



HM Prison &  
Probation Service

Action Plan: HMP Rye Hill

Action Plan Submitted 25<sup>th</sup> February 2020

A Response to the HMIP Inspection 1<sup>st</sup> -13<sup>th</sup> September 2019

Report Published 7<sup>th</sup> February 2020

## 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, Community Rehabilitation Companies (CRCs) and youth offending services 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 RYE HILL

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	<b>Key concerns and recommendations</b>				
	<b>Directed to: The Governor</b>				
S48	<p>Key concern: Although violent incidents were not serious or widespread, in our survey 30% of prisoners stated that they felt unsafe at the time of the inspection and 49% said that they had been the victim of verbal abuse, while 41% stated they had experienced threats or intimidation from other prisoners.</p> <p><b>Recommendation: The prison should explore the reasons why almost a third of prisoners felt unsafe and effective action should be taken to improve safety and prisoners' perceptions of it.</b></p>	Agreed	<p>HMP Rye Hill will implement monthly focus groups with sections of the population, chaired by Deputy Director. This will include focus groups with older prisoners, disabled prisoners and Black and Minority Ethnic (BAME) prisoners.</p> <p>HMP Rye Hill will undertake an analysis of why prisoners feel unsafe using the HMIP survey as the reference document and including discussions with a cross section of prisoners. Findings will be presented to the Director, for use in conjunction with other related management information. The on-site psychology team will be asked to provide feedback upon strategy as a result of the survey, which will determine future actions.</p> <p>HMP Rye Hill will use the results of a forthcoming Measuring the Quality of Prison Life (MQPL) Survey in order to further inform strategy in this area.</p> <p>The Head of Safer Custody will produce a monthly report in relation to the perception of safety (including for older prisoners, disabled prisoners and BAME prisoners). This will be considered and actioned at Senior Management Team (SMT) and Controller/Director meetings. Head of Safer Custody will agree actions as appropriate to respond to concerns identified.</p> <p>A display will be provided for prisoners, to outline findings from forums and resulting actions taken.</p>	<p>Director</p> <p>Director</p> <p>Director</p> <p>Director</p> <p>Director</p>	<p>Completed and Ongoing</p> <p>April 2020</p> <p>April 2020</p> <p>April 2020 and ongoing</p> <p>April 2020</p>



S49	<p>Key concern: In our survey, only 58% of black and minority ethnic prisoners said most staff treated them with respect, compared with 85% of white prisoners. The prison had not sufficiently investigated monitoring data to identify and address disproportionate outcomes.</p> <p><b>Recommendation: Black and minority ethnic prisoners' negative perceptions about staff-prisoner relationships should be explored and addressed, and better analysis of monitoring data should be undertaken to identify and address any disproportionate outcomes.</b></p>	Agreed	<p>HMP Rye Hill will explore BAME prisoner's negative perceptions about staff-prisoner relationships through the implementation of regular monthly race and diversity forums, to which all BAME prisoners are invited. The Deputy Director will chair, and will use statistical information in order to provide data for further consideration and analysis during these forums.</p> <p>The Deputy Director will provide a monthly report upon findings and recommendations for improvements to the Equality Action Team (EAT). EAT sits monthly and will co-ordinate actions to address prisoner perception and any disproportionate outcomes.</p>	<p>Director</p> <p>Director</p>	<p>Completed</p> <p>March 2020 and Ongoing</p>
S50	<p>Key concern: Major connectivity issues with SystemOne adversely affected all health services, posing risks to patient safety. Access to SystemOne was very slow and we observed frequent delays, when it took up to 50 minutes to open one patient record. This meant that health staff could not see medical notes swiftly enough to enable them</p>	Partly Agreed	<p>This recommendation is partly agreed as fully addressing the major connectivity issues with SystemOne is outside of the control of the Director.</p> <p>NHS England Health and Justice are working to ensure a reliable Health and Social Care Network connection at HMP Rye Hill as soon as possible. Onsite work has been undertaken for the secondary service.</p> <p>Connectivity issues will be monitored through clinical governance meetings until resolved.</p>	<p>NHS England commissioner</p> <p>Director</p>	<p>January 2020</p> <p>January 2020 and ongoing</p>



	<p>to make informed clinical decisions. This led to delays and clinics being cancelled, and records could not always be updated immediately after contact with the patient.</p> <p><b>Recommendation: Health staff should have prompt and reliable access to SystemOne so they can deliver health services in a safe and timely manner.</b></p>				
S51	<p>Key concern: Leaders and managers had been too slow to address the low proportion of prisoners studying English and mathematics qualifications, the lack of impartial careers and education, information, advice and guidance that prisoners received, and the failure of the allocations process to match prisoners' sentence plans to appropriate activities.</p> <p><b>Recommendation: Leaders and managers should ensure weaknesses in education, skills and work are addressed, ensuring all prisoners who need to</b></p>	Agreed	<p>In order to ensure that all prisoners who need to improve their English and Maths skills achieve suitable qualifications, the Head of Activities will lead a launch of a revised strategy for English and Maths in January 2020. The strategy will mandate the requirement for prisoners to obtain a minimum of Level 1 English and Maths.</p> <p>The implementation and success of this strategy will be maintained at monthly meetings between the on-site Head of Learning and Skills, the Director and NOVUS education provider.</p> <p>HMP Rye Hill will require NOVUS to recruit a new Induction and Guidance worker to ensure suitable advice and improve the link to sentence planning.</p> <p>A monthly update will be provided by the Head of Activities in relation to allocation of new receptions, against the need to link activities to Sentence Planning arrangements.</p> <p>An annual population needs analysis will be undertaken by the Head of Community Engagement, to identify the needs of the population and review engagement with sentence planning. This will inform future changes to the education and intervention model.</p>	<p>Director</p> <p>Director</p> <p>Director</p> <p>Director</p> <p>Director</p>	<p>June 2020</p> <p>June 2020</p> <p>June 2020</p> <p>April 2020</p> <p>December 2020</p>



	<p>improve their English and mathematics skills study appropriate qualifications, receive suitable careers advice and guidance, and are allocated to activities that better meet the objectives of their sentence plans.</p>				
S52	<p>Key concern: The large number of prisoners with additional learning needs did not receive the specialist support they needed to make the progress expected of them, and there were an insufficient number of staff with the expertise to provide this support.</p> <p><b>Recommendation: Leaders and managers should ensure that prisoners who have additional learning needs have access to specialist support to enable them to make the progress expected of them.</b></p>	Agreed	<p>HMP Rye Hill will review the use of the on-site Education Manager in conjunction with the provider; the Education Manager is Special Educational Needs Coordinator (SENCO) qualified and will co-ordinate access to specialist support. Additional time will be provided for this purpose by the appointment of an administration manager and a student support worker.</p> <p>HMP Rye Hill will require the provider to produce a bespoke Additional Learning Needs Strategy to ensure access to specialist support and enable prisoners to make the progress expected of them.</p> <p>HMP Rye Hill will require NOVUS to provide trained Level 3 support staff across the department.</p> <p>A Monthly Review meeting with the Provider will be used to monitor compliance.</p>	<p>Director</p> <p>Director</p> <p>Director</p> <p>Director</p>	<p>September 2020</p> <p>September 2020</p> <p>September 2020</p> <p>September 2020</p>
S53	<p>Key concern: Community-based offender managers sometimes developed risk management release plans too close to the prisoner's release</p>	Partly Agreed	<p>This recommendation is partly agreed because under the Offender Management in Custody (OMiC) model, Prison Offender Management provision and associated Risk Management planning is outside the direct control of the Director.</p> <p>Under OMiC Phase 2, offender management tasks will be completed in line with the OMiC model, as set out in the Excellence and Quality in Processes (EQUIP). A Senior Probation</p>	<p>Director and SE&amp;E NPS</p>	<p>April 2021</p>



	<p>date which was a concern given that many of those due for release presented a high risk of serious harm to others. This was compounded by the fact that the prison's IDRMT also reviewed cases too near the release date. The lateness in developing plans meant that some were not comprehensive and had not fully engaged the prisoner.</p> <p><b>Recommendation: Risk management planning for prisoners due for release should be improved, with planning starting several months before the actual release date.</b></p>		<p>Officer is in post and 1.5 Probation Officers have been identified. NPS South East and Eastern will provide a further uplift in the NPS staff complement to fully meet OMIC obligations, but future resourcing remains challenging and is unlikely to be met before April 2021.</p> <p>HMP Rye Hill will discuss all releases at the Interdepartmental Risk Management Team (IRMT) meetings six months ahead of release, or as soon as practicably possible.</p>	<p>Divisional Director</p> <p>Director</p>	<p>Completed and Ongoing</p>
	<b>General recommendations</b>				
	<b>Directed to: The Governor</b>				
2.11	The toilet area in all cells should have adequate privacy screening.	Not Agreed	<p>This recommendation is not agreed as the design and layout of cells prevent the installation of permanent privacy screening.</p> <p>All prisoners are issued with curtains to ensure that they are able to use the toilet in singles cells in private. A Living Conditions Audit has been carried out by HMPPS in October 2019 which assesses arrangements as appropriate.</p>		
2.23	Prisoners should be able to submit paper applications confidentially and receive a timely response.	Agreed	Case Management System applications are reviewed weekly to ensure that a timely response has been provided. The Head of Residence will review the application system to ensure that paper applications can also be dealt with confidentially and that they receive a timely response.	Director	February 2020



			The Head of Community Engagement will provide data to the Complaints Assurance Panel to demonstrate the effectiveness of the system.	Director	February 2020 and ongoing.
2.31	The equality strategy should be specific to the needs of the prisoners held at the establishment. Action planning should detail the priorities for improvement and demonstrate progress over time.	Agreed	HMP Rye Hill will review the equality strategy and produce a revised document to inform key priorities for 2020. The revised documents will be submitted to the EAT for approval.  HMP Rye Hill will monitor progress with the equality strategy monthly at EAT meetings.	Director  Director	March 2020  March 2020 and ongoing
2.41	The prison should ensure professional telephone interpretation is used when needed.	Agreed	All prison officers at HMP Rye Hill are trained in relation to when professional telephone interpretation is needed and a Notice To Staff will be reissued to remind staff.  HMP Rye Hill will offer interpretation for all Foreign National prisoners in response to an update in relation to their immigration status.  HMP Rye Hill will include training for Insiders as part of the prisoner induction process, to ensure that they are able to identify when prisoners may need to use professional interpretation.  HMP Rye Hill will maintain a log to demonstrate when interpretation has been used, cross referenced to invoices from the provider.	Director  Director  Director  Director	January 2020  April 2020  April 2020  April 2020
2.42	The prison should explore the concerns of prisoners with disabilities, particularly their concerns about safety.	Agreed	As outlined above, HMP Rye Hill will implement monthly race and diversity focus groups with sections of the population, chaired by Deputy Director. This will include focus groups to which all disabled prisoners are invited.  HMP Rye Hill will undertake an analysis of why prisoners feel unsafe, using the HMIP survey as the reference document and including discussions with disabled prisoners. Findings will be presented to the Director, for use in conjunction with other related management information. The on-site psychology team will be asked to provide feedback upon strategy as a result of the survey, which will determine future actions.	Director  Director	Completed and Ongoing  April 2020





			<p>HMP Rye Hill will use the results of a forthcoming Measuring the Quality of Prison Life (MQPL) Survey to further inform strategy in this area.</p> <p>The Head of Safer Custody will produce a monthly report in relation to perception of safety (including for disabled prisoners). This will be considered and actioned at Senior Management Team (SMT) and Controller/Director meetings. Head of Safer Custody will agree actions as appropriate to respond to concerns identified.</p> <p>A display will be provided for prisoners, to outline findings from forums and resulting actions taken.</p>	<p>Director</p> <p>Director</p> <p>Director</p>	<p>April 2020</p> <p>April 2020 and ongoing</p> <p>April 2020</p>
2.58	All staff should consistently receive mandatory training within the allocated timeframe and have the appropriate professional skills and competencies to deliver health services.	Agreed	<p>Significant improvements in this area have been made since the HMIP inspection; 97.33% of staff have completed all of their mandatory training.</p> <p>Head of Healthcare will submit a monthly monitoring report and HMP Rye Hill will monitor delivery of mandatory training through Clinical Governance meetings.</p>	<p>Director and Head of Healthcare</p> <p>Director and Head of Healthcare</p>	<p>Completed</p> <p>Completed</p>
2.77	Patients with mental health problems should have access to an appropriate range of support that meets their identified needs, including group work and psychologically informed interventions.	Partly Agreed	<p>This recommendation is partly agreed because the extent of support, including provision of group work and other psychologically informed interventions, is contingent on funding and commissioning arrangements.</p> <p>HMP Rye Hill will introduce a weekly multi-disciplinary meeting to review caseloads for both primary and In Reach services (Northampton Foundation Trust), to ensure prisoners have access to the most appropriate services available.</p> <p>Through Clinical Governance Meetings, the Director will request that NHS England undertake review of NFT provision, and that they ensure that provision provides the most appropriate range of support to meet the needs of the population at HMP Rye Hill and determine sufficient funding levels to meet this need.</p> <p>Any subsequent requirements as a result of the review, in terms of accommodation or other related matter will be resolved via monthly clinical governance meetings.</p>	<p>Director</p> <p>Director</p> <p>Director</p>	<p>February 2020</p> <p>Complete</p> <p>December 2020</p>
2.78	Patients requiring a transfer	Partly	This recommendation is partly agreed, because whilst every effort is made to meet the		



	under the Mental Health Act should be assessed promptly and transferred within the current transfer guidelines. (Repeated recommendation 2.101)	Agreed	<p>current transfer time guidelines, timeliness of transfers under The Mental Health Act is reliant on national resource being available for assessment, hospital bed availability and other external factors.</p> <p>The In reach Service at Rye Hill is managed by the Head of Healthcare based within HMP/YOI Onley, who will monitor waiting times by reviewing transfer timeframes as part of the Clinical Governance Meeting and Quarterly Contract Review Meeting (QCRM) with the NHS Commissioner. Ongoing issues will be escalated through the HMPPS QCRM.</p>	Director	Completed and ongoing
3.86	A clear policy and pathway for patients experiencing substance use and mental health problems should be developed.	Partly Agreed	<p>This recommendation is partly agreed. A policy will be developed for patients experiencing a dual diagnosis of substance use and mental health problems. Provision of a clear and effective pathway for patients experiencing such dual diagnosis is contingent on funding and commissioning arrangements for secondary mental health through Northamptonshire Healthcare NHS Foundation Trust (NHFT).</p> <p>Head of Healthcare will work with the local substance-misuse team to develop a clear local pathway to manage prisoners who require mental health interventions, including those with a dual diagnosis. This will be monitored via weekly meetings chaired by the Head of Healthcare.</p> <p>The Director will share HMP Rye Hill's Dual Diagnosis policy with NHS England commissioners to support delivery. Any subsequent requirements as a result of the review, in terms of accommodation or other related matter will be resolved via monthly clinical governance meetings.</p>	Director  Director	May 2020  December 2020
3.12	Daytime recreational PE should not be timetabled for prisoners who should be attending work or training.	Partly Agreed	<p>This recommendation is partly agreed. Daytime sessions will be needed to meet the needs of the population; HMP Rye Hill will review access to the gymnasium to ensure that prisoners who are detailed to attend work are not permitted to be elsewhere.</p> <p>Gym sessions are available to prisoners every Monday and Thursday evening. Access to the gymnasium will be reviewed, taking account of the competing demands of prisoner entitlement to weekly access to the Sports Hall against the 100% employment rate.</p>	Director  Director	June 2020  Completed
3.13	The library and gym departments should gather sufficient data so they can establish trends and ensure all groups within the prison	Agreed	<p>HMP Rye Hill will conduct a bi-annual survey to understand access to library and gym facilities and the needs of the population.</p> <p>HMP Rye Hill will monitor access levels in both the sports Hall and the Library. This data will be reviewed at monthly EAT meetings, where actions will be set to ensure that all</p>	Director  Director	March 2020  March 2020



	population have equal access to their facilities.		groups within the prison have equal access to facilities.		
3.22	Leaders and managers should review the pay policy to ensure that prisoners are not discouraged from studying education on the grounds of pay.	Agreed	HMP Rye Hill have reviewed the pay policy to ensure that pay for prisoners studying education is at a level that encourages engagement.	Director	Completed
3.29	Leaders and managers must ensure that teachers and instructors take account of prisoners' individual needs when planning their sessions, which should include setting individual targets.	Agreed	The Head of Activities and Head of Learning and Skills have strengthened existing processes to ensure that teachers and instructors plan their sessions and set individual targets effectively. This includes lesson observations, supervision and training plans.  HMP Rye Hill will monitor the quality improvement plan that is in place at monthly meetings with the provider.  NOVUS will introduce a provision map to demonstrate how learning needs in education are met effectively.	Director  Director  Director	Completed  June 2020  June 2020
3.36	Leaders and managers should ensure the proportion of prisoners who attend their activities increases significantly.	Agreed	HMP Rye Hill will introduce an activities-planning schedule which will complement the need for prisoners to attend English and Maths. This will be maintained by the Head of Activities.  Education attendance will be reported to and monitored by the Director at Morning Meetings.	Director  Director.	June 2020  Completed and ongoing.
4.8	The prison should improve the support prisoners and their families receive to help build and maintain good family relationships.	Agreed	HMP Rye Hill will invite families as appropriate to key activities such as Assessment, Care in Custody and Teamwork (ACCT) reviews, Sentence Plan Reviews, Post-Programme Reviews and parole hearings.  Head of Community Engagement will work with the G4S Family Intervention team to consider the <i>Optimising Prisoner and Family Engagement</i> document and ensure that there is sufficient support available for prisoners and their families at HMP Rye Hill. This will include consideration of a relaunch of <i>Talking Through the Taboo</i> (Support group for prisoners' families) and a review of telephone contact with families.	Director  Director	January 2020 and ongoing  June 2020



			Lockers have been fixed for use by visitors, to improve the visiting experience.	Director	June 2020
4.17	Offender supervisors managing high risk of harm cases should be adequately trained including in the management of prisoners convicted of sexual offences and the delivery of one-to-one work to motivate prisoners to participate in programmes.	Partly Agreed	<p>This recommendation is partly agreed as it is dependent on NPS recruitment to meet OMiC requirements.</p> <p>Under OMiC Phase 2, offender management tasks will be completed in line with the OMiC model, as set out in the Excellence and Quality in Processes (EQUIP) online platform. NPS South East and Eastern will provide an uplift in the NPS staff complement to meet OMiC obligations. All Prisoner Offender Managers (POMs) will be provided with relevant training to engage those convicted of sexual offences and manage the risk of harm that they present.</p>	Director and SE&E NPS Divisional Director	April 2021
	<b>Directed to: HMPPS</b>				
4.25	The transfer of prisoners convicted of sexual offences in preparation for release or for sentence progression should not be delayed.	Agreed	Capacity plans in relation to those convicted of sexual offences are built into HMPPS prison building and reconfiguration work, which will provide more resettlement places and remove barriers to flow into resettlement prisons.	Head of Prison Reconfiguration Project	March 2022
	<b>Directed to: The Governor</b>				
4.33	The counselling provision at Rye Hill should meet the demand.	Partly Agreed	<p>This is partly agreed because any uplift in counselling provision would be subject to funding.</p> <p>The Head of Community Engagement will complete a Utility Fund Business Case regarding the expansion of the counselling provision.</p> <p>The Head of Community Engagement will contact established counselling charities to determine if a Service Level Agreement (SLA) can be agreed to provide an additional service to meet the need of the population.</p>	<p>Director</p> <p>Director</p>	<p>December 2020</p> <p>March 2020</p>



4.37	Prisoners should receive more support to prepare them for release, including plans for how they will get to their release address.	Partly Agreed	<p>This is partly agreed as HMP Rye Hill is not a resettlement prison and does not have the resource to provide such a service. For the small number of prisoners released from the establishment, HMP Rye Hill will continue to contribute to support arrangements to prepare them for release.</p> <p>The prison will continue to identify appropriate release addresses in collaboration with the Community Offender Manager (COM), and provide the prisoner being released with the appropriate risk management plan. The plan will include an outline of whether appropriate transportation, (such as to the nearest train station) will be provided, or whether the prisoner is to be accompanied to their release address. In certain cases, if required, transportation arranged by Police/COM will be most appropriate and this will be discussed at Multi Agency Public Protection Arrangement (MAPPA) meetings.</p>	Director	Completed and Ongoing
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Recommendations		
Agreed	15	
Partly Agreed	9	
Not Agreed	1	
<b>Total</b>	<b>25</b>	

