



HM Prison &  
Probation Service

Action Plan: HMP Wandsworth

Action Plan Submitted 11 September 2018

A Response to the HMIP Inspection

Report Published 13<sup>th</sup> July 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 <b>must</b> be an explanation of why we cannot fully agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.
Not Agreed	The recommendation is not agreed and will not be implemented. This might be because of commissioning, policy, operational or affordability reasons.	The response must clearly state the reasons why we have chosen this option. There <b>must</b> be an explanation of why we cannot agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.



ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMP WANDSWORTH

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken / Planned	5. Responsible Owner	6. Target Date
	<b>Main recommendations to the Governor</b>				
5.1	<p>Prisoners should receive a private and detailed assessment of needs and vulnerability before being moved to adequately prepared first night accommodation. They should have additional checks and support on their first night.</p> <p>All new arrivals should receive a comprehensive induction, directly overseen by staff with attendance tracked centrally. (S40)</p>	Agreed	<p>First night interviews were reviewed and are now conducted in a private room. All staff have been reminded of the importance of private interviews, and checks are conducted to identify prisoners' risks and vulnerabilities to ensure they are appropriately managed.</p> <p>Quality assurance management checks will be introduced to ensure assessments are satisfactory and detailed. These checks will be developed to ensure that they are carried out by appropriate staff, including senior management checks and oversight to ensure delivery.</p> <p>The cleanliness of cells and availability of kit within the First Night Centre has been reviewed and initial action has been taken to improve conditions such as a deep cleaning and allocation of kit. Cells are being checked daily to ensure standards are sufficient and an auditable check will be developed to gain assurance. Work is underway to clarify and publish to all staff the agreed expected standards of prisoner accommodation</p> <p>A full review of the induction process is currently underway (led by the Head of Safety) to ensure that the sessions are comprehensive. Induction is overseen by Prison Officers and a Custodial Manager has been given oversight responsibility of inductions and will focus on improving and tracking attendance.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed and Ongoing</p> <p>October 2018</p> <p>October 2018</p> <p>October 2018</p>
5.2	Managers should make use of detailed analysis of outcomes and trends to measure the impact of safer custody and other work, and to drive improvement. (S41)	Agreed	The Violence Diagnostic Tool (VDT) will be utilised and considered at each Safer Custody meeting. This will assist identifying trends such as locations, age, race of perpetrators etc and enable resources and strategy to be targeted effectively.	Governor	October 2018



5.3	A robust strategic approach to preventing suicide and self-harm should be supported by an up-to-date action plan. ACCT procedures should be thoroughly implemented. All recommendations from the Prisons and Probation Ombudsman investigations should be implemented and monitored. Officers should be clear about their responsibility to preserve life, when to enter a locked cell and what to do in an emergency. Officers should carry anti-ligature knives. (S42)	Partly Agreed	There will be a robust managerial oversight of preventing suicide and self-harm. A full review of HMP Wandsworth's strategic approach will take place, led by the Head of Safety, and a suicide and self-harm strategy will be prepared from the review finding outcomes – with an action plan to support implementation overseen by the Safer Custody Committee, which is chaired by the Deputy Governor.	Governor	November 2018
			A Consolidated Action Plan (CAP) will be updated to include all accepted Prisons and Probation Ombudsman (PPO) recommendations. Assurance is in place through the Safer Custody lead at group level who conducts regular checks of the CAP to monitor target dates. A quality assurance process managed by the Deputy Governor will also be introduced. HMP Wandsworth cannot commit to implement all PPO recommendations – they will be considered on a case by case basis, and the prison reserves the right not to accept them on occasions, albeit rarely in practice.	Governor	December 2018
			Communications will be issued to all staff to reiterate their responsibilities to preserve life and that they should carry an anti-ligature knife at all times. Night staff will be issued anti-ligature knives at the beginning of each shift. Checks by the Night Orderly Officer will take place at the beginning of each set of night shifts to ensure staff understand their responsibility to preserve life and actions to take in the event of an emergency. A check will be carried out by Duty Governors during the monthly night visit.	Governor	October 2018
5.4	The living conditions should be improved to an acceptable standard. Managers and staff should ensure that a culture of institutional self-respect is firmly established, supporting a clean and decent environment for staff and prisoners alike. (S43)	Agreed	<p>Living conditions are being improved to ensure <u>minimum</u> acceptable standards are achieved and maintained. However, significant capital investment is required to improve living conditions in all parts of the prison to the <u>desired</u> standard, and the priority of these works at HMP Wandsworth will be considered against the needs of other establishments due to the limited funding available.</p> <p>The furniture on A and B 4<sup>th</sup> floor landing cells have been replaced and the landing showers have been refurbished.</p> <p>The A and B wing 4<sup>th</sup> floor landings are being refurbished which will include replacement of the landing and cell floors, cell refurbishment and high level painting.</p> <p>HMP Wandsworth have submitted a request for A3 and B3 landings to be fully refurbished, including all showers. A costing exercise is currently taking place. However, significant capital investment will be required to complete this work.</p>	<p>Executive Director, Estate Transformation and Governor</p> <p>Governor</p> <p>Prison Group Director for London and Governor</p>	<p>Completed</p> <p>September 2018</p> <p>April 2019</p>



			<p>Staff will be tasked with the responsibility for cleaning and managing kit allocation. A full review of cleaning equipment will take place. All wings will have cleaners equipped with enough equipment to ensure areas within the prison are kept clean. Cleaning standards will be monitored by Residential Managers, and assurance will be given through wing accountability records.</p> <p>The Governor will agree with the Prison Group Director expected standards of living conditions. Cultural change through communication, training, support, management checks and quality assurance will drive up cleanliness standards and decency across prisoners and staff areas.</p>	Governor	September 2018
				Governor	December 2018
5.5	The prison should systematically identify prisoners' protected characteristics. Equality monitoring data should be up to date, cover all key areas of prison life, and lead to thorough investigation and action where necessary. All prisoners should know how to report discrimination incidents. (S44)	Agreed	<p>The induction programme review will consider how prisoners' protected characteristics are identified and recorded.</p> <p>Monitoring data on prisoners' protected characteristics is collected locally and has previously been collated and analysed nationally but this has not been consistent and requires a refreshed approach. HM Prison &amp; Probation Service (HMPPS) Equalities Interventions and Operational Practice Group (EIOGP) are working to address this as part of a review of the Equalities Prison Service Instruction (PSI) 32/201) – Ensuring Equality.</p> <p>Through the implementation of the Offender Management in Custody (OMiC) model, further resources will be allocated to the equalities function to achieve consistency of staffing, to improve data collation, monitoring, and ensuring thorough investigations are completed and follow up action points are taken where necessary.</p> <p>A notice to staff and prisoners has been published and will be re-published quarterly to ensure prisoners' have a good understanding of how to report incidents under the Discrimination Incident Reporting Form (DIRF) process. Communication will be channelled through Radio Wanno and wing kiosk advertisements.</p> <p>Nationally, as part of the Lammy Review, the current system for reporting incidents of discrimination – 'Discrimination Incident Reporting Form (DIRF)' process is under review. HMPPS EIOGP are working to improve its efficiency, with renewed emphasis on prisoner understanding of the process and accessibility. Prisoners have been widely consulted as part of the review.</p>	Governor	September 2018
				Executive Director, Rehabilitation & Assurance	Ongoing
				Governor	April 2019
				Governor	Completed and Ongoing
				Executive Director, Rehabilitation & Assurance	Ongoing
5.6	The time unlocked should be increased and prisoners should have daily access to	Partly Agreed	This is recommendation is partly agreed as HMP Wandsworth would require additional funding to achieve more time unlocked, and HMPPS is not in a financial position to increase HMP Wandsworth's budget. Currently, under a		



	association and outside exercise provided at publicised scheduled times. (S45)		<p>Green and Amber/Green regime every prisoner has a period (at least an hour) of unlock to complete domestic activities and an additional 30 minutes outside exercise.</p> <p>Access to time out of cell and daily outside exercise is part of the published regime and further governance around consistent regime delivery is being developed through the introduction of accountability logs to measure the increase of time out of cell. This will be monitored by the Deputy Governor.</p>	Governor	April 2019
5.7	There should be enough activity places to provide educational, vocational and work places for the whole population. Participation and attendance in activities should be consistently high, and punctuality should be good, ensuring that working time is fully productive. A high proportion of prisoners who start on any course should complete it and achieve the qualification. (S46)	Partly Agreed	<p>This recommendation is partly agreed as HMP Wandsworth cannot occupy all prisoners with full-time activity due to resource constraints, and HMPPS is not in a financial position to increase HMP Wandsworth's budget.</p> <p>A review of the number of activity places at HMP Wandsworth will take place to ensure there are as many work places available as possible within resource constraints.</p> <p>A review of the staffing model and systems within the Activity Hub will take place to ensure that all prisoners are appropriately allocated to activities and support will be available from within the London Prisons Group to ensure the review incorporates best practice. Support will be given from Residential Managers to ensure prisoners attend activities promptly when required and the regime will be reviewed to ensure it includes an appropriate number of activity hours per day.</p> <p>Much of HMP Wandsworth's education curriculum has now been unitised to ensure units (qualifications are built from these) can be completed even when a prisoner is only in HMP Wandsworth for a short period of time. Where available, information about length of stay will be factored into course allocation decisions.</p>	<p>Governor</p> <p>Governor</p> <p>Director of Novus and Governor</p>	<p>September 2018</p> <p>September 2018</p> <p>Completed and Ongoing</p>
	<b>Recommendation to the Home Office</b>				
5.8	There should be a time limit on immigration detention (2.42)	Not Agreed	<p>This recommendation is not agreed. The Home Office only detains with a view to deport / remove and has no wish to detain people for any longer than necessary whether in prisons or elsewhere.</p> <p>The Government believes that the introduction of an artificial and arbitrary time limit on immigration detention would serve only to encourage individuals, including those who present a risk to the public, to refuse to comply with immigration processes until they reach the point at which they have to be released from detention, and therefore frustrate their removal from the United Kingdom. That would not be in the public interest. Whilst the Home Office aims to deport foreign national offenders at the earliest opportunity, some detainees</p>	Home Office	



			<p>will repeatedly refuse to comply with the deportation process, Factors such as this, along with a history of absconding or a risk or harm to the public, can lead to detention in prisons being prolonged. Nearly all individuals held under immigration powers in prisons are foreign national offenders, who will be transferred to immigration removal centres only after careful risk assessment, which is in the interests of the public given the more open regime of immigration removal centres.</p>		
5.9	<p>Detainees should only be held in prisons in exceptional circumstances. (2.43)</p>	Not Agreed	<p>This recommendation is not agreed as this would not be in the interests of the public. The Home Office only detains with a view to deport / remove and has no wish to detain people for any unnecessary reasons, whether in prisons or elsewhere.</p> <p>Whilst the Home Office aims to deport foreign national offenders at the earliest opportunity, some detainees will repeatedly refuse to comply with the deportation process. Factors such as this, along with a history of absconding or at risk or harm to the public, can lead to detention in prisons being necessary or prolonged. Nearly all individuals held under immigration powers in prisons are foreign national offenders, who will be transferred to immigration removal centres only after careful risk assessment, which is in the interests of the public given the more open regime of immigration removal centres.</p>	Home Office	



	<b>Recommendation to HMPPS and Governor</b>				
5.10	The most effective and dignified methods that are available should be used to identify contraband on prisoners being received into the establishment. Strip-searching should only be used where it is clearly justified by evidence of effectiveness or individual risk. (1.10)	Agreed	<p>HMPPS agrees the principle that searching of the person for contraband upon reception the most effective and dignified methods available should be deployed. The local searching strategy will set out how this principle will be applied at HMP Wandsworth.</p> <p>In terms of full searching, HMPPS position is that the evidence of effectiveness justifies its routine use in some circumstances, as set out in PSI 07/2016 Searching of the Person. This includes full-searching of prisoners on initial entry to prisons. All prisons must comply with the PSI's minimum requirements. Full searching is an essential method used to find items of contraband secreted on a person and to prevent its importation into prisons. HMPPS has a duty of care to prevent and deter illicit items from entering prisons which could be used by a prisoner to harm themselves or others.</p> <p>The Head of Security will review the risk assessment for routine full searching in line with the PSI and consider the appropriate use of full searching locally, reflecting any changes in the local searching strategy.</p>	Governor	January 2019
	<b>Recommendations to the Governor</b>				
	<b>Early Days in Custody</b>				
5.11	All prisoners should be able to access their personal property on their first night in custody. (1.11)	Not Agreed	<p>This recommendation is not agreed due to resource implications. Every effort is made to ensure that prisoners are able to access their property on the first night in custody. However, this is often dependent on the prisoners' arrival time and available staffing resources to process the property. If a prisoner does not receive his property on the first night he will receive it the next day.</p> <p>A review of the current property process will be undertaken to identify any local improvements that can be made.</p>	Governor	September 2018
	<b>Managing Behaviour</b>				
5.12	Managers should ensure that the IEP scheme is an effective tool for behaviour management. (1.16)	Agreed	A senior manager has been commissioned to review the Incentives Earned Privileges (IEP) scheme to ensure it is fair and effective. The review will include prisoner consultation and from this an effective tool for behaviour management will be produced.	Governor	November 2018





5.13	Reports of the use of force should be completed by every officer involved and should provide a detailed explanation for the use of force and a full description of the experience of the member of staff. (1.26)	Agreed	A quality assurance process, managed by the Deputy Governor and supported by a newly recruited UoF co-ordinator, is in place to check Use of Force (UoF) reports and provide feedback if not completed to the required standard. Control and Restraint instructors have been assigned areas of responsibility. A database of outstanding paperwork is kept and disseminated. All new officers are being provided with relevant training during their shadow period and this will be expanded to other new staff joining.	Governor	December 2018
5.14	All trained staff should wear body cameras. (1.27)	Agreed	<p>The location of the Body Worn Video Camera (BWVC) storage system will be changed to allow improved access to cameras by staff, and additional cameras will be purchased to enable all staff to wear one – additional funding will be made available for these purposes.</p> <p>Data is available which identifies when cameras are not collected by staff. Staff are aware that, when trained, they should wear a BVWC. During the daily operational morning meeting, the Violence Reduction team provide a briefing of the total number of cameras drawn and the numbers within each area of the prison. Remedial action is taken if any area has fewer than three cameras.</p>	Governor  Governor	December 2019  Completed
5.15	Paperwork authorising the use of special accommodation should provide clear justification for its use and should demonstrate regular reviews by a senior manager. (1.28)	Agreed	<p>All senior managers have been informed and reminded of the need to regularly review the use of special accommodation and to record their justification decision making on the relevant authorisation paperwork. A quality assurance process is in place, managed by the Deputy Governor, to identify any issues with a lack of justification and this is followed up with individual members of staff.</p> <p>All Segregation Unit staff, Custodial Managers and Operational Managers have received training outlining use and authorisation of special accommodation procedures.</p>	Governor  Governor	Completed  Completed
5.16	Segregated prisoners should have the opportunity to spend at least one hour in the open air and make a telephone call every day. (1.33)	Partly Agreed	The recommendation is partly agreed. Prison Service Order 1700 Segregation, does not mandate a time period with regards to time in open air, but it makes it clear that the regime for segregated prisoners and access to activities, including exercise, should be comparable to those of a prisoner on normal location. The minimum daily exercise in the open air requirement for prisoners on ordinary location of 30 minutes as set out in PSI 75 / 2011 Residential Services, equally applies to those who have been segregated. This provision is mandatory,	Executive Director, Security, Order and Counter Terrorism	



			<p>subject to weather conditions and the need to maintain good order and discipline.</p> <p>The opportunity for prisoners to make a daily telephone call is agreed and has been implemented.</p>	Governor	Completed
	<b>Security</b>				
5.17	A full intelligence picture should be gathered, acted on without delay and used effectively to prioritise and manage identified risks. (1.42)	Agreed	<p>A process is now in place where security managers on a daily basis check intelligence reports and identify any issues or risks that require immediate attention. This is discussed at the daily operational briefing.</p> <p>A new structure will be introduced to allow for monthly briefings between the Head of Security and the Deputy Governor around a full intelligence picture which will inform the local tactical assessment. This will be presented at the local security meeting. The intelligence streams will include local threat assessments to look at key threats through information received from: Incident Reporting System, Nominals, corruption prevention information, briefings and incident reporting.</p>	Governor  Governor	Completed  September 2018
5.18	The mandatory drug testing programme should be adequately resourced to complete the required level of target testing and all requested suspicion tests within required timeframes. (1.43)	Agreed	<p>An assessment of this need is taking place and additional resources will be put in place to adequately resource the Mandatory Drug Testing (MDT) programme.</p> <p>MDT will take place as required and an appropriate amount of suspicion testing will take place based on risk.</p>	Governor  Governor	November 2018  April 2019
	<b>Safeguarding</b>				
5.19	The Listener rota should provide adequate cover across the prison at all times, and Listener suites should be prepared and ready for use. (1.49, repeated recommendations 1.36 and 1.37)	Agreed	<p>The Listener rota has been revised to ensure there is adequate cover across the prison at all times regardless of location.</p> <p>A process will be implemented to incorporate daily checks of all Listener suites to satisfy whether they are fit for purpose. This action will be carried out by a Safer Custody Manager.</p>	Governor  Governor	Completed  November 2018



	<b>Staff-Prisoner Relationships</b>				
5.20	Managers should ensure that staff learn and practise habits of positive interaction with prisoners. (2.5)	Agreed	<p>Five Minute Intervention training has been completed at HMP Wandsworth (this is an effective Programme which engages prisoners and challenges both staff and prisoners to interact in a different way).</p> <p>The OMiC model aims to support positive staff prisoner relationships. It is being implemented in two phases. The key worker role will replace all Personal Officer schemes where they are currently operating. It provides a different approach with mandatory time for all individuals in custody to see their key worker. The aim is to provide space for prisoners to feel safe and calm. They will be motivated to progress, signposted and supported into services and build a relationship which encourages greater disclosure. It provides a more structured proactive approach than the personal officer scheme. Keyworker implementation is planned to be fully rolled out across the prison by March 2019. The start of the case management implementation will be agreed between Divisional implementation boards and HMPPS. It will be during 2019 after extensive preparation.</p>	<p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>Ongoing by 2019</p>
	<b>Daily Life</b>				
5.21	All prisoners should be able to have a shower every day in clean and well-maintained facilities with adequate privacy. (2.11, repeated recommendation 2.8)	Agreed	<p>Some initial refurbishment of showers has taken place. However, the showers would need significant capital investment to achieve the <u>desired</u> standard.</p> <p>All the showers at HMP Wandsworth will be refurbished in due course, subject to the allocation of funding that HMPPS is confident will be made. In the interim, the HMPPS National Service Management, Priority Prisons Team are liaising with specialist contractors to facilitate refurbishment of the five highest priority showers; this element of the works will be delivered within the current financial year.</p> <p>A privacy screen installation survey will be conducted and will be dependent on funding.</p>	<p>Executive Director, Estate Transformation</p> <p>Executive Director, Estate Transformation</p> <p>Governor</p>	<p>April 2019</p> <p>April 2019</p> <p>Completed and Ongoing</p>



5.22	Cell call bells should always be answered within five minutes. (2.12)	Not Agreed	<p>This recommendation is not agreed as PSI 75/2011 Residential Services states that residential staff must respond promptly to calls for assistance. The PSI does not set a specific timescale for calls to be answered.</p> <p>HMP Wandsworth has made significant progress in the time staff answer cell bells. All residential governors will have an audit process in place that will be checked by the Deputy Governor.</p>	Director Prisons Policy, Ministry of Justice / Governor	
5.23	Breakfast should be served in the mornings, rather than being issued in packs the previous night, and lunch should be served between noon and 1.30pm. (2.17)	Not Agreed	<p>This recommendation is not agreed as the contents of breakfast packs are suitable to be stored in prisoner accommodation overnight. The serving of breakfast packs the evening before is a well-established practice across the prison estate and one which contributes to a swifter start to the morning regime, including start time for work and other activities.</p> <p>Whilst the lunch meal is often served before noon due to regime purposes, this is a cold meal. Prisoners are encouraged to eat it in the afternoon in order to allow a large number of prisoners to be able to have access to purposeful activity; the time taken to serve the meals; and funded staffing.</p>	Executive Director of Prisons and Governor	
5.24	Newly arrived prisoners who are waiting for a shop order should be able to purchase enough goods to avoid debt to other prisoners. (2.18, repeated recommendation 2.125)	Partly Agreed	This recommendation is partly agreed, due to the DHL contractual constraints which only provide for Emergency Canteen. Local systems will be reviewed to see if there is opportunity for those prisoners with funds to receive earlier access to canteen. Prisoners' first prison shop order will be received if prisoners have funds in their spending account after two weeks	Governor	December 2018
5.25	Complaints and applications should be acknowledged and answered promptly, with reliable tracking and monitoring to ensure good use of and confidence in these systems. (2.26)	Agreed	<p>Complaint responses are now tracked and timeliness has improved, in line with required timescales. HMP Wandsworth will develop processes to ensure that all complaints are acknowledged with a holding response provided to prisoners.</p> <p>Quality assurance of complaints by the Senior Leadership Team will be introduced to monitor the effectiveness of the system. The prisoner council will also be asked to feed back on the complaints system.</p>	Governor  Governor	October 2018  October 2018



			The applications process will move to a kiosk system which will greatly improve the service and quality assurance will also be introduced to monitor the use of the process, this will take place by Heads of Functions.	Governor	October 2018
5.26	Prisoners should have swift and easy access to legal visits, bail information and advice. (2.27)	Partly Agreed	<p>This recommendation is partly agreed as availability does not meet the demand and access to bail information and advice is not routinely provided by the Community Rehabilitation Company (CRC) and there is no other provision available.</p> <p>The Prisoner Advice Service and Bail for Immigration Detainees hold regular bail clinics in the library and the CRC are encouraged to provide prisoners with bail information and advice.</p> <p>A review of the legal visits process has taken place, and the area has been expanded which has increased the provision from 15 to 23 rooms.</p>	<p>Chief Executive, London Community Rehabilitation Company and</p> <p>Governor</p>	<p>Completed</p> <p>Completed</p>
	<b>Equality, Diversity and Faith</b>				
5.27	Professional telephone interpreting should be used to communicate with prisoners who do not speak English when confidentiality or accuracy is required. (2.44)	Agreed	Promotion of the professional telephone interpreting service is in place. Posters and notices to staff have been published. Use of interpretation services is featured in the Equalities Action Plan. Monitoring of the usage of service will continue to take place through bi-monthly Equalities meetings chaired by the Governor or Deputy Governor. Where it is discovered that prisoners are not fully using the service, this is addressed. Further promotion and communication of these services will take place.	Governor	Completed and Ongoing
5.28	Prisoners with disabilities should have their needs assessed and reasonable adjustments made to meet these needs. (2.45)	Agreed	<p>The induction review will include a method for identifying prisoners with disabilities. Residential staff will work in conjunction with Healthcare to identify where possible, what reasonable adjustments can be made to improve the facilities for prisoners with disabilities.</p> <p>Funding has been secured to refurbish the shower on C1 landing, which will address the concern(s) about the showering facilities.</p>	<p>Governor</p> <p>Executive Director, Estate Transformation</p>	<p>September 2018</p> <p>April 2019</p>
5.29	Wing officers should know which prisoners in their care	Agreed	Personal Emergency Evacuation Plans (PEEP) will be in place for prisoners requiring one. Residential Managers will ensure that these plans remain up to	Governor	December 2018



	require assistance in the event of an emergency.(2.46)		<p>date and assurance checks will be introduced. All Wing Officers will be notified of which prisoners have a PEEP and communicated at the start of each shift.</p> <p>Additionally, OMiC funding will be used to dedicate a resource to Equalities and develop a more coordinated approach to the movement of prisoners between wings, which will address inconsistencies that are currently present.</p>	Governor	December 2018
5.30	Older and disabled prisoners who are retired or unfit to work should not be locked in their cell during the core day. (2.47)	Partly Agreed	<p>This recommendation is partly agreed as it is not possible to indicate at this stage how much out of cell time will be available.</p> <p>The regime and staffing model will be reviewed as part of the OMiC implementation and consideration will be given to provide more time out of cell for older and disabled prisoners.</p>	Governor	April 2019
5.31	All faith facilities should be bright, well decorated and structurally sound. The main chapel should be repaired to ensure the roof does not leak and the walls are free from water damage. (2.50)	Partly Agreed	<p>HMP Wandsworth will ensure the faith facilities are decorated well, but this recommendation is not agreed in full because the prison cannot at this time commit to the availability of funding to complete all this work.</p> <p>A structural survey to repair the Chapel roof will be conducted. HMPPS is currently awaiting definitive decisions about funding and timescales of commencement of these works.</p>	Executive Director, Estate Transformation and Governor	September 2018 and Ongoing
	<b>Health, Well-Being and Social Care</b>				
5.32	Prisoners should have timely access to all primary care services, equivalent to the community (2.76)	Agreed	<p>The Offender Healthcare Service (OHS) will implement NHS Health checks for Prisoners aged over 55 years old.</p> <p>The OHS will undertake a review of podiatry and ophthalmic waiting lists. A cleansing lists exercise will be undertaken as required to ascertain the validity of holding additional clinics to reduce waiting times.</p> <p>The OHS will review current availability of clinic rooms to ascertain if it is possible to implement physiotherapy clinics.</p> <p>The OHS will review the viability of implementing on site bone x-ray clinics.</p>	<p>Director St George's University Hospitals NHS Foundation Trust</p> <p>Director St George's University Hospitals NHS Foundation Trust</p> <p>Director St George's University Hospitals NHS Foundation Trust</p>	<p>November 2018</p> <p>December 2018</p> <p>January 2019</p> <p>January 2019</p>



5.33	The failure to attend rate for all clinics should continue to be monitored and appropriate remedial action taken to reduce it. (2.77)	Agreed	<p>Attendance rates are monitored and will continue to be monitored weekly by the OHS and information is provided weekly to the prison. Remedial action to reduce non-attendance is addressed by the prison where necessary. Assurance is in place and is monitored by a dedicated Operational Prison Manager for Healthcare.</p> <p>The Practice Operations Manager is spending time shadowing prison staff responsible for getting prisoners to clinics, to identify improvements to be made. Introduction of an electronic medical application form has begun and is at the implementation stage. This should prevent multiple repeated applications being lodged by prisoners as well as enabling and an improved monitoring of prisoner medical application forms.</p>	<p>Director St George's University Hospitals NHS Foundation Trust and Governor</p> <p>Director St George's University Hospitals NHS Foundation Trust / Governor</p>	<p>Completed and Ongoing</p> <p>October 2018</p>
5.34	All patients on the inpatient units should have access to a therapeutic regime. (2.78)	Partly Agreed	<p>This recommendation is partly agreed, as a therapeutic regime will not be suitable for all patients located in the inpatient unit, and the process will be managed owing to the risk they present.</p> <p>The therapeutic timetable has been reviewed to enable further activities to be provided to patients. Unit staff escalate any issues where a therapeutic regime cannot be provided and the OHS will continue to do so.</p>	Director St George's University Hospitals NHS Foundation Trust and Governor	Completed and Ongoing
5.35	Effective joint working between the prison, local authority and health providers should ensure prisoners with social care needs are promptly identified, assessed and given appropriate and safe support by staff and peers. (2.82)	Partly Agreed	<p>This recommendation is partly agreed as delivery is dependent on the Local Authority (LA). Whilst the LA are statutorily responsible for the assessment of social care needs and for providing services to meet eligible needs, it does require HMP Wandsworth to enable their work and for the Governor to lead the partnership working arrangements.</p> <p>Wandsworth Social Services are responsible for publicising services, assessment, care planning and support services. The Governor is responsible for identifying need and referring individuals to the LA service and enabling the LA to carry out their statutory duties in the prison.</p> <p>Significant efforts have been made by the prison and health provider to develop effective joint working. HMP Wandsworth has recently made contact with the LA senior leads to improve arrangements.</p> <p>The memorandum of understanding is under review and the LA have committed to improving the social care services at HMP Wandsworth, and will be delivering</p>	<p>Director of Social Care, Local Authority and Governor</p> <p>Director of Social Care, Local Authority</p>	<p>Completed</p> <p>December 2018</p>



			<p>training to local staff. This will ensure the understanding of social care needs is improved so that prison staff can facilitate appropriate and safe support.</p> <p>At regional level, HMPPS is putting in place structures to support the London Social Care / Safeguarding prison leads, to improve engagement with local authorities and develop effective systems and processes to improve the delivery of care to men in prison. HMPPS is also reviewing Safeguarding processes and policies and looking to develop regional training/awareness raising and good practise guidelines for prison staff.</p>	Executive Director, Rehabilitation & Assurance and Prison Group Director for London	Ongoing
5.36	The range of primary mental health services should be extended to support prisoners with mild and moderate mental health problems more fully. (2.92)	Partly Agreed	<p>This recommendation is partly agreed due to commissioning considerations and affordability. There were intentions for a Health and Wellbeing model to be developed and implemented which would address these issues. However, due to a notification from St George's University Hospital of its intended withdrawal from the healthcare contract in 2019, commissioners have requested that the work-stream be discontinued.</p> <p>However, commissioners plan to incorporate a new Health and Wellbeing model into the new tendered contract.</p>	Director St George's University Hospitals NHS Foundation Trust	September 2019
5.37	All discipline officers should receive mental health awareness training to enable them to identify and support prisoners with mental health conditions. (2.93)	Agreed	<p>Suicide and Self Harm training module six is being rolled out to all Prison Officers, which covers mental health awareness training.</p> <p>Further training from NHS England (NHSE) will be delivered to key staff such as Violence Reduction, First Night, Induction and Safer Custody.</p>	Governor  Governor	April 2019  April 2019
5.38	Patients requiring a transfer under the Mental Health Act should be transferred expeditiously and within the current transfer guidelines. (2.94, repeated recommendation 2.112)	Partly Agreed	<p>This recommendation is partly agreed. Although every effort is made to expedite transfers and assess patients promptly, transfers are dependent on several factors such as the completion of appropriate assessments and administrative processes within the NHS and the availability of accommodation in mental health hospitals.</p> <p>NHSE has developed a plan to improve services for prisoners with mental health issues, and includes specific reference to timely transfer and remission of patients and information about how this will be implemented and sustained.</p>	National Director of NHS England (NHSE)	Completed





			<p>The Prison Transfer and Remission Guidance published by the Department of Health in 2011 has not been agreed by NHSE. NHSE will be consulting on new guidance in relation to transfer and remissions in the first quarter of 2018-19, with timescales that consider clinical urgency and need.</p> <p>Locally, a clinical pathway will be reviewed to ensure clear processes are in place to assess patients transferred to a secure mental health setting. All transfers, from point of enquiry to complete transfer will be tracked and monitored. Delays will be documented and escalated in a timely manner.</p>	<p>National Director of NHSE</p> <p>Director St George's University Hospitals NHS Foundation Trust and Governor</p>	<p>April 2019</p> <p>December 2018</p>
5.39	The substance misuse strategy, including supply reduction, should be informed by a current needs assessment and supported by a comprehensive action plan. It should be reviewed at well-attended monthly substance misuse strategy meetings. (2.101)	Agreed	<p>The current substance misuse strategy will be subject to an immediate review including the commissioning of a needs assessment, and supported by a comprehensive action plan.</p> <p>Managerial oversight has been increased in this area. The Governor will chair the Substance Misuse Strategy meetings and will be responsible for the delivery of the strategy. The terms of reference of the meeting will be reviewed to promote good attendance.</p>	<p>Director St George's University Hospitals NHS Foundation Trust</p> <p>Governor</p>	<p>September 2018</p> <p>December 2018</p>
5.40	Prisoners on all wings should have easy access to the full range of psychosocial support services in a suitable environment. (2.102)	Partly Agreed	<p>This recommendation is partly agreed as it is not clear whether there is suitable accommodation available to provide a full range of psychosocial support services.</p> <p>OHS will review the provision for psychosocial support services and take action to ensure it meets the needs of the prisoners.</p> <p>An accommodation review will take place to look at the feasibility of prisoners having access to a suitable environment.</p>	<p>Director St George's University Hospitals NHS Foundation Trust</p> <p>Governor</p>	<p>August 2018</p> <p>December 2018</p>
5.41	All medicines should be administered at the required time and officers should manage and supervise all medicine queues effectively, to protect patient confidentiality and reduce opportunities for bullying and diversion. (2.111)	Partly Agreed	<p>This recommendation is partly agreed due to operational reasons. Queues for controlled medicines are supervised effectively. Not all medicine queues are for controlled medicines. It is not possible to supervise all medicine queues due to current staffing levels.</p> <p>The OHS will undertake a work-stream to increase the number of in possession medications. HMP Wandsworth and the provider have agreed a new regime for medication hatch timings and this will be implemented from September 2018.</p> <p>A review will be undertaken by the Head of Pharmacy and Nursing services to ensure that medications are being administered at the required times.</p>	<p>Director St George's University Hospitals NHS Foundation Trust</p> <p>Director St George's University Hospitals</p>	<p>September 2018</p> <p>September 2018</p>



			Supervision of medication queues will also be reviewed to ensure that queues are effectively managed to protect patient confidentiality and prevent opportunities for bullying and diversion.	NHS Foundation Trust Governor	December 2018
5.42	Patients should be provided with a facility to store their medication securely. (2.112, repeated recommendation 2.94)	Partly Agreed	Medication storage facilities have been purchased and will be fitted by December 2018.	Governor and Executive Director, Estate Transformation	December 2018
5.43	The pharmacy should provide effective oversight and governance of the purchase of Paracetamol from the canteen list to ensure safe use. (2.113)	Agreed	A new process has been developed within the electronic medical record to enable clinicians when providing care and treatment to be able to view the patients Paracetamol usage. Prison staff regularly provide the healthcare team with a list of prisoners in possession of Paracetamol.	Director St George's University Hospitals NHS Foundation Trust / Governor	Completed
	<b>Time Out of Cell</b>				
5.44	Available data on the number and category of prisoners borrowing books and other resources should be better used, to ensure full equitable access to the library and to promote the benefits of using library services to all prisoners. (3.14)	Agreed	Monitoring is in place to check whether prisoners are having regular and equitable access to the library.  The Head of Reducing Reoffending will ensure the benefits of using the library services is promoted to all prisoners through different channels of communication such as Radio Wanno, Kiosks, and Induction.  The Head of Reducing Reoffending will implement a system to analyse library data and present it at the Reducing Reoffending meeting(s).	Governor  Governor  Governor	Completed  November 2018  December 2018
	<b>Education, Skills and Work Activities</b>				
5.45	Prison managers should ensure that the allocation process is equitable and efficient and that prisoners always attend a course of direct benefit to them. (3.24)	Agreed	Custody plans and activities plan will be written taking into consideration educational needs so that courses are beneficial to individual prisoners.  The Head of Reducing Reoffending will review the induction and allocations processes to stream-line them in anticipation of the prison becoming a reception prison (to specialise in supporting courts, allocating sentenced individuals quickly so that they can receive the services they need either in a training or resettlement prison), which will substantially increase the numbers of prisoners	Governor  Governor	December 2018  March 2019



			requiring assessment and allocation. The establishment will review the processes by considering the relevant information on the BCST 2 to ensure it is linked into the allocation process.		
5.46	Prison managers should ensure that all positive outcomes arising from the resolution of weaknesses in induction, initial assessment, attendance and engagement in purposeful activities can be tracked and measured using accurate data. (3.25)	Agreed	<p>A new allocations and attendance tracking system was introduced in May 2018 which allows identification of attendance and engagement in purposeful activities data to be tracked and measured.</p> <p>Improvements will be made to the activities hub to ensure accurate data is used and reflects positive outcomes arising from the resolution of weaknesses in the induction process.</p>	Governor  Governor	Completed  December 2018
5.47	Prison and Novus managers should ensure that protocols for the administration of learner withdrawals from courses are applied consistently and accurately, leading to a significant and measurable reduction in withdrawals. (3.26)	Partly Agreed	<p>This recommendation is partly agreed as the churn and transfer of prisoners is likely to increase when HMP Wandsworth becomes a reception prison and the focus will be to serve the courts and sentenced prisoners will be transferred out to training prisons and prisons with resettlement facilities. It is not possible to provide assurance that withdrawals from courses will significantly reduce.</p> <p>The Head of Reducing Reoffending will however closely track withdrawals and manage reasons for doing so.</p>	Governor	Ongoing
5.48	Agencies involved in coordinating and organising prisoners' progress to education, training or employment (ETE) on release should have accurate data on the numbers progressing to ETE. (3.27)	Agreed	<p>This information is currently recorded in the management information log and is updated on a monthly basis within the Governors report.</p> <p>London CRC will continue to identify education, training or employment (ETE) needs and refer to the relevant pathway for support with ETE on release. London CRC will review their data collection of prisoners entering ETE on release.</p> <p>HMPPS is aware that the performance of the probation system, including 'Through the Gate (TTG)' resettlement services for all those leaving custody, needs to improve. On 27 July 2018 a consultation, 'Strengthening Probation, Building Confidence,' was published outlining a number of proposals to stabilise and improve probation delivery.</p>	Governor  Director of London CRC  Executive Director, Community Interventions	Completed  November 2018  Ongoing



			HMPPS is in discussions with current providers to enhance the TTG offer in existing CRC contracts, and increasing the level of service expected from them. HMPPS wants to make sure the TTG service provides a wide range of support, to incentivise offenders to take responsibility for their own rehabilitation – so the cost of reoffending can be cut and better protect the public.	Executive Director, Community Interventions	Ongoing
5.49	Prison and Novus managers should ensure that all prisoners receive a timely and effective induction to education, skills and work which includes an accurate assessment of their English and mathematics skills. The outcomes of initial assessment should be recorded promptly and made available to teachers so that they can plan and promote individuals' learning and track their progress effectively. (3.37)	Agreed	<p>The Head of Reducing Reoffending, in conjunction with the Education Manager, will review the induction and allocation processes and streamline these to ensure that all prisoners receive a timely and effective induction to education, skills and work, which includes an accurate assessment of English and mathematics skills. Outcomes of assessments will be recorded promptly to ensure they are available to teachers and are utilised. The new process will ensure that BCST assessment precedes the BCST 2, during which custody and activities plans will be written factoring in educational needs.</p> <p>The Head of Reducing Reoffending holds the Offender Learning and Skills Service (OLASS) provider accountable for communicating BCST results to teachers, this is done through the Quality Improvement Group (QIG).</p>	Governor  Governor	December 2018  Completed and Ongoing <i>(reviewed monthly at the QIG)</i>
5.50	Prison and Novus managers should ensure that teachers' professional practice improves so that all teaching, learning and assessment becomes at least good. (3.38)	Agreed	<p>Novus will implement a range of quality assurance measures to raise learning and assessment including teaching standards. A programme of grading observations will be included to ensure accuracy and consistency of grading and adopting fortnightly learning walks to monitor the quality of teaching, learning and assessment.</p> <p>Staff performance related one to one reviews will be conducted if any concerns arise identified from teaching observations or through learning walks. The Head of Reducing Reoffending will monitor the impact of these measures through the QIG.</p>	Director of Novus and Governor  Director of Novus and Governor	December 2018  March 2019
5.51	Prison and Novus managers should ensure that prisoners with learning support plans receive adequate and effective support during education and training sessions without detriment to other prisoners' learning. (3.39)	Agreed	<p>Novus will review and recruit a learning support specialist to provide specialist support at HMP Wandsworth for prisoners on with learning support plans.</p> <p>Novus will provide refresher training to staff on learning support.</p>	Director of Novus and Governor  Director of Novus and Governor	August 2018  September 2018



	<b>Children and Families and contact with the outside world</b>				
5.52	Family days and other opportunities for prisoners to rebuild and maintain relationships with their families should not be restricted by IEP status or adjudication history. (4.6)	Agreed	<p>IEP and Prisoner Discipline procedures policies advise that no punishment awarded following an adjudication or reduction in IEP status should result in a prisoner forfeiting anything that must be provided or allowed under the Prison / YOI Rules (i.e. things that are statutory rather than a privilege). The existing IEP PSI does not include any specific requirements for family days. The new IEP Policy Framework will exclude the use of IEP as a determining factor for access to family days.</p> <p>Family days and other opportunities for prisoners to rebuild and maintain family and other appropriate relationships for prisoners who do not have family, will be offered based on a risk assessment process, not through their IEP status or adjudication history.</p>	<p>Director Prisons Policy, Ministry of Justice</p> <p>Governor</p>	<p>Completed and Ongoing</p> <p>November 2018</p>
5.53	A wide range of hot and cold food and drinks should be available for visitors to buy. (4.7)	Agreed	A range of hot and cold food and drinks are now available in the visits hall for visitors to purchase.	Governor	Completed
	<b>Reducing Risk, Rehabilitation and Progression</b>				
5.54	Offender supervisors should be redeployed only in exceptional circumstances. (4.21)	Agreed	<p>Redeployment of Offender Supervisors (OSs) is monitored by the Governor during morning staff briefings. Only in exceptional circumstances, where the staffing position prevents the safe operating of a regime would OSs be redeployed.</p> <p>The position will improve once the target staffing figures for operational Prison Officers and Prison Offender Managers are met and the OMiC model is implemented at HMP Wandsworth.</p>	<p>Governor</p> <p>Governor</p>	<p>December 2018</p> <p>April 2019</p>
5.55	The reducing reoffending needs analysis should incorporate OASys data to reflect effectively need relating to the reduction of risk and harm. (4.22)	Agreed	A reducing reoffending needs analysis is conducted at HMP Wandsworth annually. The Head of Reducing Reoffending will ensure that the next and future analysis incorporates Offender Assessment System report (OASys) data.	Governor	February 2019
5.56	All prisoners meeting the criteria should have an up-	Agreed	The need for an up to date OASys continues to remain a priority for Offender Management Unit (OMU) Managers. Since HM Inspectorate of Prisons	Governor	December 2018



	to-date OASys which is appropriately orientated towards managing and addressing risk of harm and reoffending. (4.23)		inspection there has been continued improvement in this area. OASys will continuously be monitored by staff in OMU, and quality assured by the Head of OMU to ensure OASys focus on any risk of harm and reoffending.		
5.57	The criteria for downgrading prisoners' security category should be clarified and applied consistently. (4.24)	Agreed	The criteria for downgrading prisoners' has been clarified and all staff involved in the process are now fully aware of the criteria to follow. Management oversight is in place to quality assure and ensure decision making is consistent.	Governor	Completed
5.58	All men identified as presenting a risk to children and/or who are subject to harassment restrictions should be informed at the earliest opportunity and restrictions should be explained. (4.25)	Agreed	The Head of OMU will review the process to ensure that all prisoners identified as posing a risk will be informed at the earliest opportunity and have their restriction order(s) explained. A robust assurance system will be developed and introduced to staff.	Governor	December 2018
5.59	The monitoring of mail and telephone calls should be consistently applied in line with national guidelines.(4.26)	Agreed	The Head of OMU will conduct a review the current resources to assess whether further resources can be assigned to mail and telephone monitoring and ensure national guidelines are being met in accordance with PSI 49/2011 Prisoner Communications Services.	Governor	December 2018
	<b>Interventions</b>				
5.60	All prisoners with an identified need should be able to access appropriate interventions to address their offending behaviour. (4.31)	Not Agreed	This recommendation is not agreed as there are no current plans to fund a needs assessment or to introduce such interventions at HMP Wandsworth. There are a number of interventions available at other prisons. Prisoners will be allocated to sites with appropriate interventions at the appropriate point in their sentence.	Director Commissioning, Ministry of Justice and Governor	
5.61	Outcome data on debt management and sustainable housing should be made available routinely, analysed through the reducing reoffending	Partly Agreed	This recommendation is partly agreed as this will be carried out by the CRC partnership meeting and not by the Reducing Reoffending Strategy Group.  Monthly data on housing and debt management is produced via a monthly data report. The Head of Reducing Reoffending also chairs a monthly viewpoint meeting with London CRC where data is shared and discussed.	Governor	Completed



	strategy group and used to determine the most effective interventions for prisoners. (4.32)		The London CRC will be encouraged to collate the required data and share it with HMP Wandsworth at which point the data will be analysed, and used to determine appropriate interventions for prisoners.	Director of London CRC / Governor	September 2018
	<b>Release Planning</b>				
5.62	All sentenced prisoners should have a clear resettlement plan outlining all work that has been undertaken to reduce the risk of reoffending and what is outstanding. This should include the work of all departments. (4.37)	Agreed	London CRC are responsible for coordinating resettlement activity at HMP Wandsworth. The BCST 2 will form the initial custody plan for sentenced prisoners and this will be updated at BCST 3. This will outline all work undertaken to reduce the risk of reoffending, remaining outstanding work and the work of all departments who can have an impact on the resettlement plan. The CRC will be encouraged to ensure that all resettlement activity completion is reflected in the BCST 3 and handover documents are provided to the community including the TTG support provided by partners.	Director of London CRC and Governor	December 2018
5.63	The reducing reoffending strategy group should ensure that all departments share activity data appropriately to facilitate pre-release engagement and through-the-gate support. (4.38)	Agreed	The Head of Reducing Reoffending will promote the Reducing Reoffending Strategy Group to ensure that all departments appropriately share activity data to facilitate pre-release engagement and TTG.	Director of London CRC and Governor	December 2018

<b>Recommendations</b>	
Agreed	40
Partly Agreed	17
Not Agreed	6
<b>Total</b>	<b>63</b>

