



HM Prison &  
Probation Service

Action Plan: HMP Wormwood Scrubs

Action Plan Submitted: 29<sup>th</sup> September 2021

A Response to the HMIP Inspection: 7<sup>th</sup> June – 17<sup>th</sup> June 2021.

Report Published: 9<sup>th</sup> September 2021.

## 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.



## ACTION PLAN: HMCIP REPORT

### ESTABLISHMENT: HMP WORMWOOD SCRUBS

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>				
6.1	<p>Key concern (1.37): While initial assessments by health care staff had improved, the brief risk screening from reception staff was not followed up with an in-depth interview in the first night centre or reverse cohort unit to identify and address immediate needs and concerns. This was concerning, given that the PPO had been critical of the early days risk assessments preceding three self-inflicted deaths.</p> <p><b>Key recommendation:</b> <b>All new arrivals should have an in-depth first night interview that covers</b></p>	Agreed	<p>A custody care record is being introduced, which is started in reception and completed in the First Night Centre (FNC). This will act as a follow-up risk assessment for those entering HMP Wormwood Scrubs. The purpose of the care record is to provide an overarching safety assessment to ensure that all risk factors (including risk of self-harm) are taken into consideration.</p> <p>For prisoners immediately entering the Prisoner Isolation Unit (PIU) or the Segregation Unit, the custody care record will be completed as fully as possible, albeit away from the FNC. All other prisoners will have this interview on the FNC. This includes prisoners on detox.</p>	Governor	November 2021



	<b>all risk factors, including self-harming behaviour.</b> (To the governor)				
6.2	<p>Key concern (1.38): Too much use of force paperwork was outstanding and both paperwork and available video footage suggested little evidence of de-escalation. Body-worn cameras were not routinely turned on during incidents, and recordings of unplanned incidents were not retained.</p> <p><b>Key recommendation: Prison leaders should ensure rigorous oversight and accountability in relation to the use of force, including through routine use of body-worn cameras and thorough completion of paperwork.</b> (To the governor)</p>	Agreed	<p>All use of force incidents will be scrutinised at a weekly review meeting, chaired by the Head of Safety. The meeting will focus on the appropriateness of the interventions, plus techniques deployed, identifying any areas for improvement. Feedback will be provided to individuals. Refresher training will particularly focus on the importance of de-escalation, and ensuring staff sufficiently understand the policy governing use of force.</p> <p>The use of Body Worn Video Cameras (BWVC) will be driven up through the following actions:</p> <ul style="list-style-type: none"> <li>- Senior leaders will role model use</li> <li>- Usage will be stock checked regularly</li> <li>- Staff will be challenged on not drawing a BWVC through wing briefings and on an ad-hoc basis</li> <li>- Reminders to turn on BWVCs during incidents will be communicated through comms (e.g. in response to an alarm bell)</li> <li>- Information and promotion of use will be cascaded through wing based Security Champions</li> </ul> <p>High quality use of force paperwork being returned in a timely manner will be a priority as use of Digital Prison Services (DPS) to record incidents becomes embedded. The Use of Force Coordinator will prioritise following up with staff to ensure entries are completed, the oversight of paperwork and the promotion of good practice. Completion of use of force paperwork will be reviewed at the monthly Use of Force meeting, chaired by the Deputy Governor.</p>	Governor	December 2021



6.3	<p>Key concern (1.39): Many staff were inexperienced, had not worked in the prison outside of COVID-19 restrictions and were not confident in handling challenging behaviour. There was a large backlog in training.</p> <p><b>Key recommendation: Prison leaders should ensure that staff understand the needs of the prisoners they are supporting, and have the knowledge, skills and support to do this effectively. (To the governor)</b></p>	Agreed	<p>HMP Wormwood Scrubs has commenced a project to establish and assess the confidence and competency levels of Band 3 officers within the prison. Initially the officers will be required to complete a questionnaire, which will then be analysed. The information gathered will be used to develop appropriate support and training for officers, alongside the Prison Officers' Guide (POG) delivered in conjunction with Effective Probation Service Integration Group (EPSIG) and Prison Performance Support Programme (PPSP).</p> <p>In April 2021, residential managers conducted a training needs analysis collaboratively identifying key training needs. These findings will be incorporated into the training plan to be rolled out as the prison moves through its recovery phases.</p> <p>As the prison progresses through recovery levels, the POG will be promoted to staff to highlight useful information and advice regarding the prison officer role. Communications will also focus on different functions, including the role of external partners, to ensure that staff are able to appropriately signpost prisoners to support.</p> <p>In terms of the current training backlog, we will prioritise Use of Force training so that staff are more confident in challenging and de-escalating difficult behaviour.</p>	Governor	April 2022
6.4	<p>Key concern (1.40): Too many cells designed for one were still being shared by two prisoners. This longstanding problem had persisted despite prison leaders' efforts to obtain approval from HMPPS to convert them</p>	Not Agreed	<p>This recommendation is not agreed. While HMP Wormwood Scrubs support this key recommendation in principle, and it remains a key strategic priority to reduce overcrowding, it is not within the establishment's remit to reduce the operational capacity so that two prisoners would not need to be held in cells designed for one person. At the time of writing, only 102 prisoners are currently held in cells designed for one person (less than 9% of the population). This is one of the lowest overcrowding percentages of any prison of comparable function.</p>		



	to single accommodation. <b>Key recommendation: Two prisoners should not be held in cells designed for one person.</b> (To the governor)		All accommodation is compliant with the certified cell certificates and is compliant with the Certified Prisoner Accommodation policy (Prison Service Instruction (PSI 17/2012)).		
6.5	Key concern (1.41): There was poor identification of prisoners in protected groups, particularly those with disabilities. Insufficient consideration of monitoring data, together with the suspension of consultation, did not provide assurance that need was properly understood. Even when identified, some evidence of consistent disproportionate treatment was not acted on adequately. For example, there had been no action in response to monitoring data showing disproportionate use of	Agreed	<p>HMP Wormwood Scrubs will resume monthly prisoner consultation determined by protected characteristics, as the prison moves forward during the Covid recovery stages. The Equalities Manager will oversee this work.</p> <p>HMP Wormwood Scrubs has commenced a retrospective exercise, with the equalities representatives, to better identify prisoners already at HMP Wormwood Scrubs with protected characteristics. This exercise will involve individuals whose protected characteristics are not recorded being approached individually in order to better identify and understand their needs.</p> <p>A new system will be introduced as part of the prisoner induction programme, facilitated by the equalities representatives, whereby all new arrivals will be routinely asked about their protected characteristics so that they can be routinely identified. This information will be uploaded onto the prison database by the equalities manager.</p> <p>Equalities data is routinely analysed at other meetings (including the Segregation Monitoring and Review Group (SMARG) / safety / reducing re-offending). We will develop the Diversity &amp; Equalities Action Team (DEAT) meeting to be more effective at monitoring data. This meeting takes place monthly and is chaired by the Deputy Governor. In particular, where trends and patterns in terms of protected characteristics have been identified, (for example around identifying disproportionality) the</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>November 2021</p> <p>October 2021</p> <p>November 2021</p> <p>December 2021</p>



	<p>force on, and segregation of, black prisoners.</p> <p><b>Key recommendation: Prisoners in protected groups should be identified systematically and consulted regularly. Monitoring data which shows disproportionate findings should be investigated and result in suitable actions where necessary.</b> (To the governor)</p>		DEAT will have a clear role ensuring that any concerns are thoroughly investigated, and appropriate actions taken where necessary.		
6.6	<p>Key concern (1.42): Most prisoners were locked in their cells for 23 hours a day, which had a serious impact on their wellbeing. Leaders were taking a cautious approach to improving the inadequate regime, partly because of staff inexperience, but time out of cell could have been improved with current staff numbers and experience, even in</p>	Agreed	<p>HMP Wormwood Scrubs has developed a roadmap for progression for Covid recovery, which contains various milestones, with significant preparatory work currently underway. Delivery against this roadmap, however, is dependent upon having sufficient staff; any further COVID outbreaks will also have a significant impact on progress.</p> <p>Education, skills and work are integral to this roadmap. Recruitment of instructors and PEI's has continued during the pandemic and almost all vacancies have now been filled. Exceptional Delivery Models (EDMs) for education delivery are now approved and workshop opening is now scheduled. We will change to a largely part-time activity model in order to give access to more prisoners.</p> <p>As HMP Wormwood Scrubs moves into the next stage of Covid recovery during September 2021 as well as a significant number of new prison</p>	Governor	October 2021



	<p>the context of the pandemic. There was a lack of clear planning for regime recovery.</p> <p><b>Key recommendation: Prison leaders should set out a roadmap for substantially increasing prisoners' time out of cell and participation in activity, with clear milestones that are understood by prisoners and staff.</b></p> <p>(To the governor)</p>		<p>officers starting, this will lead to a considerable increase in time out of cell. We will review the core day in order to maximise time out of cell for those prisoners not otherwise engaged in activities.</p> <p>Prisoners will be kept informed of the roadmap and recovery stages through the Governor's weekly message to prisoners and via Prisoner Consultation Group (PCG) representatives who attend a monthly meeting with the Governor.</p>		
6.7	<p>Key concern (1.43): In our survey, only 10% of prisoners said that they had a custody plan, and although there was some good offender management work, it was not consistent and there was not enough contact with prisoners. Some key management posts in the OMU had been vacant for some time and there was a lack of positive day-to-day leadership. Several OMU staff told us that</p>	Agreed	<p>The Offender Management Unit (OMU) was significantly affected during the various waves of the pandemic. Whilst staffing levels have started to recover, HMP Wormwood Scrubs will be recruiting an additional temporary OMU Band 7 Manager for a 6-month period, who will provide additional management support to staff and prisoners. Furthermore, recruitment is currently underway for an additional Senior Probation Officer as well as a Custodial Manager.</p> <p>The SPO will provide additional support for staff and management oversight, whereas the CM will deliver critical key work such as overseeing the categorisation process and prisoner transfers.</p> <p>There will be an increase in one-to-one meetings, supervision and team meetings, as well as an increased focus on sentence progression, which inevitably suffered during the pandemic.</p>	Governor	December 2021





	they felt insufficiently supported in their work. <b>Key recommendation: Day-to-day leadership in the offender management unit should be strengthened and leaders should ensure that the provision of offender management services is comprehensive and consistent.</b> (To the governor)				
	<b>Recommendations</b>				
6.8	Recommendation (2.8): Strip searching on arrival at the prison should be carried out only on the basis of an individual risk assessment and always in a private space. (To the governor)	Not Agreed	<p>This recommendation is not accepted as searching of new arrivals at HMP Wormwood Scrubs is conducted in line with the National Security Framework (NSF) and Local Security Strategy (LSS), which mandates full searching of all new arrivals at the prison.</p> <p>Full searching is a critical tool that is used to find contraband secreted on an individual and to prevent the importation into establishments.</p> <p>HMPPS has a duty of care to prevent and deter illicit items from entering prisons, which could be used by a prisoner to harm themselves or others.</p>		
6.9	Recommendation (2.14): All violent incidents should be reported on the incident	Agreed	HMP Wormwood Scrubs have implemented a new process for ensuring that all incidents are recorded on Incident Reporting System, which commenced at the time of the inspection. This process has now been embedded and acts to ensure that all incidents are recorded on IRS.	Governor	January 2022



	management system. (To the governor)		<p>The above process involves observation books being checked weekly by Safer Custody staff; these entries are then checked against the Governor's Journal and IRS. Entries are added retrospectively if they are missing, however a follow up also takes place with managers to reduce the risk of incidents going unreported.</p> <p>The weekly SIM meeting, which is chaired by the Head of Safety will also now detail whether specific incidents are on IRS or not.</p>		
6.10	Recommendation (2.15): Leaders should ensure that the challenge, support and intervention plan process is used effectively for perpetrators of violence, and that formal support is in place for victims. (To the governor)	Agreed	The Challenge Support Intervention Plan (CSIP) process will be re-launched within the prison. This will involve residential CMs taking ownership of CSIP cases on their respective wings (as opposed to the Safety team, who currently oversee the whole process), as well as the roll out of CSIP for specific victims (in conjunction with the wider support for all victims that is currently in place). The involvement of residential staff will facilitate wider, more effective use of CSIP across the prison. The national Safety Team will support the prison with this process as part of a national initiative to re-launch CSIP.	Governor	January 2022
6.11	Recommendation (2.19): Adverse adjudications data should be acted on to ensure that adjudications are conducted promptly and to a demonstrably high standard. (To the governor)	Agreed	The adjudications standards meeting, which is held quarterly and chaired by the Deputy Governor will be used to monitor the rate of procedural errors, analysing any trends. The adjudications standards meeting will be used to drive forward action based on this data. Current Quality Assurance processes that are already in place will be developed further resulting in data driven analysis of trends and learning points to improve standards.	Governor	December 2021
6.12	Recommendation (2.25): Special accommodation should	Agreed	Special Accommodation is only used in exceptional circumstances. Operational Managers will be briefed by the Deputy Governor on expectations regarding special accommodation paperwork. This	Governor	November 2021



	be used only in the most exceptional circumstances and not punitively. Records of its use should be detailed and include justification. (To the governor)		paperwork will be more explicit about the reasons for use and will be subject to routine Quality Assurance (QA), the findings from which will be shared with all Duty Governors. They will also be discussed at the quarterly Segregation Monitoring and Review Group (SMARG) meeting, chaired by Head of Segregation Unit.		
6.13	Recommendation (2.32): Segregation paperwork should detail fully the reasons for segregation, and the ongoing record should demonstrate regular, meaningful interaction with those segregated. Paperwork should be quality assured by a senior leader. (To the governor)	Agreed	<p>HMP Wormwood Scrubs will implement a new, simpler form for completion by operational managers for all men entering the Segregation Unit. Governors will be required to detail the specific reasons for segregation, as well as the reasons why any alternative location would not be appropriate.</p> <p>QA processes will be introduced to ensure that regular meaningful conversations are conducted with each segregated man. The Head of Segregation Unit will communicate the expectation of regular, meaningful interaction with those segregated. The quarterly SMARG meeting (chaired by Head of Segregation Unit) will review the QA findings.</p>	Governor	November 2021
6.14	Recommendation (2.33): Strip-searching on entry to the segregation unit should be carried out only on the basis of an individual risk assessment and always in a private space. (To the governor)	Agreed	The local segregation policy will be reviewed to make it clear that individuals are not all automatically required to be full searched, which will be communicated to all members of staff via a Notice to Staff. In certain instances, a full search won't need to take place, for example where a prisoner has been moved directly after a full search elsewhere. The requirement to use discretion and carry out a dynamic risk assessment in such instances will be communicated to both Duty Governors and Orderly Officers.	Governor	January 2022
6.15	Recommendation (2.43): The handcuffing	Agreed	The level of restraint (if any) to be applied to a prisoner on escort is already based on a full risk assessment as per our Local Security	Governor	December 2021



	of prisoners on escort should be based on a full risk assessment and be proportionate to the risks posed. (To the governor)		<p>Strategy (LSS) in line with the External Prisoner Movement policy (PSI 33/2015).</p> <p>Following the inspection, HMP Wormwood Scrubs has improved the level of communications with healthcare about upcoming escorts and regime management planning. This will be further developed so that prisoners requiring more complicated risk assessments by security can be identified at a much earlier stage rather than the day before the escort.</p>		
6.16	Recommendation (3.4): Prison leaders should continue to develop the key work strategy, to ensure that each prisoner has regular and high-quality contact with a key worker. (To the governor)	Agreed	A new band 5 manager has been appointed specifically to oversee the delivery of key work. HMP Wormwood Scrubs will continue to prioritise those prisoners with the identified greatest need. Quality of contacts will be driven upwards through regular QA of entries.	Governor	January 2022
6.17	Recommendation (3.11, repeated recommendation 2.15): Prisoners should be able to access their property promptly following request. (To the governor)	Agreed	HMP Wormwood Scrubs has undertaken a review into the prisoner property process, in response to prisoner feedback. Following the review, changes are being made to the process for issuing property to prisoners, to ensure that property can be accessed promptly. The new policy will be communicated to prisoners and their families (using the Effective Communication Gateway).	Governor	January 2022
6.18	Recommendation (3.26): The prison should monitor application numbers and response times systematically. (To the governor)	Agreed	We are recruiting a new Performance and Assurance manager (Band 7) who will oversee the applications process, liaising with Residential managers to test quality and timeliness.	Governor	January 2022



6.19	Recommendation (3.27): The prison should investigate prisoners' lack of confidence in the complaints system and the reasons for the large numbers reporting that they have been prevented from complaining, and act on the findings. (To the governor)	Agreed	<p>Consultation regarding lack of confidence in the complaints system will be channelled through the monthly Prisoner Consultation Group, chaired by the Governor. Prisoners will also be invited to comment on the feedback form that is attached to the weekly newsletter.</p> <p>The business hub will ensure complaints boxes are well stocked at all times.</p> <p>Communications to prisoners (through Wayout TV and the weekly prisoner newsletter) will focus on the complaints process, including timeframes and statistics regarding response times.</p> <p>HMP Wormwood Scrubs is recruiting a new Performance and Assurance manager (Band 7) who will oversee the complaints process, and provide monthly analysis, including review of response timescales and quality, which is quality assured at the weekly "informal SMT" meeting.</p>	Governor	January 2022
6.20	Recommendation (3.46): Professional interpreters should be used where necessary to support accurate and confidential communication. (To the governor)	Agreed	<p>Staff will be reminded to utilise services from The Big Word (in situations where there are no appropriate staff available to do so), particularly those working in areas such as Reception, the First Night Centre, Segregation and those conducting ACCT initial assessments and reviews. Head of Functions (HoFs) will drive this use in conjunction with the Equalities Advisor.</p> <p>Induction booklets will be translated into key foreign languages to ensure that new foreign national prisoners are aware of prison processes and support available.</p>	<p>Governor</p> <p>Governor</p>	<p>October 2021</p> <p>January 2022</p>
6.21	Recommendation (3.47): The Home Office should inform the prison promptly of all immigration detainees assessed to be at risk in	Agreed	The Home Office will endeavour to undertake an induction with every Foreign National prior to the commencement of their detention. Should the individual meet the criteria set out in Chapter 55, the Home Office will advise HMPPS colleagues.	Assistant Director, Immigration Prison Teams (IPT) – South.	February 2022.



	detention. ( To the Home Office)				
6.22	Recommendation (3.48): Immigration detainees should have access to free, independent legal advice surgeries. (To the Home Office)	Agreed	All individuals who are detained are made aware of their right to legal representation, and how they can obtain such representation. Where eligible Civil Legal Advice can advise on finding a solicitor who can provide free advice and assistance funded by legal aid. Under the current process the prison will provide the details of immigration organisations to Foreign National Offenders (FNOs) who require legal advice. Furthermore, return documents from Home Office are now providing additional information on legal advice as well.	Assistant Director, Immigration Prison Teams (IPT) – South	February 2022
6.23	Recommendation (3.49): Paid carers should be available to provide additional support to prisoners with disabilities, and they should be subject to appropriate oversight and supervision. (To the governor)	Partly Agreed	<p>This recommendation is partly agreed because the prison is reliant on the local authority to provide these paid carers and to meet their statutory social care requirements.</p> <p>Following the inspection HMP Wormwood Scrubs have reviewed the process for social care referrals and scheduled quarterly meetings to review all individual cases. These meetings will involve the local borough, prison and Practise Plus managers; they will review the support in place for those prisoners with disabilities in need of additional support.</p> <p>The SMT Equalities champion for disability will consult prisoners with disabilities, which will include discussion of social care arrangements.</p> <p>Social Care will be a standing item on the agenda of the monthly Local Delivery Board.</p>	Governor	February 2022
6.24	Recommendation (3.50): Prisoners with specific evacuation needs should have a clear and up-to-date personal emergency	Agreed	<p>Knowledge of personal evacuation and emergency plans (PEEPs) and related processes will be communicated to staff through line managers and Head of Functions (HoFs).</p> <p>The night orders will be reviewed and amended to make it clear to staff on nights their responsibilities in terms of emergency evacuation plans.</p>	<p>Governor</p> <p>Governor</p>	<p>November 2021</p> <p>December 2021</p>



	evacuation plan, which is known to all wing staff, including those working at night. (To the governor)		Duty Governor checks on nights will be utilised to ensure that night Orderly Officers have the necessary knowledge regarding emergency evacuation plans (and who is subject to PEEPs). Oversight of PEEPs will be coordinated by the local Equalities Advisor. All PEEP's will be reviewed quarterly by the Equalities advisor and the outcomes will be reported into the DEAT, where appropriate actions can be commissioned.		
6.25	Recommendation (3.65): Prisoners should be able to access health care complaint forms freely and submit them securely on all wings. (To the governor)	Agreed	The Head of Healthcare will ensure that there are complaints forms and a box available on every wing so that complaints can be securely submitted. The number of complaints will be reviewed on a monthly basis via the Quality Assurance meeting, which is chaired by the Practise Plus Head of Healthcare to ensure they are consistent with other comparator prisons. The Head of Healthcare will always ensure there is a patient engagement focus and monthly slot within the Quality Assurance meeting. There will also be a separate patient representation meeting to support communication and improved access for patients to make complaints through all forms rather than just paper complaints.	Practice Plus Group	December 2021
6.26	Recommendation (3.80): New arrivals should receive a health consultation in private. (To the governor)	Agreed	The Head of Healthcare will ensure all healthcare reception staff are clear on the expectations of patient privacy to report any breach of privacy on Datix (healthcare incident reporting systems) in handover meetings and will escalate these incidents in the Local Delivery Board meetings. This will be communicated via improved signage, team briefings and e-mail. The head of early days in custody will also ensure that prison staff are clear that medical consultations are not to be interrupted.	Governor	December 2021
6.27	Recommendation (3.81): Care plans for prisoners with long-term health conditions should be personalised, fully to	Agreed	The Head of Healthcare will ensure that there is a lead individual staff member for each long-term condition category and will implement specific individualised clinics.	Practice Plus Group	March 2022



	reflect their wishes and needs. (To the governor)		<p>This includes but is not limited to chronic obstructive pulmonary disease, asthma, corticobasal degeneration, epilepsy, diabetes, dementia, depression/mental health, chronic kidney disease.</p> <p>All patients with a long-term condition will be offered a personalised print out of their care plan, using the Ardens templates on SystmOne.</p>		
6.28	Recommendation (3.87): Prisoners should receive prompt assessment by the local authority following a social care referral. This should be monitored by the partnership board. (To the governor)	Partly Agreed	<p>This recommendation is partly agreed because the prison is reliant on the local authority to carry out the assessment.</p> <p>The Head of Healthcare and the Governor will organise and agree a specific meeting structure with Hammersmith &amp; Fulham (H&amp;F) council with a clear focus on auditing timelines for assessment of patients who require social care intervention at HMP Wormwood Scrubs. This will be a standing monthly item on the local delivery board and all escalations to H&amp;F council will include senior parties from Healthcare and HMPPS.</p>	Governor	March 2022
6.29	Recommendation (3.97, repeated recommendation 2.75): Patients requiring admission to hospital under the Mental Health Act should be transferred within current Department of Health guidelines. (To the governor)	Partly Agreed	<p>This recommendation is partly agreed due to operational reasons outside of the prison's control relating to the availability of Psychiatric Intensive Care Unit (PICU) and secure mental health beds in the community and the outcome of clinical assessments by external services.</p> <p>HMP Wormwood Scrubs promote timely mental health transfers to hospital, however, when excessive waiting times are encountered, the prison make submissions to health commissioners and HMPPS to enable swift transfer. NHS England – London Region has set up a monthly Mental Health Transfer management meeting where all London Mental Health providers of prison and Immigration removal centres mental health in-reach services, Healthcare Lead Providers and secure mental health services are represented along with Health &amp; Justice Commissioners and Specialised Commissioning from NHS England. The meeting will identify blockers and points of delay in the mental health transfer pathway. All current cases of patients awaiting transfer are reviewed at this meeting.</p>	Practice Plus Group	March 2022





6.30	Recommendation (3.110, repeated recommendation 2.87): Prison officers should fully supervise all medicine administration to ensure patient confidentiality and reduce the risk of diversion. (To the governor)	Partly Agreed	<p>We have allocated staff to provide individual supervision of medication issue in our highest risk areas. However, HMP Wormwood Scrubs do not have the resources to specifically supervise the issue of all medication in every part of the prison to the required level to reduce the risk of diversion.</p> <p>Staff will be reminded via wing briefings of the importance of effective queue supervision in order to improve consistency. Treatment rooms will be refurbished and this will improve privacy at the point of dispensing.</p>	Governor	November 2021
6.31	Recommendation (4.6): Prisoners should be able to visit the library in person, with suitable social distancing (To the governor)	Agreed	Library visits will resume as restrictions ease and we are not subject to outbreak measures.	Governor	January 2022
6.32	Recommendation (4.20): Leaders should implement their recovery plans quickly, within the parameters of HMPPS restrictions, to enable prisoners to access and benefit from face-to-face education and training. (To the governor)	Agreed	Face to face education has now resumed and will be further expanded, with a clear timetable for progression as restrictions ease and we are not subject to outbreak measures. This will involve an increasing amount of classroom based learning (as opposed to being solely based on residential areas) and the opening up of the education department again. Our priority will continue to be men identified as having additional learning needs.	Education provider and Governor	January 2022
6.33	Recommendation (4.21): Leaders and managers should improve the effectiveness of their	Agreed	Performance will be monitored through the monthly Quality Improvement Group (QIG) meeting and through contract management with regional team. Regular quality assurance meetings will take place with the providers, chaired by a prison manager in the Reducing Reoffending team.	Governor	January 2022



	quality assurance activities, to make sure that they identify areas for improvement in education, skills and work. They should put in place clear improvement actions and challenge their providers robustly to make the necessary improvements. (To the governor)		All of this will be captured in a Quality Improvement Plan, reviewed at the monthly QIG meeting.		
6.34	Recommendation (4.22): Leaders and managers should make sure that all prisoners receive effective initial and ongoing advice and guidance to inform them of the opportunities available to them during their time in prison and on release. (To the governor)	Agreed	<p>The new provider will be recruiting new Information Advice and Guidance (IAG) advisors following implementation of the new contract which commenced 1 June 2021. A Senior Employment Coach, an Employment Coach and a Team Leader (covering London Prison Group) are in place, two Employment Coaches are awaiting start date.</p> <p>The contract will be monitored through a weekly allocations meeting, the monthly Quality Improvement Group meeting and through contract management with regional team. Regular quality assurance meetings will take place with the provider, chaired by a prison manager in the Reducing Reoffending team.</p>	Forward Trust and Governor	November 2021
6.35	Recommendation (4.23): Leaders, managers and staff should immediately review how they support prisoners to undertake the assessments of their existing English and mathematics skills.	Agreed	<p>Full assessments of learning difficulties and disabilities (LDD) needs (rather than rapid screeners) have recommenced with special educational needs (SEN) teachers providing support.</p> <p>Face to face initial assessments will resume as restrictions ease and we are not subject to outbreak measures. This will provide a higher level of support.</p>	Education provider	November 2021



	They should make sure that prisoners understand the purpose of these assessments, how to complete them and how the assessments inform their learning and individualised support plans. (To the governor)				
6.36	Recommendation (4.24): Tutors should make sure that prisoners complete their learning and assessment in their learning packs. They should give them clear feedback on how to improve their work over time and correct their mistakes. (To the governor)	Agreed	<p>Prisoners are always provided feedback on their learning plans by teachers.</p> <p>Completion of learning packs, as well as assessment and feedback are being monitored through weekly meetings and observations (by teachers and prison managers). This is monitored in the weekly meeting between the prison Learning and Skills manager and the Education manager. There is further review in the monthly Quality Improvement Group, chaired by the Head of Reducing Reoffending, plus the monthly contract meeting (chaired by the Governor).</p> <p>Learning packs have been revised where necessary and training is ensuring a standardised approach, adopting the “what went well / even better if” model.</p>	Education provider & Governor	November 2021
6.37	Recommendation (5.17, repeated recommendation S51): Prison offender manager contact with prisoners should be regular and meaningful. (To the governor)	Agreed	<p>The prison will introduce monitoring of cross-deployment levels across different areas (such as Prison Offender Managers [POMs], Safer Custody and Gym staff) to ensure that this is done fairly, minimising the risk of POMs being cross-deployed more than is necessary. The Head of Business Assurance will oversee this at the weekly Regime Monitoring meeting.</p> <p>Senior Probation Officer (SPO) will drive forward a focus on linking POM contact to prisoners’ sentence plans as is appropriate to individual</p>	Governor	December 2021



			<p>circumstances. POM supervision meetings with the SPO will discuss the frequency and quality of contact.</p> <p>Additional one-to-one contact will be maintained through the Indeterminate Sentence Prisoners (ISP) forum, overseen by the SPO.</p>		
6.38	<p>Recommendation (5.22): The prison should work with the courts which it serves, to make sure that it receives critical information promptly. (To the governor and HMPPS)</p>	Partly Agreed	<p>This recommendation is partly agreed because the prison is reliant on the courts to provide this information.</p> <p>HMP Wormwood Scrubs will work closely with our Courts and ensure that they are all fully aware of exactly what information we need from them in order for us to fully meet our public protection requirements. This will take the format of written guidance which will be sent to a named person in each of our courts.</p>	Governor	December 2021
6.39	<p>Recommendation (5.26): Prisoners judged suitable for open conditions should be moved to the category D estate without undue delay. (To the governor)</p>	Partly Agreed	<p>A new Custodial Manager has been appointed into Offender Management Unit (OMU) with a view to improving our transfer and allocations processes, and reducing delays. They will liaise closely with Population Management Unit (PMU) and prioritise transfers out. Transfers will be monitored in a regular meeting, chaired by an OMU manager.</p> <p>However, the number of prisoners identified as suitable for open conditions is, invariably, much lower than those categorised B or C, and PMU will always prioritise multiple prisoner drafts to a cat B or cat C establishment over a move to open conditions. Our ability to meet this recommendation will be dependent on national support, particularly with regard to spaces and transport.</p>	Governor	December 2021
6.40	<p>Recommendation (5.32): Interventions to reduce the risk of reoffending should be</p>	Not Agreed	<p>HMP Wormwood Scrubs have a clear strategy regarding young adults, whereby they are transferred as soon as possible after sentencing.</p>		



	available to younger prisoners. (To the governor and HMPPS)				
6.41	Recommendation (5.33): Interventions to reduce the risk of reoffending should be available to prisoners who are likely to spend their whole sentence at HMP Wormwood Scrubs. (To the governor and HMPPS)	Partly Agreed	<p>This recommendation is partly agreed because interventions to reduce the risk of reoffending are offered at establishments where a need is identified, and where prisoners will remain for long enough to complete such work. Needs analysis exercises have been completed annually and to date it has been identified that there is not sufficient need for accredited interventions at HMP Wormwood Scrubs. The most recent needs analysis (December 2020) highlights the relatively short average length stay of those at HMP Wormwood Scrubs who are sentenced. It is agreed that the needs of this population should be monitored to consider whether this changes.</p> <p>Accredited interventions are offered according to risk and treatment need to those serving long enough to complete them in custody. There is a national system in place for men whose risk and need suggests they would benefit from an intervention: they will be identified by the Offender Management Unit team and if meeting the risk and need criteria, and motivated to complete an intervention, can be transferred to an alternative site in order to complete this work. This process will be utilised at HMP Wormwood Scrubs.</p> <p>Shorter term non-accredited interventions are being introduced in order to support the prisoners who will serve their whole sentences at HMP Wormwood Scrubs.</p>	Governor	March 2022
6.42	Recommendation (5.38): Leaders should ensure that effective housing support remains in place for all prisoners, including	Partly Agreed	Under the Probation Reform Programme, from June 2021 all sentenced prisoners can access specialist accommodation support via Commissioned Rehabilitation Services. This includes support to relinquish a tenancy at the start of a long sentence, sustaining accommodation for those subject to a short sentence and support to	HMPPS – Probation Reform Programme	July 2022



	those on remand. (To the governor and HMPPS)		<p>obtain accommodation if due to be released with No Fixed Address (NFA). Future provision will include:</p> <ul style="list-style-type: none"> <li>• A focus on those serving short sentences, including partnership arrangements with Homelessness Prevention Teams being established in all Probation Regions.</li> <li>• Those on remand currently receive a service from Probation Service staff based in prisons. Options are currently being considered for a service for people on remand including sustaining existing accommodation and supporting obtaining accommodation.</li> <li>• A Resettlement pack is being designed for all those leaving prison providing key information including on local support that can continue post release.</li> </ul> <p>Homeless Prevention Teams (HPTs) set up to oversee the Covid Accommodation Emergency have been retained as a permanent feature of HMPPS to develop relationships with local authorities and other strategic partners in order to embed and expand housing options for prison leavers. The HPTs continue to provide services in all the 12 regions in England and Wales, including London.</p> <p>HMPPS are investing over £20m to launch a new service, providing up to 12 weeks of basic temporary accommodation for prison leavers who would otherwise be homeless. Launched in July 2021 within five probation regions in England; all individuals, aged 18 and over, released from prison, or moving on from either Bail Accommodation and Support Service (BASS), or Approved Premises (APs) at risk of homeless in these five regions are eligible. It will support around 3,000 offenders in its first year, with a view to scaling up and rolling out nationally, though the Spending Review 2021 will set out the approach for future years.</p> <p>A Policy Framework for the Duty to Refer (DtR) was published in April 2021, and came into force 1 July 2021, in line with unification.</p>	<p>HMPPS -Reducing Reoffending, Partnerships and Accommodation</p> <p>HMPPS -Reducing Reoffending, Partnerships and Accommodation</p> <p>MoJ – Prisoner Outcomes,</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p>
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			Communications and work to strengthen the DtR are ongoing, including working with Court-based National Probation Service (NPS) teams on their responsibility towards those released at the door of the court due to time served.	Resettlement and Reoffending & HMPPS - Reducing Reoffending, Partnerships and Accommodation.	
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Recommendations	
Agreed	31
Partly Agreed	8
Not Agreed	3
<b>Total</b>	<b>42</b>

