



HM Prison &  
Probation Service

Action Plan: HMP Whitemoor

Action Plan Submitted: 6<sup>th</sup> April 2023

A Response to the HMIP Inspection: 5<sup>th</sup> – 15<sup>th</sup> December 2022

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## INTRODUCTION

HM Inspectorate of Prisons (HMIP) and HM Inspectorate of Probation for England and Wales are independent inspectorates which provide scrutiny of the conditions for, and treatment of prisoners and offenders. They report their findings for prisons, Young Offender Institutions, and effectiveness of the work of probation, and youth offending services across England and Wales to Ministry of Justice (MoJ) and His 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 priority and key concerns. Action plans provide specific steps and actions to address the priority and key concerns, that are clear, outcome focussed, measurable, achievable, and relevant with the owner and timescale of each step clearly identified. Action plans are sent to HMIP and published on the GOV.UK website. Progress against the implementation and delivery of the action plans will also be monitored and reported on.





		<p>appointments to take place. These appointments will be made available for offender management work, key work sessions and interventions.</p> <p>The appointment booking system will be reviewed bi-monthly through the Reducing Re-offending Committee meetings, to ensure that the increased number of opportunities for one-to-one appointments is having the desired impact and action planned to address any barriers to achieving this.</p> <p>A psychological treatment needs assessment will be completed when HMP Whitemoor returns to full capacity.</p> <p>A review will be undertaken of psychological programme staff resourcing and service offer to meet the identified needs of the prisoner population.</p>	<p>Governor</p> <p>Head of Psychology</p> <p>Head of Psychology</p>	<p>July 2023</p> <p>December 2023</p> <p>December 2023</p>
1.2	Much reduced time out of cell contributed to dirty conditions and limited prisoner access to health care, key work and offender management.	<p>A review of the regime has been carried out to incorporate more focus on activity attendance. Ongoing review of regime interruptions will take place fortnightly to monitor planned and actual delivery. Reports from these meetings will be discussed at Reducing Reoffending meetings as well as being shared with the Governor.</p> <p>A review of residential unit based risk assessments has been carried out to ensure prisoners employed as cleaners are able to be unlocked to carry out cleaning activity for every session throughout the week. This will include the sessions where staffing is restricted on the units to facilitate the current split regime. A further regime meeting will take place in April 2023 to</p>	<p>Governor</p> <p>Governor</p>	<p>Complete</p> <p>April 2023</p>



		<p>agree an increase in the number of unlocked prisoners and the number of sessions available.</p> <p>The appointment booking system has been reviewed creating more opportunities for one-to-one appointments to take place. The additional appointment spaces are available for offender management work, key work sessions, interventions and healthcare meetings.</p> <p>The appointment booking system will be reviewed bi-monthly through Reducing Re-offending Committee meetings, to ensure that the increased number of opportunities for one-to-one appointments is having the desired impact and action planned to address any barriers to achieving this.</p> <p>SO's will prioritise keywork delivery when there are last minute staffing changes.</p> <p>A review of keywork delivery will be undertaken aimed at increasing keywork delivery. Progress against keywork delivery will be reviewed at the bi-monthly Reducing Reoffending meeting.</p> <p>The Head of Residence will ensure that appropriate managers and supervisors undertake checks that keywork discussions take place each month.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Complete</p> <p>July 2023</p> <p>April 2023</p> <p>April 2023</p> <p>April 2023</p>
1.3	Leaders and managers had not established a predictable regime in which all prisoners consistently attended their allocated activity.	A review of the regime has been carried out to incorporate more focus on activity attendance. Ongoing review of regime interruptions will take place fortnightly to monitor planned and actual delivery. Reports from these meetings will be discussed	Governor	Complete



	<p>Too often sessions were cancelled at short notice.</p>	<p>at Reducing Reoffending meetings as well as being shared with the Governor.</p> <p>The gym programme has been revised to enable education attendance to take priority on days when there is restricted staffing.</p> <p>A review of the Regime Management Plan as part of a future Regime Design project will be undertaken to ensure activities that contribute towards prisoners' reduction in risk and sentence progression are prioritised (<i>see Priority Concern 1.1</i>).</p> <p>The regime will be continually reviewed in consultation with prisoners through the Prisoner Council, and staff, to gain feedback on what is working well and where further improvements are required to make the regime more predictable for all. This will include a review of risk assessments and management of movement off the residential unit to maximise numbers, whilst maintaining safety when staffing levels are restricted.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Complete</p> <p>April 2024</p> <p>April 2023</p>
1.4	<p>The curriculum did not meet the needs of all the prison population, particularly for vocational training.</p>	<p>An Education, Skills and Work lead will be recruited via national campaign. The post holder will focus on curriculum planning as a priority area.</p> <p>A draft curriculum plan will be drawn up to include intent for each area. This will be based on the current needs analysis which will be reviewed quarterly at the QIG meeting to ensure it is still meeting the needs of the population.</p>	<p>Governor</p> <p>Governor</p>	<p>September 2023</p> <p>September 2023</p>



		<p>From April 2023, a greater availability of educational courses will be made available. These will include painting and decorating, graphics, art and IT courses linked to IT Skills for Africa.</p> <p>Gym delivery will be reviewed to establish the potential to incorporate vocational qualifications.</p> <p>Instructors will support prisoners' development by setting personal development targets to improve life skills, these will be set using progression plans.</p> <p>Other new employment will be considered with the support of New Futures Network and Public Sector Prison Industries, to introduce more vocational workshops such as waste management, in addition to employability qualifications in production workshops, IT qualifications in the Information Technology and Security Academy (ITSA) workshop and a laundry qualification in the laundry.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>April 2023</p> <p>September 2023</p> <p>December 2023</p> <p>December 2023</p>
1.5	Poor medicine administration had become established practice, despite contravening professional standards and being raised at previous inspections.	<p>A review of in possession risk assessments for patients located in the Bridge Unit, Segregation Unit and Healthcare Inpatient Unit has been undertaken.</p> <p>Two medication trolleys have been procured to ensure medications are transported safely and securely when administering medications in the Bridge Unit, Segregation Unit and Healthcare Inpatient Unit. A Standard Operating Practice (SOP) has been created for the transportation and administration of medications using the medication trolleys.</p>	<p>Head of Healthcare</p> <p>Head of Healthcare</p>	<p>Complete</p> <p>Complete</p>



	<p>A lock will be fitted to the wall in the nurse's office to enable the medication trolley to be secured to the wall.</p>	Head of Healthcare	June 2023
	<p>An appropriate location for medical trolleys that meets HMP locking requirements will be identified.</p>	Governor / Head of Healthcare	April 2023
	<p>A medicine hatch will be installed between the Bridge Unit and Segregation Unit.</p>	Governor Head of Healthcare	April 2024
	<p>Northamptonshire Healthcare NHS Foundation Trust (NHFT) in consultation with the Governor have agreed Datix (log of decision making) will be completed if there is a significant delay that causes impact on residents receiving their medication. This will be audited regularly and monitored through local MMC (Medication Management Committee).</p>	Governor / Head of Healthcare	Complete
	<p>The administration of medicine at the cell door practice will be reviewed. An interim measure will be put in place of administering medicines at the cell door for prisoners who are suitably assessed by the prison for their cell door to be opened.</p>	Governor / Head of Healthcare	June 2023
	<p>Medication workshops were delivered to all staff who administer medications. The workshops explored the concerns raised around medication administration (including Controlled Drugs), the actions taken to address these concerns and review of administration practices at HMP Whitemoor.</p>	Head of Healthcare	Complete





	<p>Second Checker training has been carried out by the Lead Pharmacist for Specialist &amp; Secured Services, to allow the use of non-clinical staff to second check medications during staff shortages.</p>	Governor / Head of Healthcare	Complete
	<p>Off licence preparation of Controlled Drugs has been stopped and communication sent to all staff. Weekly Controlled Drug Audits are now conducted to provide ongoing monitoring of compliance.</p>	Head of Healthcare	Complete
	<p>A communication has been sent to prison staff to ensure that patients are identified with Identification (ID) cards. Prison staff have been asked to ensure that the prisoner has their ID card with them.</p>	Governor / Head of Healthcare	Complete
	<p>Spot check audits of the recording of medication administration now takes place monthly. A medicine administration compliance audit was conducted by the Group Director of Patient Safety and Patient Experience with no concerns identified.</p>	Head of Healthcare	Complete
	<p>Local MMC meetings are now taking place bi-monthly and the feedback from the meetings is fed into the Trust wide MMC meetings.</p>	Head of Healthcare	Complete
	<p>Quarterly Partnership Boards with Commissioners have been re-introduced and will monitor progress against actions planned to address medicine administration practices.</p>	Head of Healthcare	Complete



	Key concerns			
1.6	Staff were too passive in their contact with prisoners. Staff adhered rigidly to allocated duties and some congregated with each other rather than interacting with prisoners.	<p>Monthly training days have been reviewed and refocused to incorporate content to enable staff to build confidence and resilience and help build staff and prisoner relationships and set boundaries. This will include work done in partnership with Psychological Services to explore issues including fear and boundary setting and will be followed up by an assessment of its impact.</p> <p>A development forum for SO's will be established, allowing personal development and confidence building. This will be supported by line managers role-modelling proactive and appropriately assertive interactions with prisoners to improve staff and prisoner relationships.</p> <p>A managers development programme commenced in March 2023. Delivered to a mix of SOs, Custodial Manager's (CMs) and Senior Manager grades. The training involves regular reflective sessions which are intended to create the possibility of a cross-prison talking shop, to help with workforce development, confidence in managing and leading staff and sharing of experience and information. The impact of the effectivity of the program will be assessed with post course quarterly discussions with those that took part to gather feedback and understand the actions being put into place and new behaviours/approaches to leadership of staff lacking confidence with prisoners.</p> <p>An additional colleague mentor has been recruited to encourage a greater focus on positive interactions and developing confidence levels with prison staff.</p>	Governor	Complete
			Governor	April 2023
			Governor	June 2024
			Governor	Complete



		<p>All reviews of the Regime Management Plan will include increased communication to improve staff understanding on what they are able to do with allocated resources to encourage more flexible working and consistent delivery of a more purposeful regime.</p>	Governor	April 2023
		<p>Consultation with residential unit representatives and the Prison Rehabilitative Culture Council will be undertaken to discuss staff/ prisoner relationships and how to improve them.</p>	Governor	April 2023
		<p>An updated Duty Governor checklist will be implemented to provide an increased senior management presence on residential units and encourage greater staff interactions with prisoners.</p>	Governor	May 2023
1.7	<p>Leaders did not set and maintain sufficiently high standards on residential units and communal areas were dirty.</p>	<p>A review of residential unit based risk assessments has been carried out to allow prisoners employed as cleaners to be unlocked to carry out cleaning activity for every session throughout the week. This includes the sessions where staffing is restricted on the units to facilitate the current split regime.</p>	Governor	Complete
		<p>Cleaners and residential unit staff will be provided with set cleaning schedules to work from, to ensure that staff and prisoners are clear on expectations. Additional staff training will include cleaning officer duties.</p>	Governor	May 2023
		<p>SO's, CM's and the Head of Residence have introduced daily and weekly cleaning checklists, including serveries, to ensure that expected standards of cleanliness are being carried out. The Catering Manager now undertakes hygiene inspections of the servery areas.</p>	Governor	Complete



		An updated Duty Governor checklist will be implemented to provide independent feedback and additional assurance of living conditions and cleanliness.	Governor	May 2023
1.8	Prisoners were served small portions of food, some of which was unpalatable. Not all prisoners could afford to buy extra food from the canteen to supplement this.	<p>The Catering Team will be represented at prisoner council meetings and residential meetings to improve communication with prisoners and address issues raised relating to food complaints.</p> <p>A food survey will be carried out to gain prisoners views and concerns to be acted upon. This will be repeated twice a year.</p> <p>Additional food quality checks will be carried out at the point that food is transported on trolleys by the catering staff, and again when the residential staff collect meals from the kitchens.</p> <p>Daily checks on servery areas will be carried out by SOs or CMs on each unit to include cleanliness and quality. This will be added to residential unit SO assurance sheets.</p> <p>Portion control guidance will be re-issued to residential units to assist staff supervising serveries. Guidance will be displayed in residential unit servery areas for prisoners and cleaning officers. Cleaning officers will be trained on portion control on training days.</p> <p>A new Duty Governor checklist will be introduced, including daily quality checks on the servery. Duty Governor's will carry out weekly quality assurance checks in the main kitchen.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>April 2023</p> <p>April 2023</p> <p>April 2023</p> <p>April 2023</p> <p>April 2023</p> <p>June 2023</p>



		<p>Food comments books will be introduced on all serveries for prisoners to provide feedback and comments. These will be reviewed weekly by the Catering Manager and unit CM who will sign to say they have read the comments and fed back to the kitchen. The Catering Manager will feedback to prisoners' themes and action taken at prisoner council meetings and catering forums.</p>	Governor	June 2023
		<p>Monthly meetings between kitchen and residential staff will commence to ensure quality, cleanliness, and food service delivery across the prison.</p>	Governor	April 2023
1.9	Work to improve and promote equality was not given sufficient priority.	<p>Quarterly Equalities Action Team meetings have been re-introduced and are now chaired by the Governor. Prisoner representatives are now invited to attend all meetings and actions identified are monitored through a designated action plan.</p>	Governor	Complete
		<p>HMP Whitemoor's Equalities Team now provide improved analysis of data at the bi-monthly Equalities Action Team meeting. This includes a breakdown of protected characteristics for adjudications, incentives and earned privileges, complaints, access to employment and Diversity Incident Reporting Forms (DIRF's).</p>	Governor	Complete
		<p>The induction process will be reviewed to include the recording of all protected characteristics.</p>	Governor	May 2023
		<p>HMP Whitemoor's Equalities Team will use the improved national Equalities Monitoring Tool for data analysis, once published.</p>	Governor	April 2023



		<p>The number of prisoner equalities representatives has been increased to two on each spur within the prison. Representatives are now easily identifiable by t-shirts stating their job role and picture boards on the residential units.</p>	Governor	Complete
		<p>Prisoner equalities forums now take place monthly, and all prisoner equalities representatives are invited to attend. Actions identified are monitored through a designated action plan.</p>	Governor	Complete
		<p>Senior Management Team diversity champions have been identified for each protected characteristic and guidance provided to support their areas of responsibility.</p>	Governor	Complete
		<p>A combined staff and prisoner protected characteristic forum will take place on a fortnightly basis, with one protected characteristic represented on a rolling basis. The national Diversity and Inclusion Calendar will be used to inform the timing of some of these sessions.</p>	Governor	April 2023
		<p>50% of DIRF's are now quality assured by the Head of Safety and Equalities. The Governor will carry out at least a 10% check of DIRF's.</p>	Governor	Complete
		<p>There will be improved promotion of diversity and inclusion related events for both staff and prisoners. For staff, these will be communicated via email and display boards in the gate area of the prison. For prisoners, these will be communicated via notice boards on the residential units.</p>	Governor	April 2023
		<p>A local Diversity and Inclusion calendar will be produced and displayed across the prison.</p>	Governor	April 2023



1.10	Leaders and managers had not made sure that all prisoners received effective careers information, advice and guidance at induction to allow them to make informed plans about their future.	<p>An Education, Skills and Work lead will be recruited via the national campaign. The post holder will be responsible for ensuring prisoners receive careers information, advice and guidance (IAG).</p> <p>The Long Term and High Security Estate (LTHSE) have commissioned an IAG service provider serving all LTHSE sites.</p> <p>IAG peer mentors will be trained and recruited to provide support and advice to prisoners. The IAG Co-Ordinator and peer mentors will meet with prisoners on induction and formulate a clear personal development plan for each prisoner, holding regular reviews to assess engagement and capture progress.</p>	Governor  LTHSE Contracts Team  Governor	September 2023  December 2023  March 2024
1.11	Not all prisoners with learning difficulties and/or disabilities needs received the required help to remove barriers to their future development.	<p>HMP Whitemoor will recruit a Neurodiversity Manager who will implement a prison wide strategy for supporting prisoners with learning difficulties and/or disabilities to ensure they are receiving the support they need to make progress. This will include how information is shared between departments to enable better support for individuals.</p> <p>Assurance will be carried out at the QIG and monthly governance meeting that there is equal access and progression being made by prisoners identified with Learning Difficulties and Disability needs.</p>	Governor  Governor	December 2023  June 2023
1.12	Contact between prison offender managers and prisoners was too limited to provide effective offender management.	Prison Offender Managers (POM's) are prioritised during the week to limit them being cross deployed for other duties. This will assist in increasing contact with prisoners.	Governor	Complete



	<p>A review of residential unit based risk assessments has been carried out allowing POMs to unlock prisoners for one-to-one sessions, despite other staffing restrictions on the residential unit.</p>	Governor	Complete
	<p>Clear guidance has been produced outlining the requirements for POM to prisoner contact. Delivery of these agreed levels of contact will be tracked during POM supervision sessions with the Head of Offender Management Delivery (HoOMD).</p>	Governor	Complete
	<p>An improved monitoring system of contact between POM's and prisoners will be implemented.</p>	Governor	April 2023
	<p>The HoOMD and or the Offender Management Unit (OMU) Hub Manager will carry out quality checks prior to POM supervision. Checks are recorded onto the case management system as 'Consultation with HoOMD' along with actions and supervision notes.</p>	Governor	April 2023
	<p>A review of the appointment booking system has been undertaken to create more opportunities for one-to-one appointments to take place. These appointments are available for offender management work.</p>	Governor	Complete
	<p>Offender Personality Disorder (OPD) POMs have been allocated office space on the Fens Unit to enhance visibility and contact with prisoners.</p>	Governor	Complete
	<p>Weekly checks will be introduced carried out by the HoOMD and OMU Hub Manager to ensure those 'harder to reach'</p>	Governor	April 2023





		prisoners receive appropriate contact from their respective POMs.		
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