

Action Plan: HMP Dartmoor

Action Plan Submitted 23 March 2018

A Response to the HMIP Inspection 14 - 24 August 2017

Report Published 12 December 2017

## 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 is agreed achieved along with timescales. Actions should be Measureable, Achievable, Realistic and Time-bo Actions should be specific enough to be tracked	
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>mus</b> t 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 DARTMOOR

1. Rec. no	2 Recommendation	3. Agreed/Partly Agreed/Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	Main recommendation to HMPPS				
5.1	Facilities and the built environment should allow elderly and disabled men full access to their cells and the prison regime.	Partly Agreed	This recommendation is partly agreed as any changes to the built environment including an increase in Disability Discrimination Act (DDA) compliant cells, is dependent on Ministry of Justice (MoJ) resourcing and therefore cannot be guaranteed. The Head of Residence and Services at HMP Dartmoor will be responsible for a review of access to cells and regime by elderly & disabled men, to ensure that this is optimised where possible.	Governor	March 2018
			HMP Dartmoor will liaise directly with other establishments prior to transfers to ensure they are able to meet the individual needs of men arriving at the prison.	Governor	March 2018
			Repairs to the stair lift were not completed in February due to changes in the maintenance contractor. A purchase order remains in place and it is now anticipated work will be completed by end of April 2018.	Governor	April 2018
			A disabled access ramp has been ordered through Prison Service Industries for the Chapel and will be installed by June 2018.	Governor	June 2018
	Main recommendation to the governor				
5.2	The regime should be sufficient to allow men consistent access to a good amount of time out of cell and the basic amenities and facilities they need.	Agreed	HMP Dartmoor will re-profile the core day to create sufficient association time and access to the basic amenities and facilities that prisoners require. This is envisaged to commence from June 2018 to coincide with the introduction of the Offender Management in Custody model (OMiC).	Governor	June 2018
	Main recommendations to the governor and HMPPS				
5.3	The role of the prison should be clarified and if	Partly Agreed	This recommendation is partly agreed as reconfiguration decisions are underway at a National level and may impact on the role of HMP Dartmoor. Additionally	Director of Estate Transformation	Ongoing

	men continue to be released from Dartmoor, sufficient resources should be available to carry out the appropriate release management and preparation work required.		although HM Prison and Probation Service (HMPPS) have remained committed to releasing prisoners so far as practicable from a resettlement prison, where this is not possible it should not interfere with an offender's ability to access resettlement services. The contracts with Community Rehabilitation Companies (CRCs) provide for such services, even where a prisoner has not been transferred to a designated resettlement prison prior to release. HMPPS have now streamlined the process by which the National Probation Service (NPS) is able to purchase resettlement services for the offenders they manage in those prisons. The NPS, CRCs and prisons are working together to improve the prerelease services available.	(HMPPS Headquarters)	
			A Senior Probation Officer was appointed in November 2017 to assist the Offender Management Unit (OMU) particularly with resettlement & robust risk management planning of high risk prisoners. The Senior Probation Officer will assist with preparations for the Offender Management in Custody Model ensuring all available resources are focussed on strategic priorities overseen by the Deputy Governor.	Governor	June 2018
5.4	The high-risk population should receive effective support to address their risk of harm to others.	Agreed	It is agreed that the high risk population should be supported to address their risk of harm to others, but not by the delivery of interventions at Dartmoor. HMP Dartmoor is a designated sex offender support site only and as such prepares men in its care for interventions appropriate to their risk. The establishment does not offer any programmes for men posing a high risk of harm, but will transfer, as appropriate, to a suitable prison that is delivering the required programme, typically HMP Channings Wood. HMP Channings Wood (the primary referral site for HMP Dartmoor) is currently considering future delivery of Horizon and Kaizen accredited programmes under the 2018/19 custodial commissioning round.	Director of Commissioning (Ministry of Justice)	March 2018 – Subject to further review
			Improvement in risk management planning will be introduced at HMP Dartmoor to reduce numbers of prisoners without a structured plan to address offending needs and risk of harm indicators. Levels of contact with offender supervisors will be improved with a new system to introduce a weekly surgery giving prisoners an opportunity to report concerns direct to an Offender Supervisor. HMP Dartmoor will ensure prisoners move to another prison to undertake this work as required. The arrival of the Senior Probation Officer in November 2017 has assisted in the risk management of the high-risk population.	Governor	March 2018
	Recommendation to HMPPS				
	Offender management and planning				
5.5	HM Prison and Probation Service should ensure men	Agreed	Head of Offender Management Unit at the prison will be responsible for ensuring MAPPA management levels are obtained from the lead agency at least six	Governor	June 2018

	who may need to be subject to MAPPA have their management level set at least six months prior to discharge from prison.  Recommendations to the governor		months prior to release for all relevant prisoners. The MAPPA escalation document will be used to escalate the matter if required and a system will be introduced to make checks via ViSOR at three months and again at the 6 week point in case the MAPPA level has increased due to MAPPA meetings.		
	Courts, escort and transfers				
5.6	All prisoners should be informed about Dartmoor's integrated regime before arriving at reception.	Partly Agreed	This recommendation is partly agreed as whilst all reasonable steps will be taken to ensure this normally takes place, in exceptional circumstances prisoners may transfer to HMP Dartmoor at short notice under Tornado emergency arrangements, and this may result in prisoners not being advised in advance of arrival about the integrated regime.  The Head of Offender Management Unit will be responsible for contacting feeder	Governor	April 2018
			establishments to ensure prisoners are normally made aware of the integrated regime at HMP Dartmoor before transferring.		
			HMP Dartmoor Observation Categorisation and Allocation (OCA) Officers will continually send information regarding the regime to the South West prisons cluster. They will also send this information to each establishment outside of area at the point of accepting a prisoner(s) from other establishments.	Governor	Completed and ongoing
	Early days in custody				
5.7	Initial safety screenings should be conducted in private.	Agreed	The Head of Residence and Safety will identify a designated room in Reception and in any other area carrying out induction work. These rooms will allow Initial safety screenings to be conducted in private.	Governor	April 2018
5.8	Men should have phone numbers authorised at the earliest opportunity.	Agreed	The Head of Residence and Safety will put an out of hours system in place that will enable Custodial Managers (CMs) to give access to BT phones and registered contacts of prisoners when business support is not available to complete this task. This will enable prisoners to access their authorised telephone numbers more quickly.	Governor	March 2018
	Bullying and violence reduction				
5.9	Perpetrators of antisocial behaviour should be encouraged to address their problematic behaviour, and their victims	Agreed	The Safer Custody Department at the prison will introduce a spreadsheet identifying those who pose the most risk to others in regard to bullying and violent incidents. These will be linked with Security Intelligence Reports feedback. Identified individuals will be allocated a keyworker who will discuss the	Governor	March 2018

	should be supported effectively.		issues and apply sanctions/short term behavioural targets/ interventions as appropriate. This will be linked in with the new management model for violence.  HMP Dartmoor are in the process of introducing the national Challenge Support Intervention Plan (CSIP) to provide structured case management support for perpetrators and victims. Peer support diaries will replace victim support plans and will be introduced for those who have been a victim of any bullying or violence. Support will be given by the peer mentors to assist victims. Referrals to the 'Dialogue Road Map' mediation programme will be encouraged to address both violent incidents and bullying in the establishment.	Governor	March 2018
	Self-harm and suicide				
5.10	The prison should have an up-to-date consolidated death in custody action plan.	Agreed	A consolidated death in custody action plan is now in place. The action plan will be reviewed on a quarterly basis to ensure it remains up to date and is also included as part of the establishment's overall consolidated action plan which is discussed at the monthly SMT meeting.	Governor	Completed
	Safeguarding				
5.11	Staff should receive training on their adult safeguarding responsibilities.	Agreed	The Governor will assess and identify the key roles that require Safeguarding training and the Senior Probation Officer at the prison will lead on this training for those identified staff. This will be integrated into the annual establishment training plan and priority has been given as part of the Offender Management in Custody roll out.	Governor	April 2018
	Security				
5.12	Outcomes from information reports, including searches and drug tests, should be carried out quickly.	Agreed	HMP Dartmoor has now recruited Band 3 Prison Officers up to its benchmark staffing level and intelligence-led searching is being carried out.  The new profile will detail staff on a daily basis to conduct intelligence-led searches in all areas and carry out suspicion drug testing from the intelligence received. This will ensure that results from actions taken will be completed within a reasonable time frame and overseen by the Head of Security at the prison. The June 2018 target date is for the implementation of a new profile for operational staff to better meet the needs of the OMiC model.	Governor	June 2018
	Incentives and earned privileges				
5.13	The prison required a more flexible and responsive approach to people with extremely complex needs and for whom the IEP	Agreed	The IEP Policy at HMP Dartmoor will be reviewed and will incorporate the effective use of key workers to support changes in behaviour. A case management approach will be considered and adopted for more complex individuals as necessary.	Governor	March 2018

	system was not promoting a change in behaviour.		Additionally, the complex needs support strategy is a region-wide initiative and has been used within HMP Dartmoor. Further awareness training will be completed by March 2018.	Governor	March 2018
	Discipline				
5.14	Managers should ensure that all use of force paperwork is complete.	Agreed	All Orderly Officers will ensure that all use of force paper work is completed within policy guidelines. A quality assurance check will be undertaken once a month by the Care and Separation Unit managers to ensure compliance. The Head of Residence and Safety to oversee compliance.	Governor	March 2018
	Residential units				
5.15	All cells should be properly maintained and kept warm and dry, and all toilets should be screened.	Partly Agreed	This recommendation can only be partly agreed as procurement and installation of toilet screens is subject to successfully securing funding and cannot be committed to by HMP Dartmoor. The prison will contact HMPPS HQ (Public Sector Prisons Industries department) for advice on obtaining privacy screens for toilets and arrange for fitting via a formulated bid to regional estates. The bid is on target for May 2018, however completion of work to fit privacy screens from any successful bid will extend throughout 2018 with a final completion date of March 2019, subject to approval.  HMP Dartmoor will ensure all residential staff report all issues and faults with cells and arrange rectification via the Planet FM process. Weekly inspections of all cells by residential Custodial Managers will help ensure compliance.	Governor	May 2018
5.16	Prisoners should be able to shower and use the phones every day.	Agreed	HMP Dartmoor will re-profile the core day to create daily access to basic amenities including showers and phone calls. This is envisaged to commence from June 2018 to coincide with the introduction of OMiC.	Governor	June 2018
5.17	Prisoners should be able to access their stored property without significant delay.	Agreed	HMP Dartmoor will implement a new staff profile which will enable regular staff to be allocated to work in Reception embedding a routine for allowing more prisoners access to their property at more frequent times.	Governor	June 2018
	Equality and diversity				
5.18	The prison should establish more links to community organisations to support men with protected characteristics.	Agreed	HMP Dartmoor will work with the voluntary sector coordinator to source external community support. Links have been established with external voluntary groups SSAFA, Race Equality Council, Re-coop, St Luke's hospice, Devon County Council Social Care and a directory of local services has been created.	Governor	March 2018
5.19	Discrimination investigations should be subject to external quality	Agreed	HMP Dartmoor will work with the voluntary sector coordinator to source external community support. This will enable community support to complete a monthly 10% quality assurance check on Discrimination Incident Reporting Form	Governor	March 2018

	assurance and there should be clear actions to address discrimination when it is proven.		(DIRFs), and for them to assist generally in suggestions and actions to take to address discrimination where it is evidenced.  In cases of proven discrimination, agreed actions to address this will form part of the establishment's combined action plan to ensure implementation. Evaluation of the impact of these actions will form part of the Equality Action Team.		
5.20	There should be regular support forums and improved support for foreign national prisoners from all staff.	Agreed	The Heads of Residence will establish better support networks for minority groups' particularly foreign nationals. Foreign National Offenders awareness sessions will be incorporated into the delivery of Key Worker training locally and all foreign national offenders will be allocated a Key Worker.	Governor	March 2018
 I	Complaints				
5.21	Trends in complaints should be analysed and action taken to address recurring issues.	Agreed	A trend analysis of complaints will be conducted at the monthly performance and Senior Management Team (SMT) meetings. Actions to address trends will take place through the prison council or Equality groups and be monitored by the Deputy Governor.	Governor	March 2018
	Legal rights				
5.22	Prisoners should be able to use Access to Justice laptops.	Agreed	The Head of Security at HMP Dartmoor will make contact with the Access to Justice manager located at HMP Belmarsh to arrange for two members of staff to attend a 4 day training event held at HMP Belmarsh. This will enable HMP Dartmoor to purchase Access for Justice laptops from HMP Belmarsh's approved supplier.	Governor	June 2018
	Health services				
5.23	Health care practitioners should receive regular, documented clinical supervision.	Agreed	Head of Healthcare at HMP Dartmoor will implement a culture that promotes regular clinical supervision, which will be embedded into everyday practice and will conduct regular management checks to ensure staff are aware and adhering to policy.	Governor	March 2018
			Head of Healthcare will identify Clinical Supervisors and provide training if required and staff will be given protected time to undertake clinical supervision.	Governor	March 2018
5.24	Clinical audits, particularly those for infection control compliance, should occur regularly.	Agreed	Head of Healthcare HMP Dartmoor will implement Care UK's infection prevention and control clinical audits as per the schedule. Head of Healthcare at HMP Dartmoor will review and monitor compliance via the monthly Quality Assurance meeting.	Governor	March 2018
5.25	The pharmacy service and medicines management should be reviewed to	Agreed	The Governance of pharmacy services provided to HMP Dartmoor have been reviewed and a new Regional Pharmacist has been appointed to support the wider governance and pharmacy service. Pharmacy-led clinics have also been	Director of NHS England	Completed

	ensure that the ordering and storage of medicines are scrutinised by a pharmacist and that patients have access to medicine use reviews and pharmacy-led clinics.		implemented to ensure patients receive medicines use reviews to improve compliance, patient education and prescribing review.  As part of the wider medicines management governance, regular medicines management meetings have been implemented to ensure that systems and processes are in place for safer prescribing, medicines reconciliation, audits etc. At the point of prescribing each prescription is "clinically screened" by the pharmacist before it is dispensed.  Systems for medicines reconciliations, stock audits and out of hours medicines supply will be implemented at HMP Dartmoor along with monthly medicines management meetings.	Director of NHS England  Director of NHS England	Completed  March 2018
5.26	Patients should be supplied with their medicines on time to ensure their treatment is not disrupted.	Agreed	Head of Healthcare at HMP Dartmoor will implement a "confirmation" system to provide assurance and early detection that the pharmacy department receive all faxed prescriptions.  Any issues pertaining to the patient experience or delays in receiving prescribed medications for over 3 days will be escalated and managed by the Head of Healthcare. HMP Dartmoor will actively use FP10 forms (which enable prescriptions to be issued by GPs or nurse and pharmacist prescribers, hospital doctors, supplementary prescribers or out of hours centres) to avoid further delays if/when appropriate.	Governor	March 2018  March 2018
5.27	Medicines should be administered and supervised in line with established recommended dosage schedules for optimal care.	Partly Agreed	This recommendation is partly agreed as the commissioning arrangements of healthcare services at HMP Dartmoor mirrors that of a community practice and the service provided does not meet the required 12 hourly dosage timeframe to allow 12 hourly supervised consumption. Should patients require a 12 hourly dosage, risk assessments would be undertaken to review in-possession status and any prescribing decisions would be actioned by the GP (General Practitioner). Medication dosage schedules will be reviewed regularly via Medicines Management Meetings.	Director of NHS England	March 2018
5.28	Essential dental surgery equipment should be maintained and serviced routinely, and repairs carried out promptly to ensure a safe and full dental service.	Agreed	All dental equipment servicing has been completed. 'Time for Teeth' will advise on systems and processes in place. They will be required to ensure servicing of equipment is both logged and pre-planned to avoid overdue servicing.	Governor	Completed and Ongoing
5.29	Patients should be transferred to mental	Partly Agreed	This recommendation is partly agreed as although every effort is made to expedite transfers and assess patients promptly, transfers are dependent on a		

	health services within the current time guideline.		number of factors such as the completion of appropriate assessments, administrative processes within the NHS, and the availability of accommodation in mental health hospitals and other related issues.		
			NHSE has developed a plan to improve services for prisoners with mental health issues, and includes specific reference to timely transfer and remission of patients and information about how this will be implemented and sustained.	Director of NHS England	Ongoing
			The Prison Transfer and Remission Guidance published by the Department of Health in 2011 has not been agreed by NHSE. NHSE hopes to publish guidance in April 2018, with timescales that take into account clinical urgency and need.	Director of NHS England	April 2018
			Locally, overseen by the Head of Healthcare, a clinical pathway will be reviewed to ensure clear processes are in place to assess patients transferred to secure mental health settings.	Head of Commissioning (NHSE)	April 2018
	Catering				
5.30	Breakfast packs should be issued on the morning they are to be eaten.	Agreed	As part of the planned OMiC re-profile, HMP Dartmoor will revise the core day to allow additional time to enable breakfast packs to be issued on the morning they are to be eaten.	Governor	June 2018
	Time out of cell				
5.31	Until a full regime can be delivered, the prison should ensure that the core day provided is predictable, and that men have a minimum association period and at least one hour's exercise in the open air every day.	Partly Agreed	A full regime is now facilitated that commenced in February 2018. The core day is now predictable subject to operational pressures such as unplanned events whereby operational staff are redirected from regime delivery.  The minimum association period and at least one hour's exercise in the open air every day cannot be agreed. National policy (PSI 75/2011 Residential Services), states that prisoners are afforded a minimum of 30 minutes in the open air daily as opposed to one hour's exercise in the open air recommended by the Inspectorate. This provision is mandatory subject to weather conditions and the need to maintain good order and discipline.	Governor	Completed
	Learning and skills and work activities				
5.32	The provision provided by the college and its subcontractors should be evaluated accurately.	Agreed	Weston College Manager and Head of Learning and Skills (HOLS) will establish a standard evaluation/quality process to be undertaken and evaluation of the provision will be discussed at the monthly Establishment Performance Meeting.	Governor	March 2018
			Sub-contractors (NErgy and Duchy College) will provide retention, success and achievement rate (RSA) data to the prime contractor. Monthly quality checks will be undertaken through joint observation with Weston college managers and	Governor	Completed and ongoing

			HOLS (commenced January 2018). The process will be mirrored with Hot Foot and Shaw Trust (provider deliverers).		
5.33	All prisoners should be allocated to activities, which they should be able to attend. They should also have enough to do.	Not Agreed	HMP Dartmoor do not agree that all prisoners should be allocated to activities. The age profile of prisoners at Dartmoor means there will always be a proportion of retired prisoners who are not required to attend work or structured activities.  There are sufficient activity spaces at HMP Dartmoor to allocate and occupy all prisoners who are eligible for work. HMP Dartmoor will seek to maximise attendance at all activities. This will be monitored through the daily operational meeting and non-attendance followed up to establish reasons for absence.	Governor	March 2018
5.34	Prisoners' use of English and maths should be developed to help improve their life chances.	Agreed	HMP Dartmoor will increase Maths/English provision via the 'out-reach' programme. Prisoners will be assisted in smaller groups around workshop areas for more focused learning.	Governor	March 2018
5.35	The prison should ensure instructors are able to assess and record the skills that prisoners develop in prison work.	Agreed	HMP Dartmoor will ensure Industry Instructors are able to access the Training, Assessment and Quality Assurance qualification. This will give Instructors the skills required to record prisoners achievements.	Governor	June 2018
5.36	Prisoners should attend their lessons and activities on time.	Partly Agreed	It is not possible to fully agree to this recommendation as the desired outcome to start lessons and activities on time may not on occasion be fully achieved due to unforeseen operational circumstances, such as incidents.  HMP Dartmoor believe that some prisoners are arriving late for activities due to attending healthcare for medication. HMP Dartmoor will therefore re-profile the core day to create extra association time to ensure that attending Health Care for medication does not coincide with commencement of movement to activities.	Governor	June 2018
5.37	Prisoners' achievements on low performing courses should be improved and reliable data for those who study with subcontractors held.	Agreed	Low performing courses will be monitored weekly by the HOLS and the Curriculum Manager. Reasons will be identified and actions will be discussed and progress reviewed at monthly establishment performance meetings. Subcontractors (Nergy and Duchy College) will provide retention, success and achievement rate (RSA) data to the primary contractor and monthly quality checks will be undertaken through joint observation with Weston college managers and HOLS.	Governor	March 2018

	Physical education and healthy living				
5.38	PE staff should evaluate data on attendance and use the information to target non-users.	Agreed	Snapshots will be taken quarterly to review attendance at gym inductions and how many prisoners then turn into regular gym attenders and HMP Dartmoor will introduce a follow up process for a proportion of those non-attenders to establish their reasons.	Governor	March 2018
	Offender management and planning				
5.39	Men should not be assessed as suitable for an open prison without an upto-date OASys assessment which reflects their current risks and needs.	Partly Agreed	The recommendation is partly agreed as although there are clear national instructions that no prisoner should be sent to open prisons without an OASys assessment, in order to ensure places in open establishments are not underutilised a further OASys review is not mandated for the purpose of the transfer, but managers should satisfy themselves that the OASys in place is current and relevant. A review can then be undertaken at the Open Prison for inscope prisoners prior to any period of temporary release being agreed.	Governor	Completed
5.40	Men should be able to move promptly to other prisons to promote their progression.	Partly Agreed	This recommendation can only be partly agreed as transfers to other establishments are subject to numerous variables including population pressures and programme availability etc. which are beyond the control of HMP Dartmoor and the wider prison group.  A system will be put in place to take appropriate action to ensure prisoners are moved as swiftly as possible to other prisons for progressive reasons. This will include ensuring staff are detailed to Observation Categorisation and Allocation (OCA) duties on a regular basis.	Governor	March 2018
	Reintegration planning				
5.41	Specialist accommodation advice and support should be available to all men being released from Dartmoor.	Agreed	Offender Supervisors will be appointed to ensure that those prisoners who have accommodation needs are provided with advice and support prior to release from custody. The appointed Senior Probation Officer has assisted in the risk management and resettlement planning of the high risk population.	Governor	March 2018
	Burunoon.		Regular meetings between The Governor, Through the Gate (TTG) services and the Community Rehabilitative Company (CRC) are now taking place to ensure resettlement services are purchased via the rate card system.	Governor	Completed
5.42	The booking-in process should be streamlined and visits should start on time.	Partly Agreed	It is not possible to fully agree to this recommendation as the desired outcome to start visits on time may not be fully achieved due to unforeseen operational circumstances, such as incidents.		
			A Custodial Manager will oversee the visits booking-in process to ensure visits start on time where possible and a review of the process is underway.	Governor	June 2018

			Additionally changes to the new profile for the core day will introduce an additional operational support grade in attendance at the visits booking-in area to speed up the process.		
5.43	A strategy for addressing the attitudes, thinking and behaviour of men considered unsuitable for accredited sexual offender treatment programmes should be developed.	Agreed	A strategy will be introduced which will address the specific needs of those prisoners deemed unsuitable for accredited sexual offending programmes. This may include the re-introduction of the A-Z programme aimed at this target group and will be dependent on any future re-configuration of the estate including a separate sex-offender estate.	Governor	May 2018

Recommendations	
Agreed	31
Partly Agreed	11
Not Agreed	1
Total	43