



HM Prison &  
Probation Service

Action Plan: HMP Buckley Hall

Action Plan Submitted: 30 October 2019

A Response to the HMIP Inspection: 15-26 July 2019

Report Published: 5 November 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 (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 BUCKLEY HALL

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>				
S34	Concern: Forty per cent of prisoners thought it was easy to get drugs in the prison. Although managers had identified drug supply as the prison's main threat, their response was not sufficiently robust. Only a minimal number of drug tests on prisoners were carried out following intelligence about drug misuse. The completion of random mandatory drug testing (MDT) was also very predictable, which made it easier for prisoners to avoid testing times. Additionally, the monitoring of visits via CCTV was too irregular.	Agreed	<p>Following the Drug Diagnostic Team visit which took place in September 2019, the outcomes and recommendations from this report will be used to re-write the Drug Strategy.</p> <p>HMP Buckley Hall has requested a number of Band 3 officers to replace officers who have transferred, gained promotion or resigned. When they are in post the required number of tests will be able to be completed.</p> <p>A small group of security staff conduct intel led searching and drug tests throughout the week. The Security Manager will ensure that these tasks are allocated at different times each week to ensure they are less predictable.</p> <p>The Operational Support Grade (OSG) officer tasks have been reprioritised and greater importance will be given to ensuring that a member of staff is available to conduct CCTV monitoring at every visits session.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>December 2019</p> <p>March 2020</p> <p>March 2020</p> <p>December 2020</p>



	<b>Recommendation: Managers should actively drive a robust drug strategy that is responsive to intelligence and proactive in reducing the supply of illicit drugs.</b>				
S35	<p>Concern: Cells designed for single use were still used as doubles and too small to accommodate two prisoners.</p> <p><b>Recommendation: Cells designed to hold one prisoner should not be used to hold two. (Repeated recommendation 2.8)</b></p>	Not agreed	<p>This recommendation is not agreed as the wider problem of crowding in prisons is a longstanding issue that will not be easily addressed. However HMPPPS welcome the Government's recent announcement of up to £2.5 billion investment in new prison construction to create up to 10,000 prison places and the opportunity this creates to take steps towards reducing crowding.</p> <p>Whilst the average number of prisoners held in crowded conditions across the estate has fallen slightly, HMPPS recognises the ongoing concerns raised by the Board (and others across the estate) in relation to the use of crowded cells. While these places meet HMPPS standards for crowded accommodation, holding two men in a cell designed for one prisoner in order to accommodate national population pressures is not desirable.</p> <p>HMPPS' plan for reducing prison crowding is to replace prisons that are operating over their certified normal accommodation levels with new accommodation that is safe, decent, and uncrowded and close current (crowded or partially crowded) capacity. The first steps in this direction have already been taken with a commitment to construct modern, decent, uncrowded prisons at two former prison sites, which are due to open in 2021 and 2023.</p>	Prison Estates Transformation Programme	
S36	Concern: Education and learning leaders had not sustained the quality of teaching, learning and assessment or outcomes for prisoners since the previous	Agreed	<p>The new Prison Education Framework (PEF) contract is now in place. The new contract gives the Governor the ability to withhold a percentage of contract price for under-performance. The previous education manager has been replaced with a more experienced manager to ensure the new contract is managed effectively. Performance is measured and reported on by the Head of Learning and</p>	Novus/Governor	March 2020



	<p>inspection. Too many quality improvement actions had yet to be fully implemented or were too recent to be able to measure the impact on improving the identified weaknesses in the self-assessment report. Leaders did not have adequate oversight of prisoners' progress in developing their knowledge, skills and understanding.</p> <p><b>Recommendation: The quality of the education, skills and work provision for prisoners should be rapidly raised to a higher level through the implementation and monitoring of quality improvement action plans and additional swift interventions to help prisoners achieve the outcomes of which they are capable.</b></p>		<p>Skills (HOLS) through the new Teaching Quality Management Plan. This plan includes measures for quality of teaching and qualifications achieved. Any concerns identified are discussed by the Education Manager and the Governor at the monthly Education Performance meeting where time-bound actions to rectify are agreed. The quality of education has improved since the new contract commenced, but will require a period of six months to fully embed.</p>		
S37	<p>Concern: Teachers did not plan and implement learning activities in English and mathematics that were matched to prisoners' individual needs and abilities.</p>	Agreed	<p>Individual Learning Plans (ILPs) are now in place across all areas. Monthly learning walks will be conducted by the HOLS to quality assure ILPs. Any concerns identified will be addressed through the Teaching Quality Management Plan.</p>	Novus/Governor	March 2020



	<p>Prisoners' additional learning needs were not routinely identified and assessed to gauge the effect on their learning and to provide the correct support. Learning targets were not precise and did not challenge prisoners to develop their subject-specific knowledge, skills and understanding.</p> <p><b>Recommendation: Teachers and trainers should ensure that all prisoners develop their English and mathematical skills across education, skills and work activities, that they are set challenging learning targets to meet their needs, and that prisoners with additional learning needs receive sufficient support to make good progress.</b></p>		<p>The Education provider has recruited a Special Educational Needs Co-ordinator (SENCO) worker, who will meet with identified prisoners to formulate an agreed action plan, which will be incorporated into the ILP. A protocol will be implemented to enable prison instructors to refer prisoners with additional learning needs to SENCO. The results of the quality assurance checks will be monitored via the monthly Education Performance Meeting.</p>	Governor	December 2019
S38	<p>Concern: Skills and qualifications achievement rates had declined over the past three years. Too many prisoners on education courses did not make the progress to match their capabilities. Prisoners did not have sufficient opportunities</p>	Agreed	<p>All prisoners on transfer to HMP Buckley Hall will meet with the Education Provider, the Activities Manager and the Information, Advice and Guidance Worker. At this meeting the ILP will be written to ensure that the prisoner attends activities that meets his educational needs.</p> <p>Novus now employ an outreach worker who visits all workshops to assist instructors to embed Maths &amp; English as standard. English &amp; Maths has now been mandated to Level 2 at HMP Buckley Hall.</p>	<p>Governor/Novus</p> <p>Governor/Novus</p>	<p>January 2020</p> <p>Completed</p>



	<p>to achieve qualifications in prison work activities. Too few prisoners progressed in their level of learning.</p> <p><b>Recommendation: Tutors and instructors should ensure that prisoners make at least the education and learning progress expected of them, achieve useful skills and qualifications across all activities, including in English and mathematics, and have a structured programme of learning to help them move successfully into the next stage of their education, training or employment.</b></p>				
	<b>General recommendations</b>				
	<b>Directed to: The governor</b>				
1.8	Prisoners should be allocated promptly to a purposeful activity on completion of the induction programme to prevent prolonged periods locked up during their early days at the establishment.	Agreed	HMP Buckley Hall will provide an activity area and basic work for all men within three days of arrival at HMP Buckley Hall prior to the formal sequencing process where they will be allocated work or education appropriate to their needs.	Governor	December 2019
1.16	The support and interventions provided to perpetrators and victims of violence should be accurately recorded to track	Agreed	The Safer Custody Department will quality check all Challenge Support and Intervention Plans (CSIP) to ensure targets are tailored to the individual needs. Support will also be offered for victims through the identified actions in the CSIP. These plans will also be discussed	Governor	December 2019



	progress and enable good communication between departments.		weekly at the multi-disciplinary Safety Interventions Meeting. The Head of Residence will then ensure that these plans are communicated to all Residential staff by displaying them in wing offices & discussing them at the daily briefing to staff.		
1.29	Prisoners in the segregation unit should be offered a full and purposeful regime to minimise the impact of segregation on their emotional and mental health.	Agreed	Additional funding has now been received and a new classroom is currently being built. The Head of Residence & Head of Reducing Reoffending will provide a programme of events that prisoners in the Care and Separation Unit (CSU) can partake in.	Governor	January 2020
1.30	Reintegration planning should be strengthened to facilitate prisoners' safe return to mainstream residential accommodation.	Agreed	Prisoners who are located in CSU on Rule 45 (for their own interest or good order or discipline) have a CSIP opened to provide support and a plan for either reintegration or transfer.  The Regional Safer Custody Team will develop a proforma regarding identifying SMART targets within plans. The Head of Safety and Equalities will quality check all plans put in place to ensure targets and objectives are of good quality.	Governor  Governor	Completed  January 2020
2.10	The prison should systematically monitor and analyse officer response times to cell call bells.	Agreed	Funding has been submitted for a new electronic cell call system on A and B wings to electronically monitor cell call bell response times. In the interim, manual monthly checks will be conducted to monitor and analyse the timeliness of cell call bell responses.  There is a new electronic cell call system which has been installed on C and D wings. Cell Call bells are monitored and analysed on a weekly basis.	Governor  Governor	December 2019  Completed
2.11	Toilets in all cells should be adequately screened to ensure prisoner privacy and dignity.	Partly agreed	This recommendation is partly agreed as all double cells have now been routinely screened, however due to funding pressures, finance is not available to routinely screen single cells. Residential Services PSI (75/2011) at states that 'prisoners should have access to living	Operational Policy: System Delivery and Reform	





			accommodation, furnishings, fittings, and equipment that are safe, decent and secure which meet individual needs, as far as practicable.’		
2.21	Monitoring of the applications system should be sufficiently robust to ensure that responses are prompt and helpful.	Agreed	<p>Analysis of applications will be carried out monthly by the Head of Residence and reported to the business assurance meeting.</p> <p>The Prisoner Information System will be implemented where all applications will be logged and monitored.</p> <p>Envelopes will be made available for confidential applications.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>January 2020</p> <p>March 2020</p> <p>December 2019</p>
2.51	Governance arrangements should ensure that all aspects of the health service are monitored and delivered in line with required guidance.	Agreed	The healthcare service will be monitored through a monthly Governance meeting, bi-monthly Local Delivery Board meeting and a quarterly Contract Monitoring meeting. Where it is identified that Improvements are required action plans will be developed to identify how that improvement will be delivered. These action plans will be reviewed at the monthly governance meeting.	Greater Manchester NHS Foundation Trust	December 2019
2.52	Prisoners who make a health care complaint should receive information about how to raise any concerns to external agencies if they are dissatisfied with the initial response.	Agreed	All responses to healthcare complaints will be answered on the Trust response form. This form gives information to the complainant on how to escalate their complaint. Posters will also be displayed in healthcare and residential areas on how prisoners can escalate their complaints to the Trust Customer Care team.	Greater Manchester NHS Foundation Trust	December 2019
2.66	All patients with long-term conditions should be promptly identified, assessed and receive reviews of their conditions.	Agreed	All receptions into HMP Buckley Hall will be assessed by nursing staff and, where a long term condition exists, will be placed on the appropriate register to ensure they receive regular reviews. This will also apply to those prisoners who develop a long term condition whilst in custody. Training will be given to nursing staff in the assessment and management of long term conditions.	Greater Manchester NHS Foundation Trust	April 2020



2.97	There should be effective officer supervision of medication administration queues in the health care centre to reduce the risk of diversion and manage prisoner behaviour.	Agreed	An officer is allocated to supervise medication in the Healthcare centre which is subject to a daily duty management check.	Governor	Completed
3.7	The data collected to monitor library use should include details of active membership to identify and address any gaps in provision.	Agreed	Library staff will collect data of all those attending the library sessions and this information will be presented and discussed at the monthly Quality Improvement Group (QIG) meeting to identify gaps in provision and how to encourage non-users.	Governor	December 2019
3.20	The prisoner pay structure should not discourage prisoners from taking part in education and vocational training.	Partly agreed	This recommendation is partly agreed as two workshops are currently run by external contractors who fund an additional productivity bonus. This is outside of the control of the Governor.  However, the pay strategy at HMP Buckley Hall will be rewritten to provide incentives for prisoners to attend education. This policy will also link with the sequencing policy.	Governor	December 2019
3.21	Teachers and trainers should promote the benefits and use of the virtual campus across all education, training and prison work activities.	Agreed	The HOLS and Education Manager will increase prisoner use of the virtual campus by promoting and publicising the use of the Virtual Campus. The benefits and use will also be included as part of the induction programme.	Governor	March 2020
3.31	Teachers and trainers should give prisoners detailed and accurate feedback to help them improve the standard and quality of their written work.	Agreed	Formal feedback will be given to any individual whose work is identified as below standard and recorded on the ILPs. The HOLS will quality check 10% of ILPs each month and perform lesson observations jointly with the Education Manager and action will be taken to address any concerns.	Governor/Novus	March 2020



3.40	Trainers should promote equality of opportunity, diversity and democratic values in vocational and prison workshops.	Agreed	All workshop instructors will be given refresher training in equalities and the establishment Equalities Officer will provide further guidance on how to promote opportunities for individuals within a work / training environment. Training will include adherence and reference to all HMPPS Equality Policies.	Governor/Novus	March 2020
3.50	Leaders, teachers and trainers should ensure that there are no gaps in the achievement of different groups of prisoners.	Agreed	All prisoners will be interviewed on reception through the sequencing board and an ILP based on individual needs will be produced. Monitoring of ILPs will be conducted monthly and reported on during the QIG meeting.	Governor/Novus	March 2020
4.14	The prison's reducing reoffending work should be informed by an up-to-date analysis of the needs of the population.	Agreed	HMP Buckley Hall will commission a needs analysis of the prison population which will be completed by January 2020. This will inform the reducing reoffending strategy which will be completed by March 2020.	Governor	March 2020
4.28	There should be adequate provision to review and address the resettlement needs of prisoners due for release.	Agreed	Any prisoners identified for discharge are transferred to a resettlement prison to ensure that provision can be made to address their resettlement needs before release. If a prisoner is not transferred the appropriate Community Rehabilitation Company will be contacted and requested to provide the required services.	Governor	Completed

Recommendations	
Agreed	21
Partly Agreed	2



Not Agreed	1
<b>Total</b>	<b>24</b>

