



HM Prison &  
Probation Service

Action Plan: HMP Full Sutton

Action Plan Submitted: 28<sup>th</sup> July 2020

A Response to the HMIP Inspection: 30<sup>th</sup> April 2020

Report Published: 11<sup>th</sup> June 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, Measurable, 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.



**Actions against targets are likely to be due to COVID 19 disruptions to service delivery**



5.2	<p>Key concern (<b>Error! Reference source not found.</b>): There were not enough activity places to enable those who could, to participate in purposeful activities. Managers had only recently reviewed the curriculum in education and work and prisoners did not understand why they were being allocated to certain activities, such as education, which created a negative attitude towards it. (Directed to: the Governor)</p> <p><b>Recommendation: The prison should increase the number of appropriate education and work activity places so all prisoners can engage in education and work, gaining the skills and knowledge that will help them sustain successful careers.</b></p>	Agreed	<p>HMP Full Sutton's core day has been reviewed and changed from 7 June 2020 to a more conventional morning and afternoon structure in order to facilitate improved allocation and attendance management to activity places.</p> <p>The Vulnerable Prisoner (VP) and Main Location (ML) split has also changed in Education to mornings/afternoons, which will encourage more engagement with courses as attendance will be one session per day. This enables more individual flexibility to access other scheduled activities.</p> <p>The education waiting lists will be allocated in order to ensure that those men who require courses can be contacted in a timely manner to support their engagement and timetabling to classes. This will encourage maximum participation and enthusiasm. However, the policy of requiring men to address Functional Skills requirements remains in place as this is considered necessary and appropriate for the development of our population and their long-term future prospects. In order to build on this, HMP Full Sutton have two long term projects (Wood Mill &amp; Recycling), which will deliver at least 60 additional work places with vocational qualifications.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Complete</p> <p>Complete</p> <p>Complete</p>
5.3	<p>Key concern (S44): Instructors in prison industries did not assess or record the knowledge and skills prisoners gained and there were very few opportunities for prisoners to achieve accredited qualifications through their work. (Directed to: the Governor)</p> <p><b>Recommendation: The knowledge and skills that prisoners gain through work should be assessed and recorded and where appropriate, prisoners should be able to achieve accredited qualifications.</b></p>	Agreed	<p>Prisoner learning and development plans are available in all work areas and will be embedded by all instructors to support this. HMP Full Sutton will monitor quality and use of these documents through Quality Improvement Group (QIG) meetings, which are chaired by the Head of Reducing Reoffending. These minutes feed into Prison Education Framework meetings which are chaired by the Deputy Governor. These are used to identify individual targets for development to sequence prisoner learning.</p> <p>Qualifications provided by AIM Qualifications and Assessment Group will be delivered by workshop instructors in textile workshops and the prison is working towards offering more qualifications across industries, for example HMP Full Sutton is looking into partnership with a charity for bike repair in</p>	<p>Governor</p> <p>Governor</p>	<p>December 2020</p> <p>April 2021</p>

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			Workshop 17. The Wood Mill and Recycling workshops will also provide opportunities for qualifications.		
5.4	<p>Key concern (S45): About 40% of prisoners did not have an up-to-date assessment of their risks and needs. Risk assessments and sentence plans were sometimes out of date and did not always reflect prisoners' current circumstances, which meant prisoners got frustrated because they did not always know what they needed to do to progress. This was compounded by prisoners having infrequent, reactive, contact with prison offender managers that did not always focus sufficiently on progression. (Directed to: the Governor)</p> <p><b>Recommendation: All prisoners should have an up-to-date OASys report with clear and relevant sentence plan objectives to help them reduce their risks and enable them to progress.</b></p>	Partly Agreed	<p>This recommendation is partly agreed due to policy restrictions. Offender Assessment System (OASys) reviews of sentence plans will be updated by the Prison Offender Manager (POM) for standard determinate prisoners every two years in line with Offender Manager in Custody (OMIC) guidance, and every three years for indeterminate prisoners.</p> <p>All OASys assessments are updated by the POM following any significant change in circumstances. Such changes include a re-categorisation review which may involve an upgrade/downgrade, completion of an accredited programme and/or any significant increase in the use of violence and/or self-harm. To date there are 29 OASys reviews required before the end of July 2020. OASys assessments completions and reviews are tracked and monitored with monthly alerts sent to POMs.</p> <p>All OASys assessments are now countersigned by the Head of Offender Management Delivery to ensure the quality of assessments completed as required. All prisoners will receive a copy of their sentence plans to enable them to track their progression.</p>	Governor	April 2021
	<b>General recommendations</b>				
	<b>Directed to The Governor</b>				
5.5	<p>General recommendation (<b>Error! Reference source not found.</b>): Prisoners should have prompt access to their property following transfer and should not have to wait a long time for their catalogue items. (Directed to: the Governor)</p>	Partly Agreed	<p>This recommendation is partly agreed due to policy, which prevents Category A prisoners not being authorised to travel with their property as per PSI 09/2013 – Security and Management of Category A Prisoner External Movements. Further to this, long-term prisoners have more property allowance than other groups and there is a requirement to search all property as per PSI 19/2011 – Searching Stored</p>	Governor	April 2021

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			<p>Property. The transfer of property remains governed by PSI 12/2011 – Prisoners Property and PSI 72/2011 – Discharge and is measured against 2 volumetric sized boxes and a single outsized item. The escort contractor is aware that property established within these limits must accompany the prisoner on escort. Property which exceeds the requirements stipulated in the PSI is not accountable to the contractor and will be refused transport accordingly.</p> <p>However, HMP Full Sutton acknowledge that improvements to the issuing of property to Category B prisoners transferring into the establishment can be made. Reception staffing levels have been factored into the latest agreed version of the Regime Management Plan (RMP), which will improve the management of catalogue items. The new Generation 4 PECs vehicles which are due to commence in August 2020 will also have more provision for the transport of the prisoner and their property</p>		
5.6	<p>General recommendation (<b>Error! Reference source not found.</b>): All incidents of violence, bullying or intimidation should be reported to the safer custody team for investigation. (Directed to: the Governor)</p>	Agreed	<p>Incidents of violence are captured on the daily briefing sheet and clearly identify what actions have been taken and which reports have been submitted by who. Once reported the Safety Team investigate every act of violence.</p> <p>In addition to this the Safety Team will also undertake weekly checks on all wing observation books to ensure incidents are not under reported. Further assurance will be gained through the Assurance and Audit team, alongside the Safety Team checks. Every incident of violence will be discussed within seven days at the weekly Safety Meeting to ensure all correct actions are taken and to identify any trends, patterns and actions which need to be taken if any. This meeting is chaired by the Head of Safer Custody and Equalities.</p>	Governor	Complete

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5.7	General recommendation ( <b>Error! Reference source not found.</b> ): A comprehensive range of data should be analysed and used to develop an effective prison-wide violence reduction action plan. (Directed to: the Governor)	Partly Agreed	<p>This recommendation is partly agreed as HMP Full Sutton will continue to develop, analyse and use data to inform the Safety Strategy, however this will not initially specifically result in the form of a violence reduction action plan.</p> <p>HMP Full Sutton utilise the data to produce a RAG rated report each month as well as reviewing all acts of violence on a weekly basis. Furthermore, a monthly overview is produced by the Head of Safety identifying any trends or patterns, which will then be actioned as well as informing the safety strategy. This information will then be discussed at the Safety meeting, which is chaired by the Head of Safer Custody and Equality and will also highlight any emerging trends at the earliest opportunity for a prison wide multi-disciplinary approach.</p>	Governor	Complete
5.8	General recommendation ( <b>Error! Reference source not found.</b> ): Prisoners who are segregated should have access to the wider prison regime as part of reintegration planning. (Directed to: the Governor)	Agreed	<p>HMP Full Sutton now provide the opportunity for increased in-cell working. Through R45 boards and Care Plan Meetings which are chaired by the Segregation Unit Custodial Manager and four different SMT members, consideration is given to how we engage men in the wider regime to prepare them for location either at HMP Full Sutton or elsewhere. If appropriate Risk Assessments will be required to allow access to work places/Education and Offending Behaviour Programmes (OBP) whilst residing on the Segregation Unit. The Segregation Unit bubble is already used for workaround OBP for men who are being assessed or those who have been taking part in programmes and find themselves segregated part way through. The main gym timetable will be developed to take into account supporting those long term segregated for no disciplinary offences or issues.</p>	Governor	Complete
5.9	General recommendation ( <b>Error! Reference source not found.</b> ): Prisoners should only be strip-searched on the basis of an up-to-date risk assessment that is regularly reviewed to demonstrate it is still required. (Directed to: the Governor)	Not Agreed	<p>This recommendation is not agreed as per the national security framework and PSI 2016-17 – Searching of the Person.</p>		

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5.10	General recommendation ( <b>Error! Reference source not found.</b> ): All requested suspicion drug tests should be completed. (Directed to: the Governor)	Agreed	HMP Full Sutton have recently implemented new profiles (launched 7 June 2020), which provides more resource and flexibility across 7 days in order to ensure that all requested suspicion drug tests are completed. For example, testing will now take place all day Saturday and Sunday which is a 100% increase from previous weekend testing resourcing.	Governor	Complete
5.11	General recommendation ( <b>Error! Reference source not found.</b> ): Staff should know how to identify vulnerable adults and make referrals to appropriate agencies. (Directed to: the Governor)	Agreed	In collaboration with our existing weekly safety meeting and health providers HMP Full Sutton will identify those within our care who are considered to be vulnerable. Additionally, the establishment will review current safeguarding policy. The prison will carry out staff training on the basis of need and will continue to work with the identified external agencies such as The East Riding of Yorkshire Council Social Care department. Monitoring of provisions and subsequent chase-ups will be done via the Local Health Delivery Board and the Safety Team both having in attendance SMT.	Governor	October 2020
5.12	General recommendation ( <b>Error! Reference source not found.</b> ): All complaint forms submitted should be logged as a complaint. Responses should be on time and fully address the issues raised by the complainant. (Directed to: the Governor)	Agreed	All Complaint forms submitted will be logged as a complaint and a 10% functional head management check will take place monthly for complaints pertaining to their respective functions. An overview will be discussed at the SMT Meeting to ensure the response addresses the issue and complies with Rehabilitative Culture and Procedural Justice. This will be a combination of internal scrutiny, or an independent panel comprising of either another prison, IMB and/or a prisoner panel (with complaints anonymised accordingly).	Governor	August 2020
5.13	General recommendation ( <b>Error! Reference source not found.</b> ): The prison should conduct a comprehensive analysis of complaint data so that emerging problems, themes and trends over time can be identified and addressed. (Directed to: the Governor)	Agreed	Complaint data will be robustly analysed to identify any emerging themes and trends, which will be discussed at the SMT meeting, which is chaired by the Governor. Functional Heads will be required to address the issue and submit their findings for internal audit purposes.	Governor	August 2020

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5.14	General recommendation ( <b>Error! Reference source not found.</b> ): Responses to DIRFs should be timely and should involve talking to the prisoner as part of the investigation before a response is given. (Directed to: the Governor)	Agreed	All Discrimination Incident Reporting Forms (DIRFs) will be responded to within 28 days following a full investigation into issues raised. Prisoners will be supplied with an acknowledgement to their DIRF within 5 working days. All responses will clearly identify that the complainant staff or prisoner has been spoken to if not the response will clearly identify this. HMP Full Sutton will continue to monitor the quality of responses and also ensure that adequate training is up to date. Currently IMB offer a percentage of QA of DIRFs. In addition, HMP Full Sutton will explore external options in light of the National Diversity Panel being disbanded. Furthermore, DIRFs are also discussed at the quarterly Equalities Action Group (EAG) meeting, which is chaired by the Deputy Governor.	Governor	September 2020
5.15	General recommendation ( <b>Error! Reference source not found.</b> ): Focus groups and forums for all prisoners with protected characteristics should take place frequently and be supported by prison managers. (Directed to: the Governor)	Agreed	The Deputy Governor will be chairing the EAG meeting and other meetings of this nature such as LGBT, Older Prisoners, etc, will be chaired by the Head/Deputy Head of Equalities or other SMT member. This will drive and ensure good levels of attendance across all forums in the future.	Governor	September 2020
5.16	General recommendation ( <b>Error! Reference source not found.</b> ): Prisoners receiving personal care packages should have the expected level of care at the times determined within the care package. (Directed to: the Governor)	Agreed	The content of personal care packages needs to be sympathetically designed to support the individual, but fit within the constraints of the regime. Record keeping needs to reflect choices made by the individual when they have declined elements incorporated into their care packages. Care package details incorporating attendance sheets will be implemented and monitored by the Equalities Team (disability lead). This is a Standing agenda item on the Local Delivery Board represented quarterly by an SMT, dependant on operational need and the invite is extended to the East Riding Social Services.	Governor	September 2020

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5.17	General recommendation ( <b>Error! Reference source not found.</b> ): Mental health services should provide appropriate therapies to respond to complex psychological needs. (Directed to: the Governor)	Agreed	NHS England & Improvement (NHSE&I) have developed a revised national Service Specification in 2018 for Mental Health services, which includes meeting the psychological needs of patients. All Providers have completed a self - assessment against the new specification and additional monies were available to address any gaps within their service delivery model against the new specification requirements. Spectrum CIC have confirmed that patients are offered Psychological interventions / psychological support and have not highlighted any gaps in service. The new Mental Health specification is focused on patient outcomes. Thus, the Providers have flexibility of how they meet these patient outcomes rather than Commissioners being explicit about the expected service / staffing model. Psychology is already embedded into the contracted service offer from Spectrum CIC (as per their original tender and current contract) It is noted that this was highlighted in the previous HMIP report in 2016 and the recent Health Needs Assessment, however, the Provider has not to address this shortfall via service redesign. This will be addressed by Commissioners via the Contract Management process.	Spectrum Services CIC	August 2020
5.18	General recommendation ( <b>Error! Reference source not found.</b> ): Governance arrangements require development to ensure the effective oversight and management of the day-to-day operation of the dental service. (Directed to: the Governor)	Agreed	<p>As from 1<sup>st</sup> July 2020, there is a new requirement for NHSE&amp;I to contract directly with the Dental Provider via PDS (Personal Dental Service contract model) and Compass (NHS Business Service Authority contract management tool). This includes the new national Dental service specification which sets out the Clinical Governance requirements.</p> <p>The Health &amp; Justice Commissioners will manage the delivery of the contracted service in terms of payment and contractual compliance. However, the day to day co-ordination of the Dental service, including activity management reporting and complaints management will remain the responsibility of Spectrum CIC as the Lead Provider with the co-ordinating role. A new Clinical Governance framework has been agreed between Spectrum CIC, NHSE&amp;I and Smart Dental (Dental Provider) to formalise the Clinical Governance arrangements.</p>	NHSE&I, Spectrum CiC and Smart Dental	Completed

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5.19	General recommendation ( <b>Error! Reference source not found.</b> ): The library should monitor usage to determine the level of attendance and take action to encourage prisoners to visit. (Directed to: the Governor)	Agreed	Following a recent accommodation review, the library will be moving location which will allow increased cooperation and usage with and by the Prison Education Framework (PEF) provider. This will also provide more opportunities for individuals to use the service, allowing for increased promotion of its services in work. These changes will generate data to monitor library usage. Usage and attendance will be monitored at the Quality Improvement Group (QIG) meeting by the Head of Reducing Reoffending. Equalities Team will also monitor equalities/usage data as part of Allocation Board.	Governor	December 2020
5.20	General recommendation ( <b>Error! Reference source not found.</b> ): The education provision should be extended so that the range of higher-level learning meets the needs of those serving longer sentences or with higher prior academic attainment. (Directed to: the Governor)	Agreed	In using the Dynamic Purchasing System (DPS) funding as well as Prison Education Framework (PEF), the curriculum has been planned in order to provide delivery which meets the needs of the current population. This provides a foundation for longer-term and higher-level opportunities to expand as individuals are developed and encouraged to take these opportunities. This includes Learning Together, Open University and Distance Learning. There will be Level 3 qualifications available in Art and Design, Study Skills and Award in Education and Training	Governor & Milton Keynes College	December 2020
5.21	General recommendation ( <b>Error! Reference source not found.</b> ): Prisoners should receive impartial careers advice to help them plan an appropriate range of education and work activities to build their skills and knowledge incrementally and support their long-term career goals. (Directed to: the Governor)	Agreed	The Information, Advice & Guidance (IAG) service contract was awarded to Milton Keynes College in April 2020 although it is run independently from the PEF delivery. The performance of the contract will be monitored via the QIG meeting. IAG will work alongside Education tutors in Induction and use the prison Careers in Custody pathways to signpost prisoners and advise them on their career options both in custody and in the community.	Governor	December 2020
5.22	General recommendation ( <b>Error! Reference source not found.</b> ): A wider range of interventions and initiatives to enable prisoners to build positive relationships with their family and	Agreed	HMP Full Sutton have developed and published a Children and Families Strategy. An additional 10 extended themed visits are planned per year and these are available to all enhanced prisoners. The strategy and development aims are overseen by the establishments Pathway meeting chaired by the Head of	Governor	April 2021

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	friends should be developed, implemented and evaluated. (Directed to: the Governor)		<p>Reducing Reoffending. The strategy is reviewed annually and is reflected in the 3-year establishment performance plan.</p> <p>Following Lord Farmer's review HMP Full Sutton will be developing strategies in partnership with Partners of Prisoners (POPs) to promote improved contact between prisoners and their families, furthermore, the prison will also seek to implement a family support worker.</p>	Governor	April 2021
5.23	General recommendation ( <b>Error! Reference source not found.</b> ): Attendance at public protection meetings should be multidisciplinary and there should be good sharing of information between security and the OMU. (Directed to: the Governor)	Agreed	HMP Full Sutton will undertake a review of Public Protection procedures, roles and Terms of Reference (ToR), to identify areas of improvement as well as improving attendance, which will include a multidisciplinary approach and improving practices of sharing information between Security and the Offender Management Unit (OMU). The team will consist of an OMU representative, Public Protection representative, Central Correspondence and Security Custodial Managers.	Governor	April 2021
5.24	General recommendation ( <b>Error! Reference source not found.</b> ): The letters and phone calls of those under public protection monitoring should be translated if they are not in English. (Directed to: the Governor)	Agreed	Letters and phone calls for those monitored for public protection reasons and who do not speak/write in English are referred to The Big Word for translation where there is a proportionate reason/risk assessment for doing so.	Governor	Complete
5.25	General recommendation ( <b>Error! Reference source not found.</b> ): Prisoners should be actively involved in re-categorisation reviews, including being consulted prior to any decision and receiving clear information setting out the targets to be achieved. (Directed to: the Governor)	Agreed	<p>HMP Full Sutton have recently reviewed and amended the Offender Management Unit (OMU) processes and procedures to enable prisoners to contribute to their annual Re-Categorisation Board by means of written submission in line with the processes currently used for Category A boards.</p> <p>Any recommendations for further work outlined on the Re-Categorisation Board will be updated within the sentence plans. All prisoners will be informed upon the outcome of their annual board and the results will be recorded on PNOMIS. This is now in place.</p>	Governor	August 2020

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5.26	General recommendation ( <b>Error! Reference source not found.</b> ): There should be an adequate range of programmes and enough accredited programme spaces to meet the needs of vulnerable prisoners. (Directed to: the Governor)	Agreed	<p>HMP Full Sutton have already increased planned delivery of accredited interventions for 2020-21 in comparison to 2019-20. This includes the reintroduction of the RESOLVE programme, which will be available to the Vulnerable Prisoner (VP) population.</p> <p>HMP Full Sutton and the Long Term High Security Estate (LTHSE) take a strategic approach to the provision of accredited and non-accredited interventions through a 'Regional Clinical Framework Delivery model'. This regional strategic approach ensures that the needs of prisoners across the whole estate are fully considered and best met.</p> <p>It is not viable to offer all interventions at every establishment, however the LTHSE approach ensures that the broadest range of key interventions are made available in at least one establishment within the estate, thus ensuring availability and opportunities to engage and progress.</p> <p>HMP Full Sutton will continue to fully engage with the LTHSE regional approach. The Interventions team will work closer with the Offender Management Team to ensure the needs of all prisoners are addressed either locally, or via transfer to other establishments where appropriate.</p>	Governor/Head of Psychology & Interventions	July 2020
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Recommendations	
Agreed	22
Partly Agreed	3
Not Agreed	1
<b>Total</b>	<b>26</b>

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