

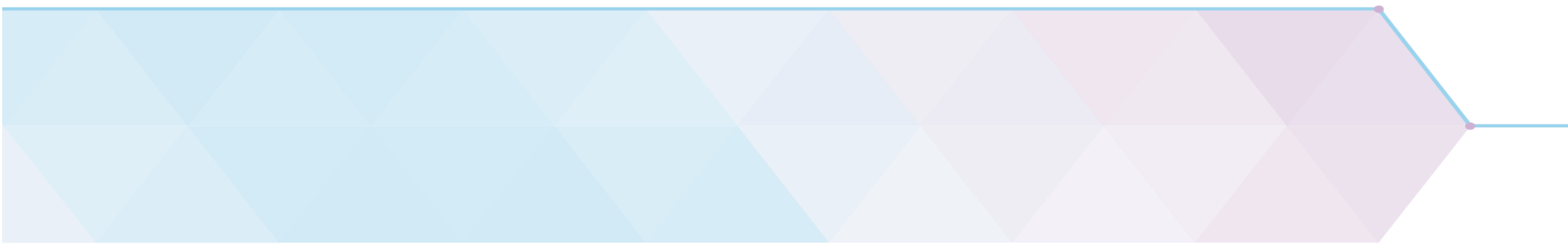


HM Prison &
Probation Service

Action Plan: HMP Liverpool

A response to the HMCIP Inspection Report

Published 19th January 2018



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 MOJ and 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.

Only the following response to recommendations should be used:

Agreed: All of the recommendation is agreed with, can be achieved and is affordable.

Partly Agreed: Only part of the recommendation is agreed, is achievable, affordable and will be implemented. This might be because we cannot implement the whole recommendation because of commissioning, policy, operational or affordability issues.

Not Agreed: The recommendation is not agreed with and will not be implemented. This might be because of commissioning, policy or operational constraints or affordability issues.

ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMP LIVERPOOL

| 1. Rec. no | 2 Recommendation | 3. Agreed / Partly Agreed / Not Agreed | 4. Response Action Taken/Planned | 5. Function Responsible/ Policy Lead | 6. Target Date |
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| | Main recommendations To HMPPS and The Governor | | | | |
| 5.1 | Concerted action should be taken by national and local managers to ensure that the prison environment is brought up to an acceptable standard. In particular, all cells should provide decent, hygienic and well maintained conditions, and necessary repairs should be completed swiftly. Cells falling below basic standards should not be occupied. (S44) | Agreed | <p>172 places have been taken out of use at HMP Liverpool due to unacceptable conditions.</p> <p>A full condition survey is underway, on which an investment proposal for a medium term refurbishment programme will be based.</p> <p>Funding has been agreed for a full programme of window replacement. In the interim, remedial action is being taken to repair existing damaged windows on a rolling basis.</p> <p>Daily Accommodation Cell Fabric Checks are conducted and unacceptable cells are reported and taken out of commission until adequate repairs have taken place. There is a new monthly cleaning programme in place and the number of prisoners working on the area cleaning party has been increased to 18. A cleaning schedule is in place with oversight of Custodial Managers.</p> | Deputy Governor/ Head of Reducing Reoffending | <p>Completed</p> <p>January 2018</p> <p>January 2019</p> <p>Completed and Ongoing</p> |
| 5.2 | The mental health service should be adequately resourced and staffed to ensure that all prisoners with mental health needs receive prompt assessment and regular input to address and review their | Agreed | A Joint National Oversight Group was established and met in November. This meeting established a Joint Health and Social Care Improvement Board which own the healthcare action plan for HMP Liverpool. HMPPS will provide a reporting link from the Health and Social Care Improvement Board to the National Prison Healthcare Board to provide oversight and provide a route for escalation if necessary. | Joint National Oversight Group/HMPPS | Completed and ongoing |

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| | individual risks and needs. (S45) | | <p>Lancashire Care Foundation Trust (LCFT) have established a demobilisation group which will review and monitor staffing levels on an ongoing basis until the end of contract on 31 March 2018. Post March 2018 NHS England and HMPPS have committed to re-let the new contract based on the health needs analysis with appropriate mental health care.</p> <p>Since the inspection an e-rostering system is now in place and all rotas are now managed via this. Service leads work with staff to fill shortfalls as necessary and escalate to the Service Manager if staffing levels do not meet minimum requirements.</p> <p>LCFT's Lead Nurse along with the team leader of Inpatient Mental Health Team (IMHT) are reviewing the tasks and team procedures for well men's assessments (a general healthcare check), and case management. National Health Service England (NHSE) and LCFT are working together to review the staffing model for healthcare.</p> | <p>Care Group Manager LCFT</p> <p>Lead Nurse</p> <p>NHSE and Deputy Operations Manager</p> | <p>March 2018</p> <p>Completed and Ongoing</p> <p>March 2018</p> |
| | Main recommendations To The Governor | | | | |
| 5.3 | Managers should ensure that use of force documentation is completed promptly and thoroughly, including for special accommodation, and that force is demonstrably proportionate and justified. Data should be analysed and incidents reviewed to monitor trends, identify good practice and learn lessons. (S42) | Agreed | <p>The establishment now have a dedicated Use of Force (UoF) coordinator who ensures all documentation is completed promptly. Samples of the documentation are Quality Assured at the Use of Force Committee meeting and any issues and trends are added to the action plan. The Use of Force Co-Ordinator will give feedback to staff whose paperwork needs additional training needs.</p> <p>All incidents are reviewed, to ensure that use of force is reasonable, proportionate and justified. The UoF co-ordinator produces a report, any issues arising are escalated through the management line and discussed at the monthly Use of Force Committee meeting. The co-coordinator holds and documents a prisoner and staff debrief after all incidents. Outcomes provide a lessons learnt or good practice report.</p> <p>The UoF co-ordinator uses a Control and Restraint database which provides data enabling incidents to be analysed and</p> | Head of Safer Custody | Completed and Ongoing |

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| | | | monitored for trends. The data is discussed at the monthly Use of Force Committee meeting. | | |
| 5.4 | All actions following the receipt of intelligence reports should be carried out, including the targeted searching of cells and suspicion drug testing. (S43) | Agreed | Additional resources have been put in place for intelligence, analysis, search and suspicion testing. The establishment now has in place a dedicated search team. Targeted searches have increased and will continue to do so as the new profile identifies additional resources. A monthly Security meeting will regularly review intelligence related to drug testing and searching. | Head of Security & Intelligence | Completed and Ongoing |
| 5.5 | Prisoners should be unlocked and engaged in constructive activity during the working day. The regime should include an hour to exercise in the open air, evening association, frequent library access and sufficient time to carry out domestic tasks. Managers should ensure that poor attendance and punctuality are addressed. (S46) | Partly Agreed | <p>Prisoner unlock to engage in constructive activity has improved since the inspection. The introduction of interim profiles allows for a regime which delivers daily exercise in the open air in line with PSI 75/2011, weekly visits to the library for all prisoners who wish to attend, and 1 hour association within which domestic tasks can be undertaken.</p> <p>Planned further improvements to the regime will increase the number of men who are able to access evening association in line with policy.</p> <p>An Activities Manager has been appointed tasked with ensuring that poor attendance and punctuality in relation to activities are addressed. The activities manager will report figures at the daily operational meetings. All poor punctuality or absence is investigated. Those prisoners found not to have a legitimate reason for lateness or non-attendance are dealt with via the Incentive and Earned Privileges (IEP) scheme.</p> <p>1-hour Exercise: National Policy PSI 75/2011, Residential Services states that prisoners are afforded a minimum of 30 minutes in the open air daily. This provision is mandatory subject to weather conditions and the need to maintain good order and discipline. There is no requirement to provide 1-hour or more than 30mins.</p> <p>Evening Association: (Policy) Significant changes or curtailment in existing regimes is not expected given that evening association is generally necessary to maintain access to</p> | <p>Deputy Governor</p> <p>Head of Reducing reoffending/ Head of Residence</p> | <p>Completed and Ongoing</p> <p>April 2018</p> <p>Completed and Ongoing</p> |

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| | | | <p>“personal and practical needs” and to provide appropriate time out of cell to maintain well-being; support social interaction; and avoid risk of disorder. A minority of establishments do not provide evening association and this is permissible as long as the regime remains compliant with the specification and has been approved through the SLA process.</p> | | |
| 5.6 | <p>All eligible prisoners should have an offender supervisor who provides them with regular focused contact to manage risk, encourage and monitor the achievement of sentence plan targets and secure progressive transfers. High-risk prisoners should be allocated to probation offender supervisors. (S47)</p> | Partly Agreed | <p>The new officer profile will reduce the number of times offender supervisors are redeployed to other duties. The keyworker element of Offender Management in Custody (OMiC) will be implemented by April 2018. The new case management arrangements will replace the offender supervisor role and are part of a national roll-out with the new case management arrangements in place by 2019.</p> <p>The establishment currently have two non-operational offender supervisors which will mitigate the risk of redeployment. Offender contact is a specific task on detailed duties for offender supervisors. Management checks have been introduced to ensure offender supervisors are working to their detailed tasks. The checks will be carried out by the Custodial Manager (CM).</p> <p>Additional Probation Officers will be recruited to ensure that all high risk prisoners are appropriately managed.</p> | <p>HMPPS</p> <p>Head of Offender Management</p> <p>Head of Offender Management</p> | <p>December 2019</p> <p>Completed and Ongoing</p> <p>April 2018</p> |
| | Recommendation To HMPPS | | | | |
| 5.7 | <p>Foreign national detainees should be moved to an immigration removal centre once their criminal sentence has been served (repeated recommendation 2.37).</p> | Not Agreed | <p>Every effort is made to ensure that a foreign national offender’s (FNO’s) removal by deportation coincides with his or her release from prison on completion of sentence or during the Early Removal Scheme period where that applies.</p> <p>Where the removal of an FNO is not possible on completion of their sentence, detention may be continued under immigration powers. FNOs may continue to be detained in prison for reasons of security or control and where it is assessed that those concerned are not suitable for the more informal environment provided in immigration removal centres. The prison may also accommodate detainees who have been assessed as suitable</p> | HMPPS | |

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| | | | for transfer to the immigration removal estate but are awaiting transfer. | | |
| | Recommendations to HMPPS and the governor | | | | |
| | Staff-prisoner relationships | | | | |
| 5.8 | Key workers should receive additional support and training to help them engage with prisoners and deliver the service to prisoners outlined in the key worker strategy. | Agreed | <p>HMP Liverpool continues to train staff in the keyworker role and the new Offender Manager model. The establishment has rolled out Keyworkers on five wings. All prison officers have completed the theory exam while 80% have completed the practical elements. All wings will have keyworkers by March 2018. All current keyworkers have completed Five Minute Intervention training, keyworker theory and keyworker skills training.</p> <p>HMP Liverpool have put in place additional support measures including a mentoring scheme for keyworkers. A keyworker information folder is provided to all keyworker staff which contains information on interventions, education courses, prison activity, services provided by partner agencies. Additional training will be facilitated by the psychology team initially focusing on reception and the care and separation unit and other high risk areas. Ongoing training related to the delivery of key worker tasks will be incorporated into the annual training plan for 2018 which will be produced by April 2018.</p> | Head of Business Assurance | <p>March 2018</p> <p>April 2018</p> |
| | Daily life | | | | |
| 5.9 | Prisoners should not be held in overcrowded conditions. (S44) | Not Agreed | <p>For the foreseeable future, and in common with other prisons, it will be necessary for Liverpool to operate with an operational capacity that involves a level of crowding above its Certified Normal Accommodation.</p> <p>As part of prison reforms the long-term goal is to reduce crowding, while maintaining sufficient capacity in the prison estate to manage the demands of the courts and the sentenced population as efficiently as possible. This level is kept under constant review, taking into account fluctuations in the prison population and useable capacity across the estate. The prison ensures that this level of operational capacity is set to reflect the provision of safe and decent accommodation and the operation</p> | Prison Estate Transformation Programme at HMPPS Headquarters | |

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| | | | <p>of suitable regimes and that levels of crowding in prisons are carefully managed.</p> <p>The occupancy of prison cells is determined by the Governor of each establishment and, where cells are proposed for sharing when they were originally designed for single occupancy, this is certified by the relevant Prison Group Director in accordance with PSI 17/2012, which provides clear guidelines for determining cell capacities.</p> | | |
| | Equality, diversity and faith | | | | |
| 5.10 | The national equality monitoring tool should be revised to cover all protected characteristics and produce data that are no more than a month old. All disparities should be investigated. | Partly Agreed | <p>Information on sexual orientation is shown where there are sufficient numbers. However, because of insufficient data quality and coverage, no disability information is currently shown on the Equalities Monitoring Tool (EMT). Prison and Probation Analytical Services are at present reviewing the information included in the EMT and its frequency and will include the Inspectorate's comments as part of the review.</p> <p>Where data is available it is analysed at the bi-monthly equalities meeting at HMP Liverpool. Any disparities are investigated to review if actions and learning points can be formalised. These investigations will be carried out by a member of the equalities team. The findings will be discussed with the Head of Equalities and fed back to the Equalities meeting.</p> | <p>Prison & Probation Analytical Services</p> <p>Head of Equalities</p> | <p>August 2018</p> <p>Completed and Ongoing</p> |
| | Recommendations To The Governor | | | | |
| | Early days in custody | | | | |
| 5.11 | Prisoners should not be held in reception for long periods. (repeated recommendation 1.15) | Agreed | All medical staff/interviews have been moved into one area of reception to make the process more efficient. The prison will monitor the procedure and if no significant improvement is evident in the time prisoners spend in reception, then the alternative solution of moving the medical assessment onto the First Night Care centre will be explored. A review of the new system will take place in February 2018. | Head of Operations. | February 2018 |
| 5.12 | There should be enough night officers on the first night unit to monitor the welfare of new arrivals regularly and support prisoners on ACCTs. | Agreed | Staffing on the first night unit has been temporarily increased to two members of staff, to monitor and support first night prisoners and prisoners on ACCT documents. This will be reviewed and made permanent if judged necessary. | Deputy Governor | April 2018 |

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| 5.13 | All prisoners should complete an induction programme that provides comprehensive information about the prison. Attendance should be centrally tracked. | Agreed | <p>The induction programme has been reviewed with partner agencies to ensure it provides comprehensive information, and the appropriate duration is now under consideration. The Head of Reducing Re-offending is also reviewing the length of the induction with a view to extending it to 3 days.</p> <p>The Induction wing manager is tracking attendance at induction centrally to ensure attendance is tracked and non-attendance is followed up. Management information is now available centrally and reviewed at the monthly performance meeting.</p> | Head of Reducing Reoffending/ Head of Residence/ Partner Agencies | March 2018 |
| | Managing behaviour | | | | |
| 5.14 | Violence reduction work should be adequately resourced and be underpinned by an up-to-date analysis of data and a comprehensive action plan. All incidents of violence and antisocial behaviour should be investigated thoroughly, perpetrators should be managed consistently and victims supported. | Agreed | <p>The Violence Reduction (VR) strand of Safer Prisons has been increased to three Band 3 officers. There is a comprehensive local VR database that is discussed at Security & Safer Liverpool meetings where actions are formulated and added to an action plan.</p> <p>All incidents of violence are now investigated by the VR team using the new Challenge, Support & Intervention Planning (CSIP) tool. The VR Team analyse the Intelligence Report System (IRS) system, Orderly Officer reports and Observation books to ensure they are aware of any incidents of violence and victims can be supported. These are discussed at the weekly Support Intervention meeting (SIM).</p> | Head of Safer Prisons | Completed and Ongoing |
| 5.15 | Self-isolating prisoners should receive multidisciplinary support and encouragement to promote their reintegration. | Agreed | <p>The establishment is working closely with the Regional Safer Custody Team (RSCT) and a new Self-Isolated Prisoners Policy has been published to inform staff of the process and referral systems in place for supporting self-isolated prisoners. The referral system is now embedded and self-isolating prisoners receive multidisciplinary support which encourages their reintegration. Keyworkers have been introduced to support self-isolating prisoners to encourage them to engage in the regime. The number of self-isolaters has reduced since the inspection.</p> | Head of Safer Custody | Completed and Ongoing |

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| 5.16 | Prisoners on the basic level of the IEP scheme should have individual targets which focus on addressing their poor behaviour. | Agreed | <p>IEP Participatory Boards are now being held weekly on each wing. Residential Custodial Managers (RCMs) have been reminded of the contents of the IEP policy which was reviewed in June 2017. They are now providing appropriate oversight of the process.</p> <ul style="list-style-type: none"> • The IEP levels are reviewed at the IEP Review Board on a weekly basis. • The Head of Residence completes a 10% assurance management check of all IEPs. • Additional assurance processes to monitor the IEP scheme are currently being developed. | Head of Residence | Completed and ongoing |
| 5.17 | Adjudication hearings should be timely and thorough and include the full range of relevant information. All prisoners, including vulnerable prisoners, should be held in decent conditions while awaiting adjudication. | Agreed | <p>The timeliness of adjudication hearings has been improved by introducing comprehensive timetable of additional remanded adjudications. The conduct and paperwork associated with adjudications will be continually reviewed at bi-monthly SMARG meetings.</p> <p>Steps will be taken to improve physical conditions in the existing holding room in the Care and Separation Unit to immediately improve the decency of conditions experienced by prisoners awaiting adjudication. A separate session of adjudication hearings will be held for vulnerable prisoners.</p> | Head of Residence | <p>Completed and Ongoing</p> <p>March 2018</p> |
| 5.18 | Data on adjudications and segregation should be analysed thoroughly to identify emerging patterns and trends. All relevant stakeholders should attend segregation and adjudication review meetings. | Agreed | To support the data capture and analysis HMP Liverpool now has a Residential Administrator who collates the data on a weekly basis so that the CSU Senior Officer (SO) and Custodial Manager can analyse current and emerging trends. Any concerns relating to the data or attendance patterns are escalated to SMARG. | Head of Residence | Completed and Ongoing |
| 5.19 | All planned use of force should be filmed on hand-held video cameras. | Agreed | The establishment have purchased three Video cameras and roll-out will be completed by February 2018. | Head of Safer Custody | February 2018 |

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| 5.20 | The segregation regime should be more purposeful with a greater range of activities to occupy prisoners constructively. | Agreed | In-cell education packs are being provided, where appropriate, for men located in segregation and in discussion with a tutor. A library trolley is refreshed fortnightly with books or requests for specific books via application to the Librarian. Attendance at religious services can be requested via application to the chaplain on morning rounds and approved subject to security risk assessment. | Head of Reducing Reoffending | Completed and Ongoing |
| 5.21 | The use of unofficial punishments should cease. | Agreed | HMP Liverpool are adhering to the PSO 1700. Duty Governors have been fully briefed to ensure that PSO 1700 is fully adhered to on all occasions. In cases where the specific provision within the PSO related to prisoners refusing to leave segregation needs to be applied, prior authority will be sought from the Duty Governor. | Head of Residence | Completed and Ongoing |
| 5.22 | All segregated prisoners should have an individual care plan with a clear focus on identified risks and successful reintegration planning. | Agreed | All segregated prisoners will have an individual care plan with a clear focus on identified risks and reintegration planning. | Head of Residence | March 2018 |
| | Security | | | | |
| 5.23 | Closed visits should be imposed only for visits-related activity. | Agreed | Prisoners subject to closed visits are reviewed monthly by the Head of Security who will ensure the use of closed visits complies with PSI 15/2011. | Head of Security | Completed and Ongoing |
| | Safeguarding | | | | |
| 5.24 | The ACCT process should support consistent care of prisoners at risk of self-harm. Triggers should be correctly recorded, care maps should be pertinent and completed before closure and multidisciplinary care reviews should be held on the scheduled day. | Agreed | An overhaul of Suicide & Self Harm training (SASH) and Assessment Care in Custody Teamwork (ACCT) Case Manager training has begun at HMP Liverpool. All staff are required to attend the new SASH training package which has 6 modules including recognising risks & triggers. This training has already begun and will be completed by the end of 2018. All Band 4's & Band 5's are required to attend the new ACCT Case Manager training or new Case Manager refresher training. This has already begun. Staff are being detailed training courses throughout 2018. With limited spaces available the target completion date for all staff will be December 2018 subject to the Learning & Development group supplying spaces. As the training | Head of Safer Custody Head of Safer Custody | December 2018 Completed and Ongoing |

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| | | | <p>programme progresses the ACCT process should support consistent care of prisoners at risk of self-harm.</p> <p>To ensure quality of ACCT documents, all documents are now checked within 72 hours of opening by Safer Custody and checked weekly by Wing Custodial Managers.</p> | | |
| 5.25 | There should be a coherent strategy to reduce self-harm, informed by the characteristics of the population. A local self-harm reduction policy should be accompanied by an up-to-date and responsive action plan. | Agreed | The Head of Safer Prisons & Regional Safer Custody Team (RSCT) will work together to produce a Local Self-Harm reduction policy accompanied by an up-to-date responsive action plan. | Head of Safer Custody/RSCT | March 2018 |
| | Staff-prisoner relationships | | | | |
| 5.26 | Staff should address prisoners respectfully and maintain a professional approach towards them. They should encourage positive and responsible behaviour and support engagement with the regime. | Agreed | <p>One of our key goals is to embed a rehabilitative culture in HMP Liverpool where prisoners are dealt with in a respectful and legitimate way.</p> <p>In conjunction with Regional Psychology HMP Liverpool held a Rehabilitative Culture workshop which reviewed Measure of Quality of Prisoner Life (MQPL), Staff Quality of Life (SQL) and Culture Web. The establishment has received the report and action plan.</p> <p>The following actions will support this recommendation:</p> <ul style="list-style-type: none"> • Provide further guidance & communications to staff on Every Contact Matters; • Ensure all staff are trained in five minute intervention & use the skills on a daily basis, staff to also receive regular refresher training; • Continue to train staff in the keyworker role and the new Offender Management in Custody model. The establishment has rolled out Keyworkers on 5 wings. All prison officers have completed the theory with 80% completed practical all wings will have keyworkers by February 2018 | <p>Deputy Governor</p> <p>Head of Residence</p> <p>FMI Project Lead</p> <p>OMiC project lead</p> | <p>Completed and Ongoing</p> <p>February 2018</p> <p>Completed and Ongoing</p> <p>February 2018</p> |

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| | | | A revised Rehabilitative Culture strategy will be developed based on the culture web exercise completed in October 2017. | Deputy Governor | April 2018 |
| | Daily life | | | | |
| 5.27 | All prisoners should have a working emergency cell bell. Officers should respond to cell bells promptly, the timeliness of responses should be monitored closely and action should be taken to address delays. | Agreed | <p>The process to check all cells have an emergency cell bell is:</p> <ul style="list-style-type: none"> • Wings to check cell call through the Accommodation Fabric Check (AFC) process, results should be logged in the Wing Observations Book; • All defects should be reported on Planet FM (the Computer Aided Facilities Management System). • If the Cell Call Unit is not operational the cell will be taken out of use. • The alarms contractor (Amey Subcontractor) test the Cell Call system Quarterly, any Remedial work is actioned by AMEY, records Kept in Works Department; <p>To ensure officers respond to cell bells promptly HMP Liverpool have introduced a weekly monitoring system to check response times to cell call bells.</p> | Head of Residence | Completed and Ongoing |
| 5.28 | Breakfast packs should be more substantial and served on the day they are to be eaten (repeated recommendation 2.124) | Partly Agreed | <p>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.</p> <p>HMP Liverpool will however provide additional hot items such as toast and porridge on the wing in the morning.</p> | Governor / Head of Residence | April 2018 |

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| 5.29 | Regular consultation should take place to understand and address prisoners' discontent with the food. | Agreed | . A prisoner forum to address prisoners' discontent with food now takes place at the monthly Prisoner Consultative Committee (PCC) which sees wider representatives rather than just the food representatives. This will ensure a greater breadth of views. The revised Terms of Reference for the PCC reflect this. | Head of Residence | Completed and Ongoing |
| 5.30 | Applications should be tracked, and responses should be focused, timely and demonstrate sufficient enquiry. | Agreed | Applications are recorded in triplicate and Wing Managers are responsible for tracking response times. Management checks are conducted on a monthly basis to provide oversight of the system. | Head of Residence | Completed and Ongoing |
| 5.31 | All complaints should be responded to and returned to prisoners quickly. A robust system for quality assurance of complaints should be introduced which includes consultation with prisoners on their perceptions of the complaints system. | Agreed | Complaints are collected daily, distributed to the relevant areas for response with target date. A Business Hub manager tracks and records timeliness on a spreadsheet and prompts are sent out as appropriate. A draft complaints and applications policy has been produced which outlines the complaints system. This will be published by January 2018 and delivery will be closely monitored. A review of the quality assurance of complaints at the prison is also being conducted which will include consideration of introducing a prisoner's oversight committee. The review will be carried out by Business Hub Manager and changes implemented. The Deputy Governor will conduct a 10% quality assurance check each month. | Head of Residence/Head of Business Assurance Deputy Governor | Completed and Ongoing January 2018 February 2018 February 2018 |
| 5.32 | Prisoners' access to justice should be supported through timely legal visits, provision of laptops to help pursue legal cases, and easy access to a library with up-to-date legal text books. Information about the Criminal Casework Review Commission and the Legal | Agreed | HMP Liverpool have improved the timeliness of legal visits as the interim re-profile provides adequate levels of resources to support legal visits. Access to Justice laptops will be purchased and provided by May 2018. The librarian has reviewed the legal publications to ensure all up-to-date mandatory legal books are available. | Head of Reducing Reoffending/ Head of Residential | May 2018 February 2018 |

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| | Ombudsman should be displayed around the prison. | | The establishment will ensure information regarding the Criminal Casework Review Commission (CCRC) and the Legal Ombudsman is displayed throughout the establishment. | | |
| | Equality, diversity and faith | | | | |
| 5.33 | The equality action team meeting should be attended by all relevant departments and managers should maintain an action log. | Agreed | The Equality Action Team meeting invites all relevant departments and is chaired by the Deputy Governor. The Deputy Governor will review the Terms of Reference of the Equalities Action Team, set mandatory attendance requirements and robustly chair the meetings. An action log will be reviewed as a standing agenda item. | Head of Equalities | March 2018 |
| 5.34 | Discrimination incident report forms should be available on all wings. They should be responded to promptly by a manager and there should be independent quality assurance of completed DIRFs. | Agreed | <p>A system has been developed whereby ensure discrimination incident report forms (DIRF's) are available on all wings. The equalities officers routinely check to ensure there are sufficient forms available and the Prisoner Information Desk worker can request the forms when the number is low.</p> <p>Discrimination Incident Report Forms (DIRF's) are dealt with by the Equalities Officers. Appeals are dealt with by the Equalities/Safer Custody CM. Quality assurance is carried out by Head of Equalities and deputy governor. A selection of DIRF's are redacted and reviewed at the Equalities meeting which is also attended initially by Prisoner Equalities representatives. An appropriate independent quality assurer will be appointed.</p> | <p>Head of Equalities</p> <p>Head of Equalities</p> | <p>Completed and Ongoing</p> <p>April 2018</p> |
| 5.35 | The poor perceptions of prisoners from a black and minority ethnic background and prisoners with disabilities should be investigated and addressed. | Agreed | During January 2018 & February 2018 Black, Minority, Ethnic (BME) and Disabilities forums will be held. The Equalities team will investigate these perceptions during the respective forums and formulate action plans to address any issues raised. The findings of the investigations will be published via a Notice To Staff and the Safe and Fear free Environment (SAFE) newsletter. The findings will also be discussed at the Equalities meeting with partner agencies to decide how best to address their perceptions. | Head of Equalities | February 2018 |
| 5.36 | Wing staff should make greater use of the telephone interpreting service to communicate with foreign national prisoners who do not | Agreed | Staff training on the use of the telephone interpreting service (The Big Word) was completed in December 2017. Six staff have been identified which will improve service provision. Further training will be delivered to ensure enough wing staff are aware of the service and how to access it. Additionally an IT telephone | Head of Equalities | Completed and Ongoing |

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| | <p>speak or understand English. Information about the prison should be translated into common languages (repeated recommendation 2.36)</p> | | <p>device has been purchased to translate a phone call and save as an audio file on the computer.</p> <p>Information about the prison has been translated into several common languages and is available in the First Night Centre (A Wing). However work is in progress to have the new core day translated & published into common languages across all wings during the first quarter of 2018. Information which is held on A wing will be duplicated for the other wings.</p> | | <p>March 2018</p> |
| 5.37 | <p>Prisoners with disabilities should be located in appropriately adapted cells and should have equitable access to the regime. Staff should be aware of those requiring personal emergency evacuation plans.</p> | <p>Agreed</p> | <p>A temporary Healthcare manager (prison) is now in place who is responsible for ensuring prisoners with disabilities/social care needs are transferred appropriately. An accommodation survey is being conducted. This survey is taking into account the adaptation cells on all wings to meet the requirements of the Equalities Act 2010.</p> <p>The Learning and Skills manager and Activities Custodial Manager (CM) will review access to the regime. In-cell education is provided where appropriate and supported by a NOVUS tutor (contractor).</p> <p>There is a well-publicised Personal Escape and Evacuation Plan (PEEP) process with PEEP liaison officers nominated on each wing to ensure the PEEP plans & roll boards are up to date. The Equalities team will continue to monitor prisoners with disabilities who require a PEEP, keep an updated database and liaise with residential colleagues.</p> | <p>Head of Healthcare (Prison)</p> <p>Head of Reducing Reoffending</p> <p>Head of Safer Custody</p> | <p>Completed and Ongoing</p> <p>January 2018</p> <p>Completed and Ongoing</p> |
| 5.38 | <p>The chaplaincy should be sufficiently resourced to provide consistent individual support, faith-based classes and groups to prisoners, and to attend key meetings, such as ACCT reviews.</p> | <p>Partly Agreed</p> | <p>The Chaplaincy manager is actively recruiting sessional and faith chaplains to deliver weekly faith groups for all faiths. There are some faith based teaching classes provided, and group provision is supported by the Prison fellowship team.</p> <p>Statutory duties are met by the team. The team rota does not allow for Chaplains to routinely attend all ACCT reviews although they will attend when the prisoner is known to the Chaplaincy Department.</p> | <p>Head of Reducing Reoffending/ Chaplaincy Manager</p> | <p>March 2018</p> |
| | <p>Health, well-being and social care</p> | | | | |

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| 5.39 | Governance arrangements should ensure that patient engagement, effective complaints management and clinical staff supervision inform service improvements. | Agreed | Lancashire Care Foundation Trust (LCFT) has committed to address engagements, complaints and supervision which are addressed within the CQC Action Plan and this will be monitored. The responses to CQC notices will be monitored in the Prison, Health and Social Partnership Board Meeting. There is a monthly prisoner focus group to improve patient engagement. | Service Manager/ Mental Health Network (Secure Services) HMP Liverpool | May 2018 |
| 5.40 | Service models and staffing levels should meet prisoners' needs. | Agreed | A Joint National Oversight Group met in November. This meeting clarified an agreement to establish a Joint Health and Social Care Improvement Board which met in December which will own the healthcare action plan for HMP Liverpool. LCFT's Lead Nurse along with the team leader of Inpatient Mental Health Team (IMHT) are currently reviewing the tasks and team procedures for well men's assessments and case management. NHS England (NHSE) and LCFT are working together to review the staffing model for healthcare. Since the inspection an e-rostering system is in place. All rotas are now managed via e-rostering. Service leads work with temporary staffing to fill shortfalls as necessary and escalate to the Service Manager if staffing levels do not meet minimum requirements. | NHSE and Deputy Operations Manager Lead Nurse Service Manager | March 2018 March 2018 March 2018 |
| 5.41 | All health care areas, including wing treatment rooms, should provide a decent, clean, safe environment. They should be compliant with infection control and Health and Safety Executive standards. | Agreed | The additional works request was submitted in December for the wing dispensary and the shower area. Funding has been agreed for a deep-clean for the shower and wing dispensary area and the procurement process is underway. In patient rooms have been painted and will be subject to an on-going painting programme. | HMPPS Healthcare lead | March 2018 |
| 5.42 | Health promotion and care for older and disabled prisoners should be developed to include prompt assessment and appropriate review. | Agreed | Materials are being sourced to provide to offenders relating to all areas of health promotion. A newly appointed Social Worker is completing new social assessments and reviewing existing ones. | LCFT Healthcare manager | March 2018 |
| 5.43 | Health services should be supported to provide primary and secondary care appointments and medicines | Agreed | A role brief has been devised that includes this task. The daily Custodial Manager team meeting is the forum that provides the Governance mechanisms for this. The Healthcare Custodial | HMPPS Healthcare Lead | Completed and Ongoing |

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| | supervision through timely and reliable prison officer support. | | <p>Manager has been tasked with improving the assurance that this supervision takes place.</p> <p>Attendance rates for offender clinic appointments are fed back via the Prison daily operations meeting. The newly appointed Governor and Senior Officer allocated to Healthcare are working to increase the attendance of Officers supervising medication hatches when medications are being dispensed. New Profiles now include resources to ensure supervision of the medication hatches is covered.</p> | | Completed and Ongoing |
| 5.44 | Admission to the inpatient unit should be based on clinical need with regular multidisciplinary reviews, including prison staff. Prisoners should benefit from an appropriate therapeutic regime which includes regular access to fresh air, educational and therapeutic activity and showers. | Partly Agreed | <p>The new profiles now provide an additional member of staff on the inpatient unit to improve the regime in relation to access to fresh air, education, therapeutic activities and access to showers. A regime brief will be produced to articulate these expectations. This regime will be driven by a dedicated full time custodial manager.</p> <p>A Healthcare Operational team meeting is now held every month with a standing agenda item of admissions process to ensure adherence to the local policy.</p> <p>A weekly Enhanced Care Review meeting takes place chaired by the Deputy Governor or Head of Safer Custody. This meeting is attended by prison and healthcare staff. The Terms of Reference for this meeting are to be reviewed to ensure healthcare patients are appropriately located.</p> <p>However, HMPPS reserves the right to use inpatient places for non-clinical reasons, in exceptional circumstances and on the authority of an operational manager.</p> | <p>Deputy Governor</p> <p>HMPPS Healthcare lead</p> <p>Deputy Governor</p> | <p>March 2018</p> <p>Completed and Ongoing</p> <p>March 2018</p> |
| 5.45 | Prisoners with social care needs should be located in suitable accommodation with adaptations and equipment that meet their needs and should be monitored. | Partly Agreed | Access to Disability Discrimination Act (DDA) compliant cells and appropriate accommodation for those with complex social care needs is a national issue. A social worker has been appointed to assess the social care needs and actively pursue the provision of appropriate services and equipment. HMP Liverpool has successfully reduced the number of prisoners held in these | Head of Healthcare/ NHSE Social Worker | Completed and Ongoing |

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| | | | <p>circumstances. Management oversight of this is provided by an appropriate manager designated to health.</p> <p>A bid will be submitted by March 2018 to increase the number of DDA compliant cells and facilities at HMP Liverpool.</p> | | March 2018 |
| 5.46 | The prison and the health care provider should ensure that prisoners requiring stabilisation or detoxification from drugs or alcohol receive 24-hour observation in a suitable location and regular treatment reviews by appropriately qualified staff, including a prescriber. | Agreed | LCFT provide the screening, observation, prescribing and reviews of prisoners when on A wing. HMP Liverpool will provide new doors to facilitate 24-hour observation as clinical needs dictates by June 2018. | Substance Misuse Lead HMP Liverpool and Head of Healthcare | June 2018 |
| 5.47 | All prisoners with substance misuse issues should have prompt access to a comprehensive range of psychosocial support throughout their sentence, which meets their identified needs. | Agreed | A new service will be commissioned with a service specification to include a comprehensive range of psychosocial support. | Service Manager/Substance Misuse Lead HMP Liverpool and head of Healthcare | April 2018 |
| 5.48 | Prisoners should be able to access a range of pharmacy-led clinics, including medicine use reviews. Nurses should be trained to administer an adequate range of medicines without a prescription underpinned by current out-of-hours and special sick policies. | Agreed | Healthcare staff attend prison based patient forum/prisoner consultative groups. A patient survey was sent to men on week commencing 1 January 2018. Following this, feedback will initiate an action plan to address the concerns raised. Feedback from staff and minutes of the governance meeting will demonstrate that learning is being shared and service improvements made. | Head of Healthcare | March 2018 |

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| | (repeated recommendations 2.99 and 2.101) | | | | |
| 5.49 | Clinical audits should be presented to the medicines and therapeutics committee to provide assurance that prescribing is appropriate and supply is safe. | Agreed | Clinic audits will be presented to the Health and Justice Drugs and Therapeutics meeting commencing March on a rolling programme to provide assurance that prescribing is appropriate and supply is safe. | Senior Pharmacist Substance Misuse and Inpatient Lead | March 2018 |
| 5.50 | Regular audits should inform and improve patient dental care and all dental clinical records should meet the required professional standards. | Agreed | Lancashire Care Foundation Trust (LCFT) will extend the current audit programme to ensure HMP Liverpool is included. A record keeping audit has taken place this year already and LCFT will ensure that records meet the required standard. | Service Manager – Dental Services | Completed and ongoing |
| | Time out of cell | | | | |
| 5.51 | The library should promote the development of literacy skills by introducing more activities. (repeated recommendation 3.41) | Agreed | The Library will introduce the Turning Pages mentoring initiative with a number of mentors and staff trained by the Shannon Trust. The Story Book Dads initiative will also be provided. The Head of Reducing Reoffending (HoRR) and Learning & Skills manger to discuss with Library manager the introduction of additional activities to improve footfall and interest in literacy and the library e.g. 6-Book Challenge where men agree to participate in the challenge to read 6 books within a set timeframe, meet to discuss, and are awarded a certificate of completion. Creative writing competition to be considered supported by NOVUS. | Head of Reducing Reoffending/ Library Manager | March 2018 |
| 5.52 | The all-weather pitches should be refurbished and repaired to allow more access to outside team sports (repeated recommendation 3.51) | Not Agreed | Funding for such refurbishment is not currently available. A business case has been submitted for future consideration, but the allocation of limited funding will be subject to competing priorities. | Head of Reducing Reoffending AMEY (Facilities Management contractors) | |
| 5.53 | There should be sufficient showers for those using the gym (repeated recommendation 3.52) | Partly Agreed | A bid has been accepted for seven additional showers and for refurbishment of an existing ten showers. This will improve provision and will be completed by March 2018, | Head of Reducing Reoffending | March 2018 |

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| | | | Further bids will be submitted in due course. | AMEY (Facilities Management contractors) | January 2019 |
| | Education, skills and work activities | | | | |
| 5.54 | Prison and Novus managers should manage the operational aspects of the provision well and pay good attention to health and safety. | Agreed | A review was undertaken by HMP Liverpool in conjunction with education provider NOVUS and the Urgent Notification team in October 2017. As a result a comprehensive OFSTED action plan is in place which addresses all of the concerns, including health and safety – a full list of all outstanding repairs was resubmitted to Amey in November to address the physical health & safety concerns, repairs on-going to be reviewed and updated end March 2018. | Head of Reducing Reoffending / NOVUS Manager | March 2018 |
| 5.55 | The quality of teaching, training, learning and assessments should be good or better. Novus managers should review the self-assessment process to ensure that the self-assessment report is accurate. | Agreed | NOVUS have completed Observation, Teaching and Learning (OTL) refresher training with their staff; those tutors not scoring well in first observation have had Individual Learning Plan (ILP) training, mentoring support from peers and an individual targeted action plan for improvement. Subsequent OTL reviews have been conducted from January 2018. Joint monthly management learning walks with Head of Reducing Reoffending and education manager in place from 12/17. The NW regional Head of Learning and Skills has worked with NOVUS to address the concerns with their Self-Assessment Report (SAR) process. Locally the NOVUS SAR for 2017/18 was jointly reviewed with Education and Learning and Skills managers in October 2017, as a result a more accurate reflection of the strength and weaknesses of NOVUS education delivery is reflected in the SAR. | Novus Education Manager Head of Reducing Reoffending / NOVUS Manager | Completed and Ongoing Completed and Ongoing |
| 5.56 | Prison and Novus managers should provide sufficient and stimulating education and work activity for all prisoners. It should meet their needs and enable them to obtain useful qualifications. | Agreed | The Planning tool informs the curriculum delivery. For current academic year produced jointly by Deputy Education manager and Learning and Skills manager. The current establishment Needs Analysis, previous HMIP recommendations, Local labour market information, Learner voice surveys and NOVUS quality survey were reviewed and information used to inform the curriculum mix. The Planning tool is a live working document reviewed monthly and altered according to emerging trends and need. | NOVUS Manager / Learning and Skills Manager | Completed and Ongoing |

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| | | | The Industries Manager has used the same information as above to produce a plan for qualification implementation in the workshops, including the vulnerable prisoners' workshop, (this includes Warehousing and Storage, embedded Quality Assurance processes and Performance Manufacturing Operations in partnership with NOVUS) | Head of Reducing Reoffending/Learning and Skills manager | |
| 5.57 | Instructors and tutors should use prisoners' existing skills to set relevant targets for their development, including their skills in English and mathematics. | Agreed | <p>Tutors have completed Individual Learning Plan (ILP) training and now utilise the information gathered from Induction, including the Information Advice and Guidance (IAG) data, to inform and plan individual learners' tasks and targets (relevant to the individual's existing skills and interests). Embedded functional skills are in place and evidenced in the NOVUS education provision.</p> <p>The Industries Manager has ordered white boards for all of the workshops to embed functional skills into the activities and operations produced in the Workplace. The Industries plan includes use of the information gathered at induction to inform targets in individual learning plans to be introduced once qualifications are in place in the workshops</p> | <p>NOVUS Education manager</p> <p>Head of Reducing Reoffending</p> | <p>Completed and Ongoing</p> <p>September 2018</p> |
| 5.58 | Prison managers should ensure that instructors identify and record the skills that prisoners develop in prison work. | Agreed | The Industries Manager has ordered white boards for all of the workshops to embed functional skills into the activities and operations produced in the Workplace. The Industries plan includes use of the information gathered at induction to inform targets in individual learning plans to be introduced once qualifications are in place in the workshops. ILP and OTL training is to be provided by NOVUS for instructors and managers planned to commence February 2018. | Head of Reducing Reoffending | September 2018 |
| 5.59 | Prison and Novus managers should ensure that prisoners start on courses that they can complete. Novus managers should ensure that successful completions of functional skills in English at level 1 are substantially increased. | Agreed | <p>The Learning and Skills manager and NOVUS manager will robustly monitor the withdrawal data. Withdrawal reasons are explored and discussed at the monthly Establishment Performance Meeting (EPM). NOVUS are now robustly managing how guided learning hours are calculated and withdrawals recorded.</p> <p>Placement to courses result from induction learning and skills testing and IAG interview, subsequent Activities security risk assessment and release date inform allocation to learning. Those with short term sentences are now allocated to a fast track functional skills courses evidencing improvement in completions.</p> | Head of Reducing Reoffending/NOVUS Manager | Completed and Ongoing |

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| | | | To improve the number of functional skills completions, tutors have individual targets for completions monitored through the OTL review process by the NOVUS manager | | |
| | Children and families and contact with the outside world | | | | |
| 5.60 | Where appropriate, families should be involved in the care of prisoners at risk of self-harm or suicide. | Agreed | Prisoners subject to ACCT provisions are asked if they would like to have family involvement and attendance at reviews. If agreed, arrangements are made to facilitate families taking part in the review. An additional box has been added to the weekly Quality Assurance (QA) sheet asking if consideration has been given to involve any family at ACCT reviews. | Head of Safer Prisons | Completed and Ongoing |
| 5.61 | Prisoners should be able to add telephone numbers to their pin phone account without delay. They should be able to make telephone calls in the evening. | Agreed | <p>The system will be reviewed by the Head of Security to ensure PIN phone numbers can be added without delay.</p> <p>The implementation of digital prisons which introduces In-Cell phones will allow prisoners to make phone calls throughout the evening from their cells. Provided the project remains on schedule In-cell phones should be installed by the end of April 2018.</p> | <p>Head of Residence / Head of Business Assurance</p> <p>Deputy Governor/Digital Prisons Lead at Headquarters</p> | April 2018 |
| 5.62 | Sufficient family days and parenting courses should be provided to meet demand. | Not Agreed | <p>Given resource constraints, we cannot commit to meet demand regardless of its level. However, provision will be increased. Six family days will be provided in 2018 through the Partners of Prisoners (POPs) contract. Five additional family days, with 'embedded learning' in conjunction with NOVUS and TATE Gallery, Liverpool will be provided across the year.</p> <p>Parenting courses are being provided by HMP Liverpool. Dads Matter' was delivered in October 2017 and a further course is planned for February 2018 linked with Story Book Dads provision.</p> | <p>Head of Reducing Reoffending/ Programmes Manager</p> <p>NOVUS Manager/ Change, Grow, Live Manager/ Head of Reducing Reoffending/ Programmes Manager</p> | |

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| 5.63 | Closed visits should be held on any day of the week when domestic visits take place. | Not Agreed | Resource constraints do not allow for closed visits to take place every day. However, the number of days on which closed visits take place has been increased. Closed visits are now held on Saturday, Sunday, Tuesday and Friday morning. The number of closed visit sessions has now increased from 3 to 8 sessions. | Head of Operations | |
| | Reducing risk, rehabilitation and progression | | | | |
| 5.64 | A comprehensive needs analysis of the population should be undertaken, including data from OASys. The analysis should inform the range of provision and interventions available at the prison. | Agreed | <p>The establishment will undertake a further needs analysis which will include data from the Offender Assessment System (OASys). Once analysed this information will inform the establishment of the provision and interventions available or required. It is acknowledged that this will need to be repeated when estate reconfiguration progresses and, as a reception prison, Liverpool's population profile changes.</p> <p>Change, Grow, Live (CGL) will undertake a substance misuse needs analysis separately in January 2018. A template will be developed for the new year and a questionnaire will be provided to Prisoner and Stakeholders for completion. This will be incentive-driven to ensure a high percentage response.</p> | Head of Reducing Reoffending / Head of Offender Management / Senior Prison Officer | October 2018 |
| 5.65 | There should be well planned and integrated work between departments involved in work to reduce prisoners' risk of reoffending and harm, including the offender management unit and Shelter. Roles and responsibilities should be clearly defined and quality assurance procedures should be implemented to maintain consistency. | Agreed | <p>A review of stakeholders contracts and all job descriptions and agreed roles and responsibilities will be undertaken by Head of Offender Management</p> <p>A review of HMP Liverpool's Reducing Reoffending (RR) and Offender Management Unit (OMU) strategies will be undertaken by Head of OMU and Head of RR. A combined/integrated strategy will be produced informed by the needs analysis.</p> <p>The managers of both departments will meet weekly to discuss progress of the integration of the departments. This meeting will have a terms of reference and agenda and will be minuted. The integrated strategy will involve the buy in from both departments and signed off by the Governor. The Custodial Manager will produce a live directory of interventions and services available within the establishment.</p> | Head of Offender Management / CRC Manager | <p>May 2018</p> <p>February 2018</p> <p>March 2018</p> |

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| | | | progression/transfer referrals. Training in risk management will also be delivered. | | |
| 5.69 | Specific services and interventions should be made available for long-term prisoners unable to progress from Liverpool. | Not Agreed | <p>Improving the provision of services and interventions for long term prisoners is an objective of national plans for estate reconfiguration, which include an expansion of the training estate and creation of reception prisons, so that long-term prisoners will not be managed in establishments like Liverpool but will instead be allocated swiftly to training establishments that are better placed to meet their needs. In light of these plans, we will not in general terms be introducing new services at Liverpool for long-term prisoners.</p> <p>Whilst long-term prisoners continue to be held at Liverpool in the interim, the monthly meeting referred to at 5.68 above will monitor their progress and the offender management process will, by exception, facilitate the provision of appropriate services and activities prior to transfer to a training prison.</p> | Prison Estates Transformation Programme | December 2020 |
| | Interventions | | | | |
| 5.70 | An appropriate range of offending behaviour interventions should be available to meet the needs of prisoners. | Partly Agreed | Some offending behaviour interventions, such as accredited programmes, are not currently provided at the establishment and are not generally appropriate for a local prison or future reception prison such as Liverpool. However, a comprehensive needs assessment of the current prison population will be carried out and the provision of interventions will be reviewed, so that needs can be met as far as possible within the resources available. The introduction of the new Offender Management in Custody model will provide sentenced prisoners with greater support and help to access wider resettlement services. | Head of Reducing Reoffending/ Treatment Manager/ Programmes Manager | September 2018 |
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| 5.71 | Outcome data on sustainable housing should be collected and analysed to ensure that provision for prisoners is appropriate and effective | Agreed | <p>The Head of Offender Management will work with Shelter to produce a tracking system for collating housing data. The data will be reviewed and analysed bi-monthly and raised at the Strategic Implementation Group (SIG) meeting and contract meetings.</p> <p>Probation providers are now recording accommodation statuses on release from custody and at termination of community sentence for offenders under their supervision. They also record any significant changes to accommodation status throughout the period of supervision. In addition, from next financial year (2018/19) Prison & Probation Analytical Services (PPAS) aim to have data available on safe accommodation on release from custody – with safe defined as anyone who is not homeless or NFA on the first night following release.</p> | <p>Senior Probation Officer/ Head of Offender Management</p> <p>HMPPS/PPAS</p> | <p>End of Financial Year 2018/2019</p> <p>March 2019</p> |
| Release planning | | | | | |
| 5.72 | Mentoring and meet at the gate support services should be provided to meet the needs of prisoners. | Partly Agreed | Resettlement services are the responsibility of the Community Rehabilitation Company. Mentoring and meet at the gate services may form part of the CRC offer, but are not a mandated requirement. A mentoring service is in place at HMP Liverpool for some prisoners, and the provision will be enhanced by the planned introduction of additional CRC mentoring services in early 2018. | Head of Offender Management/ Senior Probation Officer/CRC Manager | April 2018 |

| Recommendations | |
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| Agreed | 55 |
| Partly Agreed | 10 |
| Not Agreed | 7 |
| Total | 72 |

