

Action Plan: HMP Send

Action Plan Submitted: 6th September 2021

A Response to the HMIP Inspection: 10th May - 21st May 2021

Report Published: 26th August 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 mus t be an explanation of why we cannot fully agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.
Not Agreed	The recommendation is not agreed and will not be implemented. This might be because of commissioning, policy, operational or affordability reasons.	The response must clearly state the reasons why we have chosen this option. There must be an explanation of why we cannot agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.

ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMP SEND

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	Key concerns and recommendations				
6.1	Key concern 1.31: Although COVID-19- related restrictions on physical contact had been relaxed in the community before the inspection, contact between prisoners and visitors during social visits remained restricted. Women were not able to have any physical contact with visitors, including a ban on hugging their children, which caused enormous upset. Recommendation: Restrictions on physical contact during face-to- face social visits should be relaxed to be in line with those applicable in the community. (To HMPPS)	Partly Agreed	This recommendation is partly agreed due to having tighter restrictions is place in prisons, which are seen as high risk environments, which is due to high number of people living and working together, making the spread of infection more difficult to control and the risk of outbreaks more acute. On the 27th May 2021, rules were relaxed allowing physical contact for the children of prisoners aged under 11. Ministers have given approval to the rollout of Testing for Physical Contact on social visits across the estate. Therefore, subject to local risk assessments and the availability of resources, prisons can introduce a testing programme that, where negative visitor tests are evident, will allow for some physical contact between prisoners and their visitors. HMP Send has introduced testing to allow contact. Visitors can either provide proof of a recent negative test result or complete a lateral flow test on arrival. If the tests are negative, physical contact will be allowed. In addition HMP Send will continue to take temperatures of prisoners and visitors upon visits. All children under the age of 11 can have physical contact without a test.	HMPPS	Completed
6.2	Key concern 1.32: Leaders had been slow to reintroduce face-to-face inductions for prisoner	Agreed	The prison will have implemented various measures to increase the profile and emphasis on education and learning, such as:	Governor	Completed

participation in education, skills and work. The information that women received about the curriculum was out of date, inaccurate and lacked detail. Most women were not placed on courses that met their resettlement needs or that were informed by their sentence plans. Recommendation: Leaders and managers should promote the benefits of education effectively. They must rapidly increase and improve the advice and guidance women receive to enable them to make the appropriate choices about taking part in education, skills and work. (To the governor)	 Maximising the use of notice boards and ensuring they contain up to date information about courses on offer. Making use of the prison newsletter each week to promote information. A tutor is tasked with writing a paragraph about their subject which will include highlighting current learners. The education induction booklet has been renewed to reflect current delivery. Quarterly celebration events are now taking place to acknowledge and celebrate success in education – milestones and qualifications achieved. The first of these took place in July 2021. Shannon Trust mentors were reinstated in June 2021 and are providing peer led support with literacy. A newly recruited specialist tutor is working with those who do not respond well in a classroom setting to work on a one-to-one basis in different settings across the prison. Keyworkers will support learning aims for their caseloads. The Information Advice & Guidance (IAG) contract is due for renewal in August 2021. HMP Send will be increasing provision to four days per week. Personal development plans (PDPs) devised by the IAG provider must be completed face to face, clearly evidencing short and long term goals to ensure women are able to make appropriate and progressive choices. Under the additional provision PDPs will be reviewed and updated. PDPs will be shared with Prison Offender Managers, Keyworkers, education and work areas to ensure that they inform sequencing. 	Governor and IAG provider	December 2021
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6.3	Key concern 1.33: Opportunities for women to demonstrate progression against their sentence plan targets remained limited due to the COVID-19 restrictions. For example, many peer worker roles had not resumed and release on temporary licence (ROTL) remained suspended. The closure of E and F wings meant that women had lost a positive, progressive environment, which had not yet been replicated on C and D wings. Core components of the PIPE unit and the democratic therapeutic community, such as therapy groups, had yet to restart. Recommendation: Women should have access to a full range of progression pathways that allow them to take responsibility, complete their sentence plans and learn new skills. (To the governor)	Agreed	Since the easing of restrictions, a number of progression pathways have been reinstated, these include: - Democratic Therapeutic Community - Psychologically Informed Planned Environments (Outreach, Preparation and Progression services) - Release on Temporary Licence HMP Send continues to support women and plan progressive moves to other prisons for courses that are not available locally as well as for open conditions. Peer support roles will continue to be reintroduced in line with covid restrictions. There are three peer support roles to be fully resumed (Social care peer supporters, Shannon Trust peer workers and Healthcare champion). Prisoner Information Desk Workers – These roles will be reinstated once easing of Covid restrictions allow. Key work is now in place. Key workers and Prison Offender Managers will support women in their progression, completion of their sentence and reinforce and support the learning of new skills.	Governor	October 2021
	Recommendations				
6.4	Recommendation 2.19: The prison should increase awareness of adult safeguarding and embed this through staff	Agreed	HMP Send's Adult Safeguarding Policy will be reissued to all members of staff and repeated on an annual basis supported by notices that highlight individual responsibilities and indicators of abuse/neglect.	Governor	December 2021

training and support. (To the governor)	A briefing on adult safeguarding will be provided to all new staff as part of their induction to the prison. HMP Send will explore further training for staff at HMP Send with the local authority through our membership of the Local Adult Safeguarding Board.		
Recommendation 2.24: Women's negative perceptions about the level and type of victimisation from other women should be explored and effective action taken to address the issues identified. (To the governor)	The Governor has commissioned the Women's Estate Psychology Service (WEPS) to explore perceptions of victimisation, which will be completed by December 2021, HMP Send will implement the relevant actions following the findings from the work. Safety surveys will take place at least twice a year and will ask women about perceptions of bullying and victimisation and ask women to rate the efficacy of actions taken to address this. HMP Send will also explore mental health status to better understand which women are most affected. Prior to their release women leaving HMP Send will have an exit interview. Currently questions are asked about bullying, however the exit interview questions will be amended to also ask about their experiences of victimisation at HMP Send. Findings from the WEPS work, surveys and exit interviews will be discussed by a multidisciplinary team at the monthly Safety Custody Meeting chaired by the Head of Safer Custody. This committee will agree actions to further explore and/or to address emerging issues.	Governor	March 2022

6.6	Recommendation 2.25: Women should be able to benefit from an effective incentives scheme, including the full range of benefits gained by living on enhanced wings. (To the governor)	Agreed	The Incentives Scheme was revised in January 2020. Unfortunately it has not been possible to implement the scheme in full due to the national restrictions being in place for Covid-19. Currently, national restrictions still demand social distancing and prohibit association on wing. When these restrictions are lifted women will have access to the full range of benefits applying to the enhanced wings. In the interim, women on C wing have access to the grounds throughout the core day; and women on D wings have access to a kitchenette, garden and grounds throughout the core day.	Governor	January 2022
6.7	Recommendation 2.30: The decision to segregate women in any location should always be correctly authorised with all the necessary safeguards expected within a formal segregation unit. (To the governor)	Agreed	HMP Send have developed and implemented a new policy, which sets out the requirements and procedures that need to be adhered to for segregating women. The Residential function oversee all segregation paperwork, which is available in hard copies and electronic copies. The Residential Function will work closely with the Safer Custody Team to identify vulnerability concerns. Furthermore the Deputy Governor will quality assure all segregation paperwork as well as a checklist being displayed by the holding cell to remind staff of its appropriate use. The use of segregated conditions will be monitored through the quarterly Safety and Order meeting, which is chaired by the Deputy Governor.	Governor	October 2021
6.8	Recommendation 3.16: An effective system for monitoring and quality assuring applications should be introduced, including tracking the time it takes for applicants to receive a response. (To the governor)	Agreed	HMP Send will reintroduce the Prisoner Information Desk (PID) worker role which will include the logging and tracking of non-confidential applications. Wing logs will be maintained by staff for any confidential applications. Responses will be logged and the Residential team will track and monitor the time for responses. Any applications that have not received a reply within 5 working days will be escalated to the manager of that area. Residential managers will quality assure 10% of responses.	Governor	December 2021

			Oversight of performance against this target and quality will be provided through the monthly Performance and Assurance meeting.		
6.9	Recommendation 3.20: Prisoners, especially foreign national women, should have more access and advice to find legal advocacy. (To the governor)	Agreed	Prisoners Advice Service (PAS) will reinstate a fortnightly service to the prison. PAS pursues prisoners' calls for help about their treatment in prison by providing advice and information and, where appropriate, taking legal action. HMP Send are looking to commission specialist services for immigration advice and advocacy. Not Beyond Redemption, a charity set up by Camilla Baldwin Solicitors who support Mothers in custody. The charity will provide women with legal advice and represent them in court. Due to Covid-19 the charity had to suspend work at the prison, however, since July 2021, these services have been resumed and are attending the prison monthly.	Governor	December 2021
6.10	Recommendation 3.30: Women should be able to access their stored property without delay. (To the governor)	Agreed	The Reception team will ensure women have access to stored property within a target of 10 days of the written application being received. The Reception manager will carry out monthly assurance checks to ensure that the targets are being met. Findings of the assurance activity will be discussed at the monthly Performance and Assurance meeting which is chaired by the Governor.	Governor	November 2021
6.11	Recommendation 3.31: All women should be able to eat communally. (To the governor)	Agreed	HMP Send have reinstated communal dining for all women on a weekly basis. When social distancing requirements are removed, communal dining will be offered to everyone daily.	Governor	Completed

6.12	Recommendation 3.32: A range of self-catering facilities should be available. (To the governor)	Agreed	All residential areas have kitchens access, which can be used on a timetabled and risk assessed basis by women. D wing has a kitchenette accessible to women through the core day. Temporary accommodation planned for the autumn will have a shared kitchen included. All women have access to microwaves and toasters outside of the timetabled access to kitchens.	Governor	October 2021
6.13	Recommendation 3.47: The prison should contact the ambulance service immediately as soon as an emergency code blue or red is called to prevent any unnecessary delays in treatment. (To the governor)	Agreed	HMP Send have re-issued guidance to all members of staff on requesting an ambulance in the event of an emergency to avoid delays. The Operational Support Grades (OSGs) in Comms will contact an ambulance upon receipt of a medical code via the net. Actions taken following the calling of a medical code will be recorded at each instance in the controller's log and then monitored and where necessary reviewed in the monthly Safety meeting, which is chaired by the Head of Safety.	Governor	Completed
6.14	Recommendation 3.48: The confidential health complaints process should be clearly advertised, and training in and monitoring of complaint responses should be fully implemented. (To the governor)	Agreed	Posters have been placed throughout HMP Send on all wings showing where the Healthcare complaints forms are located. Healthcare complaint forms are now clearly visible on the wing by the medication hatch. Healthcare complaints system will be explained to women as part of their Healthcare induction. All complaints are reviewed by Head of Healthcare before being sent to the patient, for quality assurance check and monitoring. They will be discussed at the Quality Improvement Board.	Governor	Completed September 2021

6.15	Recommendation 3.99: Women should receive the appropriate doses of medication and reasons for deviation from in- possession risk assessment should be recorded. (To the governor)	Agreed	Pharmacist and GPs to work collaboratively to ensure patient's medication is reviewed and assessed for appropriateness, where medicines administration is affected by the prison regime. All staff are required to record any deviations from the in-possession risk assessment, and reasoning, on patient's medical notes and complete the relevant templates. The pharmacist has reinstated the medicines review clinic and is reviewing patients and referring to GP where appropriate. Oversight will be provided by the Medicine Optimisation Meetings attended by the prison, Healthcare and the NHS. This meeting is chaired by the Lead Pharmacist for Health & Justice.	Governor	Completed
6.16	Recommendation 3.103: The dental room should be refurbished to update the environment, including an improved flow for the decontamination process. (To the governor)	Partly Agreed	At present there is no funding available to carry out this work. The Governor will seek funding.	Governor	March 2023
6.17	Recommendation 3.107: Regular equality meetings should take place, including analysis of a comprehensive range of data to make sure that any potential disproportionate outcomes are identified and rectified. (To the governor)	Agreed	The Equality Action Team (EAT) meetings resumed in February 2021, which is chaired by Head of Safety. Attendees agreed that bi-monthly meetings provided better oversight and attached the appropriate importance to equality issues. Since February these meetings have been taking place bi-monthly and are well attended by a multi-disciplinary team. A range of data is now collected locally, analysed by the Safety Analyst and presented to the EAT for comment, to agree actions and determine the strategic direction to address any disproportionality.	Governor	October 2021

			Actions identified are recorded and monitored through the Equality Action Plan.		
6.18	Recommendation 3.116: Information relevant to women who are foreign nationals and their detention should be available in the language of their choice. (To the governor)	Agreed	During induction information will be available to women signposting them to Safer Custody and Prisoner Advice Service (PAS) for issues surrounding their immigration and deportation status. The Big Word service will be promoted to all staff and guidance on how to access it will be reissued so that all departments can communicate with the women effectively. Induction will have a resource of basic information in a variety of languages. OASys SAQs (Self-Assessment Questionnaire) can be printed in any language and Prison Offender Managers have been reminded of this.	Governor	January 2022
6.19	Recommendation 4.7: Women's time out of cell should increase to the levels in place before the pandemic. (To the governor)	Not Agreed	This recommendation is not agreed as the new core day will meet the expectation requirements, which will be slightly less than the levels prior to the pandemic.		
6.20	Recommendation 4.8: Association time should be resumed with a range of activities. (To the governor)	Agreed	Association indoors has not been possible due to Covid restrictions. Association time indoors will be available in evenings at Stage 1 of the HMPPS recovery framework with a focus on providing structured groups including chaplaincy groups, book clubs, kitchen access and special interest sessions such as Fine Cell and the Women's Institute.	Governor	March 2022

			Women currently have free time for association outside in the grounds and over communal meals.		
6.21	Recommendation 4.9: Women living on the enhanced unit should have additional privileges including more time in the open air and not being locked in their cell at night. (To the Governor)	Partly Agreed	This recommendation is partly agreed as HMP Send will consider carefully whether or not to extend unlocked cell doors for more of the enhanced wing. HMP Send have some accommodation for enhanced women who meet a local risk assessment are not locked in their rooms at night. This is currently in place on D-Wing and will be in place for new accommodation expected in the autumn. Women are able to access time in the open air from 08.00 to 17.30 on C-Wing and 08.00 to 20.30 on D-Wing.	Governor	Completed
6.22	Recommendation 4.23: Leaders and managers must increase the urgency with which they reintroduce the education, skills and work curriculum. They must increase the opportunities for women to access face-to-face teaching, utilising learning space better. (To the governor)	Agreed	HMP Send have introduced more opportunities that are for face-to-face learning since the inspection. These include facilitation time for distance learning, which is currently being accessed by 13 unique learners. The Customer Services and Small Firms Enterprise Development Initiative (SFEDI) (business set up) course both re-started in June 2021. HMP Send have also introduced a specialist tutor to work one-to-one with those who have not previously engaged with education. With the easing of Covid restrictions, HMP Send are now able to mix both sites of the prison within education which increases allocation and use of learning spaces. Redemption Roasters are a behind bars coffee company, who were approached by the Ministry of Justice (MOJ) to help address the state of reoffending through coffee industry learning and work. They will be delivering from Autumn 2021. All provision is assured at the quarterly Quality Improvement Group (QIG) meeting, chaired by the Learning and skills manager.	Governor	December 2021

6.23	Recommendation 4.24: Leaders and managers must accurately identify women's additional learning needs and use this to provide appropriate support for women to help them make progress in gaining new skills and knowledge. (To the governor)	Agreed	Learning Difficulties & Learning Disabilities (LDD) are recorded on the education information management system, CURIOUS. Managers and leaders are now aware that when multiple learning needs are reported, this requires further examination to ensure the primary need is accurately reported. This has been addressed on the system. This in turn will inform the support tutors are able to implement and document in the LDD context statements. Staff will record LDD status on the sequencing spreadsheet, where it can be viewed by all staff. The Learning & Skills department will promote awareness to all activity areas about how learners' context statements can be accessed and used. LDD support is assured at the monthly Education Provider Meeting (EPM), the quarterly performance monitoring meting (QPM), both chaired by the Regional Head of Learning and Skills, as well as the quarterly Quality Improvement Group (QIG) meeting, chaired by the Learning and Skills Manager.	Governor and Weston College	Completed
6.24	Recommendation 4.25: Leaders and managers must make sure that women retain and reinforce their knowledge. They must introduce strategies to help women catch up with lost learning ahead of, and when, returning to face-to-face lessons and work areas. (To the governor)	Agreed	HMP Send will utilise education peer mentors to support learners by facilitating study groups to revise and refresh learning prior to the pandemic and through remote learning. When learners return to in-class learning tutors will carry out confirmation diagnostics to check and reinforce prior and remote learning. When learners returned to face-to-face learning, they are given assessments in their respective subjects to determine if they are at the same level that they had left off at. Those needing remedial tuition are back-termed to an appropriate point of their courses with supportive tuition.	Governor and Weston College	Completed
6.25	Recommendation 5.14: Work to reduce	Agreed	HMP Send carried out a prison survey early in 2021 to inform the Reducing Reoffending strategy. The action plan was agreed at the July	Governor	May 2022

	reoffending should be measured against an action plan and based on a comprehensive and detailed analysis of prisoner need. (To the governor)		2021 Reducing Reoffending meeting, which is chaired by the Head of Reducing Reoffending. HMP Send will extend the scope and detail of the next needs analysis for 2022 and beyond so that is more comprehensive and combines data from different sources including OASys and wider multidisciplinary input.		
6.26	Recommendation 5.15: Every woman should be engaged in an annual review of their OASys assessment and sentence plan to make sure that it reflects their individual risks, needs and targets. (To the governor)	Not Agreed	The Offender Management in Custody (OMiC) Model provides the framework to co-ordinate and sequence an individual's journey through custody and post release. The OMiC model places prisoners and the development of rehabilitation cultures in prisons at the heart of offender management processes and supports the reduction of re-offending in custody and the community. Under OMiC all prisoners in scope for OASys sentence planning should have a plan which is monitored, implemented and reviewed at points of significant change in circumstance from reception to the end of licence and post sentence supervision. The plan needs to be commensurate with risk, need and must involve the individual as an active participant. OMiC introduced a change to the yearly review requirement and since implementation. All determinate sentence prisoners, with 10 months or more left to serve at point of sentence, will have their OASys reviewed every two years and three years for those on indeterminate sentences or following a significant event between these times. Resource has been allocated to Prison Offender Managers to undertake OASys reviews and sentence plan meetings when a significant event occurs, for example, the completion of an offending behaviour programme.		
6.27	Recommendation 5.16: Support for women who have experienced trauma should be fully	Agreed	HMP Send provide a range of support for women who have experienced trauma.	Governor	October 2021

	reinstated. (To the governor)		The full programme of Democratic Therapeutic Community has recommenced since June 2021 been reinstated. Psychologically Informed Planned Environments (PIPE) Outreach, Preparation and Progression services have been reinstated. The Aurora course restarts in August 2021. This is a course for women who have been victims of domestic abuse and violence. A new course for HMP Send - Female Wellbeing, delivered by Streetlight UK starts in September 2021. This is a course for women who have worked in the sex industry, experienced human trafficking or sexual violence. The Healing Trauma course is currently suspended nationally and under national review. Becoming Trauma Informed, a course for staff working with trauma experienced women, restarts in September 2021.		
6.28	Recommendation 5.17: Women needing to claim benefits should be able to initiate a claim in custody and book an appointment at their local Jobcentre for the day of their release. (To the governor)	Agreed	The Universal Credit (UC) claim process does not allow for serving prisoners to make a claim while they are still in custody, however as part of the government's Covid response, DWP established a bespoke telephony service to enable prison leavers to make a claim for UC quickly on release, where they are unable to make a claim online. This service has been embedded as business as usual by DWP. The Department for Work & Pensions (DWP) has now committed to resuming onsite working. They will replicate an initiative called 'The Departure Lounge', whereby claims are started in the prison a fortnight or so before release and final submission is completed on the day of release.	Dept. Works & Pensions (DWP)	January 2022
6.29	Recommendation 5.18: Women granted parole requiring residence at a probation approved	Agreed	In June 2020 a process commenced where the Parole Board notified the National Approved Premises Team of a decision to release to speed up the process of securing an Approved Premises placement.	Deputy Director	Completed

	premises should be able to access a place without delay. (To HMPPS)		During the pandemic Approved Premises have been operating to an Exceptional Delivery Model. An aspect of this model is priority allocations of placements – releases directed by the Parole Board are given the highest priority and we will continue to ensure that placements are arranged in a timely manner. Commencing in June 2021 is a project looking at current arrangements within the Central Referral Units of each region with consideration to forming a nationally managed unit to maximise full use of all placements available across the county. We remain committed to the expansion of the Approved Premises through the delivery of an additional 200 bed placements. The Approved Premise Expansion Programme (APEX) has delivered 82 bed spaces to date with further bed spaces confirmed for this financial year including a brand new Approved Premises for females in Bristol (26 spaces) which opened in June 2021. The Programme is continuing to progress additional sites and we are confident in achieving this target.	Reducing Reoffending, Partnerships and Accommodation Directorate	
6.30	Recommendation 5.28: Staff overseeing restrictions on mail and phone calls should be supported to make sure that child contact restrictions are well understood and enforced. (To the governor)	Agreed	The monitoring guidance as set by the Offender Management Unit (OMU) team is completed by the Operational Support Grade (OSG) group. Each instance will be recorded on the appropriate log. The OMU team will make sure that child contact restrictions are well understood by the OSG group through written and verbal briefing: awareness sessions to be delivered for all involved in monitoring pin phones/handing of mail and step by step guide available for reference. Quality assurance dip testing reviewed at the monthly Performance and Assurance meeting.	Governor	October 2021

Recommendations	
Agreed	25
Partly Agreed	3
Not Agreed	2
Total	30