



HM Prison &
Probation Service

Action Plan: HMP/YOI Swinfen Hall

Action Plan Submitted: 21 March 2019

A Response to the HMIP Inspection: 6-7, 20-23 August 2018

Report Published: 10 January 2019

INTRODUCTION

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

Term	Definition	Additional comment
Agreed	All of the recommendation is agreed with, can be achieved and is affordable.	The response should clearly explain how the recommendation will be achieved along with timescales. Actions should be as SMART (Specific, 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/YOI SWINFEN HALL

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	Main recommendations to the Governor				
5.1	Prisoners, particularly those at risk of self-harm, should have consistent access to the regime and be engaged in purposeful activity. They should receive better support from staff working on residential units. (S41)	Agreed	<p>All prisoners, but particularly those at risk of self-harming, will be supported by residential staff to engage in the regime by increased focus and accountability on residential areas to deliver the required numbers of prisoners to allocated activities. Daily interrogation of prisoners allocated against actual attendances will take place by Safer Custody and Residential Managers at each Daily Morning meeting (Mon–Fri inc). All variances will be followed-up and challenged appropriately by those managers attending the morning meeting along with a running record of actions/completions. The action log is maintained by the Governor’s Personal Secretary.</p> <p>Unemployed prisoners and those self-isolating will receive continued support to engage with wing-based and in-cell activities, i.e. distraction packs, packing work, education, daily access to on–wing cardiovascular suites (where available), full access to professional and domestic visits, access daily to a shower and PIN phone, a cell clean at least weekly and wing cleaning, with the overall aim of full reintegration with the regime. Prisoners self – isolating will have a dedicated exercise period in fresh air each day, and a communal PE session run by the Physical Education department each Thursday. Individual needs/targets of each prisoner will be identified through their CAREMAPs when on Assessment, Care in Custody and Teamwork (ACCT) monitoring and during post closure; Multi-Agency Safeguarding Hub (MASH) and Safer Custody Committee meetings.</p> <p>All operational staff will be Suicide and Self Harm (SASH) trained by March 2019 and all other identified prisoner-facing staff by April 2019.</p> <p>All prisoners will have a nominated Keyworker by June 2019 to better support prisoners on residence. A priority for each Keyworker will be to ensure that the prisoners they work with engage consistently and</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>June 2019</p> <p>Completed</p> <p>April 2019</p> <p>June 2019</p>



			<p>purposefully in the regime. The Incentives & Earned Privileges (IEP) scheme and Refusals policy (which is designed to be a transparent process which ensures consistent, standardised action is taken to encourage purposeful activity participation) will provide clear guidance for both staff and prisoners alike with regards to regime engagement and consequences for not engaging.</p> <p>The up-skilling of all residential staff in autism awareness, adverse childhood experiences (ACES) and acquired brain trauma injury will be a training priority for 2019/20.</p>	Governor	March 2020
5.2	The prison should work to improve the quality of relationships between staff and prisoners, using lessons learned from the more positive examples around the prison. Staff should consistently model pro-social behaviour, have high expectations of prisoners, and encourage them to participate in allocated activities and contribute actively to the wider prison community. (S42)	Agreed	<p>A prisoner forums schedule has been introduced allowing for regular, meaningful engagement between staff and prisoners and is part of the establishment's Communication Strategy. Bi-monthly Equalities meetings, Governor's monthly Breakfast Forums, monthly Residential wing forums and quarterly Prisoner Council meetings will be key to informing our strategy on future engagement and relationship status. Outcomes from all forums will be recorded, circulated throughout the prison and actioned in a timely way to improve staff/prisoner relationships and offer reassurance. Quality assurance will be conducted by the Rehabilitative Culture Lead.</p> <p>HMP/YOI Swinfen Hall will introduce Prisoner Information Desk (PID) Workers on every wing who will have and utilise information to support and encourage prisoners into identified activities.</p> <p>Prisoner Equalities peer mentors will actively support each of the protected characteristics, sponsored by a member of the Senior Management Team (SMT).</p> <p>The Personality Disorder Assessment Unit & Psychologically Informed Planned Environment (PIPE) staff will hold an annual open day to help promote the benefits of pro-social behaviours as well as the benefits of healthy staff/prisoner relationships. This will be aimed at both staff and prisoners alike.</p> <p>There will be a continued roll out of the Keyworker model, providing every prisoner with a designated Keyworker detailed to provide a minimum of 45 minutes each week for meaningful, one-to-one conversations. The expectation is that this will reduce prisoners' anxiety by having regular, quality and protected time with their Keyworker. Relationships will improve through developing trust, understanding the needs of the individual and responding to requests in a timely way. These may include queries around transfers, engagement in programmes and other services, working towards</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>July 2019</p> <p>June 2019</p> <p>April 2019</p> <p>September 2019</p> <p>June 2019</p>



		<p>securing Category D conditions and other sentence planning requests. Interactions will be quality assured by the Band 5 Hub Manager Keyworker Mentor until the full roll out of Keyworkers (June 2019), when this task will be adopted by each of the Band 5 Residential Custodial Managers. Keyworker entries will be assessed dependent on a quality assurance RAG (Red, Amber & Green) rating for each Keyworker. Keyworkers assessed Red will have all entries quality assured. Keyworkers assessed Amber will have all entries checked every two weeks. Keyworkers assessed Green will have a number of entries quality assured each 4 weeks. Additionally, manager's managers will carry out a random 5% per week quality assurance check and provide feedback to the respective manager and Keyworker.</p> <p>Each Keyworker will be provided with a comprehensive, bespoke handbook 4 – 6 weeks prior to going live to ensure consistent information is given to every prisoner and to clearly set out the expectations of the Keyworker role, including the importance of pro-social behaviours and the Rehabilitative Culture of Swinfen Hall.</p> <p>Accreditation has been received for HMP/YOI Swinfen Hall's Enabling Environment (a concept developed by The Royal College of Psychiatrists that aims to create and sustain a positive and effective social environment) which reflects HMP/YOI Swinfen Hall's work towards achieving active citizenship within the prison. Further work is planned to achieve accreditation for both the Care and Segregation Unit (CSU) and the Enhanced status wing to improve the quality of relationships and support prisoners to actively contribute to this environment.</p> <p>Positive staff behaviours will be acknowledged and promoted at daily Morning Meetings, monthly Reward and Recognition events, Prison Officer of the Year Awards, Butler Trust Awards and by all managers on a consistent basis. Participation in The Duke of Edinburgh Award Scheme, which commenced in January 2019, will also enable fostering of positive relationships between staff and prisoners working on this unique initiative.</p> <p>On a day-to-day basis, HMP/YOI Swinfen Hall will continue with wider efforts to develop a rehabilitative culture (RC) and encourage our staff to adopt an approach that is reflective of the RC principles and strategy. This will be developed via quarterly RC staff and prisoner forums, work undertaken by the 13 culture champions, and developing sanctions as part of the RC adjudications including 'Community Payback' which will direct</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>June 2019</p> <p>March 2020</p> <p>Completed</p> <p>September 2019</p>
--	--	--	---	---



			<p>actions that contribute positively and directly to the wider prison community.</p> <p>HMP/YOI Swinfen Hall has recently introduced Duty Governor daily assurance logs which include observations of behaviours throughout the establishment and is providing immediate, or same day, feedback. This feedback is shared with line managers in bi-lats, performance reviews and also feeds into monthly staff recognition at full staff briefings.</p>	Governor	Completed
5.3	<p>The prison should fully assess the needs of prisoners under 21 and investigate the reasons behind their over-representation in many areas of poor behaviour and self-harm. There should be a detailed and realistic strategy for this age group to ensure they are properly cared for, and to provide an age-appropriate regime to keep them fully occupied and address any areas of poor behaviour. (S43)</p>	Partly Agreed	<p>This recommendation is partly agreed as benchmark staffing levels are not conducive to operating a separate comprehensive regime for prisoners aged 21 years and under.</p> <p>West Midlands Psychology Service have been commissioned to carry out research into the regime needs of prisoners aged under 21 years and why they are over-represented in terms of poor behaviour and self-harm. From this research, a strategy for the younger age group of 18-21 years will be explored and compiled.</p> <p>An SMT lead has been assigned for the Protected Characteristic of 'age' and will meet with a group of prisoners on a quarterly basis. The information from these meetings will be fed into the wider Equalities meeting, where actions relating to age and associated behaviours will be agreed and reviewed as part of the overall Equalities action plan.</p> <p>Data is now being collected by age to include those residing in the CSU, adjudications, and incidents of self-harm and violence. This data will be explored and analysed on an ongoing, bi-monthly basis in the Equalities meeting in order to identify themes and trends linked to those under the age of 21 years, and to inform the strategy going forwards.</p> <p>The new Prison Education Framework (PEF) and Dynamic Purchasing System (DPS) will be utilised to commission and procure bespoke activities specifically appropriate to those prisoners aged under 21 years. This will be informed by a needs analysis and prisoner consultation.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>December 2019</p> <p>Completed</p> <p>Completed and ongoing</p> <p>April 2019</p>
5.4	<p>A full and predictable regime should provide for all prisoners to be allocated to, and expected to attend, work or education and have a</p>	Agreed	<p>The prison re-profiled in September 2018 to incorporate a daily domestic session and it is envisaged that the establishment will be at the target staffing level by April 2019. Newly recruited staff will be sufficiently embedded by July 2019 to allow the introduction of the full core day & profile including the morning domestic period. This should enable the prison to deliver the intended regime inclusive of daily access to fresh air,</p>	Governor	July 2019



	period for domestic tasks and association every day. (S44)		<p>showers, and general wing domestics prior to attending activities/work to facilitate increased time out of cell.</p> <p>There is, however, a shortfall of activity places to allow every prisoner to be engaged on a full-time basis. The prison will expand activity places with new work, where possible, and the Facilities Management provider (AMEY) has also agreed to employ a small number of prisoners. Release on Temporary Licence (RoTL) opportunities will be introduced in 2019 and, as a designated Training prison under the Reconfiguration Project, the ambition is to provide every prisoner with full-time activity and/or employment by 2020.</p>	Governor	December 2020
	Recommendations				
	Early days in custody				
5.5	New arrivals should receive a full and timely induction, which includes sufficient time unlocked, and have easy access to peer support workers, who should receive sufficient support from staff and managers. (1.7)	Agreed	The Induction Programme is under review in order to maximise opportunities for new arrivals. The review includes time unlocked during induction, timely induction, and access to the right support. The establishment will ensure that new arrivals have easy access to peer support workers who will also receive formal managerial support. There will be increased input from officers in the programme, and prisoners will have the opportunity to ask questions.	Governor	May 2019
	Managing behaviour				
5.6	Improvement targets for prisoners on the basic level of the incentives and earned privileges scheme should be individualised and regularly monitored. (1.20)	Agreed	<p>The Incentives and Earned Privileges (IEP) policy will be reviewed by June 2019. This will set out the revised improvement targets for those subject to Basic regime, and include regular quality assurance checks by Custodial Managers. These checks will review the quality of targets set and ensure timely review and monitoring is taking place. Assurance will be provided to heads of function through bi-lats on a bi-monthly basis.</p> <p>Implementation of mandated Challenge, Support and Intervention Plan (CSIP) will be at steady state from May 2019. Safer Custody will support Residential Band 5 Custodial Managers in effective delivery via the bi-weekly multi-agency Safety Inclusion Meeting. Independent quality assurance will be provided by West Midlands Group Safer Custody via bi-monthly visits and reports.</p>	Governor Governor	June 2019 May 2019



5.7	The prison should investigate the causes of violence and antisocial behaviour, and take appropriate steps to address them. (1.21)	Agreed	West Midlands Psychology will conduct a research project investigating why prisoners aged under 21 years are disproportionately responsible for acts of self-harm, violence and other anti-social behaviours. This will inform Violence Reduction & Safer Custody strategies and feed into the Incentives and Earned Privileges (IEP) policy review.	Governor	May 2019
			Each act of known violence is investigated by a member of the Safer Custody team. Actions are taken to support the victim, challenge the perpetrator and to prevent further repetition.	Governor	Completed
			A dynamic action plan is now in place and discussed at the monthly Safer Custody meeting, where trends are identified and analysis takes place to inform future strategy.	Governor	Completed
			Safer Custody staff will meet with high risk Viper (violence in prisons estimator) identified prisoners during their Induction, prior to them being involved in any violent incidents. Staff will explore with them their specific drivers and offer support for them to desist from violence. Drivers of violence will be discussed at the monthly Safer Custody meetings and actions initiated will be recorded on the fluid action plan.	Governor	Completed
			Implementation of mandated CSIP will be at steady state from May 2019. Safer Custody will hold a multi-agency bi-weekly Safer Inclusion Meetings using data obtained from a range of sources to identify the most violent prisoners and apply CSIP policy where appropriate.	Governor	May 2019
			Enhanced Support Service (ESS) will be provided to target the most prolific perpetrators of violence and provide 12 weeks intensive individual support to reduce levels of violence.	Governor	July 2019
5.8	Violent incidents should be investigated within seven days. (1.22)	Agreed	Violent incidents will be investigated within seven days by the Band 4 Safer Custody Supervising Officers and where appropriate, Residential Band 5 Custodial Managers. Quality assurance of both timeliness will be carried out by the Safer Custody Band 5 Hub Manager, the Band 5 Safer Custody Custodial Manager and the Head of Safety & Equalities.	Governor	May 2019
5.9	The regime for self-isolating prisoners should include more time out of cell. (1.23)	Agreed	HMP/YOI Swinfen Hall will offer daily exercise in fresh air to those self-isolating, separate to the main population. HMP/YOI Swinfen Hall will also offer in-cell work, showers, education, distraction packs, phone calls,	Governor	April 2019



			<p>domestic legal visits and healthcare. Access to on-wing exercise equipment will also be available.</p> <p>The gym timetable will be reviewed to provide a weekly gym session for self-isolators to participate in controlled corporate physical education.</p>	Governor	April 2019
5.10	All planned use of force should be video recorded and scrutinised by managers. (1.28)	Agreed	<p>The Use of Force (UoF) Coordinator has issued guidance to staff regarding planned interventions, the location of the camera and the process for this. Incident footage is routinely reviewed at the fortnightly UoF meetings and scrutinised by managers at the quarterly UoF assurance meetings.</p> <p>All planned interventions are recorded and observations from video evidence is fed back to individual staff members, where learning points are identified. A prisoner de-brief form has been introduced and is now completed after each use of force incident. This is completed by the Duty Governor.</p>	Governor Governor	Completed Completed
5.11	Body-worn cameras should focus on the incident of violence taking place. (1.29)	Agreed	<p>In the event of an alarm bell or call for assistance, the Communication Room operative requests the activation of Body Worn Video Cameras (BWVC) over the radio net. A Governors Order reinforces this as expected practice. Orderly Officers are responsible for establishing whether all BWVCs were activated at the incident scene following the incident to offer assurance around compliance. However, to ensure further assurance HMP/YOI Swinfen Hall will log all BWVC footage and reflect this as part of the National Assurance Process (NAP).</p> <p>Footage is reviewed at the bi-weekly and quarterly UoF meetings and where it is identified that footage is of poor quality and does not focus appropriately on the incident taking place, feedback will be provided to the individual staff members involved to ensure improved future use.</p>	Governor Governor	Completed Completed
5.12	Managers should investigate and address prisoners' poor perceptions of staff in the care and separation unit. (1.33)	Agreed	Poor perceptions of staff in the CSU will be explored via the use of exit-interviews conducted by the Safer Custody Team. Feedback will be analysed at the monthly Safer Custody meetings and actions assigned accordingly.	Governor	June 2019
	Daily life				



5.13	All prisoners should have daily access to showers and telephones. (2.12)	Agreed	The prison re-profiled in September 2018 to incorporate a daily domestic session to allow for access to telephones and showers. This will be routinely delivered to all prisoners from May 2019, including those residing in the CSU.	Governor	May 2019
5.14	Processes for prisoners to replace their own clothes should be reliable and sufficient to meet their needs. (2.13)	Agreed	Prisoners are able to order from a variety of catalogues (Very, M&M, Argos & Sports Direct) and an annual one-off spending policy is in operation. In addition to this, an exchange policy will be introduced where prisoners can receive an annual clothing parcel to ensure that all prisoners' needs are met. Sufficient and reliable processes will be in place by September 2019 to allow for the regular exchanging of prisoner clothing.	Governor	September 2019
			The recruitment and embedding of additional Band 3 officers and Band 2 Operational Support Grades will facilitate improved access to stored property, and the efficiency of the Reception and Visits processes will be reviewed.	Governor	July 2019
5.15	Staff should respond to emergency cell bells within five minutes. (2.14, repeated recommendation 2.10)	Agreed	As part of the monthly decency checks, cell bells are pressed and response times are recorded, with feedback given to staff and wing managers. This will also be included as part of the staff induction and notices will be displayed in wing offices as a reminder of the five minute response time.	Governor	Completed
			Custodial Manager Night Orderly Officers will carry out weekly checks of cell bell response times, prioritising those cells occupied by prisoners on an ACCT (Assessment, Care in Custody & Teamwork) or Constant Supervision. Findings will be sent to the Head of Safety.	Governor	May 2019
5.16	Breakfast should be served on the day it is to be eaten. (2.21, repeated recommendation 2.82)	Not Agreed	This recommendation is not agreed as the regime does not allow for breakfast packs to be served on the day. Sealed breakfast packs are served with the evening meal for the following day. The serving of breakfast packs in the evening 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.	Governor	
5.17	Prisoners should have the opportunity to self-cook and dine out of their cell. (2.22, repeated recommendation 2.83)	Partly Agreed	This recommendation is partly agreed as the prison does not have the facilities to provide this opportunity across every wing.	Governor	Completed
			However, some prisoners have been given access to microwaves and fridges to assist with limited self-cooking including wings D to J, and dining out on wings E, F and I.	Governor	



			On D, G & J wings, partial dining out is to be introduced.	Governor	June 2019
5.18	Prisoners should receive their catalogue orders promptly on delivery to the prison. (2.23)	Agreed	Catalogue orders are processed on a weekly basis. On receipt at the stores, items received are sent to Reception to be added to the prisoners' property cards. This process is currently completed within 14 days of receipt at the prison. A review of this process will be conducted, aiming to reduce the lead time to 10 days initially, with a determination to reduce this further thereafter.	Governor	April 2019
5.19	Consultation with prisoners should be consistent across the residential units, and lead to changes that are communicated to prisoners. (2.28)	Agreed	The agenda for wing meetings has been standardised together with an agreed format for sharing the minutes and action plan. Where actions have led to changes, the prison will communicate these to prisoners via wing forums, minutes of meetings, notices, posters, Prisoner Information Representatives and Governors forums. This is reflected within the establishment's Communications Strategy and related action plan to ensure consistency in the delivery of all messages to prisoners. HMP/YOI Swinfen Hall will undertake consultation with prisoners with Learning Disabilities and Learning Difficulties to improve all forms of communication. This will be led by the Rehabilitative Culture Lead.	Governor Governor	Completed April 2019
5.20	Responses to complaints should address the issues raised. (2.29)	Agreed	The responsible manager for each area of complaint will have face to face discussions with complainants before a written response is provided to ensure that the issue(s) raised have been addressed. Quality assurance checks (10%) are completed by the Band 5 Business Hub manager. An additional 5% will be quality assured by the Senior Management Team (SMT) to further ensure that responses are relevant and comprehensive.	Governor Governor	Completed Completed
	Equality, diversity and faith				
5.21	The equality and diversity action plan should be time-bound and include actions arising from prisoner forums. (2.35)	Agreed	The Equality Action Plan now has clear timeframes set out within the plan. The prison includes all actions arising from the prisoner forums and council meetings.	Governor	Completed
5.22	Discrimination incident report forms should be	Agreed	The Safety and Equalities Team will be responsible for ensuring DIRF Forms (DIRF'S) are replenished on the wings and always available.	Governor	Completed



	freely available to all prisoners. (2.36)		Equality Representatives will also hold copies and will be further supported by wing Prisoner Information Representatives ensuring that all prisoner forms are accessible and readily available. Electronic copies of the DIRF form has also been sent to all staff at the prison for ease of access.		
5.23	Prison managers should explore the reasons behind black and minority ethnic prisoners' negative perceptions in our survey, and the poor responses about safety from those with disabilities. (2.42)	Agreed	<p>Black, Asian and Minority Ethnic (BAME) forums are held on a bi-monthly basis to explore negative perceptions, and minutes are discussed at the Equalities Committee meetings where actions to improve perceptions are recorded on the Equalities Action Plan (EAP).</p> <p>Disability Forums are held on a bi-monthly basis and will be used by Protected Characteristic leads to explore the negative safety perceptions from those with disabilities highlighted in the HMIP survey. Any actions arising from this will be added to the EAP to inform future change.</p> <p>HMP/YOI Swinfen Hall will foster relationships with external BAME and Disabilities organisations to assist in better understanding the poor perceptions of these groups and to support the prison in improving those perceptions.</p>	Governor Governor Governor	Completed May 2019 May 2019
5.24	Prison managers should assess the distinct needs of young prisoners and formulate a strategy to meet them. (2.43)	Agreed	<p>The Governor has commissioned the West Midlands Regional Psychology Services to assess the distinct needs of the younger population. A strategy will then be formulated from this research to better address the needs of young prisoners by December 2019.</p> <p>The needs of young prisoners are being explored on a bi-monthly basis through the use of a dedicated 'Age' forum and the equalities committee meeting.</p> <p>Exploration around young prisoners (18-21), education & activities will be investigated through the Prison Education Framework (PEF) and Dynamic Purchasing Scheme (DPS) to better address their personal and sentence planning needs.</p>	Governor Governor Governor	December 2019 Completed July 2019
5.25	Muslim worship facilities should be repaired and re-opened as a matter of urgency. (2.47)	Agreed	The space allocated for Islamic worship was scheduled for repair at the time of inspection. That work has since been completed and the service moved back to the dedicated facilities.	Governor	Completed
	Health, well-being and social care				



5.26	Treatment rooms on wings should be routinely cleaned, and debris and rubbish removed from waiting areas. (2.56)	Agreed	<p>Treatment rooms are cleaned weekly as part of the Healthcare cleaning schedules and Healthcare staff will feedback any issues. Residential Band 5 Custodial Managers and Functional Heads will carry out weekly inspections. Residential Managers to ensure the waiting areas are cleaned and maintained. Custodial Managers to include this area in their wing Cleaning Schedule and weekly quality assurance checks.</p> <p>All nursing staff maintain general cleanliness in the treatment rooms. Weekly spot checks have commenced to ensure and evidence compliance. Infection Prevention and Control Audits, and other annual audits will continue. A deep clean schedule is provided by the Facilities Management contract (AMEY).</p>	<p>Governor</p> <p>Head of Healthcare (Care UK)</p>	<p>Completed</p> <p>Completed</p>
5.27	There should be a clear process for prisoners to make health complaints, and responses should always address the concerns raised and inform patients how to escalate concerns if they remained dissatisfied. (2.57)	Agreed	<p>A review of the healthcare concerns and complaints process will be undertaken, including the escalation process, and recommendations from this review will be implemented by June 2019. The interim complaint process notices will be issued and the patient induction slides will be updated.</p> <p>All healthcare staff will be made aware of the complaints procedures and training/retraining of staff in complaints procedures will be undertaken.</p> <p>Regional Care UK team will carry out annual Clinical Quality Visits at the establishment and the complaints process will be checked as part of this visit.</p>	<p>Head of Healthcare (Care UK)</p> <p>Head of Healthcare (Care UK)</p> <p>Head of Healthcare (Care UK)</p>	<p>June 2019</p> <p>August 2019</p> <p>August 2019</p>
5.28	The delivery board should take sustained action to reduce non-attendance rates for appointments and make good use of clinical time, and help reduce waiting times for some services. (2.64, repeated recommendation 2.56)	Agreed	<p>Innovations will be explored by the prison and healthcare department to ensure patients can cancel appointments allowing time for another patient to use the appointment or allowing clinic time to be re-allocated e.g. telephone booking/cancellation system.</p> <p>Care UK will work with the prison regime and Activities Hub to reduce duplicate activities/appointments to ensure that clinics are scheduled at the most appropriate time to reduce the risk of patient cancellations e.g. Visits and Health appointments.</p> <p>Care UK will gain patient feedback on reasons for cancellations and promote good community use of Healthcare. This work will be in conjunction with Staffordshire Health watch.</p>	<p>Governor and Head of Healthcare (Care UK)</p> <p>Governor and Head of Healthcare (Care UK)</p> <p>Head of Healthcare (Care UK)</p> <p>Governor</p>	<p>October 2019</p> <p>Completed</p> <p>April 2019</p>



			A daily and weekly clinic attendance report is provided by CareUK to prison managers. Duty Governors and Orderly Officers are held to account for poor performance.		Completed
5.29	Mental health service provision should meet the needs of patients, including over weekends, and offer clinical psychology and specialist learning disability support. (2.74)	Partly Agreed	<p>This recommendation is partly agreed as a Specialist Learning Disability Service is not currently commissioned and the most recent needs assessment has not highlighted this as a gap in service. A new and dedicated service specification for Learning Disability is currently in development by NHS England.</p> <p>As part of the implementation of the new national service specification for prison mental health, provision will be extended to cover evenings and weekends. This is to commence from April 2019 and will ensure access to a mental health professional for telephone advice and for attendance at the prison as and when required during evenings and weekends. The new service specification also includes an increased offer of Clinical Psychology. In the interim, the Head of Healthcare On Call will facilitate action for any concerns relating to a patients' physical/mental health during evenings and weekends.</p>	<p>Head of Healthcare (CARE UK)/Health & Justice Commissioning Manager (NHS England)</p> <p>Head of Healthcare (CARE UK)/Health & Justice Commissioning Manager (NHS England)</p>	April 2019
5.30	All custody staff should have regular mental health awareness training to enable them to identify and support prisoners with mental health problems. (2.75, repeated recommendation 2.75)	Agreed	<p>The Prison will deliver regular Mental Health Awareness training to custody staff and partners via the Suicide and Self Harm (SASH) Training Package. Care UK will offer support where required.</p> <p>Healthcare will adopt principles of the SECURE STAIRS programme for young offenders. Bespoke, subject specific training packages (i.e. childhood trauma) and Reflective Practice for Prison Officers will be commissioned, developed, and implemented to support mental health awareness throughout the prison. This will aide staff in understanding the behaviour of young adults in relation to previous trauma, and will give them the tools to effectively communicate with those affected by trauma and de-escalate situations as required. Reflective Practice will also allow officers to openly reflect on their challenging experiences with young adults, and receive advice and support from a qualified psychologist. It has benefits for prisoners, and for the health and wellbeing of officers who feel more equipped to manage challenging situations</p> <p>HMP/YOI Swinfen Hall are also providing specific training including Autism, Awareness, Adverse Childhood Experiences and Acquired Brain Injury as part of the monthly 'shut down days' and training plan.</p>	<p>Governor</p> <p>Head of Healthcare (Care UK) and H&J Commissioning Manager (NHS England)</p> <p>Governor</p>	<p>Completed</p> <p>June 2019</p> <p>Completed</p>



			<p>ACES awareness is now part of the mandatory staff induction programme, and staff employed on the PD & PIPE Units have undertaken Knowledge and Understanding Framework (KUF) training.</p> <p>NHS England and Northants Healthcare Trust have agreed to fund two Awareness and Training for trainers. This will enable Keyworkers and other prisoner facing staff to be KUF trained in-house commencing May 2019.</p>	<p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>May 2019</p>
5.31	Transfers of patients under the Mental Health Act should take place within the current Department of Health transfer time guidelines. (2.76, repeated recommendation 2.76)	Partly Agreed	<p>This recommendation is partly agreed as HMP/YOI Swinfen Hall cannot commit to transfers within Department of Health guidelines ('The Prison Transfer and Remission Guidance' published by the Department of Health in 2011), which in any event is not agreed by NHS England.</p> <p>NHS England guidance, published in March 2018, sets out timescales that take into account clinical urgency and need. The health care provider and NHS England Health and Justice, and NHS England Specialised Commissioning, continue to robustly manage this challenging pathway.</p>	H&J Commissioning Manager (NHS England)/ Head of Healthcare Care UK	Completed and ongoing
5.32	Northamptonshire NHS Trust should have access to and utilise electronic clinical records systems to enable effective continuity of care. (2.77)	Agreed	Care UK and Northamptonshire NHS Trust will work collaboratively to explore options for additional access to SYSTM1 (a clinical records system) via the current cabling arrangements. Where this is not possible, and where the prison estate permits, procurement and installation of new cabling (HSCN) will be undertaken. NHS England will support any additional requests for funding with regards to cabling requirements.	Head of Healthcare (CARE UK) and Clinical Lead (Northamptonshire NHS Trust)	September 2019
5.33	The prison should ensure that prisoners can participate in a range of interventions that address substance misuse, and encourage recovery and well-being. (2.82)	Agreed	The prison will be able to support recovery and wellbeing via a consistent regime from June 2019 once full staffing levels have been reached and embedded.	Governor	June 2019
5.34	There should be regular support from pharmacy technicians to ensure that patient access to treatment is consistent and efficient. (2.87)	Not Agreed	<p>This recommendation is not agreed as the current model of a pharmacy technician visit of two hours per week and a pharmacist visit twice per month was recently reviewed and considered to be sufficient to meet the need. This model will be reviewed quarterly, as part of the services contract/performance monitoring meetings.</p> <p>However, a bank pharmacy technician has recently been recruited by Care UK to support the nursing team with medicines management.</p>	<p>H&J Commissioning Manager (NHS England) and Head of Healthcare (Care UK)</p> <p>Head of Healthcare (Care UK)</p>	<p>Completed</p> <p>Completed</p>



5.35	Administration of medicine should be supervised by prison staff in all areas, and controlled drugs should always be administered at consistent times, with privacy maintained through the provision of a discrete waiting area. (2.88)	Agreed	<p>The Prison will ensure the administration of medicine at all locations continues to be supervised.</p> <p>The time and location of Controlled Drugs Administration will change to improve the timings for patients. HMP/YOI Swinfen Hall will supply staff to enable this to happen.</p> <p>The Facilities Management contractor (AMEY) has been commissioned to fit a controlled drugs cabinet in the small pharmacy and the re-enforced door is to be adapted to a split stable type door. This will allow patients to wait in an enclosed and private waiting area and will ensure controlled drugs are stored securely. This work is now complete.</p>	<p>Governor and Head of Healthcare (Care UK)</p> <p>Governor and Head of Healthcare (Care UK)</p> <p>Governor</p>	<p>Completed and ongoing</p> <p>May 2019</p> <p>Completed</p>
	Education, skills and work activities				
5.36	Quality improvement meetings should follow up all agreed actions to ensure that the provision continues to improve. (3.19)	Agreed	<p>The Quality Improvement Group (QIG) calendar has been updated to better capture all quality and improvement activities for assurance purposes. Activity functions (namely - Education, Library, Gym, Activity Hub, and Industries and Learning and Skills) will have agreed follow-up improvement actions. These will then be reviewed and managed by the Head of Reducing Reoffending and the Head of Learning, Skills & Employment at each subsequent QIG meeting and documented in the minutes.</p>	Governor	Completed
5.37	The number of prisoners who are unemployed and unoccupied should be reduced by increasing the periods when the regime is running, providing sufficient activity places for the prison population. (3.20)	Partly Agreed	<p>This recommendation is partly agreed as providing additional activity spaces requires capital investment for additional learning/workshop space and funding would need to be provided centrally.</p> <p>The prison will however continue to engage with local industry to bring work opportunities into the prison and make best use of the Dynamic Purchasing System to enhance the provision in line with the budget. The prison re-profiling has also allowed for all those in employment to attend work and, in due course, should provide additional activity for those who are unemployed once the target staff figure is attained.</p> <p>The Activities Hub Manager and Industries Manager have reviewed all workshops and the Industries Manager will explore how many full-time spaces can be changed to part-time positions without affecting the contract and what is carried out within the workshop. This will increase activity spaces and is due for completion by April 2019.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>Completed</p> <p>April 2019</p>



5.38	The education, skills and work provision should be further developed to provide appropriate qualifications to all prisoners participating in activities, including progression routes and support for distance learning courses. (3.21)	Agreed	<p>The introduction of a weekly Sequencing Meeting attended by all key stakeholders ensures that prisoners' allocations focus on sentence plans and progression.</p> <p>Prison Managers have an adapted Personal Learning Plan (PLP) which is to be rolled out within workshops to capture progression routes. One instructor is enrolled to take their Award in Education and Training (AET) Level 3 by the end of March 2019 to enable them to assess their prisoners for the qualification they have undertaken, and several other instructors are due to commence the same training in April 2019.</p> <p>Waste Management Industry Training and Advisory Board (WAMITAB) qualifications in waste management will be rolled out through the DPS after April 2019, following the commencement of the new education contract.</p> <p>All prisoners on distance learning (DL) are able to access the library each Friday morning for bespoke support. We will enhance this provision through the PEF, DPS and National Careers Service providing DL and Information, Advice & Guidance from April 2019.</p> <p>The education provider (Novus) will be working closely with the Governor and prison managers to look at existing provision as well as new options to develop and compliment the curriculum, and offer clear progression routes to learners.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor and Director of Novus</p>	<p>Completed</p> <p>September 2019</p> <p>June 2019</p> <p>May 2019</p> <p>April 2019</p>
5.39	Prisoners should receive effective careers information, advice and guidance to inform their allocation to activities, as well as the necessary information on education, training and employment opportunities before their release. (3.22)	Agreed	A new national contract commences in April 2019 which will re-introduce National Careers Service Information, Advice and Guidance at the establishment. This will be one full time post and a recruitment process is ongoing with a candidate likely to take up post in June 2019.	Governor	June 2019
5.40	The employability skills that prisoners develop in activities should be monitored and recognised as a record of their achievement. (3.29)	Agreed	Passport to Employment documents which capture employability skills, and Individual Learning Plans (ILPs) will be rolled out across all workshops, education and industries. All instructors and tutors will be trained in the effective use of these plans. Monthly management/learning walks will be conducted by all managers in the Reducing Reoffending function to quality assure the use of the ILPs and ensure they are kept up-to-date.	Governor	May 2019



5.41	Prisoners attending workshops and work activities should have learning opportunities that enhance and further improve their English and mathematics skills. (3.30)	Agreed	HMP/YOI Swinfen Hall has embedded English and Maths learning opportunities in some workshops. Training has been initiated for all Workshop Instructors to enable the expansion of this embedded learning across other workshops. All instructors will be trained by July 2019.	Governor	July 2019
5.42	Prisoners participating in workshops should receive the appropriate targets to progress quickly and gain new employability skills. (3.31)	Agreed	During the monthly learning walks, the progression of learners in workshops will be monitored and then discussed at the monthly QIG. ILPs will be reviewed and any training needs or support for an Instructor will be identified through this process and, where necessary, support will be provided and monitored via the staff performance development reports (SPDRs) and bi lateral review processes. The weekly Sequencing Meeting will also discuss progression routes of prisoners to ensure that they gain employability skills and realise their potential.	Governor	April 2019
5.43	Prisoners should arrive punctually at their allocated education, skills and work activities so that they develop a good work ethic. (3.36)	Agreed	Orderly Officers and Duty Governors are held responsible for driving the regime on a daily basis and punctuality is recorded and challenged at the morning Daily Briefing. Duty Governors maintain a monthly assurance log, which are quality assured by the Deputy Governor. The increase in staff over the coming months will assist in providing the resource to run a predictable regime. Regime delays are interrogated at each morning operational briefing and lessons learned are shared. The Communications Officers operate a daily regime script informing all outstations of what should be happening and when.	Governor Governor	April 2019
5.44	The monitoring of health and safety regulations in the education, skills and work areas should be strengthened. (3.37)	Agreed	Learning walks and manager's inspections include a focus on Health and safety, feedback and action plans to address any issues are part of this assurance. The Industries Manager and workshop instructor will carry out weekly and monthly assurance/management checks. Further assurance is provided by the establishment's Senior Health & Safety Officer (Band 8) who conducts quarterly safety checks across the entire site including all prisoner activity areas.	Governor Governor	Completed Completed
5.45	All staff should be able to deal effectively with problem behaviour during	Agreed	The Education provider (Novus) will be continuing to develop their staff resilience and supporting them in challenging problem behaviour. Education Managers, Head of Reducing Reoffending and Head of Learning Skills and Employment have already commenced observations	Governor and Director of Novus	April 2019



	learning in activities. (3.38)		<p>using Learning Walks. In addition Duty Governors and Orderly Officers will conduct discipline checks as part of their core work. Their findings will be passed on to both prison and Novus management at each morning meeting. During these learning walks, the behaviour of learners in workshops and the response of staff is observed, and any issues are raised at the monthly QIG. Any training needs or support for staff that are identified will be provided and monitored.</p> <p>Education and Activities staff will be trained in Resilience Awareness training and refreshed in adjudication and IEPs awareness.</p>	Governor and Director of Novus	October 2019
5.46	The work provided should enhance and further develop prisoners' personal, social and employability skills. (3.39)	Agreed	<p>New work initiatives offering meaningful work are always being sought by the industries manager. All work areas will implement ILPs, identifying both development and personal targets by June 2019.</p> <p>All work areas have implemented the Passport to Employment documents. Quality assurance process will be implemented to assess consistency and quality of passports via learning walks and the monthly QIG meeting.</p>	Governor Governor	June 2019 May 2019
5.47	All wing cleaners and food servery workers should be appropriately qualified for these roles. (3.45)	Agreed	<p>The Activities Manager will ensure that all wing cleaners and food servery workers are appropriately qualified to carry out such tasks. This will include checks against databases and feedback from the Education and Industries Managers.</p> <p>Residential Functional Heads and Custodial Managers are also responsible for ensuring that only Activities Hub approved prisoners are employed in these wing based jobs. The Heads of Residence and Reducing Reoffending will carry out a monthly assurance check to ensure compliance.</p>	Governor Governor	July 2019 May 2019
5.48	Leaders and managers should address any differences in the participation, progress and achievement of different groups of prisoners. (3.46)	Agreed	Activity allocation and success rates are being monitored by the Activity Hub and the education provider has been asked to provide updates to Prison Managers regarding this when results/success rates are reported. This data will then be analysed at both the monthly QIG and bi-monthly Equalities Meeting to identify and investigate trends or concerns, and take forward appropriate actions.	Governor	April 2019
	Children and families and contact with the outside world				
5.49	Visits should start at the advertised time, and there should be sufficient visits	Agreed	Staff break times will be realigned to ensure prompt start times for visits sessions. Punctuality is monitored on a session by session basis by the Operations and Security Management. Assurance will be provided by the	Governor	Completed



	sessions to meet demand. (4.6)		<p>Operations Custodial Manager, Head of Operations and Security, and Duty Governor Assurance Log, together with prisoner and visitors questionnaires.</p> <p>Under the new profile, an additional visits session has been added on Thursday afternoons, however, this is not currently taking place due to contractual issues with the provider, Barnardos. A contractual meeting with Barnardos is to be arranged by May 2019.</p> <p>A review is to be conducted of current operating procedures and practices to see where improvements can be facilitated. Work is underway with staff, prisoners and their visitors to employ more efficient ways of working that adversely impact on maintaining punctuality.</p>	Governor	May 2019
				Governor	May 2019
	Reducing risk, rehabilitation and progression				
5.50	Prisoners should not be transferred to Swinfen Hall without an up-to-date OASys assessment. (4.22)	Not Agreed	<p>This recommendation is not agreed as HMP/YOI Swinfen Hall does not have any capability to influence Offender Assessment System (OASys) assessments by other establishments. The establishment is a national resource and as such can receive prisoners from any establishment with no control over those transferring, subject to the satisfying criteria.</p> <p>Although the establishment routinely check the completion of OASys assessment when notified of incoming prisoners, transfers are still proceeded with regardless of a completed OASys or not. This is standard HMPPS practice. The only exception is for those transferring into the establishment for specific programmes whereby an OASys assessment is a pre-requisite requirement.</p>	Governor	
5.51	Sentence planning should include input and contributions from all departments working with the prisoner. (4.23)	Agreed	<p>Prison Offender Managers will invite relevant departments engaged with an individual to contribute to the sentence planning process to assist the completion of a thorough and comprehensive sentence plan.</p> <p>Contribution forms will be introduced to ensure that all departments that have input into individual prisoners have the opportunity to contribute to the sentence planning process.</p>	Governor	Completed
5.52	Quality assurance should be introduced into offender management to	Agreed	All Prison Offender Managers will update prison service database (NOMIS) and individual Offender Management contact logs providing a clear rationale for the nature of the contact, in accordance with the required	Governor	Completed



	ensure consistent and effective engagement with prisoners focused on assessing and managing their risk of harm and reoffending. (4.24)		minimum contact frequency. This is quality assured monthly by the Offender Management Unit (OMU) Hub Managers (10%) and Head of Function (5%) as part of their overall Quality Assurance (QA) process.		
5.53	Offender supervisors and other staff working with prisoners should enter notes on their work on to P-NOMIS to ensure effective information sharing to support risk assessment and management. (4.25)	Agreed	<p>All Prison Offender Managers will update NOMIS when then have contact with prisoners mirroring the input into the individuals Offender Management contact log. This is quality assured monthly by the Offender Management Unit Hub Managers (10%) and Head of Function (5%) as part of their overall QA process. Up until full keyworker roll out (June 19) all Keyworker P-NOMIS entries are quality assured by the Band 5 Hub Manager Keyworker Mentor when this task will be adopted by each of the Band 5 Residential Custodial Managers.</p> <p>Keyworker entries will then be assessed dependent on a quality assurance RAG (Red, Amber & Green) rating for each Keyworker. Managers' managers will carry out an additional random 5% per week quality assurance check and feedback to the respective managers and Keyworkers.</p> <p>Increased staff access to, and use of, VISOR will be reviewed to facilitate an improved involvement in prisoner risk and risk mitigation.</p>	Governor	September 2019
5.54	Support for life-sentenced prisoners should be extended to include those subject to an indeterminate sentence for public protection. (4.26)	Agreed	A forum for those sentenced to an indeterminate sentences has been identified and scheduled within the OMU event calendar with the inaugural forum completed in February 2019. 'Lifer days' and 'family days' and additional time with Offender Supervisors will be scheduled at the forum.	Governor	Completed
5.55	Representatives from all departments should have attend the monthly inter-departmental risk management team meeting (IDRMT), in line with its terms of reference. (4.27)	Agreed	Representatives from all departments attend the IDRMT meetings, as per the terms of reference. The Head of Offender Management Services follows up non-attendees and holds members to account for completing actions.	Governor	Completed



5.56	The IDRMT should review all prisoners assessed as high or very high risk of harm, regardless of their MAPPA (multi-agency public protection arrangements) level, to inform release planning. (4.28)	Agreed	The Interdepartmental Risk Management Team (IDRMT) now review and discuss all offenders in the last six months of their sentence regardless of their Multi-Agency Protection Arrangements (MAPPA) level.	Governor	Completed
	Release planning				
5.57	Staff from all prison departments involved in work with prisoners should contribute to a single coordinated pre-release planning process. (4.41)	Agreed	Prison Offender Managers invite relevant departments to the pre-release meetings, where necessary. Contribution forms will be introduced to ensure that all departments that have input into individual prisoners have the opportunity to contribute to pre-release planning.	Governor Governor	Completed Completed

Recommendations	
Agreed	49
Partly Agreed	5
Not Agreed	3
Total	57



