

Action Plan: HMP & YOI Hollesley Bay

Action Plan Submitted 7th June 2019

A Response to the HMIP Inspection 22nd October to 1st November 2018

Report Published 5th March 2019

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 (Speci 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 mus t be an explanation of why we cannot fully agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.			
Not Agreed	The recommendation is not agreed and will not be implemented. This might be because of commissioning, policy, operational or affordability reasons.	The response must clearly state the reasons why we have chosen this option. There must be an explanation of why we cannot agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.			

ACTION PLAN: HMCIP REPORT ESTABLISHMENT: HMP & YOI HOLLESLEY BAY

1. Rec No	2. Recommendation	3. Agreed / Partly Agreed / Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	Main recommendation to the Governor				
5.1	The application of national procedures to protect the public, including children, from harm should be applied robustly. This should include the prompt application of contact restrictions, where necessary, and more effective monitoring of mail and telephone calls in relevant cases. Every possible action should be taken to confirm the multi-agency public protection arrangements (MAPPA) management level with the National Probation Service in the lead-up to release, including release on temporary licence events. (S57)	Agreed	 HMP & YOI Hollesley Bay has fully implemented the Public Protection Manual (PPM), including the Persons Posing a Risk to Children processes and Child Contact Measures. The PPM will be robustly applied by; Immediate implementation of a new local Public Protection Policy for the establishment. Identification of an Offender Management Unit (OMU) Business Administrator, to act as Pubic Protection co-ordinator and promptly initiate contact restrictions where necessary. Improved joint working between security and Offender Management Unit (OMU) departments. Prioritisation of communications monitoring by Security staff. Every possible effort will be made to confirm the multi-agency public protection arrangements (MAPPA) management level by; Contact will be made with the Offender Manager (OM) upon commencement of Release on Temporary Licence (ROTL) application process, including a request for confirmation of the anticipated or actual MAPPA management level. The Public Protection co-ordinator will send requests for confirmation of MAPPA level in accordance with the PPM, following the escalation process set out in the MAPPA guidance where necessary. In the event that no response is received, the request for confirmation of MAPPA level will be escalated to the Senior 	Governor	June 2019
			Probation Officer (SPO). To ensure robust and consistent application of Public Protection processes, training has been delivered to OMU staff by the Senior Probation Officer. OMU staff will ensure that requests for information from	Governor	July 2019

	Recommendations to HMPPS		Offender Managers (OMs) or MAPPA co-ordinators do not delay ROTL timeliness for prisoners, unless insufficient information is available for a reliable risk assessment. The robust application of national public protection procedures will be monitored by the Head of OMU.		
5.2	Prisoners should only transfer to open conditions once a full and up-to-date assessment of their risk and needs has been carried out. (4.24)	Partly Agreed	This recommendation is partly agreed. Prisoners will only transfer to open conditions once a full assessment of their risk and needs has been carried out, in accordance with mandatory processes for re-categorisation (including through Public Protection Casework Section for Indeterminately Sentenced Prisoners ISPs). These processes require an OASys to be place, but do not stipulate that it has to be up to date at the point of transfer to open conditions and OASys reviews should not act as a barrier to swift progression. Under Offender Management in Custody arrangements, determinate cases will have an OASys review every two to three years (depending upon sentence type) and in response to a significant change in circumstances. As transfer to Open conditions constitutes a significant change in circumstances, HMP & YOI Hollesley Bay will undertake an OASys review within 8 weeks (Low to Medium Risk of Serious Harm RoSH determinates) or 12 weeks (High RoSH determinates and ISPs) of transfer from higher category establishments	Governor	Completed
5.3	There should be sufficient places available in Bail Accommodation and Support Service accommodation to allow prisoners to be released on home detention curfew on their eligibility date. (4.25)	Partly Agreed	This recommendation is partly agreed, as Bail Accommodation and Support Service (BASS) places are subject to National Contract arrangements, stipulating 550 bed spaces across England and Wales. The Authority are working closely with the supplier to ensure that 550 bed spaces are realised as quickly as possible, to maximise the likelihood that sufficient places are available for prisoners released from establishments such as HMP & YOI Hollesley Bay. The contract also allows the Authority to enter negotiation about providing an additional number of bed spaces to a maximum of a further 55, which will be subject to remaining within the affordability threshold. HMP & YOI Hollesley Bay will continue to submit weekly returns in relation to BASS waiting lists, to ensure that their local need is taken into account when contracts are reviewed and renewed nationally.	Bail Accommodation and Support Services (BASS)	June 2019 Completed and ongoing

	Recommendations to the Governor				
	Managing behaviour				
5.4	All use of force incidents should be scrutinised by senior staff to ensure that force is only used as a last resort. (1.18)	Agreed	All use of force incidents will be scrutinised as follows; • Following an incident where force has been used, the Deputy Governor or appointed SMT member will promptly chair a meeting with relevant functional leads to ensure that force is justified and proportionate. Statements, Body Worn Camera (BWC) footage and other available information will be reviewed. • The Deputy Governor or appointed SMT member will initiate follow up action where necessary.	Governor	June 2019
			Trends and lessons learned will be considered quarterly by Senior Management Team (SMT), through use of force meetings.	Governor	June 2019
5.5	Body-worn cameras should be used during all use of force incidents. (1.19)	Agreed	HMP & YOI Hollesley Bay will continue to ensure that BWCs are available to Prison Officers for use in line with the Prison Service Instruction "Body Worn Cameras" (PSI 2017-04), which sets out the circumstances in which BWCs should be used. This includes circumstances in which the user has exercised force or may be required to do so.	Governor	Completed
			 The Security team will drive an increase in the use of BWCs by; Security Custodial Manager will oversee all activity to promote the use of BWCs. Visual reminders are located at the staff entrance. Inclusion of a check of the use BWCs in SMT tours. Any concerns will be followed up by the relevant SMT member. Until the consistent use of BWCs is embedded, emergency response requests on the radio-net will include a reminder to responding staff to turn on BWC equipment. 	Governor	Completed
			The usage of BWCs will be monitored by Head of Security and shared at quarterly Use of Force meetings to enable actions to be set to address deficits.	Governor	Completed

	Security				
5.6	Risk assessments to determine if a return to closed conditions is necessary should be multidisciplinary and should show sufficient exploration of all relevant factors relating to the risks presented. (1.29)	Agreed	A review of re-categorisation processes has been undertaken and an Open Conditions Suitability Assessment (OCSA) will be used to ensure sufficient exploration of all relevant factors relating to risk by; • The duty manager and Offender Supervisor (or OMU representative) will act as core attendees, supplemented by input from the Offender Manager, Residential Officers, Phoenix Futures (Substance Misuse provider) and/or other staff with particular knowledge of the individual, depending upon the circumstances. • Decisions and the key underpinning reasons will be recorded by the Duty Custodial Manager on the OCSA and P-Nomis, • Where possible, an Action Plan will be created by the Offender Supervisor to support continued residence in Category D conditions. • The Duty Governor will sign-off all OCSAs and re-categorisation decisions. HMP & YOI Hollesley Bay will continue to take proportionate actions to	Governor	Completed
			manage immediate risk. Trends will be monitored by SMT through the weekly Stability Meeting, to consider necessary actions to communicate learning and address concerns.		
5.7	Decisions to use handcuffs should be based on an individual risk assessment. (1.30, repeated recommendation 1.45)	Agreed	Handcuffs for transfers will only be used if supported by a risk assessment through the OCSA. In accordance with annex A, PSI 30/2015 this will clearly describe the circumstances and the justification for the use of handcuffs. All other decisions to use handcuffs will be subject to dynamic risk assessment and approved by the Duty Manager where possible. Trends will be monitored by SMT through the Use of Force meeting, to consider necessary actions to communicate learning and address concerns.	Governor	Completed
	Staff-prisoner relationships				
5.8	The negative perceptions expressed by some prisoners that a small number of staff were punitive in their approach towards them should be explored and addressed. (2.5)	Agreed	The negative perceptions identified in HMIP's report will be explored by; Listen To Improve sessions will be held with residents focussing on relationships with staff. Parallel sessions will be held with staff.	Governor	June 2019

			 Residents will have an opportunity to meet prior to Prisoner Council Meetings, to enable individual concerns to be channelled through the appropriate representative. Staff and resident relationships will be a standing agenda item for the Prisoner Council Meeting. Findings from The Discharge Survey (completed by all who leave the establishment) will be discussed at the monthly Resettlement meeting. Specific actions to address the underlying causes of negative perceptions will depend upon the outcome of consultation with residents. 	Governor	June 2019
	Daily life				
5.9	Basic living conditions on the Bosmere unit should be improved to ensure decency, including refurbished and well-maintained showers. (2.10)		This recommendation is partly agreed, as refurbishment of showers requires capital investment. Two of the four shower areas have been replaced and a third is planned for refurbishment in 2019. The fourth set of showers will be refurbished once capital investment is available.	Governor	December 2019 Completed
			Basic living conditions on the Bosmere unit will be improved to ensure decency by; • The implementation of regular SMT Decency checks • Repainting and deep cleaning Existing shower facilities. • Basing a general cleaning party on the unit. • Ensuring small maintenance jobs are promptly actioned by an enhanced working party of residents.	Governor	June 2019
5.10	Prisoners' views about the quality of the food should be explored in greater depth and, where possible, changes should be made to increase their level of satisfaction. (2.18)	Agreed	Prisoners' views about the quality of the food will be explored further by; The development of an improved Prison Council Catering staff and the Catering Manager will be visible at point of service where possible, to obtain immediate feedback. SMT food-checks will be undertaken frequently, to obtain immediate feedback and record first hand observations in the Governor's Servery Inspection Book.	Governor	June 2019

			Following feedback a Menu review will be undertaken by the Catering Manager. Other changes will depend upon the feedback received and may include consideration of better preservation for transportation. Some self-cooking facilities will also be introduced.	Governor	August 2019
5.11	The issues with the prison shop should be resolved, so that prisoners receive their correct order. (2.19)	Partly Agreed	This recommendation is partly agreed because issues with the prison shop are linked to Dallsey Hillbrom and Lynn (DHL) performance. DHL Have recruited a Workshop Manager at the originating prison and have assigned two experienced Workshop Managers as mentors. Prison Industries and Retail will continue to monitor progress carefully. HMP and YOI Hollesley Bay will undertake the following actions to maximise the chance of prisoners receiving a satisfactory service; Issue immediate refund or replacement to prisoners where appropriate, with a view to subsequent recharge to DHL. Performance issues raised by Business Hub Manager at biannual meetings between HMPS and DHL.	Prison Industries, Catering, Retail and PE Governor	Completed August 2019
5.12	7 Codit vidoo iiiik orlodid bo avallabio. (2:20,	Partly Agreed	This recommendation is partly agreed because there is no central budget for new Court video links and full completion is therefore reliant upon capital investment. Staff will continue to facilitate the following arrangements to mitigate the impact of having no onsite video link capacity; • Use of Release on Temporary License or Prisoner Escort services to facilitate attendance in person where possible. • Use of nearby HMP Warren Hill's video-link facility through visitor arrangements where appropriate.	Governor	August 2019
	Equality, diversity and faith				
5.13	The prison should routinely consult prisoners in the protected groups to ensure that their concerns and needs are identified and, where possible, addressed. (2.31, repeated recommendation 2.25)	Agreed	Monthly consultation with prisoners from a variety of Protected characteristic groups has been re-launched in relation to Black, Asian and Minority Ethnic (BAME) groups, Age and Disability. Where applicable consultation with any other protected characteristic groups will also be incorporated into these Forums. An Equality Action Team (EAT) meeting will take place regularly, at which	Governor	June 2019

5.14	Managers should consider both local and national equality monitoring data, and address inequitable outcomes. (2.32)	Agreed	Monthly Equalities Action Team meetings will routinely include the following standard agenda items and minutes will be retained to accurately reflect discussion; Consideration of the most recent national equality monitoring data, taken from the hub. Consideration of local equality monitoring data, taken from the hub,	Governor	June 2019
			Appropriate Actions will be set by the Equalities Action Team, to address inequitable outcomes and completion of agreed tasks will be tracked through EAT meetings.	Governor	June 2019
5.15	Reasonable adjustments for prisoners with disabilities should be swiftly completed. These prisoners should have access to practical support, such as a buddy scheme, which supports them in their day-to-day life at the prison. (2.38)	Agreed	The need for reasonable adjustments can be highlighted at any time, but will typically be identified during the induction period by the Disability Liaison Officer or the Healthcare Team. HMP & YOI Hollesley Bay will ensure that such adjustments are completed by; • Reasonable adjustments will be discussed and agreed with the relevant residential manager before being passed to the Facilities Management Company to carry out necessary work. • The target timescale for implementation of reasonable adjustments will depend upon on the complexity of the adjustments required, but should typically be completed within 48 hours unless there are exceptional circumstances. • The Head of Residence will assure timeliness of completion. Practical support by way of the 'buddy scheme' will be reintroduced. This is a scheme where individuals needing practical support are provided help collecting meals, medication and with evacuation should it be necessary.	Governor	June 2019 June 2019
	Health, well-being and social care				
5.16	There should be a regular health care representative forum to inform service developments and enable collective concerns to be addressed. (2.57)	Agreed	Care UK have employed a <i>Health Promotion</i> member of staff for HMP & YOI Hollesley Bay, who will promote health and run necessary forums. Monthly health care representative forums to inform service developments and enable collective concerns to be addressed have commenced. Minutes will be made available when required. This provision will be better advertised to residents.	Director of Care UK	June 2019
5.17	There should be regular, systematic health promotion campaigns delivered in conjunction with the prison. (2.64)	Agreed	Care UK's <i>Health Promotion</i> staff member will run promotion campaigns and presentations both in person and through Way Out TV (WOTV), with support from the Head of Security.	Director of Care UK	June 2019

5.18	Prisoners should have timely access to optician and dental services. (2.71, repeated recommendation 2.68)	Agreed	The Care UK Performance Manager will work in collaboration with Community Dental Services to introduce dental triage and a See & Treat session to reduce the dental waiting lists, which are currently four weeks.	Director of Care UK	June 2019
			Additional monthly optician sessions have been purchased to reduce waiting time, which now stand at one week.	Director of Care UK	June 2019
			HMP & YOI Hollesley Bay will raise any issues at the next prison health partnership meeting.	Governor	June 2019
5.19	There should be a memorandum of understanding and information sharing agreement between agencies, to outline appropriate joint service working on social care. (2.75)	Agreed	HMP & YOI Hollesley Bay have drawn up a Memorandum Of Understanding and Information Sharing Agreement, to outline appropriate joint service working in relation to social care, which is awaiting signatory from the Social Care Lead for Suffolk.	Governor and Suffolk County Council	June 2019
	Education, skills and work activities				
5.20	Prison managers should ensure that they have accurate information on the education, training or employment that prisoners enter following their release, so that they can evaluate and monitor fully the impact of the curriculum on offer. (3.20)	Agreed	HMPPS collect data on prisoners' employment and training/education status on release and during community supervision. A measure for employment following release has been introduced into the HMPPS Prison Performance Framework from April 2019. This is to reflect the importance of prisons' role in providing education and employment opportunities, and collaborating with probation providers to help to secure employment on release, and assisting with the rehabilitation of offenders. Performance will be reported on the Hub by prisons and probation providers, to enable evaluation of their success rates and to drive improved outcomes.	Head of Performance Analytics and Contract Management	Completed
			In addition, HMP & YOI Hollesley Bay obtain self-reported information from prisoners on discharge. Available data will be evaluated through the monthly Resettlement Meeting and Quality Improvement Group (QIG) meetings to further inform the prison's curriculum planning and offer.	Governor	Completed

5.21	Prison managers should ensure that prisoners receive impartial careers advice and guidance when they arrive at the establishment and throughout their time in custody, so that they can plan their future after release more effectively. (3.21)	Agreed	An IAG contract has be let via the new Education arrangements to provide impartial careers advice and guidance. This provision will focus on both arrival at the prison and release planning.	Governor	June 2019
5.22	Prison and People Plus managers should ensure that vocational tutors provide detailed and constructive feedback on practical work, to help prisoners to improve. (3.31)	Agreed	PeoplePlus will ensure that residents are given constructive feedback to help them improve their vocational skills by; PeoplePlus managers will continue to conduct regular lesson observations, including in relation to feedback to participants. PeoplePlus will launch a Teacher Management Quality Plan as part of the education contract specification, which will include plans to ensure constructive feedback on practical work.	Director of PeoplePlus	June 2019
			Trends in relation to lesson observations and progress with the Teacher Management Quality Plan will be reviewed at QIG meetings and actions will be set to address any gaps in relation to constructive feedback on practical work.	Governor	June 2019
5.23	Prison and People Plus managers should ensure that vocational tutors challenge prisoners to achieve high standards of professional workmanship that meets commercial expectations. (3.32)	Agreed	PeoplePlus will ensure that residents are challenged to achieve high standards of professional workmanship by; PeoplePlus managers will continue to conduct regular lesson observations, including in relation to setting success criteria linked to high standards. PeoplePlus managers will provide regular monitoring of Individual Learning Plans. PeoplePlus will launch a Teacher Management Quality Plan as part of the education contract specification, which will include plans to ensure high expectations.	Director of PeoplePlus	June 2019
			Residents have an opportunity to complete VQ Level 3 qualifications and undertake real work scenarios reliant on high standards of workmanship.	Governor	Completed
			Trends in relation to lesson observations and progress with the Teacher Management Quality Plan will be reviewed at QIG meetings and actions will be set to address any gaps in relation to the expectations set for participants.	Governor	June 2019
5.24	Prison managers should ensure that prisoners engaged in prison industries have an opportunity to study and achieve a qualification related to their job. (3.37)	Agreed	HMP & YOI Hollesley Bay will provide opportunities for residents engaged in activities such as cleaning and catering to study and achieve a qualification related to their job by;	Governor	August 2019

			 Recruitment has commenced for a Vocational Instructor in Industrial Cleaning. A review of opportunities for delivering qualifications from the main kitchen is being undertaken by the Learning and Skills Manager. 		
	Children and families and contact with the outside world				
.25	Visits provision should meet demand. (4.9)	Agreed	HMP & YOI Hollesley Bay will continue to attempt to reduce the demand on visits provision by; • Encourage the use of Resettlement Day Release where possible. • Write to visitors who book appointments but regularly fail to attend.	Governor	Completed
			 HMP & YOI Hollesley Bay will review the feedback received via a Visitors Survey conducted in April 2019 and will implement necessary changes. In addition, full use of available visits facilities will be maximised, including by; At times of particularly high demand, residents without access to ROTL provision will be prioritised. The Children's play area will be redesigned to ensure that it is fit for purpose. A reserve list will be maintained to ensure that if a visit is cancelled, another resident can receive the visit. 	Governor	June 2019
26	Prisoners on resettlement day release to maintain family ties should not be required to be collected and returned by family members in a car unless the risk assessment suggests that this is necessary. (4.10)	Agreed	HMP & YOI Hollesley Bay will fully implement the revised ROTL policy (April 2019) and prisoners on resettlement day release to maintain family ties will not be required to be collected and returned by family members in a car unless the risk assessment indicates that this is necessary. Self-drive and/or minibus provision will continue to be available to assist with onward travel where appropriate.	Governor	June 2019
	Reducing risk, rehabilitation and progression				
.27	The prison's needs analysis should make full use of offender assessment system (OASys) and P-NOMIS data, in order to identify and address gaps in provision. (4.23)	Agreed	The Head of Reducing Re-Offending will make use of the HMPPS Segmentation Tool (a web-based tool showing the characteristics of the prison and probation population) alongside P-Nomis data, OASys data, and prisoner questionnaire responses in preparing the 2019 needs analysis. The Prison Group Director's team will support the development of a more detailed analysis, to ensure that resettlement provision meets need.	Governor	June 2019
	Categorisation and transfers				

5.28	Meetings to discuss a prisoner's suitability for open conditions should be multidisciplinary. Decisions to return prisoners to closed conditions should be clearly evidenced and defensible. (4.35)	Agreed	 A review of recategorization processes has been undertaken and an Open Conditions Suitability Assessment (OCSA) will be used to ensure sufficient exploration of all relevant factors relating to risk by; The duty manager and Offender Supervisor (or OMU representative) will act as core attendees, supplemented by input from the Offender Manager, Residential Officers, Phoenix Futures (Substance Misuse provider) and/or other staff with particular knowledge of the individual, depending upon the circumstances. Decisions and the key underpinning reasons will be recorded on the OCSA and P-Nomis, Where possible, an Action Plan will be created by the Offender Supervisor to support continued residence in Category D conditions. The Duty Governor will sign-off all OCSAs and recategorization decisions. 	Governor	Completed June 2019
			consider necessary actions to communicate learning and address concerns.	Governor	Julie 2019
5.29	For prisoners returning to closed conditions, recategorisation to C should be supported by clear evidence. (4.36)	Agreed	The Orderly Officer will ensure the recategorization paperwork is completed correctly with quality assurance being carried out by the OMU Custodial Manager. The Open Conditions Suitability Assessment (OSCA) will determine whether the prisoner returning to closed conditions requires being returned to Category C. Decisions and the key underpinning reasons will be recorded on the OCSA document and P-Nomis. The Duty Governor will sign-off all OCSAs and recategorization decisions.	Governor	June 2019
	Interventions				
5.30	The prison should undertake a comprehensive analysis of needs, to establish the range of offence-focused interventions required. (4.41)	Not Agreed	This recommendation is Not Agreed because as a category D resettlement prison, HMP & YOI Hollesley Bay are not commissioned to deliver any interventions and are not resourced to do so. The open prison expectation is that any interventions are completed prior to arrival or subject to availability in the community, through ROTL or upon release, as part of their reintegration back into the community.		
5.31	The community rehabilitation company (CRC) should monitor the number of prisoners released to sustainable accommodation (12 weeks after	Agreed	HMPPS collect data on prisoners' accommodation circumstance on release and during community supervision. CRCs are already subject to an assurance metric for assessing settled accommodation on release	Head of Performance Analytics and	Completed

	release), to understand the effectiveness of provision. (4.42)		using this data. In addition, a measure for accommodation on release have been added to the prison performance framework from April 2019. New CRC measures are under consideration for future contracts within the Probation Programme. Prisons and probation providers are encouraged to work together and with the local community to meet offender housing needs.	Contract Management	
	Release planning				
5.32	The CRC should ensure that interviews to review resettlement plans are conducted by a trained member of staff. (4.45)	Agreed	Interviews to review resettlement plans will be conducted by a Responsible Officer, a trained member of Norfolk and Suffolk CRC staff.	Governor and Norfolk and Suffolk Community Rehabilitation Company (CRC)	Completed and Ongoing

Recommendations	
Agreed	26
Partly Agreed	5
Not Agreed	1
Total	32