherever possible that prisoners are better equipped to find a job on release.	Governor	May 2019
			The Preparation for Release and Gateway Skills to Employment initiatives and booklets will be used to document progress and provide direction as to where and how learning improvements should be made. This data will be analysed monthly to measure the outcomes of the learner journey and to drive improvements in provision. This will be reported on by the Head of Reducing Reoffending in their monthly report.	Governor	May 2019
	<b>Children and families and contact with the outside world</b>				
5.70	The various schemes designed to support prisoners who receive few or no social visits should be actively promoted in the most popular languages and their use monitored. (4.7)	Agreed	Several key schemes such as prisoner voicemail, official prison visitor scheme and email a prisoner were relaunched and promoted last year however uptake of some of these were low. The Email a prisoner scheme was well utilised.	Governor	Completed
			HMP Maidstone has initial data that has been used to identify those receiving no or few visits to inform a strategy and data collection will be undertaken quarterly to continue to identify what would improve outcomes for this cohort as well as promoting further the key schemes. More families and significant others literature is currently being translated for display and this will be further promoted through Key Work.	Governor	April 2019
			Spurgeons, the children and families provider will work with the Chaplaincy team to push forward on work with prisoners who do not receive social visits, ether	Governor	September 2019



			individually or through larger forums to ensure the schemes provided are better focused on those who have the greatest need meetings and forums will utilise the translation provision, Language-Line, to assist prisoners access to these initiatives data recorded.		
	<b>Interventions</b>				
5.71	There should be a range of programmes and one-to-one offending behaviour work, including victim awareness, to meet evidenced need. (4.28, repeated recommendation 4.44)	Not Agreed	OBPs are not provided at HMP Maidstone however where a specific need is identified, prisoners can be transferred to another establishment to undertake the relevant work, subject to availability of places.	HMPPS	
	<b>Release planning</b>				
5.72	Preparation for release should be developed into a coordinated procedure available to all prisoners, including effective provision of information to support resettlement in another country. (4.32)	Agreed	<p>HMP Maidstone's local Preparation for Release Programme (PRP) builds on a co-ordinated provision with the Steps to the Gate provision which commences during prisoners induction and is available to all prisoners. This coincides with the Offender management in Custody (OMiC) roll out and Key Workers will take forward PRP throughout sentence.</p> <p>Staff are currently being trained in delivering the programme and this will be rolled out to all prisoners. Officer Key Workers and Peer Support Workers will support prisoners through their resettlement journey to help them achieve their objectives as identified in the prep for release booklet.</p> <p>Work to improve one of HMP Maidstone's resettlement workshops is complete and acting on prisoner and Key Worker feedback, the prison is now offering 1-2-1 case work to those prisoners who need it.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>April 2019</p> <p>April 2019</p> <p>Completed</p>



<b>Recommendations</b>	
Agreed	60
Partly Agreed	9
Not Agreed	3
<b>Total</b>	<b>72</b>

