



Action Plan: HMP Swansea

Action Plan Submitted: 5 March 2018

A Response to the HMIP Inspection of 7, 8, 14-17 August 2017

Report Published: 4 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 Ministry of Justice (MOJ) and Her Majesty's Prison and Probation Service (HMPPS). In response to the report HMPPS / MOJ are required to draft a robust and timely action plan to address the recommendations. The action plan confirms whether recommendations are agreed, partly agreed or not agreed (see categorisations below). Where a recommendation is agreed or partly agreed, the action plans provides specific steps and actions to address these. Actions are clear, measurable, achievable and relevant with the owner and timescale of each step clearly identified. Action plans are sent to HMIP and published on the HMPPS web based Prison Finder. Progress against the implementation and delivery of the action plans will also be monitored and reported on.

Term	Definition	Additional comment
Agreed	All of the recommendation is agreed with, can be achieved and is affordable.	The response should clearly explain how the recommendation will be achieved along with timescales. Actions should be as SMART (Specific, Measureable, Achievable, Realistic and Time-bound) as possible. Actions should be specific enough to be tracked for progress.
Partly Agreed	Only part of the recommendation is agreed with, is achievable, affordable and will be implemented. This might be because we cannot implement the whole recommendation because of commissioning, policy, operational or affordability reasons.	The response must state clearly which part of the recommendation will be implemented along with SMART actions and tracked for progress. There must be an explanation of why we cannot fully agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.
Not Agreed	The recommendation is not agreed and will not be implemented. This might be because of commissioning, policy, operational or affordability reasons.	The response must clearly state the reasons why we have chosen this option. There must be an explanation of why we cannot agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.

ACTION PLAN - HMCIP REPORT

ESTABLISHMENT: HMP SWANSEA

1. Rec. no	2 Recommendation	3. Agreed / Partly Agreed / Not Agreed	4. Response Action Taken/Planned	5. Function Responsible/ Policy Lead	6. Target Date
	Main recommendations to the Governor				
5.1	All newly arrived prisoners should have a private interview to help identify vulnerability and risk, followed by systematic support during their early days in the prison. There should be rigorous support for prisoners identified as being at risk of self-harm and Prisons and Probation Ombudsman recommendations should be implemented in full. (S43)	Agreed	<p>The Head of Residence and Safety will implement the aspects of the Prison and Probation Ombudsman recommendations it is directly responsible for, and will support partners in acting on the recommendations when these are not within the Prison's direct control. Monthly Safer Custody Meetings will ensure that progress is robustly monitored and that any implementation issues are addressed collaboratively and effectively.</p> <p>All new prisoners will be interviewed in a private office in Reception to complete the First Night Risk Assessment and separately for the First Night Health Screen assessment.</p> <p>During the early days in custody prisoners will be held on the Induction Wing to ensure that Basic Custody Screen, full prison induction and Learning and Skills Inductions are completed.</p> <p>For the first 72 hours Prison Staff will raise levels of observation during patrol state. This will be hourly until midnight and then reduce to three observations between the hours of 12:00 and 06:00.</p> <p>Prisoners at risk of self-harm will be supported by the Assessment, Care in Custody and Teamwork (ACCT) process and will have a multi-disciplinary reviews within the first 24 hours and when ready to move location.</p>	Governor	<p>April 2018</p> <p>Completed</p> <p>Completed</p> <p>Completed</p> <p>Completed</p>
5.2	Prisoners should be provided with sufficient and good quality clothing, bedding and towels each week. (S44, repeated recommendation 2.7)	Agreed	<p>The Head of Business Assurance will ensure that prisoners have access to decent clothing, bedding and towels at all times, and undertake weekly management checks to monitor standards.</p> <p>The processes for laundry exchange has been reviewed and a new process has been agreed between the prison and the Facilities Management Contractor.</p>	Governor	Completed

			<p>The minimum stores for all items of laundry have been raised so that there are always a sufficient amount available for one week supply.</p> <p>All prisoners are provided with two sets of clothing, seven sets of underwear, two towels, two sheets and a pillow case and blanket upon Reception. Prisoners will be able to exchange these items weekly on a one for one basis. They will be able to wash and retain their underwear in the wing laundry.</p> <p>Issues of supply have been raised through the Head of Business Assurance to the Facilities Management Contractor's complaints process. This has resulted in a focus on improved control processes within the Laundry stores to ensure supplies are maintained. The outcomes have resulted in the issues identified by the Inspector being resolved.</p>		
5.3	<p>Managers should ensure that prisoners are unlocked and engaged in constructive activity during the working day, and that poor attendance is addressed consistently. The number, range and quality of education, training and work places should be sufficient to give sentenced prisoners realistic opportunities to improve their employment prospects. (S45)</p>	Agreed	<p>The Head of Learning and Skills and the Head of Reducing Reoffending are committed to ensuring that prisoners have consistent daily access to relevant, useful and high quality activities, and that prisoner non-attendance is challenged constructively. There will be daily management checks on activity attendance, including at Senior Management Team level, supported by an Activities Hub. That will record all absences, this is due for completion (by April 2018) through a central database.</p> <p>All non-attendance without acceptable reasons result in a warning under the Incentives and Earned Privileges (IEP) policy, two warnings will then result in a review on the prisoner's current status. The sustained refusal to work will result in the prisoner having a period on basic regime, in which engagement in work or education will be their route from a basic regime. The continued non-attendance will have consequences to the prisoner such as the down grade to Basic levels and loss of pay.</p> <p>A full review of all Learning and Skills provision has already commenced, based on the needs analysis of local employers. Several Workshops will be refreshed to better reflect modern work places and local employment needs, improving the quality and quantity of provision. This forms part of a region-wide review of Learning, Skills and Employability provision in Public Sector Prisons in South Wales.</p>	Governor	<p>April 2018</p> <p>Completed</p> <p>September 2018</p>
	Main recommendation To the Ministry of Justice, HMPPS and the Governor				
5.4	<p>An up-to-date reducing reoffending strategy and action plan should reflect the offending behaviour and resettlement needs of all prisoners,</p>	Partly Agreed	<p>HMP Swansea recognise the importance of stable housing as prisoners resettle into the community and will continue to work with Welsh Government colleagues on this issue. The prison will continue to work with partners, such</p>	Executive Director of HMPPS Wales	Completed and Ongoing

	including those on short sentences and remand. Local and national managers should ensure that there are enough offender management unit staff to support prisoners through sentence. The strategic approach should ensure that action is taken to reduce substantially the high number of men released without sustainable accommodation, including support from the Ministry of Justice to address the underlying causes of the problem.(S46)		<p>as the Local Authority and the Wales Community Rehabilitation Company (CRC) to ensure individual resettlement support is robust.</p> <p>A new needs based Reducing Reoffending strategy will be developed to address the pathway provision for all prisoners in HMP Swansea's care. The strategy will adopt a holistic approach in enabling desistance, beginning with the interventions and support available in custody and transitioning to supported release plans. Notable milestones will include, improving the sustainable accommodation outcomes for those released; by working with the Local Authority and community support groups through the CRC to provide support.</p> <p>The Offender Management in Custody Model (OMiC) will provide the additional resource of the Key Worker scheme. These staff will be taking on a supporting /coaching role and can liaise with the CRC's. The new OMiC model will ensure that every prisoner at Swansea has adequate support from their Offender Managers.</p>	<p>Governor</p> <p>Executive Director of HMPPS Wales</p>	<p>July 2018</p> <p>July 2018</p>
	Recommendation to HMPPS and the Governor				
5.5	The national equality monitoring tool should be revised so that the data are no more than one month old. Disparities should be considered by the equality team, thoroughly investigated and addressed. (2.23)	Partly agreed	<p>The Equalities Team will monitor contemporaneous local data available to them and ensure that any disparities will be addressed. This recommendation is partly agreed due to the time required to process the data at the end of each month and resources available at present, the data is not provided within a month. 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. As part of the Lammy review (an independent review of the treatment of, and outcomes for, Black, Asian and Minority Ethnic (BAME) individuals in the Criminal Justice System), data is being further scrutinised to have some of the new data fields such as Use of Force (UoF), centrally in April 2018.</p> <p>The agenda at the Monthly Equalities meeting will include reports on all aspect of prison life such as employment, IEP, Complaints, Discrimination Incident Reporting Forms (DIRFs), Adjudication, UoF and Attendance at Gym and Residential Unit demographics. Locally, with the support of Equalities, Interventions and Operational Practice Group (EIOPG), the prison will continue to analyse data to inform practice. The Head of Residence and Services will ring-fence sufficient resources to ensure any equalities issues and/or disparities are investigated and addressed. The staff resource provided to support this work will not be diverted to cover other duties except in an operational emergency.</p>	<p>Executive Director of Rehabilitation and Assurance - HMPPS</p> <p>Governor</p>	<p>June 2018</p> <p>April 2018</p>
	Recommendations to the Governor				

	Early days in custody				
5.6	All new prisoners should be located in a supportive and calm environment, where they can assimilate information and receive help to settle into the prison. (1.11)	Agreed	<p>HMP Swansea will ensure that the First Night Centre is a safe, calm and supportive place where prisoners have the opportunities and support they need to adjust to the prison environment. HMP Swansea have reviewed the population on the primary induction wing to ensure that the all new prisoners have a stable and supportive experience, including sufficient access to Listeners and other forms of support.</p> <p>HMP Swansea will review and revise how information is provided to new prisoners to ensure that they have access to robust, credible and comprehensive answers to any questions.</p> <p>HMP Swansea have reviewed the accommodation within the prison to identify the best possible space for housing newly arrived prisoners. The prison will be reconfigured accordingly to accommodate this as a priority to ensure there is a safer experience for new prisoners.</p>	Governor	Completed
				Governor	April 2018
				Governor	July 2018
5.7	All prisoners should receive a full induction programme that meets their needs. (1.12)	Agreed	<p>The Head of Residence and Safety has delivered a comprehensive and quality-assured induction process to ensure the needs of newly arrived prisoners are met, particularly those who have not been held at HMP Swansea previously.</p> <p>Prisoners with a learning difficulty or language issues will have the induction process tailored to meet their needs by utilising a range of alternative methods such as one to one peer mentoring, language translation services and other appropriate solutions to ensure key messages about what prisoners can expect in the prison and what the prison expects of them are understood.</p> <p>The Head of Residence and Safety will Quality Assure the Induction process and report monthly to the Deputy Governor on the number of completed inductions and actions taken if the prisoner refuse to engage in the process.</p>	Governor	Completed
				Governor	May 2018
				Governor	April 2018
	Bullying and violence reduction				
5.8	All incidents of violence, bullying and use of force should be recorded and thoroughly investigated, with appropriate action taken. Victims should be supported. (1.17)	Agreed	<p>HMP Swansea will ensure that the prison is a safe place for all staff and prisoners. All incidents of violence are recorded on the Prison Service Incident Reporting System by the Orderly Officer on the day it occurs, and on the Governors briefing by the Duty Governor for the following day. The Head of Security will cross check that incidents of violence have been robustly recorded on the appropriate systems. Any anomalies or gaps will be escalated to a Senior Management Team member for action.</p> <p>All incidents where force is used by staff on prisoners are reviewed by a panel of staff chaired by the Head of Operations to ensure all incidents are</p>	Governor	Completed
				Governor	Completed

			<p>justified and that the use of force was appropriate. Where the use of force does not seem appropriate the Head of Operations make a referral to the Deputy Governor for consideration to investigate through a disciplinary investigation.</p> <p>HMP Swansea will ensure that lessons are learned from each incident, and that victims are listened to and provided with sensitive and caring support. The Safer Custody team, supported by expertise from a new Regional Team, will investigate all incidents of violence and allegations of bullying. Case management arrangements will be put in place to support victims and challenge perpetrators.</p>	Governor	May 2018
	Self-harm and suicide				
5.9	The strategy to prevent self-harm should be based on analysis of information about the nature of incidents, patterns and trends. It should be rigorously overseen by the safer custody meeting (1.24)	Agreed	<p>The Head of Residence and Safety will bring together a multi-disciplinary team (including Forensic Psychological Services, the National Probation Service and the regional Safer Custody team) to develop a comprehensive Self-Harm Reduction Strategy.</p> <p>HMP Swansea review and analyse long term data to better understand the underlying causes of self-harm and ensure these are addressed through the strategy. This will complement robust ongoing analysis of self-harm data.</p> <p>The monthly Safer Custody Meeting is chaired by the Governor or Deputy Governor and progress is robustly monitored progress against the Strategy, taking action as necessary to ensure that all relevant steps are taken to address the causes of self-harm.</p>	Governor Governor Governor	April 2018 Completed Completed
5.10	Constant watch cells should provide a clean and decent environment for prisoners in crisis. (1.25)	Agreed	The Head of Residence and Safety has taken action to ensure the Constant Observation cell is clean, decent and well equipped. Ongoing assurance will be provided to at the weekly Performance meeting.	Governor	Completed
5.11	The safer custody meeting should establish why so many prisoners do not feel they can speak to a Listener when they need to, and investigate concerns reported by the Listeners. (1.26)	Agreed	A review of the Listener service will be commissioned to ascertain any issues or perceived barriers that prevent prisoners from accessing Listeners when they need to at any time of day or night. The review will consult with Listeners, Service Users and Staff to identify any cultural, practical or procedural factors that prevent the service from working and make recommendations to remove such barriers.	Governor	April 2018
	Safeguarding				
5.12	A safeguarding policy should be developed and implemented. All staff should be trained in safeguarding procedures and be aware of their responsibilities under the Social Services and Wellbeing (Wales) Act 2014. (1.28)	Agreed	The Head of Residence and Safety at HMP Swansea will be proactive in safeguarding and promoting welfare to reduce harm and create a safe, decent and kind environment. HMP Swansea will provide a policy and structure for staff and partner agencies, to work simultaneously and preventatively, in order to implement a quality service to vulnerable people.	Governor	July 2018

			Prison staff will receive training so that they understand their common law duty of care to prisoners that includes taking appropriate action to protect them.		
	Security				
5.13	The prison should have an integrated approach to reducing the demand and supply of drugs in the establishment. Supply reduction measures should include an adequately resourced mandatory drug testing programme that ensures the required level of target testing and completion of all requested suspicion tests and target searches. (1.36)	Agreed	<p>The Head of Reducing Reoffending will have a rigorous and comprehensive approach for addressing the supply and demand of drugs, working with a diverse range of partners and supporting an holistic approach across prison and probation. This will form part of an overall regional strategic approach addressing substance misuse.</p> <p>Evidence based target searching will be carried out daily on Residential Units. To further tackle the supply of drugs, Operational Support Grades will patrol the external perimeter at movement times to deter members of the public from contraband or unknown packages in to the prison. They have appointed a Single Point of Contact (SPOC) to manage referrals to the Police to reduce the levels of crime in prisons.</p>	Governor	September 2018
				Governor	September 2018
5.14	Security measures should be proportionate. Strip-searching should only be conducted when the decision is supported by intelligence. Closed visits should be for visits-related activity, with restrictions lifted during monthly reviews if they are no longer supported by intelligence. (1.37)	Partly Agreed	<p>This recommendation is only partly agreed as Searching of the Person National Security Framework Function 3.1, (PSI 67/2011), requires that male prisoners outside of the high security estate are routinely given a full search on initial reception to prison, on reception on return from release on temporary licence (ROTL) or an outside working party (closed prisons only), on return from a non-prison escort, on transferring to another prison and all other discharges apart from on final discharge and discharge for ROTL. All prisons must comply with the PSI's minimum requirements. Local risk assessments are undertaken in other circumstances. HMP Swansea's local security strategy complies with the PSI, for male prisoners outside of the high security estate to include full searching at discharge and following visits.</p> <p>Appropriate intelligence, as outlined in PSI15/2011- 'Management and Security at Visits' is used to underpin all decisions at HMP Swansea about the use and review of closed visits. Closed visits are reviewed regularly and only continued when the risk is still evident.</p>	Executive Director Security, Order and Counter Terrorism /	Completed
				Governor	Completed
	Incentives and earned privileges				
5.15	The incentives and earned privileges scheme should provide incentives for good behaviour and include individual and meaningful targets. Those on the basic level should be managed consistently. (1.40)	Agreed	The Head of Residence and Services will ensure that the Incentives and Earned Privileges (IEP) scheme effectively rewards good behaviour and helps prisoners set meaningful and attainable individual goals. To achieve this, the prison has completed a review of the IEP scheme in consultation with prisoners, staff, prisoners and partners which reflects the national policy on violence reduction. The actions from this review will be implemented by end of March 2018.	Governor	Completed
	Discipline				

5.16	Data on adjudications should be routinely analysed to identify emerging patterns Trends should be investigated and appropriate action taken to address concerns. (1.45)	Agreed	<p>The weekly performance meeting analyses adjudications raised in the previous last seven days and highlight trends and patterns of nature of offences, areas where offences occur and demographics of staff and prisoners involved. Any areas of concern will be discussed and actions agreed to mitigate risk.</p> <p>The Head of Residence and Safety will ensure that data on adjudications is analysed on a monthly basis so that any trends can be identified and actioned.</p>	Governor	Completed
5.17	An adjudication quality assurance procedure should be introduced. (1.46)	Agreed	The Head of Residence and Safety will ensure all adjudications at HMP Swansea will be just, fair and robustly quality assured. A minimum of 10% of adjudications are quality assured on a monthly basis. The prison's quarterly Tariff review meeting will include a quality assurance element using peer reviews to identify good and bad practice. Additionally, the Director of Public Sector Prisons in South Wales' team will include adjudications within the scope of their regular assurance visits.	Governor	April 2018
5.18	Managers should routinely analyse use of force data and review incidents to monitor trends, identify good practice and learn lessons. (1.52)	Agreed	<p>The Head of Residence and Safety will ensure that all use of force incidents are justified, proportionate and robustly reviewed.</p> <p>All incidents where force is used by staff on prisoners will be reviewed on a weekly basis by a panel of staff chaired by the Head of Operations. In addition a member of the IMB will be routinely invited to these reviews to ensure independence to ensure all incidents are justified and the Use Of Force (UOF) was appropriate. Where the UOF does not seem appropriate the Head of Residence and Safety will make a referral to the Deputy Governor for consideration to investigate through a disciplinary investigation.</p> <p>Lessons learned will be shared with staff and examples of good practice will be used in training to ensure that staff have the guidance needed to use force in a proportionate and justifiable way.</p>	Governor	April 2018
5.19	Individual care plans should be in place for all segregated prisoners with a clear focus on identified risks and successful reintegration planning. (1.57)	Agreed	<p>The Head of Residence and Safety will ensure that any prisoners segregated from the general population have a comprehensive plan in place to support effective risk management and reintegration.</p> <p>All prisoners segregated under Good Order or Discipline (GOOD) or Cellular Confinement will be case managed by the Safer Custody team in conjunction with psychology, mental health team where appropriate and their Key Worker. Care plans will identify individual risks and triggers, short term behaviour targets and reintegration plans. The residential manager for the area will be responsible for the management of the plan.</p>	Governor	April 2018

5.20	Prisoners should not routinely be held in the segregation unit before their adjudications. (1.58)	Agreed	<p>The Head of Residence and Safety will ensure that prisoners are only held in the Segregation Unit before adjudications in absolutely exceptional circumstances relating to the safety of individuals or the safe and decent running of the prison as a whole. Any instances of this will have to be formally signed off by the Governor ahead of any action being taken to ensure that segregation is only used before an adjudication when it is absolutely necessary.</p> <p>Prisoners who are segregated pending adjudication will have the reasons given to them in writing by an Operational Manager. Operational Managers will have to justify to the Governor that the use of segregation was a last resort to prevent harm to others and to ensure the safe running of the prison to the same standard for Good Order or Discipline.</p>	Governor	Completed
5.21	Segregation monitoring meetings should be held regularly, with consistent core attendance and analysis of data. (1.59)	Agreed	<p>The Head of Residence and Safety will ensure the Segregation Monitoring & Review Group (SMARG) will meet on a quarterly basis and will comprise of the following:</p> <ul style="list-style-type: none"> • Operational Manager/Director with responsibility for the segregation unit • Segregation unit officer(s) • Key worker (Prison Officer) • Chaplain • Member of the Healthcare Team • Psychologist (where available) • Probation and or an offender supervisor (particularly when the prisoner is in scope of offender management) • Safer Custody Manager • IMB member (in the role of observer/monitor) <p>The objective of the meeting is to ensure that monitoring arrangements are in place to ensure that prisoners are treated fairly and decently. The reasons for initial and continuing segregation are monitored so that prisoners do not spend longer in segregation than is necessary. The aim is to return prisoners to normal accommodation within the prison as soon as possible. This will be achieved by ensuring that the monitor and review role of the SMARG is fulfilled through the ongoing management checking of documents and the monitoring of segregation statistics</p>	Governor	April 2018
	Substance misuse				
5.22	All prisoners with substance misuse issues should have prompt and sustained access to a comprehensive range of psychosocial support which meets their identified needs. (1.69)	Agreed	The Head of Reducing Reoffending is committed to ensuring that offending behaviour linked with substance misuse is managed appropriately and that desistance from crime is promoted. In such cases specialist support is made available.	Governor	Completed

			HMP Swansea have developed a wellbeing provision through a dedicated Wellbeing Centre. This Centre will be a hub of a provision for prison and community partners to undertake psychosocial support for identified and self-referred prisoners, the provision will include services such as Alcoholics Anonymous, Tools for Change, Wellbeing, and Dyfodol. The Recovery and Desistance Advice and Care Trust (PACT) are integral to making sure that families are engaged in the support and management of substance misuse for prisoners in HMP Swansea.		
5.23	All prisoners withdrawing from drugs and alcohol should receive comprehensive monitoring and prescribing according to the Drug Misuse and Dependence UK Guidelines on Clinical Management 2017. Prisoners continuing opiate substitution from the community should receive regular prescribing reviews. (1.70)	Agreed	HMP Swansea and Abertawe Bro Morgannwg (ABMU) recognise the importance of providing appropriate clinical care to prisoners withdrawing from illicit substances is essential. HMPPS in Wales will work with ABMU to ensure that the Welsh Government clinical substance misuse policy is operationally effective both clinically and in a custodial setting. HMP Swansea will follow the Drug Misuse and Dependence UK Guidelines on Clinical Management 2017. Prisoners who are maintained on opiate substitution from the community will have three monthly reviews.	Executive Director of HMPPS Wales	May 2018
	Residential units				
5.24	Cells should not accommodate more prisoners than they are designed for. (2.9)	Not Agreed	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 of suitable regimes and that levels of crowding in prisons are carefully managed. 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.	Governor	
5.25	The cleanliness and condition of cells and communal areas on all wings should be of a good standard. (2.10)	Agreed	Maintaining a safe and decent standard of cleanliness and good condition is critical to HMP Swansea. The Head of Residence and Services have drafted a new decency policy and consulting with both staff and prisoners. This policy will set out core standards of cleanliness and actions to ensure these are achieved and maintained. The new decency policy will be implemented by April 2018. HMP Swansea have implemented a daily wing and cell inspection to ensure cleanliness is maintained. This will be supported through weekly inspections	Governor Governor	April 2018 Completed

			<p>conducted by the Governor/Deputy Governor. Operational Managers will carry out daily checks on accommodation as part of the duties of the Duty Governor responsibilities.</p> <p>The Heads of Residence and Business Hub Manager will ensure that there are sufficient cleaning products and equipment available to prisoners and staff to ensure cleanliness is maintained. This will be achieved by implementing a recording system that has a minimum agreed so that all products are always available.</p>	Governor	April 2018
5.26	Prisoners should be able to make a telephone call every day. (2.11)	Partly Agreed	All prisoners currently have access to the telephones seven days a week unless operational reasons impact on the regime. This is planned into the prison's core day. The prison seeks to minimise any regime disruption that results in an impact on men having sufficient time to make calls.	Governor	Completed
5.27	Cell bells should be answered promptly. (2.12)	Agreed	The Head of Residence and Services will ensure all cell bells are answered within five minutes. The response rate will be monitored through the cell call system. This will also be monitored and recorded at the Safer Custody Committee.	Governor	April 2017
5.28	The applications system should be monitored to ensure that responses are timely and focused. (2.13)	Agreed	A new application process has been agreed and implemented to ensure that responses to applications are timely and focused. The Head of Residence and Head of Business Assurance will monitor the new process and assure compliance with the process from start to finish. The written records will be kept.	Governor	Completed
	Staff-prisoner relationships				
5.29	Staff should exercise consistent care and management of prisoners. They should challenge inappropriate conduct and encourage prisoners to engage with the regime. (2.16)	Agreed	<p>The Offender Management in Custody (OMIC) model will provide additional support to the prisoners and staff through the introduction of the new Key Worker role, which sits within the job description of a Residential Prison Officer. The role of the Key Worker is to develop constructive, motivational relationships with prisoners in prison, supporting them to make appropriate choices and giving them hope and responsibility for their own development through one-to-one key work sessions. This will support robust care, management and engagement within the prison. Each residential Prison Officer will undertake key work sessions with around six prisoners. The resourcing will be for 45 minutes per week, per prisoner. All civil, remand and sentenced prisoners will have a dedicated Key Worker.</p> <p>In addition the re-profile under the OMIC model, HMP Swansea will ensure additional incentives for those men engaging in the regime.</p> <p>HMP Swansea is developing a Quality Management Framework (QMF) document that identifies areas of inconsistency and produces a process which staff must follow to address the issue. This work has commenced with</p>	<p>Executive Director of HMPPS Wales</p> <p>Governor</p> <p>Governor</p>	<p>July 2018</p> <p>April 2018</p> <p>June 2018</p>

			<p>a number of processes being produced, on completion this will form part of an induction for all new staff.</p> <p>The prison have revised the Incentives and Earned Privileges policy and ensured all staff and prisoners are aware of expected standards of care and conduct.</p>	Governor	Completed
	Equality and diversity				
5.30	All incidents of alleged discrimination should be thoroughly investigated. Quality assurance should be effective and include external scrutiny. Standard complaints that allege discrimination should be investigated as DIRFs. (2.24)	Agreed	All instances of discrimination will be thoroughly investigated, and shared with the regional Equalities Team to ensure independent scrutiny. All complaints that allege discrimination will be investigated through the Discrimination Incident Report Form (DIRF) process. This will include liaison with the HM Prison and Probation Service (HMPPS) in Wales, the Equality Manager for expert advice and oversight. This will be monitored by the Head of Business Assurance.	Governor	Completed
5.31	The distinct needs of prisoners with protected characteristics should be identified and systematically addressed. (2.32)	Agreed	<p>Where prisoners have identified needs, the Head of Reducing Reoffending and Head of Residence and Services will provide Information, Advice and Guidance (IAG) on reporting inequality through the DIRF system. The prison will ensure the appropriate level of support is provided throughout the custodial sentence. This is supported by staff training to make sure all members of staff understand their duties.</p> <p>Equality representatives will be employed, and receive sufficient training to enable them to offer appropriate support and initial signposting to services. Where need is identified on Basic Custody Screening Tool (BSCT) 1, the CRC, Saint Giles will signpost to supportive services.</p> <p>HMP Swansea will undertake an Equality Needs Analysis and develop an Action Plan to systematically address identified needs</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>June 2018</p> <p>April 2018</p> <p>July 2018</p>
	Complaints				
5.32	Complaints processes should be implemented consistently and managers should ensure that prisoners receive polite and focused responses. (2.39)	Agreed	<p>There is a clear process to make sure that complaints are resolved in the timescales. Any late responses are chased up by the Deputy Governor.</p> <p>The Head of Business Assurance will monitor returns to make sure that responses are appropriate, polite and focused.</p> <p>The Governor, or suitable Deputy, will quality assure responses to complaints on a weekly basis.</p>	Governor	Completed
	Health services				
5.33	Formal clinical governance arrangements should be established to ensure consistent delivery of appropriate standards related to health promotion, audit, infection	Agreed	ABMU Health Board are committed to providing robust and effective clinical governance which effectively ensures that consistent and comprehensive standards are upheld across health services in HMP Swansea.	Governor and ABMU Health Board	April 2018

	prevention, complaints management, prisoner engagement and clinical supervision. (2.50)		<p>This will be addressed through the Healthcare Lead at HMP Swansea continuing to attend a monthly Quality and Safety meeting covering the Local Health Board as a whole. As part of this meeting, standards will be reviewed across custody and community health services to ensure that services at HMP Swansea meet the required quality of practice.</p> <p>This will be supported by a comprehensive Audit Matrix for community and custody healthcare provision, which will set and measure practices against robust standards in areas such as complaints, health promotion, supervision and engagement.</p> <p>Additionally, from January 2018 Clinical Supervision has been offered in line with the health board's policy. Two nurses with additional supervision training will work together to promote and implement supervision practice within the wider healthcare team.</p>		<p>April 2018</p> <p>April 2018</p> <p>Completed</p>
5.34	Responses to medical emergencies should be routinely recorded and monitored to ensure that expected standards are reached. Resuscitation equipment should be available in the health care department and all equipment should be routinely checked against standardised lists. (2.51)	Agreed	<p>The ABMU Health Board ensure that all medical emergencies are managed and monitored effectively so that adequate care is provided.</p> <p>A system has been implemented with all medical emergencies to be listed within the healthcare handover diary. The Healthcare Lead is chairing a weekly meeting in relation to incidents and criteria for listing on the NHS DATIX system. Medical emergencies form part of this content. The Healthcare Lead and Charge Nurses review all medical emergencies weekly to monitor standards and ensure learning is shared.</p> <p>Additional resuscitation kits have been purchased and these are now ready to use in the prison in Healthcare, Reception and G Wing. The Healthcare Lead will liaise with the Finance and Health Board in order to purchase an additional resuscitation kit for the Healthcare Department.</p> <p>The Healthcare Charge Nurse will review the resuscitation kit check list so as there is a space for dates to be written on the check list. This will provide an audit trail and ensure the kits are suitable for use.</p>	ABMU Health Board	Completed
5.35	Prisoners should be able to complain about health services through a confidential, well- advertised system and responses should address all issues raised. (2.52)	Agreed	<p>ABMU Health Board will ensure that complaints are sensitively and confidentially collected, reviewed and acted on.</p> <p>A process has been agreed for complaints including the escalation to the Health Board, which will be discussed and printed as standard on all complaint forms. A new process for quality checks and reviews will be introduced to improve the process of managing and responding to complaints.</p>	ABMU Health Board	May 2018
5.36	Prisoners should have easy access to relevant health promotion	Agreed	HMP Swansea have opened a Wellbeing Centre which is providing prisoners to relevant health promotion interventions. This includes providing the	Governor	Completed

	interventions, including smoke-free support and all relevant community screening programmes. (2.53)		<p>prisoners with access to Health and Wellbeing events and promotions working in partnership with health and other key services. Services currently include:</p> <ul style="list-style-type: none"> • Smoke free support from healthcare provider and Dyfodol through weekly support sessions. • A dedicated Health and Wellbeing Coordinator employed through the Dyfodol service. Health and Wellbeing events. • Gymnasium support programmes. • Access to Nicotine Replacement Therapy (NRT), and vaping devices on reception. • IAG on NRT support from initial Reception Screener from Healthcare. • IAG from Smoke Free Champions. <p>There is a regional team within Wales that have developed a new smoke free pathway. Stop smoking Wales have been part of the meetings looking at intervention.</p> <p>The Healthcare Leads will develop a health promotion steering group by April 2018 with a view to re-establishing meetings early this year. This will include the development of a health promotion calendar to ensure that these campaigns are promoted throughout the prison and Healthcare department.</p> <p>HMP Swansea will undertake a quarterly review focusing on health and wellbeing to evaluate the effectiveness of provision, and develop partnerships with other establishments and community providers to improve best practice. This will be jointly led by the prison and Local Health Board.</p>		<p>April 2018</p> <p>April 2018</p>
5.37	Waiting time for the optician should be reduced to ensure prisoners receive timely care. (2.58, Repeated recommendation 2.58)	Agreed	ABMU Health Board hold responsibility for optician provision at HMP Swansea. The Governor has requested for a formal review of the optician's service, including a review of wait time services and any health promotion or preventative work that should be completed. This request was in November and the prison is awaiting an update at the next partnership board. The review is due for completion (July 2018).	ABMU Health Board	July 2018
5.38	The capacity of the pharmacy team should be reviewed so that the team can deliver medicines use review clinics and other services to improve prisoner care and outcomes. (2.63)	Agreed	ABMU Health Board hold responsibility for pharmacy provision at HMP Swansea and are committed to delivering high standards of patient care. A review of pharmacy resource has been carried out and provision is at full capacity at the time of submission of this Action Plan. This will be reviewed quarterly to ensure there is sufficient resource to meet the needs of the prison.	ABMU Health Board	Completed and Ongoing
5.39	Facilities should be provided to allow in-possession medicines to be stored securely. (2.64)	Agreed	The prison will provide lockable cabinets for the prisoners to store medication that are deemed suitable to be in possession.	Governor	July 2018

5.40	All medicines rounds should be adequately managed and supervised to ensure that patients are identified correctly, patient confidentiality is protected and medicines administered at therapeutic times. (2.65)	Partly Agreed	<p>ABMU Health Board are committed to ensuring that medicines are given out in an effective and well-managed way which supports the overall goals of HMP Swansea and respects patient confidentiality.</p> <p>The System One health database will be audited monthly by charge nurses to make sure patients identification photos are uploaded to their personal files. All prisoners have been issued with identification badges from prison staff which will assist in the identification process for the issuing of medication. The Healthcare Charge nurse will audit SystemOne monthly to check patient pictures are on screen and the dispensing nurse is checking identification.</p> <p>In terms of medication administration, this part of the recommendation is Partly Agreed. The Healthcare Lead will review the core day and regime to ensure that medication times are appropriately scheduled however medicines cannot always be administered at therapeutic times.</p>	<p>ABMU Health Board</p> <p>ABMU Health Board</p> <p>ABMU Health Board</p>	<p>April 2018</p> <p>April 2018</p> <p>April 2018</p>
5.41	The service contract for dentistry should be agreed and tendered for as soon as possible to ensure that prisoners have timely access to dental health services which are appropriately governed. In particular, men in acute pain and distress should be treated as a matter of priority. (2.68)	Agreed	<p>There is not currently a service contract in place for dentistry at HMP Swansea. ABMU Health Board hold responsibility for the Dentistry provision at HMP Swansea and will work alongside the Governor to ensure that effective and timely dental services are in place.</p> <p>The Health Board are currently exploring options in relation to Dental Services and expect a provider to be in place by June 2018. This contract will contain appropriate provisions around emergency care requirements. Until the contract is in place, men in pain and distress will be treated within the current provision.</p>	<p>ABMU Health Board</p> <p>ABMU Health Board</p>	<p>June 2018</p> <p>June 2018</p>
5.42	All patients with mental health conditions should have timely access to a range of interventions which meet their identified needs. (2.73)	Agreed	<p>ABMU Health Board are responsible for primary mental health and clinical support and will continue to provide five mental primary mental health clinics with five weekly morning single sessions. The clinics are well attended. One nurse has been trained in Cognitive Behavioural Therapy. Workforce planning aims to continue to provide interventions training for mental health works to staff.</p> <p>The Mental Health Nurse Lead will review current referral pathways on a quarterly basis as part of a formal meeting with in-reach providers. This will ensure that patient needs are met and that effective referrals to mental health services are made.</p> <p>Additionally, HMP Swansea have expanded broader non-clinical interventions and support to support the wider wellbeing and wellness of the prisoners held. This will be driven through the use of counselling, a Wellbeing Centre and the Health and Wellbeing Coordinator. The Wellbeing Centre will draw upon partnerships from prisons and community providers to deliver support services in collaboration with the Dyfodol substance misuse service.</p>	ABMU Health Board	Completed

	Catering				
5.43	Lunch should not be served before midday and the late meal should be in the evening. (2.79)	Agreed	HMP Swansea will ensure both the lunch and the evening meal are served at appropriate times during the day. A full re-profile will be conducted with the implementation of Offender Management in Custody including a review of the core day timings. Suggested times for the serving of meals are contained in PSI 44/2010 Catering for Prisoners and the accompanying Operating Manual. HMP Swansea will ensure they operate within these times.	Governor	July 2018
	Purchases				
5.44	Prisoners should not be charged an administration fee for catalogue orders. (2.81, repeated recommendation 2.89)	Agreed	This is completed and the administration fee for catalogue orders was removed with effect from 1 December 2017	Governor	Completed
	Time out of cell				
5.45	Prisoners should have a regime that includes daily association and at least one hour in the open air. (3.3)	Not Agreed	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. HMP Swansea will ensure that prisoners have adequate and regular time out of their cells including sufficient time to shower and complete domestic tasks, associate with one and other and have at least 30 minutes in the open air.	Governor	
	Learning and skills and work activities				
5.46	The role of the learning and skills provision in reducing offending should be central to the prison's strategic vision. (3.12)	Agreed	The Head of Reducing Reoffending will develop a Reducing Reoffending Strategy which will consolidate the importance of learning and skills within the prisons strategic vision. The prisons regime will be optimised to ensure prisoners regularly attend relevant work which helps them move into further employment, education and/or training as they resettle into the community. The Head of Learning and Skills will be responsible for the formation of a new Activity Hub will underpin relationships between Learning and Skills and all other activities within the prison, and there will be an increased focus on embedding learning within industries and employment activity across the prison. HMP Swansea will support the objectives of the Learning and Skills Quality Development Plan, and HMIP Action Plan. Learning and Skills will form the key quorum across all Reducing Reoffending meetings, to promote collaboration with the prison and community partners.	Governor Governor Governor	April 2018 May 2018 May 2018

5.47	Managers should ensure that swift progress is made in achieving the objectives in the prison's quality development plan. Data should be used effectively to inform improvements in curriculum planning, quality and performance. (3.13)	Agreed	<p>The Head of Reducing Reoffending and Learning and Skills Cluster Lead will provide oversight in ensuring that a swift response to the Quality Development Plan (QDP) is embedded to implement projects. A new Head of Learning & Skills has been recruited to assist with this, they will be in post April 2018.</p> <p>HMP Swansea will provide bi-monthly responses to the local Senior Management Team (SMT) and regional commissioners on progress against the QDP, and the implementation on projects to support the prison objectives. A new Management Information System (MIS) will be implemented to ensure that robust and useful data is collected and analysed to support curriculum planning and performance. The Labour Market Information (LMI) data, by region will be used to inform the education curriculum and all purposeful activities offer across the establishment.</p>	Governor	<p>May 2018</p> <p>April 2018</p>
5.48	Managers should ensure that teachers' learning needs are appropriately assessed and that they have opportunities to improve their skills. (3.22)	Agreed	<p>HMP Swansea is committed to ensuring that teachers are given the opportunity to develop their skills. The Head of Learning and Skills/Reducing Reoffending will ensure Staff Performance and Development Report (SPDR) and performance reviews will outline objectives for personal and professional development. The teachers' learning needs to be in-line with quality and curriculum development plans will be considered against budgetary and resource constraints.</p> <p>The Head of Learning and Skills will implement a quality development plan to improve teaching quality, with the outcomes of observations from peers and others identifying learning and training needs to improve performance. It is expected that there will be a dedicated budget for up skilling teachers, as part of quality performance improvements.</p>	Governor	May 2018
5.49	Teachers should deliver well-planned sessions that meet prisoners' individual learning needs. (3.23)	Agreed	<p>The Head of Reducing Reoffending will implement a new Individual learning Plan to individualise each prisoners learning journey, with targets for learning in custody aligned with employment on release and/or transfer to Category C/D establishments.</p> <p>The management and quality assurance checks will be implemented at a local and regional level. Within the prison, alongside robust analysis of each course using the new MIS to inform performance reviews and actions alongside a robust lessons observation approach. A refreshed approach to regional, learning and skills assurance will complement this by offering regular and comprehensive checks based directly on Estyn (Office of Her Majesty's Inspectorate for Education and Training in Wales) expectations.</p>	Governor	May 2018
5.50	Prisoners should be able to undertake a wide range of accredited learning and have opportunities to progress to higher levels. (3.30)	Partly Agreed	HMP Swansea recognises the importance of prisoners being able to undertake a range of accredited learning programmes to developed their learning and skills. The progression to higher level courses are available	Governor	June 2018

			<p>through the Prisoner Education Trust and through the Open University. The Progression streams from Entry 1 to Level 2 Open University.</p> <p>The Better Jobs, Better Futures programme will provide learners with progression routes to higher level learning and training upon release. HMP Swansea will continue to embed NVQ qualifications in workshops through N-ergy at levels 1 and 2, also a new Customer Service NVQ will be coming online through the Census Data call centre (March 18).</p> <p>The opportunities for progression will also be available across the Essential Skills framework, with the implementation of the WEST Centre and the embedding of contextual essential skills in workshop activities.</p>		
5.51	Managers should ensure that all prisoners have regular access to the library. (3.35)	Agreed	<p>HMP Swansea is committed to providing regular access to the Library. This is part of the regime for all full-time workers, and part time workers will be allocated slots to ensure they have sufficient access.</p> <p>A Prisoners Information Desk on each wing collate lists of those wishing to attend the Library and opening times will be published on all wings to increase awareness. Advocacy will be further supported by two library peers based on each large residential unit. The Library is located in the main Learning & Skills unit so that students and those undertaking distance learning qualifications have access when they need it. There is also a weekly outreach service to all off wing activities, where the Library manager and two peers collect, issue and take book requests.</p>	Governor	Completed
	Strategic management of resettlement				
5.52	Staff in all departments, including residential staff and St Giles Trust staff, should work together effectively to ensure the rehabilitation and resettlement needs of prisoners are met. In particular, agencies should always report to St Giles Trust on the outcome of referrals to ensure effective ongoing resettlement planning. (4.6)	Agreed	<p>The Head of Reducing Reoffending will ensure the prison will have a robust Reducing Reoffending Strategy which will comprehensively outline how the prison will work together with partners to enable the rehabilitation and successful resettlement of people at HMP Swansea.</p> <p>The prison runs monthly resettlement meetings, chaired by the Head of Reducing Reoffending, which brings together staff from residential units, St Giles Trust and other departments and partners. This forum will be used to ensure that resettlement and rehabilitation work is effectively coordinated, that partners work well together and that St Giles Trust have the information they need to undertake effective resettlement planning.</p> <p>The Director of Public Sector Prisons and their team will include rehabilitation and resettlement planning within the scope of their regular assurance visits to provide an additional layer of monitoring against this action.</p>	Governor	April 2018

5.53	Contacts should be developed with community organisations which can contribute to resettlement work. (4.7)	Agreed	<p>The Head of Reducing Reoffending is improving the community provision as part of the Reducing Reoffending strategy. HMP Swansea are continually reviewing and engaging with new and existing community partners on an ongoing basis. This will bolster services such as accommodation services, substance misuse and recovery services and key services for those who are and will be homeless.</p> <p>Community partners are now invited to attend a bi-monthly Communities strategy meeting as part of the Reducing Reoffending consultation agenda. Community projects are already being delivered, with workshop 1 hosting a project to produce fencing for the local Vetch community project. The Better Jobs, Better Futures project, provides a community link Through the Gate (TTG) for prisoners undertaking career and employment pathway support through Gower College's site at the Kingsway Centre, Swansea City Centre. In addition, the Health Visitors deliver sessions to prisoners on the Positive Parenting course and join the Baby and Toddler groups as part of the Families and Children pathway support. This collaboration between HMP Swansea, PACT and ABMU Health Board began in January. A quarterly review will take place to measure the effectiveness of these provisions.</p>	Governor	<p>June 2018</p> <p>Completed</p>
	Offender management and planning				
5.54	Offender supervisors should be appropriately trained and supervised. There should be effective quality assurance of their work. (4.16)	Agreed	The Head of the Offender Management Unit will ensure all staff are appropriately trained and have the skills to conduct their jobs. A re-profile of the establishment undertaken as part of the Offender Management in Custody Model will refresh the approach to supervising offenders, including through the creation of the new Prison Offender Manager role. This will ensure that all staff are adequately trained for their role. The Head of the Offender Management Unit and Senior Probation Officer will conduct quality assurance of the Prison Offender Manager role.	Governor	July 2018
5.55	Cases should be referred promptly to the interdepartmental risk management team and action plans should be monitored to ensure that all actions are completed. (4.20)	Agreed	The Head of the Offender Management Unit will ensure cases are referred promptly to the Interdepartmental Risk Management Team (IRMT), with a standardised approach to recording and monitoring actions. The IRMT meet monthly with all stakeholders, and invite external National Probation Staff to attend. The actions derived from the meeting are monitored by the Head of Offender Management, reporting to the Deputy Governor.	Governor	Completed
5.56	There should be appropriate support for indeterminate sentence prisoners. Those who need to attend an offending behaviour programme which is not available at Swansea should be transferred to an appropriate prison promptly. (4.24)	Agreed	HMPPS and the Parole Board are overseeing the delivery of a joint action plan, which covers a range of measures designed to increase opportunities for IPP prisoners. IPP prisoners continue to be included amongst priority groups to receive interventions. It is not mandatory for IPPs to complete accredited offending behaviour programmes in order to achieve release.	Executive Director of HMPPS Wales	Completed

			<p>HMP Swansea have a process in place that ensures the needs of IPP prisoners are identified. The prisoners are then allocated to an offending behaviour programme accordingly based on their needs. When a programme is required which is not available at Swansea, the HMPPS prisoner movements unit are informed and a transfer for the prisoner is requested. The caveat here is heavily reliant on the receiving establishment accepting the transfer.</p> <p>HMPPS in Wales has established an IPP pre-release panel where cases that are over tariff and are still in closed conditions at the second parole hearing are reviewed with operational staff, psychology and public protection. The panel's aim is to remove blockages through the system to ensure the prisoners access the right things at the right time to help them progress. The prisoners are also invited to these panels so that they understand the actions they need to take to progress through the system.</p>	Governor	Completed
	Reintegration planning				
5.57	The visits area should be refurbished to provide a welcoming environment and the closed visits booths should be relocated out of sight of the main visits area. (4.43)	Partly Agreed	<p>The visits area has been partly refurbished with new carpet and a new play area. New furniture is being sourced will be in place by Summer 2018. This will create a more positive and welcoming environment which supports a rehabilitative culture.</p> <p>The prison are unable to relocate the closed visits booths due to practical reasons. This part of the recommendation is Partly Agreed.</p>	Head of Operations	August 2018

Recommendations	
Agreed	48
Partly Agreed	7
Not Agreed	2
Total	57