



HM Prison &
Probation Service

Action Plan: HMP Woodhill

Action Plan Submitted 16 November 2018

A Response to the HMIP Inspection 5-16 February 2018

Report Published 19 June 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 |
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| 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 WOODHILL

| 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 the governor | | | | |
| 5.1 | There should be prison-wide action to improve prisoners' perceptions of safety, reduce violence, tackle anti-social behaviour and support victims. This should be supported by a detailed survey of prisoner perceptions, an evidence-based strategy and action plan, improved data analysis and timely investigation of incidents. (S59) | Agreed | <p>HMP Woodhill conducted a violence reduction survey in April 2018 and the results are due to be published by September 2018. HMP Woodhill will conduct and publish the results of a further safety survey before December 2018. The results of both surveys will be used to formulate action plans which will be monitored through Priority 1 Meetings chaired by the Head of Safety. Perceptions of safety will be gauged and fed into the action plan through Prisoner Council Committee (PCC) meetings and Listener Forums. This will be supplemented by Measuring the Quality of Prisoner Life (MQPL) and Measuring the Quality of Staff Life surveys.</p> <p>HMP Woodhill currently has an up to date Violence Reduction Strategy that was drafted in December 2017. The evidence base for this strategy was the locally-generated Violence Diagnostic Tool and Directorate-generated statistics on key indicators. As part of this strategy men who have specific time-bound violence reduction targets meet with residential managers to agree the bespoke, outcome-focussed target plans. These plans are monitored by the residential managers with support from the Safety Function through weekly meetings. This arrangement is subject to HMP Woodhill achieving a full staffing profile, expected by December 2018. HMP Woodhill will also aim to implement the Challenge Support and Intervention Plan (CSIP) case management model by April 2019.</p> <p>HMP Woodhill will trial a short session of the Stoicism course for prisoners as a further measure to reduce violence and tackle anti-social behaviour. This is collaborative across functions including the gymnasium and helps men identify and manage 'risky' thinking and behaviours. Stoicism will be evaluated through data on the National Violence Diagnostic Tool and through aforementioned meetings and MQPL Surveys.</p> | <p>Governor</p> <p>Governor</p> <p>Governor</p> | <p>December 2018</p> <p>April 2019</p> <p>Completed and ongoing</p> |



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| | | | To support victims, all prisoners who are post-incident victims will be offered extra support through signposting to the Listeners, Chaplaincy and Healthcare providers as well as residential staff and follow-up visits from the Safety Team. HMP Woodhill will ensure that incidents of violence are investigated within 72 hours by a member of the safety team, subject to full staffing, anticipated by December 2018. There may be circumstances in which this timeframe cannot be adhered to, however investigation will take place as soon as possible thereafter to ensure a timely investigation. | Governor | January 2019 |
| 5.2 | The work already done to analyse the high number of deaths at Woodhill should be reviewed, to determine the progress made and set up-to-date strategic priorities. Actions to reduce levels of self-harm should be sustained over time, and progress should be monitored consistently by senior managers. (S60) | Agreed | <p>HMP Woodhill has a Performance Agreement, signed off by the Governor and Commissioners, with 3 strategic priorities, the first of which is 'Make Woodhill Safer'. This is reviewed regularly, in line with monthly Priority 1 meetings which have been held regularly since May 2018 and established Safer Custody meetings, to review progress against actions and to set new targets to reduce self-harm. The monitoring of this work is carried out by the Governor/Deputy Governor and senior managers in the meetings.</p> <p>HMP Woodhill have amended the agenda for the Safer Custody meeting to provide more trend and data analytical work around the monitoring of self-harm and the Suicide and Self Harm strategy. This analysis will feed into the action plan together with the 'Priority 1 meeting', and an agreed system for senior managers to monitor progress will be established.</p> | Governor Governor | Completed and ongoing Completed and ongoing |
| 5.3 | Prisoners should have more time out of cell and be provided with a reliable regime, so that they can access constructive activities, education, training and work opportunities, and gain skills and qualifications to aid their rehabilitation and resettlement. (S61) | Agreed | <p>The delivery of a reliable and consistent regime is subject to a full staffing compliment. It is anticipated HMP Woodhill will have a full staffing compliment by December 2018 when the prison will ensure prison officers are available to run a full reliable regime.</p> <p>In the interim, HMP Woodhill will continue to allocate staff in advance to provide as much regime predictability and reliability as possible. HMP Woodhill will adopt a 'whole prison approach' to encourage men to attend activities each day. This work will be led by the Deputy Governor and will focus on changing the culture with a view to incentivise and establish a reward based approach to attendance. Prisoner non-attendance will be challenged by movements' staff on the house units in line with the Incentives and Earned Privileges (IEP) Policy.</p> | Governor | January 2019 |
| | Recommendation to GeoAmey | | | | |
| | Early days in custody | | | | |



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| 5.4 | Escort vehicle staff should retain their anti-ligature knife on admission to the establishment. (1.9) | Agreed | Prison Escort and Custody Services (PECS) staff now carry anti-ligature knives as standard personal issue and as such have access to this item at all times. It is agreed with HMP Woodhill that Anti Ligature Knives remain with the Prison Escort and Custody Services (PECS) staff at all times whilst in the confines of the establishment. | Director of Prisons (HMPPS HQ) | Completed |
| | Recommendations to HMPPS | | | | |
| | Early days in custody | | | | |
| 5.5 | HMPPS should address the contractual arrangements with the escort provider to ensure that prisoners arrive at the prison early enough to be assessed and settle into clean, appropriately equipped accommodation. (Error! Reference source not found., repeated recommendation S36i) | Partly Agreed | <p>This recommendation is partly agreed as returning prisoners effectively is dependent on other stakeholders within the Criminal Justice System. There will be occasions when late court sittings, combined with traffic or weather conditions, have a detrimental impact on prisoner arrival times.</p> <p>Where a late arrival is unavoidable, the escort contractors are required to ensure that receiving prisons are informed of delays and an agreement is sought in advance for the safe receipt of any late arrivals. Where performance relating to prisoners being returned before the latest reception time fall short of contractual requirements, the escort contractor is challenged and if required formal contractual measures are taken against the contractor.</p> | Director of Prisons (HMPPS HQ) | Completed and ongoing |
| | Reducing risk, rehabilitation and progression | | | | |
| 5.6 | More category B places should be available nationally, to ensure that prisoners are located in the most appropriate prison in order to progress through their sentence. (Error! Reference source not found.) | Agreed | <p>In October 2017, Prisons Estate Transformation Programme (PETP) at HMPPS Headquarters published its vision for the future adult male estate in 2021. Planning towards achieving this vision over a period of gradual change between now and 2021 is taking place with partners and stakeholders. HMPPS will simplify the organisation of the prison estate gradually into three key functions: reception, training and resettlement.</p> <p>By matching prisoners to the correct function and having plans in place to recognise the needs of specialist groups, HMPPS will improve safety and access by offenders to appropriate services, creating the right conditions for safer prisons. Reconfiguration of the prison estate will continue through to March 2021, with HMP Woodhill becoming a category B training prison and Peterborough and Bullingdon becoming reception prisons by Summer 2019.</p> | Director or Estates Transformation (HMPPS) | Ongoing |



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| | Recommendations | | | | |
| | Early days in custody | | | | |
| 5.7 | Prisoners should only be handcuffed on and off the escort van based on an individual risk assessment. (Error! Reference source not found. , repeated recommendation 1.4) | Partly Agreed | <p>This recommendation is partly agreed as all Category A prisoners are handcuffed off escort vans and new prisoners to HMP Woodhill will be cuffed off the escort vehicle due to unknown risk and adherence to PSI 2013-09. (PSI) 2013-09.</p> <p>HMP Woodhill will complete individual risk assessments for all other moves to assess whether handcuffs are required.</p> | Governor | December 2018 |
| 5.8 | Staff should complete every stage of the 'Early days in custody' booklet to required timescales, and managers should ensure compliance. (Error! Reference source not found.) | Agreed | <p>HMP Woodhill requires a full staffing complement to ensure that every stage of the 'Early days in custody' booklet is completed to the required timescales, which is anticipated by December 2018. New First Night Centre staff will receive a full introduction to the 'Early Days in Custody' process.</p> <p>Processes for management checks to ensure compliance have been reviewed, introducing monthly Head of Function checks and quarterly spot checks by the Deputy Governor or Governor.</p> | Governor | March 2019 |
| 5.9 | All prisoners should receive a full and prompt induction. (Error! Reference source not found.) | Agreed | <p>Provision of full and prompt inductions to all new arrivals is subject to a full staffing complement. It is anticipated a full staffing complement will be achieved by December 2018.</p> <p>Missed induction completions will be added to new Senior Management Team 'watch list' of priority improvements, which will be reported monthly to the governor & monitored by the Senior Management Team. The Early Days in Custody (EDiC) staff will produce this information and EDiC management will monitor this on a daily basis to ensure inductions are completed promptly except where prisoners refuse to engage. Paper-based inductions will only be provided as a contingency measure and this will be managed by the allocations and inductions officers.</p> | Governor | January 2019 |
| | Managing behaviour | | | | |
| 5.10 | Vulnerable young adults located on the vulnerable prisoner unit should have a formal risk assessment and a plan to promote their | Agreed | HMP Woodhill will introduce a Vulnerable Young People's Risk Assessment to support their continued location on House Unit 4B and maintain their safety. A health check will be conducted on the individual within the first 14 days of their arrival by the Safety Team to identify risk factors and offer further support. | Governor | December 2018 |



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| | safety on the unit. (Error! Reference source not found. , repeated recommendation 1.25) | | Once HMP Woodhill transitions into a Category B prison and no longer has a Vulnerable Person's Unit, this plan will be further adapted to support vulnerable young people on the main wings. | | |
| 5.11 | The incentives and earned privileges (IEP) policy should be fully and consistently applied, with appropriate quality assurance and management checks. (Error! Reference source not found. , repeated recommendation 1.49) | Agreed | <p>HMP Woodhill are conducting a review of the IEP process with a greater focus on Procedural Justice. HMP Woodhill will also introduce IEP Representatives who will provide greater balance and voice to IEP boards. Concurrently, a "Clubcard" style scheme will be introduced to promote and reward positive behaviour rather than placing an emphasis on punitive measures.</p> <p>Residence managers at HMP Woodhill will conduct a review of the effectiveness of the current weekly Custodial Manager checks to ensure a minimum of 5% IEP management checks are completed and fed back to staff around the quality of entries. Prison Officer Entry Level Trainee mentors (POELT) will also assist with feedback for new officers.</p> <p>The Head of Residence will use P-NOMIS management reports (Prison Service database) to monitor the level of checks being carried out and report into Senior Management Team (SMT) meetings.</p> | Governor Governor | January 2019 January 2019 |
| 5.12 | The number of adjudications which are dismissed or not proceeded with should be reduced. (Error! Reference source not found.) | Agreed | <p>HMP Woodhill will roll out "Five Minute Intervention" training to all staff ahead of introducing Key Workers to address the over reliance on placing prisoners on report. The prison will ensure reporting officers discuss their report with a trained Adjudication Liaison Officer before the adjudication is processed to consider alternatives. HMP Woodhill will also ensure that all segregation unit staff attend the Adjudication Liaison Officers (ALO) course to enable them to support reporting officers in this way</p> <p>Adjudications figures will be added to new SMT 'watch list' of priority improvements and hot topics, reported monthly to the governor. The Deputy Governor will review adjudication outcomes and the number of dismissed/not proceeded with adjudications with adjudicating governors in the Adjudication Standardisation meeting to ensure consistency.</p> | Governor | November 2018 |
| 5.13 | Adjudication data should be analysed and monitored, to identify and address any ongoing trends or emerging hotspots of poor behaviour. | Agreed | <p>All adjudication data will be monitored at the quarterly Segregation Monitoring And Review Group (SMARG) meeting and via the adjudication standardisation meeting to identify and address emerging trends and patterns of behaviour.</p> <p>HMP Woodhill will update the adjudication database to enable more relevant and useful information to analyse and highlight the most common adjudications and</p> | Governor | November 2018 |



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| | (Error! Reference source not found.) | | trends in previous periods. This information will inform staff and wing briefings to address poor behaviour. | | |
| 5.14 | Oversight of use of force should be improved, to ensure that it is always used appropriately. Use of force documentation should be completed within 72 hours of the incident, and managers should routinely review a proportion of incidents, including video and audio footage. (Error! Reference source not found.) | Agreed | <p>A senior manager has now been appointed as the Use of Force lead. HMP Woodhill will introduce an action plan to reduce use of force and ensuring appropriate use. A training package to improve management and supervision of incidents will be put in place and will be rolled out to all Custodial Managers and Supervising Officers.</p> <p>A full time Control and Restraint (C&R) Co-ordinator has been appointed to oversee all Use of Force paperwork and ensuring completion within 72 hours (with appropriate escalation as required). The monthly Use of Force Committee is chaired by the Deputy Governor and the routine reviewing of planned incidents has now been added to the agenda. Lessons learned will be fed back by the Use of Force Co-ordinator or Deputy Governor in person with either individuals or teams including supervisors, orderly officers, and duty governors.</p> <p>HMP Woodhill will ensure that any complaint received by a prisoner or member of staff of inappropriate or excessive use of force triggers an immediate review including downloading any CCTV or body worn camera footage. Where necessary, a formal investigation will be commissioned.</p> | Governor Governor Governor | December 2018 Completed Completed |
| 5.15 | Prisoners in the segregation unit should have daily access to telephone calls and showers. (Error! Reference source not found.) | Agreed | All prisoners in segregation now have daily access to showers and telephones. | Governor | Completed |
| | Security | | | | |
| 5.16 | The strip-searching of all but category A prisoners should be supported by a risk assessment. (Error! Reference source not found.8) | Not Agreed | This recommendation is not agreed as the National Security Framework and PSI 2016-07 allows for full searches to be conducted on all categories of prisoners without a risk assessment and all full searches are conducted as per the aforementioned National Security Framework and PSI. | Governor | |



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| 5.17 | Prisoners who present a risk to staff and are subject to multiple officer unlocking arrangements should receive a thorough risk assessment which is reviewed regularly. (Error! Reference source not found.) | Agreed | HMP Woodhill will ensure that risk assessments are in place for all individuals on a multiple officer unlock on the impatient unit. HMP Woodhill have established a weekly meeting within Healthcare and attendance at this meeting includes clinical staff, mental health nurses, and operational prison staff. During this meeting risk assessments are reviewed with a summary for each review documented on P-NOMIS and System1 (patient medical notes). | Governor | Completed |
| 5.18 | The establishment should develop a more strategic and integrated approach to drug and alcohol supply and demand reduction, involving all key stakeholders. This should be supported by an up-to-date strategy and detailed action plan, which should be monitored for effectiveness. (Error! Reference source not found.) | Agreed | HMP Woodhill will conduct a full review to introduce a credible and integrated drug strategy which effectively addresses supply reduction of substances including Spice and alcohol and links with security as well as partner agencies. The Drug Strategy Meeting Terms of Reference will also be re-written as part of this review to establish an effective monitoring process. This comprehensive review will result in a detailed action plan to deliver effective supply and demand reductions. The plan will be a standing agenda item, for review, at the newly established meeting. | Governor | April 2019 |
| | Safeguarding | | | | |
| 5.19 | There should be a referrals process by which staff can report concerns about prisoners at risk of harm, abuse or neglect. (1.48) | Agreed | Information about how to make referrals will be re-published and made available to all staff by the end of September 2018. A meeting between key safeguarding stakeholders has been scheduled for October 2018 to align multiple referral processes into a streamlined policy which will be shared with all staff and stakeholders at HMP Woodhill by December 2018. The referral process for healthcare staff currently in place is managed by the healthcare provider, Central North West London, who make referrals to Milton Keynes Safeguarding Board. | Governor | December 2018 |
| | Staff-prisoner relationships | | | | |



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| 5.20 | Electronic case notes should reflect engagement between staff and prisoners, and the circumstances of individual prisoners. Management checks should be recorded. (Error! Reference source not found.) | Agreed | <p>Case notes will be added to new SMT 'watch list' of priority improvements and hot topics, reported monthly to the governor & monitored.</p> <p>HMP Woodhill will conduct a review of the effectiveness of current weekly Custodial Manager checks, to ensure a minimum of 10% case note management checks are conducted and fed back to staff around quality of entries. POELT mentors will also assist with feedback for new officers.</p> <p>The quality of case notes will be raised with staff and examples of best practice entries will be shared with staff to improve standards. The Head of Residence will use P-NOMIS management reports to monitor the level of checks being carried out and report into SMT meetings.</p> | Governor | January 2019 |
| | Daily life | | | | |
| 5.21 | Two prisoners should not be held in cells designed for one. (Error! Reference source not found., repeated recommendation 2.9) | Partly Agreed | <p>This recommendation is partly agreed as the occupancy of prison cells is determined by establishments and certified by the Deputy Director of the Long Term & High Security Estate in accordance with PSI 17/2012, which provides clear guidelines for determining cell capacities. Cells will only be shared where it has been assessed to be of adequate size and condition for doing so. All accommodation is compliant with the certified cell certificate.</p> <p>HMP Woodhill is due to be reconfigured to a Category B Training Prison by late spring 2020. As part of the reconfiguration, a lowered Operational Capacity of 616 prisoners has provisionally been agreed with the expectation that the majority of accommodation will become single-cell configuration. While the aim will be, at HMP Woodhill, for single-cell accommodation across the prison, this will be dependent on operational pressures.</p> <p>The wider problem of crowding in prisons is a longstanding national issue that can only be addressed through sustained additional investment in the estate over the long term. Crowding is the result of population levels that exceed the system's total certified normal accommodation (CNA). Holding two prisoners in a single cell is facilitated to accommodate national population pressures and although this does not breach HMPPS standards for crowded accommodation, it is not a desirable practice. HMPPS' strategy for reducing prison crowding entails the incremental replacement, as resources allow, of older, crowded prisons with new accommodation that is safe, decent, and uncrowded. As plans to transform the prison estate gather pace and more new prisons are delivered while existing crowded unsuitable capacity is closed, a steady reduction in crowding is achievable.</p> | Governor | May 2020 |



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| 5.22 | Showers areas should be screened, kept clean and maintained properly. (Error! Reference source not found.) | Agreed | <p>The screening of shower areas has been costed and approved and installation of the screens is being taken forward by Government Facilities Services Limited (GFSL).</p> <p>HMP Woodhill will introduce daily cleaning officer check-sheet to assist wing management checks ensuring shower areas are clean.</p> <p>A deep cleaning programme will be introduced as an additional planned maintenance measure to ensure clean and decent living conditions.</p> | <p>Governor</p> <p>Governor</p> <p>Governor</p> | <p>Ongoing</p> <p>November 2018</p> <p>December 2018</p> |
| 5.23 | Prisoners should be able to access their property on arrival and subsequently within seven days of application. (Error! Reference source not found.) | Partly Agreed | <p>This recommendation is partly agreed as although most prisoners will have access to their property on arrival, it is not guaranteed for those arriving outside of reception times when staff may be unavailable to process it. Reliance will be on the transport contractor to ensure that men arrive into custody at a reasonable time to complete property checks.</p> <p>Property application (and complaints) are to be added to new SMT 'watch list' of priority improvements and hot topics, reported monthly to the governor & monitored. Until full staffing is achieved, envisaged to be by March 2019, tasks such as property checking/allocation may be dropped.</p> | Governor | March 2019 |
| 5.24 | Lunch should not be served before 12 noon and the evening meal not before 5pm, and breakfast should be issued on the day it is to be eaten. (Error! Reference source not found., repeated recommendation 2.99) | Not Agreed | <p>This recommendation is not agreed as the current core day does not have scope for the serving of the lunch meal after 12pm, the serving of the evening meal after 5pm, or the serving of breakfast on the day it is to be eaten.</p> <p>The serving of breakfast packs in the evening is also 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> | Governor | |
| 5.25 | Prisoners' poor perceptions of food should be explored through regular consultation and surveys. (Error! Reference source not found.) | Agreed | <p>The contracted caterer (Aramark) attends the monthly Prisoner Council Committee (PCC) to discuss all food issues. Aramark will set up a monthly survey of prisoners' views. In tandem with prison managers, findings will be considered with action taken to improve quality and quantity of food. High turnover of kitchen workers will be addressed and consideration of how to incentivise and reward quality of meals being produced. Aramark will introduce food comments books to complement PCC meeting discussions and Duty Governors to taste food daily and log this in the Kitchen.</p> | Governor | January 2019 |



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| 5.26 | Complaints data should be analysed to identify trends, and action should be taken as a result. (Error! Reference source not found.) | Agreed | Complaints and trend analysis will be added to new Senior Management Team (SMT) 'watch list' of priority improvements and hot topics, reported monthly to the governor & monitored. The Business Hub and the SMT will analyse the data on a monthly basis. Dependent on the trends, actions will be allocated to appropriate Functional Heads for remedial action where possible, from the SMT meetings. | Governor | February 2019 |
| | Equality, diversity and faith | | | | |
| 5.27 | The equality committee should analyse data, to ensure that there are no inequitable outcomes for prisoners with protected characteristics, and ensure that the needs of prisoners with protected characteristics are met. (Error! Reference source not found.) | Partly Agreed | HMP Woodhill's Equality Committee will analyse data with a view to tackling any inequitable outcomes for any prisoners with protected characteristics, however this recommendation is partly agreed as the establishment cannot confidently commit to the eradication of any inequitable outcomes at any time for any prisoner with a protected characteristic. SMT champions have been allocated to all protected characteristics and prisoner attendance at committee meetings will enable the governor to ensure outcomes are equitable. | Governor Governor | December 2018 December 2018 |
| 5.28 | Discrimination incident report forms should be investigated fully and responses should be timely. (Error! Reference source not found.) | Agreed | A review of the Discrimination Incident Report Form (DIRF) process will be undertaken to ensure compliance and quality of both the investigation and outcome with required improvements made based on findings and quality improvement recommendations. The timeliness of responses will be monitored through Functional Management checks and as part of the monthly equalities meeting. | Governor | December 2018 |
| 5.29 | Regular prisoner forums should be available for all protected characteristics, to provide support and understand needs. (Error! Reference source not found.) | Agreed | HMP Woodhill will deliver quarterly forums for each protected characteristic with the SMT lead taking the opportunity to work alongside staff and prisoners to highlight learning and actions which better support needs. Wing-based prisoner Equality Representatives will also assist with this work. | Governor | November 2018 |
| 5.30 | Staff should be aware of prisoners who are subject to personal emergency | Agreed | HMP Woodhill will ensure that all personal emergency evacuation plans (PEEP) are held on a database and managed by the Equalities team who will also brief staff on prisoners in their area who require a PEEP. Clear recording against | Governor | December 2018 |



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| | evacuation plans, and the support required in the event of an evacuation. (Error! Reference source not found.) | | individual cell cards will be implemented and a full list will be maintained in each wing manager's office. HMP Woodhill will introduce spot checks and contingencies to confirm staff awareness and preparedness for an evacuation. These will be carried out by the Equalities Team. | | |
| 5.31 | Age-appropriate activities should be available both for younger and older prisoners. (Error! Reference source not found.) | Agreed | HMP Woodhill will work with the education provider and prisoner council to conduct a prisoner Needs Analysis to reflect age appropriate activity including gymnasium activities. Achievable actions from this analysis, in terms of activity provision, will be implemented. Formal forums do not take place as yet, however CAMEO (Come and Meet Each Other) meetings (for older prisoners) for House Unit 4B take place weekly and this will be rolled out across the prison by the target date. The Equalities Lead is drawing up a schedule which will show two forums per year, i.e. every 6 months, for prisoners under 21. | Governor | March 2019 |
| | Health, well-being and social care | | | | |
| 5.32 | The health care provider should gather and analyse prisoners' views on health care routinely, to support service development. (Error! Reference source not found.) | Agreed | Complaints and compliments and the views of prisoners are monitored at the quarterly contract review meetings. Health and Justice North Midlands (East) conducts a yearly quality review visit where this is part of the measurements. Health and Justice North Midlands (East) dedicated equalities lead works with HMP Woodhill to run focus group, the resulting action plan is then reviewed in the contract review meetings. Additionally, although HMP Woodhill are not required to act on this recommendation, the Governor however has identified a Band 6 team leader to lead on service user involvement. A Friends and Family Test (FFT) will be re-launched alongside healthcare forums being restarted and a healthcare manager attends the Prisoner Consultative Committee each month. | Director of NHS England North Midlands Governor | Completed January 2019 |
| 5.33 | There should be a whole-prison strategy to support health promotion and well-being activities, and this should include health-specific peer workers. (Error! Reference source not found.) | Agreed | The Healthcare Peer Workers element of this recommendation will be developed when HMP Woodhill has been reconfigured to a Category B training establishment. The reconfiguration is due to be completed by Summer 2019. In the meantime, established peer workers from other areas (Insiders and Equality Representatives) will continue to work alongside healthcare to promote health and well-being. | Governor Governor Governor | August 2019 Completed June 2019 |



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| | | | A health promotion strategy incorporating the NHS calendar of campaigns is being developed. Key dates will be championed with stakeholders. The target date follows the conclusion of the healthcare retendering process due by April 2019. | | |
| 5.34 | The regime for inpatients should include appropriate therapeutic activity. (Error! Reference source not found. , repeated recommendation 2.72.) | Agreed | NHS England commissions health care services and focusses on therapeutic activity where appropriate (i.e. mental health). A full review of facilities and resources is underway to assess how best to provide therapeutic activity amongst restrictions caused by individual unlock risk assessments. Local council and other stakeholders have been invited to participate in conversations and planning forums. | Governor and Director of NHS England North Midlands | February 2019 |
| 5.35 | There should be a memorandum of understanding between agencies, to outline appropriate joint service working on social care. (Error! Reference source not found.) | Agreed | HMP Woodhill and its partner agencies have met to discuss and draw up a Memorandum of Understanding for social care joint working. The draft is with Commissioning Group at HMPPS Headquarters for approval. | Governor | February 2019 |
| 5.36 | All discipline officers should receive regular mental health awareness training to enable them to recognise and take appropriate action when a prisoner has mental health problems. (Error! Reference source not found. , repeated recommendation 2.92) | Agreed | Suicide and Self Harm (SASH) training, which includes a mental health module, is underway as a rolling programme for all officers. Full roll out of SASH training is not expected before March 2019 due to an absence of a full staffing complement together with balancing the priority with other essential training needs. All new officers receive SASH training as part of their initial officer training. | Governor | March 2019 |
| 5.37 | Patients requiring a transfer under the Mental Health Act should be assessed promptly and transferred within the current transfer guidelines. | Not Agreed | This recommendation is not agreed as although every effort is made to expedite transfers and assess patients promptly, transfers are dependent on a number of systemic factors within the NHS, such as the completion of appropriate assessments, administrative processes and the availability of accommodation in mental health hospitals and other related issues, HMP Woodhill cannot commit to transfer within Department of Health guidelines ('The Prison Transfer and | Governor and Director of NHS England North Midlands | |



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| | (Error! Reference source not found. , repeated recommendation 2.93) | | Remission Guidance' published by the Department of Health in 2011), which in any event is not agreed by NHS England. NHS England guidance, published in March 2018, sets out timescales that take into account clinical urgency and need. The health care provider and NHS England Health and Justice, and NHS England Specialised Commissioning, continue to robustly manage this challenging pathway. | | |
| 5.38 | Prescribing regimes for drug dependency should be flexible, individualised and reflect national guidance on buprenorphine. (Error! Reference source not found. , repeated recommendation 1.75) | Agreed | Westminster Drug Project (WDP) have met with HMP Woodhill's pharmaceutical supplier (Martindale Pharma) and discussed the supply and use of a variety of buprenorphine products to ensure individual needs are met while satisfying prison concerns around diversion. The WDP Clinical Lead will update the local clinical guidance to reflect this new approach to buprenorphine appropriate prescribing. NHS England have also confirmed this has been discussed and agreed at contract review meetings for Q4 2017/18 and Q1 2018/19. | Governor, Director of Martindale Pharma, and Director of WDP | December 2018 |
| 5.39 | Prisoners should be able to access self-help and mutual aid groups such as Alcoholics Anonymous, Narcotics Anonymous or SMART Recovery, for additional support. (Error! Reference source not found.) | Agreed | HMP Woodhill have arranged for Alcoholics Anonymous and Narcotics Anonymous facilitators to have access into the prison to deliver regular groups once the necessary clearance processes have been completed. Westminster Drug Project (WDP) will continue to deliver weekly peer support groups facilitated by peer mentors, staff and clients in the interim period. In addition, WDP have made 12-step materials available to service users in the absence of 12-step groups as well as providing signposting to mutual aid support in all WDP release packs. WDP will also look for alternative mutual aid support networks and encourage these networks to set up groups within Woodhill. | Governor Director of Central Northwest London NHS Foundation Trust (healthcare provider) | November 2018 Completed |
| 5.40 | In-possession risk assessments should be up to date, relevant for each patient and followed by the prescribers according to policy. (Error! Reference source not found.) | Agreed | In possession risk assessments are carried out with all new receptions. In quarter 1 of 2018/2019 91% of all new receptions had an assessment completed. Of the existing population, 97% have a current and valid IP risk assessment which is reviewed periodically and following an incident or event of concern. The risk assessment is followed by prescribers or an entry of exception made on SystemOne. The previously used visual RAG rating display on SystemOne does not work with the protocol on new NHSE templates. This is currently being worked on by the commissioning support unit and will assist practitioners in providing a more visual display, however all practitioners are able to access the risk assessment on SystemOne. | Governor | Completed |



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| 5.41 | Medicines should be administered at clinically appropriate times, in line with current professional standards. (Error! Reference source not found. , repeated recommendation 2.80) | Agreed | <p>NHS England can confirm that the core day and medicine administration times are discussed at contract review meetings and plans are in place for those men who have more frequent medicines administration needs.</p> <p>HMP Woodhill benefits from the opportunity of being able to administer medication 4 times a day, however most men are prescribed medication once or twice a day only. The in-house pharmacy team monitor all prescriptions and identify men that are prescribed the same medication three or four times a day (not in possession). Nurses administering medication from SystmOne can see when the last dose was administered and make arrangements to administer medication at a safe and clinically appropriate time. The Primary Care Lead audits the time between doses of those men previously identified by pharmacy. Where possible medication is prescribed in possession, or use of modified release medicines to reduce the frequency of administration.</p> | Governor and Director of Central Northwest London NHS Foundation Trust (healthcare provider) | Completed |
| 5.42 | Custodial staff should supervise the medicine administration queues adequately to maintain patient confidentiality and reduce potential bullying. (Error! Reference source not found. , repeated recommendation 2.81) | Agreed | A protocol is in place for nursing staff to only commence issuing of medication once appropriately briefed supervising staff are present. All wing staff will receive guidance on duties for medicines hatches in daily briefings and this is due for completion by December 2018. Escalation of non-attendance to wing managers is also now in place. | Governor | December 2018 |
| | Time out of cell | | | | |
| 5.43 | All prisoners should have daily access to an hour in the open air. (Error! Reference source not found.) | Not Agreed | This recommendation is not agreed as National policy (PSI 75/2011 Residential Services), states that prisoners are afforded a minimum of 30 minutes in the open air daily as opposed to the one hour recommended by the Inspectorate. This provision is mandatory subject to weather conditions and the need to maintain good order and discipline. | Governor | |
| 5.44 | Data on the use of the library and its stock should be collected and used to improve access. (Error! Reference source not found. , repeated recommendation 3.32) | Agreed | Data will be harvested from the Library Management System and will be analysed to improve the service for prisoners. The Library Manager will meet with the Learning Skills Manager monthly to discuss prisoner attendance and use of library stock with a specific view to improve overall provision. | Governor | January 2019 |



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| 5.45 | Wherever possible, all gym facilities should be used to full capacity. (Error! Reference source not found.) | Agreed | HMP Woodhill will change timings to one full afternoon session allowing all facilities to be offered. This will improve attendance figures. A review will take place consider allowing prisoners who would otherwise be locked in their cell for a particular session to attend the gymnasium where there is spare capacity. | Governor | January 2019 |
| 5.46 | PE provision should be developed to include age-appropriate sessions and support for prisoners with specific health needs or those on the drug rehabilitation programme. (Error! Reference source not found.) | Agreed | HMP Woodhill will provide a gymnasium programme that provides a weekly detox session for prisoners on House Unit 2A or those referred through the Westminster Drug Project or healthcare provider, with a total of 3 sessions in the week. Age specific classes will be incorporated into the current 'exercise referral' classes to maximise overall session attendance supporting individual need. An information campaign to advertise these sessions amongst other professionals and staff (such as doctors) will increase referrals. Promotion of sessions via peer representatives, forums, Way Out TV notices and newsletters will also increase self-referrals. | Governor | December 2018 |
| | Education, skills and work activities | | | | |
| 5.47 | Managers should increase the number of activity places, specifically in vocational training and employment-related work, to meet all prisoners' needs. (Error! Reference source not found.) | Partly Agreed | <p>This recommendation is partly agreed as although there are plans to increase activity places as recommended, this is unlikely to be sufficient to meet all prisoners' needs due to financial and physical constraints.</p> <p>April 2019 has been set as the provisional date to cease holding remand prisoners as part of Phase 1 of the reconfiguration of the prison. Work is underway to source an increase in activity spaces and redefine the type of activities available for a category B population. Vocational training will be made available in most work areas where there is an industry specific qualification, with the education provider rolling out pathways to vocational training in construction, hospitality, and technology.</p> | Governor | May 2019 |
| 5.48 | Quality assurance processes should be further developed, to make sure that prison managers have a cohesive approach to self-evaluation and planning for improvement across all education, skills and work. (Error! Reference source not found.) | Agreed | <p>The Long Term High Security Estate have now agreed a directorate approach to learning and skills which will enable better support, access to funds, partnership working and assurance processes. At a local level, departments will continue to provide education, training and employment on a Quality Improvement Plan.</p> <p>A quarterly Quality Improvement Group (QIG) will meet to analyse and challenge the plan to ensure its success. Membership of QIG now includes the Independent Monitoring Board to allow for an independent voice to be included in the process. The Head of Reducing Re-offending will revise the Terms of Reference for the QIG meetings to include a mandatory attendees list.</p> | Governor | February 2019 |



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| | | | Attendance will be monitored through bilateral meetings between Governor/Deputy and Functional Heads. | | |
| 5.49 | The virtual campus should be made fully operational, and available to all prisoners. (Error! Reference source not found.) | Not Agreed | <p>This recommendation is not agreed as the Virtual Campus has not operated to its full potential for affordability reasons relating to requirement of a fibre optic connection to make it fit for purpose.</p> <p>Although the prison are obtaining alternative costings and continue to investigate all funding streams to implement an upgrade of the incoming feed line, this is subject to funding and HMP Woodhill cannot commit to it.</p> | Governor | |
| 5.50 | Individual learning plans should contain sufficient detail to ensure that prisoners know what to do to improve their academic, work and vocational skills. (Error! Reference source not found.) | Agreed | New Individual Learning Plans (ILP) which will identify a learners starting point, objectives and review dates are being introduced. Each learner will have the opportunity to discuss their pathway with tutors at periodic intervals. Targets set will include academic, personal and employment related goals. Management checks by the education provider, the Learning Skills Manager and the Industries Manager will be agreed. | Governor | December 2018 |
| 5.51 | Prisoners' work skills should be recognised and recorded, to show their skills development. (Error! Reference source not found.) | Agreed | A Progress and Achievement Record (PAR) will be introduced in all workshop areas which captures employment related skills and records achievements against pre-set goals. Learners will also contribute to this assessment and feedback given. Celebration of achievements will be encouraged in all activity areas. | Governor | December 2018 |
| 5.52 | Trainers should record prisoners' development of personal and social skills, to ensure that they are better prepared for progression to further education and training, and/or release into the community. (Error! Reference source not found.) | Agreed | <p>A tracker will be developed to evaluate, monitor and record social skills, industry/employability skills, education and training. Instructional Officers and prisoners will work together to develop an action plan and provide opportunities for prisoners to self-evaluate and offer individual feedback, guidance and recognition.</p> <p>These measures will improve prisoner skills and confidence to progress and develop, and prepare them for further education or release into the community and their employment prospects. Course/training materials will be taken with prisoners on release or transfer if deemed useful to them by trainers and if appropriate.</p> | Governor | December 2018 |



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| 5.53 | The prison should increase the number of prisoners undertaking accredited qualifications, to provide prisoners with recognition of their achievements. (Error! Reference source not found.) | Agreed | Promotion of accredited courses with Probation, offender supervisors and Community Rehabilitation Companies (CRCs) will mean these form part of prisoner sentence plans. A review of all activities where there is currently no accredited outcomes is underway to improve employability skillsets through recognised achievements. | Governor | January 2019 |
| | Reducing risk, rehabilitation and progression | | | | |
| 5.54 | The strategic management of reducing reoffending should be improved. An up-to-date and comprehensive needs analysis should inform a detailed strategy and a robust action plan against which to monitor progress. (Error! Reference source not found.) | Agreed | A review of the Reducing Reoffending local strategy is underway. A Needs Analysis will be undertaken as part of the review with input from the Psychology Department to create a credible and informative action plan that will be monitored via the quarterly Reducing Reoffending meeting and fed into both prisoner forums and Senior Management Team meetings. | Governor | February 2019 |
| 5.55 | The quality of offender management should be improved. Contact with prisoners, particularly those assessed as presenting a high or very high risk of harm, should be meaningful, clearly aimed at promoting progression and protecting the public. (Error! Reference source not found.) | Agreed | <p>A review of all current procedures linked to levels of prisoner contact, purpose of contact, and completion of OASys reviews will take place to ensure there is a consistent approach. Guidance will be issued outlining expectations and providing a structure to sentence planning, with a particular focus on pre-release planning. This will involve developing closer links with the Community Rehabilitation Companies and Resettlement teams.</p> <p>The review will also consider how and when information is recorded. Guidance will be provided to the Offender Supervisors outlining what the requirements are to ensure key information relating to contact with prisoners is recorded in a timely and appropriate manner in all cases.</p> | Governor Governor | November 2018 November 2018 |
| 5.56 | Risk management planning for release, particularly for | Agreed | The Offender Supervisor is notified of the contact details for the Offender Manager (OM) at the point of allocation to promote good liaison from the outset. | Governor | Completed |



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| | those assessed as high or very high risk of harm, should be more robust, with clear evidence of information exchange with the community-based offender manager, including confirmation of the multi-agency public protection arrangements (MAPPA) management level where relevant. (Error! Reference source not found.) | | <p>HMP Woodhill have developed an escalation process to ensure links with the OM are established.</p> <p>Inter-departmental Risk Management Team (IRMT) meetings are held on a monthly basis with an agenda that includes multi-agency public protection arrangements (MAPPA) and pre-release planning considerations. All prisoners assessed as high or very high risk of harm within 6 months of release will be on the agenda regardless of MAPPA status/level.</p> <p>A communique has been sent to Community Offender Managers informing them when a case they manage is being discussed at the IRMT, inviting them to contribute to the meeting.</p> <p>Prison staff are reliant on Probation staff setting MAPPA levels for prisoners. An escalation process has been established for prison staff to use in cases where the MAPPA level has not been received from the community Offender Manager. The MAPPA Team will review the effectiveness as an ongoing process.</p> <p>The establishment has implemented a process whereby reminders are sent to Offender Managers to set MAPPA levels at the 6-month point prior to a prisoner's release. The establishment will ensure that the escalation process is used in all cases where the level has not been received 5 months prior to release.</p> | <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> | <p>Completed</p> <p>Completed</p> <p>Completed and ongoing</p> <p>Completed</p> |
| | Interventions | | | | |
| 5.57 | The proportion of prisoners released to sustainable accommodation should be monitored more robustly to measure the effectiveness of provision. (Error! Reference source not found.) | Agreed | <p>HMP Woodhill, in partnership with their Community Rehabilitation Companies (CRCs), will analyse data received through senior contract managers for both Thames Valley and BeNCH (Bedfordshire, Northamptonshire, Cambridgeshire and Hertfordshire) CRCs at Tripartite meetings to ensure mandated services are being delivered.</p> <p>The prison will challenge appropriately, through MOJ contract leads, if performance demonstrates significant shortfall or ineffectiveness of delivery</p> | Governor | November 2018 |
| 5.58 | The prison should develop a strategy to address the management of and engagement with prisoners with histories of domestic violence and sex offences. | Agreed | In partnership with other agencies who work with prisoners with a history of domestic violence and or sexual offending, HMP Woodhill's Offender Management & Psychology Units will collaboratively develop a local strategy for engaging and working with convicted prisoners. These will then be actively disseminated and made available for relevant staff to refer to and act upon. | Governor | March 2019 |



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| | (Error! Reference source not found., repeated recommendation 4.45) | | | | |
| | Release planning | | | | |
| 5.59 | The resources and support provided by BeNCH CRC should equal that provided by Thames Valley CRC, to ensure that all prisoners can access the same range of help, irrespective of the area to which they are being released. (Error! Reference source not found.) | Not Agreed | <p>This recommendation is not agreed as the level of resources allocated to HMP Woodhill from both providers were set at the contract tendering process and not directly controlled by the Governor of HMP Woodhill.</p> <p>Additionally, HMP Woodhill is in phase 2 of the reconfiguration project and it is envisaged the establishment will become a non-resettlement prison during the latter part of 2019. This means that there will be no requirement for contracted Through The Gate resettlement services to be delivered at HMP Woodhill from that date.</p> | Governor | |
| | Children and families and contact with the outside world | | | | |
| 5.60 | Regular family visits should be developed. (Error! Reference source not found.) | Agreed | An all-day Family Day was piloted in August 2018 (school holidays) with a further family day planned for each school term break. Prisoner and family feedback will be actively sought after each event to craft future events and develop a family events and activities schedule. Prison Advice and Care Trust (PACT) completed a family survey in May 2018 and the findings of this will shape future Father and Child events. It is envisaged a schedule of family days/events will be published during October 2018. | Governor | February 2019 |



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| 5.61 | Prisoners should be able to access telephone numbers (subject to public protection measures being cleared) within the first few days of arrival. (Error! Reference source not found. | Agreed | A process has been put in place to prioritise all new receptions in the First Night Centre to have their numbers put onto the pin system as priority above other change requests. A wider pool of staff are being identified and trained to perform this task to ensure appropriate cover can be provided each day regardless of staff absence or leave. | Governor | Completed |
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| Recommendations | |
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| Agreed | 49 |
| Partly Agreed | 6 |
| Not Agreed | 6 |
| Total | 61 |

