



HM Prison &  
Probation Service

Action Plan: HMP Wandsworth

Action Plan Submitted: 24<sup>th</sup> January 2022

A Response to the HMIP Inspection: 13<sup>th</sup> – 24<sup>th</sup> September 2021

Report Published: 6<sup>th</sup> January 2022

## 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 with future target dates maybe delayed due to Covid-19 related disruptions to service delivery.

ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMP WANDSWORTH

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>				
7.1	<p>Key concern 1.44: Although leaders were making good use of data to measure daily and weekly progress, governance arrangements were not sufficient to make sure that longer term plans, targets and monitoring were taking place in a number of important areas such as violence reduction, use of force, key work, safety and equality and diversity.</p> <p><b>Recommendation: Prison leaders need to develop longer term plans for improving the prison against their priorities. The governor and his team should introduce robust</b></p>	Agreed	<p>A Consolidated Action Plan (CAP) with clear accountability lines will be updated to include all strategic actions and all accepted recommendations including those associated with, Prisons and Probation Ombudsman (PPO), violence reduction, use of force, keywork, safety and equality &amp; diversity. The CAP will be aligned with the overarching Business Strategies at both National, Regional and localised level, and act as the monitoring tool for progress.</p> <p>The governance and assurance of target progression and timeliness will be captured and reported through the monthly Senior Management Meetings, chaired by the Governing Governor. This will include Functional Head reports on the delegated strategic actions from the CAP, where delivery will be tested against performance indicators on The Hub and 2nd line assurance measures.</p> <p>The Regional Team, under the PGD, will provide a third line of assurance through their site visits, every 6 weeks, where a visit report will be provided to the Governor which will include tracking of CAP actions.</p>	Governor	March 2022

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	<p><b>governance arrangements to give them assurance that plans are being followed, that work is taking place on time, that there are clear lines of accountability, that progress is monitored and that there is a process for reviewing plans.</b></p> <p>(To the governor)</p>				
7.2	<p>Key concern 1.45: Over half of respondents to our survey reported that they had felt unsafe at some point during their stay. There was no formal support for victims. Violence was increasing and the number of assaults on staff was high. The management of perpetrators of violence was weak, too many investigations into incidents were not thorough enough, and there was no embedded violence reduction strategy or action plan.</p> <p><b>Recommendation: There should be a prison-wide approach to reducing violence and making</b></p>	Agreed	<p>A data, policy &amp; national guidelines informed Violence Reduction Strategy has been commissioned and will be embedded within an overarching Safety Strategy, which will be overseen by the Deputy Governor and validated by the Senior Management Team.</p> <p>Prisoner consultation (involving victims of violence) and stakeholder input (staff groups, psychology peers and Change Grow Live (CGL)) will constitute the working group to produce actions that will target the levels of violence to produce safer outcomes for prisoners and staff. Targets, monitoring and review of progress will sit within the establishments Consolidated Action Plan (CAP) and the Performance Hub KPI's.</p> <p>The Incentives Policy (IP) and the Challenge Support Intervention Plan (CSIP) processes will be reviewed alongside the Violence Reduction strategy and will promote and motivate good behaviour.</p> <p>Residential Custodial Managers (CMs) will take ownership of CSIP cases on their respective wings as well as the roll out of CSIP for specific victims. This will facilitate wider, more effective use of CSIP across the prison and help ensure investigations into incidents are complete. Open CSIP investigations will be quality assured by the Safety team and any findings will be discussed on a weekly basis at the Safety Intervention Meeting (SIM), which is chaired by the Head of Safety.</p> <p>The IP will be reviewed through consultation with prisoners and look to be embedded once Covid-19 restrictions are no longer apparent.</p>	Governor	March 2022
				Governor	March 2022

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	<p><b>prisoners feels safe. This should include setting targets for set periods, monitoring progress and reviewing, and where necessary, amending plans.</b> (To the governor)</p>		<p>A revised Safety Strategy will incorporate an alternative hub model, focussed on data analysis and joint working between, Residence, Security and Safety.</p>		
7.3	<p>Key concern 1.46: The use of force was high and there were no formal governance meetings. Staff involved in incidents did not always record de-escalation techniques or switch on body-worn cameras early enough to provide sufficient scrutiny. Not all incidents involving the use of batons and PAVA incapacitant spray were investigated by senior managers and too much use of force documentation was missing.</p> <p><b>Recommendation: Leaders should make sure that body-worn cameras are switched on at the beginning of any incident. There should be regular and effective senior management scrutiny and oversight of the use of</b></p>	Agreed	<p>Use of force incidents, including the use of Body Worn Video Cameras (BWVC) and the recording of planned incidents, will be scrutinised at a weekly review meeting, which is chaired by the Head of Safety. Notices to staff will be periodically shared to reiterate the importance of the use of BWVC and their importance in deescalating uses of force.</p> <p>The Use of Force meeting will focus on the appropriateness of the interventions, plus techniques deployed, identifying any areas for improvement. Feedback will be provided to individuals and the relevant areas. Refresher training will particularly focus on the importance of de-escalation and ensuring staff sufficiently understand the policy governing use of force, as well as principles of procedural justice and five-minute intervention.</p> <p>Appropriate 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 and will oversee the completion of paperwork and the promotion of good practice. Completion of use of force paperwork will be Quality Assured at the weekly Use of Force meeting, chaired by the Head of Safety. Learning and good practice outcomes from the quality assurance process will be shared with individuals and their managers to help drive performance in this area</p> <p>Where PAVA or batons have been deployed the Use of Force Co-ordinator will submit the relevant paperwork and justifications for doing so to the Deputy Governor, who will undertake QA to ensure actions were fully justified.</p>	Governor	March 2022
				Governor	March 2022

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	<p><b>force, including deployment of batons and PAVA, to make sure that force used is always justified and proportionate.</b></p> <p>(To the governor)</p>				
7.4	<p>Key concern 1.47: Wandsworth remained one of the most overcrowded prisons in the country with most prisoners sharing a cell built for one. The shower areas on Trinity were poor. The physical environment in the mental health inpatient unit was unacceptable, did not meet infection control standards and had ligature points that had not been remedied to reduce the risk to patients. The control of vermin needed greater focus, including measures to prevent food waste and rubbish being thrown from cell windows.</p> <p><b>Recommendation: All living conditions, including the inpatient unit and Trinity unit, should be improved to safe and decent standards.</b></p>	Agreed	<p>Works in both Trinity and Addison has been commissioned, with work already progressed to address cells, flooring, and showers in Addison for completion by April 2022 to address the living conditions.</p> <p>A Trinity decant project plan and meeting has been established by the Deputy Governor to address living condition concerns on Trinity. Further additional works requests have been submitted to address the works outside of the scope of business as usual remedial works to progress improvements in this area.</p> <p>A Decency Lead has been appointed and commissioned to undertake a Clean &amp; Decent audit in February 2022, where decency issues are monitored and addressed more robustly. The monthly Senior Management Meeting (SMT) will capture progressed work requests through updates from the Senior Site Manager to the Governor and SMT and where required management intervention will be sought by the Governor to avoid delay.</p>	Governor	July 2022

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	(To the governor)				
7.5	<p>Key concern 1.48: There was insufficient support for the many foreign national prisoners held at Wandsworth. Home Office immigration staff had only recently returned to the prison, face-to-face contact was limited, and wing surgeries were still suspended. Legal documents were often served too late, and prisoners and detainees spent far too long in prison with their cases unresolved.</p> <p><b>Recommendation: Foreign national prisoners and detainees should have their cases reviewed promptly and have timely access to information, help and face-to-face support.</b></p> <p>(To the Home Office)</p>	Agreed	<p>The Immigration team vacated HMP Wandsworth on the 23/03/2020 due to COVID restrictions being placed. During this period, the Immigration Prison Team (IPT) sought alternative methods for documents to be served. It was agreed with the Head of OMU, that prison staff would assist where possible. Only imperative paperwork was sent for service (e.g. Stage 1, stage 2 and detention paperwork etc). These were sent over with a full explanation of what the letter meant and entailed, and what the prison officer needed to do with it.</p> <p>During lockdown, IPT started using Video link to conduct interviews, however access was limited somewhat due to this facility being used for court proceedings. The Chief Immigration Officer (CIO) also established a weekly Wandsworth Duty Officer role who would be on call to answer any enquiries from prison staff. Lists and contact details (email address and phone) were provided to the prison for their convenience.</p> <p>Since 9<sup>th</sup> March 2021 , IPT have regularly attended 4 days per week, however as restrictions have continued to ease, since 1st August 2021 there has been full coverage – 7 days per week.</p>	Home Office	Completed
7.6	<p>Key concern 1.49: The lack of primary mental health and inpatient staff resulted in patients not having their mental health needs met in a safe or timely manner. This</p>	Partly Agreed	<p>An action plan was initiated immediately following the inspection to address the concerns, which is overseen by the mental health service deputy director and Oxleas Service Manager. The referral process has been reviewed and new procedures put in place to ensure all referrals are triaged in the daily referral meeting. The operational policy has also been reviewed and is being updated to reflect the new processes for managing referrals. The new referral process is monitored with a daily report for the</p>	Oxleas	March 2022

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	<p>was creating significant risks affecting the monitoring of referrals, assessments taking place within agreed timescales and ensuring that the outcome of assessments was fully documented.</p> <p><b>Recommendation: The prison should work with the local delivery board, in conjunction with NHS England and Improvement, to make sure there are sufficient staff to meet the needs of patients with mental health problems safely.</b> (To the governor)</p>		<p>team and a weekly support submitted weekly to the management team for oversight.</p> <p>Staffing has been addressed with a recruitment campaign, internal secondments and financial incentives for staff, to ensure safe staffing levels. Additional staff have been recruited for the inpatient unit and safe staffing levels have been maintained since the inspection. The recruitment tracker is reviewed by the senior team in our monthly contract monitoring meetings.</p> <p>The action plan is reviewed and updated monthly by the mental health Clinical Programme Lead and Oxleas Service Manager with oversight from NHS England and Improvement Senior Commissioner and Patient Safety Lead. It includes the updated recruitment strategy and position and is included in the agenda of the bi-monthly Local Delivery Board.</p>		
7.7	<p>Key concern 1.50: Patients requiring transfer to secure mental health inpatient services continued to wait far too long for a bed. Only four of the 18 patients transferred to a mental health hospital under the Mental Health Act in the last six months had done so in fewer than 14 days. The remaining 14 patients waited</p>	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 Wandsworth promote timely mental health transfers to hospital and monitor those men on the waiting list daily. 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;</p>	Oxleas	Completed

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	<p>from 15 to 226 days, which was unacceptable.</p> <p><b>Recommendation: The prison should work with the local delivery board, in conjunction with NHS England and Improvement, to make sure that patients requiring a transfer under the Mental Health Act are transferred expeditiously and within the current transfer guidelines.</b> (To HMPPS and the governor)</p>		<p>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>		
7.8	<p>Key concern 1.51: The daily regime remained far too limited and most prisoners continued to spend more than 22 hours a day locked in their cells, with some denied access to the open air for days at a time. Opportunities to engage in purposeful activity remained very limited and too many prisoners were unemployed. Access to the library and the gym and education were poor.</p> <p><b>Recommendation: Time out</b></p>	Partly Agreed	<p>This recommendation is partly agreed as whilst we endeavour to provide a full and exhaustive daily regime offer for all prisoners, the changes in function, under Reconfiguration, to 65% Remand and 35% Resettlement cohort is dictated by operational policy for the offer that can be provided for those on Remand regarding activities.</p> <p>A full reprofile was commissioned in January 2022 to supplement a 18:30 finish time to bolster, ensure and staff at least one hours' daily exercise in the open air for all and that equal access to PE, work, library, education, training, and other constructive activities is also available. This will improve the current offer under the current Covid-19 restrictions but will still be subject to change once a full reconfiguration has taken place, which is likely to reduce the activities offer at HMP Wandsworth.</p> <p>The monitoring of delivery will be through reporting to the Governor in the morning briefing, so that daily challenge and escalation can be made to assure delivery with issues being resolved daily.</p>	Governor	April 2022

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	<p><b>of cell should be improved, including a daily regime that provides at least an hour in the open air for all and access to work, PE, the library, education, training or other constructive activities.</b></p> <p>(To the governor)</p>				
7.9	<p>Key concern 1.52: Following unification of the Probation Service, the housing provider no longer supported prisoners on remand. This resulted in the large number of remand prisoners not being able to access support, for example to secure tenancies or deal with rent arrears.</p> <p><b>Recommendation: Leaders should make sure that there is effective housing support for all prisoners, including those on remand.</b></p> <p>(To HMPPS and the governor)</p>	Agreed	<p>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 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. HMPPS are investing over £20m to launch a new service, providing up to 12 weeks of</p>	<p>HMPPS – Probation Reform Programme</p> <p>HMPPS - Reducing Reoffending, Partnerships and Accommodation</p>	<p>July 2022</p> <p>Completed</p>

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			<p>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 homelessness 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 national 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>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.</p>	<p>HMPPS - Reducing Reoffending, Partnerships and Accommodation</p> <p>HMPPS - Reducing Reoffending, Partnerships and Accommodation</p> <p>MoJ – Prisoner Outcomes, Resettlement and Reoffending &amp; HMPPS - Reducing Reoffending, Partnerships and Accommodation.</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p>
	<b>Recommendations</b>				
7.10	<p>Recommendation <b>Error! Reference source not found.</b>: All new arrivals should be offered a shower. (To the governor)</p>	Agreed	<p>All new arrivals at HMP Wandsworth will be offered a shower either in Reception or First Night in Custody (FNiC) depending on the time of their arrival into custody.</p>	Governor	March 2022

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7.11	<p>Recommendation <b>Error!</b>  <b>Reference source not found.:</b> Searching procedures should be proportionate to the risk posed and not applied automatically. (To the governor)</p>	Partly Agreed	<p>This recommendation is partly agreed as 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> <p>Searching procedures are 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>Searching procedures will be mandated in concordance with the NSF and LSS to manage the associated risk.</p>	Governor	March 2022
7.12	<p>Recommendation <b>Error!</b>  <b>Reference source not found.:</b> There should be a wide range of incentives to encourage prisoners' positive behaviour and effective systems to address poor behaviour. (To the governor)</p>	Agreed	<p>The current Covid-19 restrictions and requirement for social distancing do not allow full implementation of rewards that would otherwise be available. When these restrictions are lifted, further enhanced rewards will be available. These will include those that have been deemed both acceptable and achievable once prisoner consultation has taken place.</p> <p>A re-launch of the IP scheme is underway, with final consultation with men before publication to encourage and promote positive behaviour. Additional on wing incentives have been sort through bids to provide recreational activity to enhance time out of cell and promote positive behaviour.</p> <p>Throughout Covid-19 a temporary IP scheme was brought into inception to cover the changes to regime delivery and account for the defensible decisions made around the Basic IP level.</p>	Governor	March 2022
7.13	<p>Recommendation <b>Error!</b>  <b>Reference source not found.:</b> Managerial oversight of disciplinary procedures should make sure that all</p>	Agreed	<p>The adjudications standards meeting, held quarterly and chaired by the Head of Safety will analyse procedural errors in fairness and timeframes to uncover any apparent trends.</p> <p>The adjudications standards meeting data findings and trends will be used to make</p>	Governor	April 2022

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	hearings are held fairly and completed within a reasonable time. (To the governor)		informed management intervention to drive fair and consistent outcomes for individuals.  The Deputy Governor will quality assure 5% of adjudications chaired by operational managers with feedback being provided to staff as well as sharing good practice.	Governor	April 2022
7.14	<b>Recommendation Error! Reference source not found.:</b> There should be meaningful reintegration planning for prisoners held in the segregation unit, which should address the reasons for the behaviour that has led to their segregation. (To the governor)	Partly Agreed	This recommendation is partly agreed due to the operational pressures of producing individual reintegration plans for all men who are held in the segregation unit.  A multi-disciplinary and informed reintegration plan will be issued to prisoners deemed as long-term (continuous 42-day period) and will form part of the Good Order or Discipline (GOOD) Review discussions. This will provide the opportunity to address their behaviour that has led them to their segregation alongside plans to locate on normal accommodation. The quarterly Segregation Monitoring & Review Group (SMARG), chaired by the Head of Safety, will quality assure reintegration plans to ensure they are robust and meaningful, sharing good practice.  In conjunction with this the weekly Safety Intervention Meeting (SIM) will discuss those prisoners considered to be complex cases held in segregation or whose reintegration is deemed to require further planning and consultation with a multi-disciplinary approach.	Governor	March 2022
7.15	<b>Recommendation Error! Reference source not found.:</b> Assessment, care in custody and teamwork (ACCT) documentation across the prison should be maintained to a sufficient standard to assist the provision of support to prisoners in crisis. (To the governor)	Agreed	Assessment, Care in Custody and Teamwork (ACCT) documentation across the prison is quality assured against set criteria following the launch of ACCT V6 in July 2021 and completed by residential CMs and then overseen by the Head of Safety.  The monitoring of ACCT quality is presented at the Governors morning meeting alongside the monthly multidisciplinary Safety meeting, which is chaired by the Head of Safety.  Defined accountability lines are managed to drive improvement to assist in quality support of prisoners in crisis.	Governor	Complete

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7.16	<p>Recommendation <b>Error!</b>  <b>Reference source not found.</b>: Prison leaders should continue to develop the key work strategy to make sure that each prisoner has regular and high-quality contact with a named key worker.          (To the governor)</p>	Agreed	<p>Work has been commenced with the national Offender Management in Custody (OMiC) Team whereby a relaunch of keywork will take place in summer 2022. The reprofile exercise and progression out of command mode and Covid-19 regime management plans will enable the prison to progress keywork delivery.</p> <p>Progress and monitoring of keywork delivery will be monitored through the Performance Hub KPI alongside keywork entries being quality assured through Residential management and overseen by the Head of OMU.</p>	Governor	August 2022
7.17	<p>Recommendation <b>Error!</b>  <b>Reference source not found.</b>: All prisoners should have access to basic items, including weekly provision of clean bedding, clothes and cleaning materials.          (To the governor)</p>	Agreed	<p>A full kit provision of basic items is provided to all men on arrival in the First Night Centre (FNC).</p> <p>HMP Wandsworth have appointed a Decency Lead, who will oversee the weekly provision of clean bedding, clothes, and cleaning materials to all prisoners on all residential units. The weekly residential meeting will capture and escalate any operational pressures to delivery.</p>	Governor	April 2022
7.18	<p>Recommendation <b>Error!</b>  <b>Reference source not found.</b>: Lunch should be served no earlier than 12 noon and dinner no earlier than 5pm.          (To the governor)</p>	Agreed	<p>HMP Wandsworth will endeavour to ensure that lunch isn't served earlier than 12pm and dinner not earlier than 5pm. However, due to operational reasons this may not always be possible due to varying operational pressures.</p> <p>HMP Wandsworth have factored these changes into the recent changes in regime delivery across the establishment.</p>	Governor	May 2022

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7.19	<p>Recommendation <b>Error! Reference source not found.</b>: Professional telephone interpreting should be used to communicate with prisoners who do not speak English when confidentiality or accuracy is required. (Repeated recommendation 2.44) (To the governor)</p>	Agreed	<p>Promotion of the professional telephone services from 'The Big Word' will continue to be promoted, with further notices to staff and posters distributed.</p> <p>Through the Equalities meeting and as part of the Equalities Action Plan particular areas such as, Reception, the First Night Centre, Segregation and those conducting ACCT initial assessments and reviews will have their 'Big Word' usage monitored at the monthly Equalities meeting.</p> <p>The Equalities Manager will capture usage across the establishment and address areas where it is discovered that further use is required. All men requiring translation services will be captured through the FNC interview processes and monitored at the Equalities meeting.</p>	Governor	March 2022
7.20	<p>Recommendation <b>Error! Reference source not found.</b>: There should be a time limit on immigration detention. (Repeated recommendation 2.42) (To the Home Office)</p>	Partly Agreed	<p>The Government believes that the introduction of an artificial and arbitrary time limit on immigration detention would serve only to encourage individuals, including those who present a risk to the public, to refuse to comply with immigration processes until they reach the point at which they have to be released from detention, and therefore frustrate their removal from the United Kingdom. That would not be in the public interest.</p> <p>Whilst the Home Office aims to deport foreign national offenders at the earliest opportunity, some detainees will repeatedly refuse to comply with the deportation process, factors such as this, along with a history of absconding or a risk or harm to the public, can lead to detention in prisons being prolonged. Nearly all individuals held under immigration powers in prisons are foreign national offenders, who will be transferred to immigration removal centres only after careful risk assessment, which is in the interests of the public given the more open regime of immigration removal centres.</p> <p>The Home Office is committed to limiting detention post the Custodial Release Date. Detention is used as a last resort and is reviewed regularly by case workers as well as Case Progression Panels. If deportation is not possible within a reasonable</p>	Assistant Directors – Home Office	Ongoing

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			timeframe, release is favoured.		
7.21	<p><b>Recommendation Error! Reference source not found.:</b> The prison should work with the partnership board to reduce non-attendance rates for both internal and external appointments to optimise use of clinical time, reduce waiting times and improve outcomes for patients. (To the governor)</p>	Agreed	<p>The monitoring of non-attendance rates for both internal and external appointments is monitored through the morning meeting and overseen by the Governing Governor.</p> <p>At the bi-monthly delivery board meeting, which is chaired by The Governor and Head of Healthcare and is attended by all relevant HMPPS and healthcare staff including HMPPS healthcare lead and NHSE commissioner, this data is collated and presented to resolve any operational issue that may be affecting the attendance rates, for which resolutions are sought and progressed. Following the November 2021 delivery board meeting clinicians and healthcare officers have been working together to drill down into the reasons for non-attendance and to find solutions for these. The Oxleas Access and Engagement policy has been revised and recirculated to clinicians who have been reminded of their responsibilities to follow up patients who have not attended their appointments.</p> <p>A new healthcare building is due to be completed in the summer of 2022 and as a result of this all healthcare clinics will take place in one dedicated building, allowing for much easier patient access to clinicians, more efficient ways of working, improved management of patient access and engagement, and ultimately improved outcomes for patients.</p>	Governor & Oxleas	October 2022
7.22	<p><b>Recommendation Error! Reference source not found.:</b> There should be effective release planning to make sure prisoners have adequate information and medicines for continuity in their health care on release or transfer. (To the governor)</p>	Agreed	<p>HMP Wandsworth Offender Healthcare Service has been engaging with pathway transformation work initiated by NHSE London to standardise and improve pathways for individuals within the London Prison Group, including men who arrive at HMP Wandsworth from any of the local courts.</p> <p>In April 2022 Wandsworth will be receiving individuals from two further courts, Guildford and Staines, and a readiness assessment has been completed to provide assurance of our ability to manage the resulting increased numbers of arrivals and releases. The pathway for Release and Transfer is currently being finalised.</p> <p>HMP Wandsworth Offender Healthcare service is creating a Release and Transfer team to coordinate healthcare through the gate. This will include adequate information and continuity of healthcare. Release planning will begin in Reception and care will be</p>	Oxleas	April 2022.

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			coordinated for at least six weeks before known release dates, and information shared with individuals and partner agencies.		
7.23	<p><b>Recommendation Error! Reference source not found.:</b> Medication should be administered in line with professional standards by consistently checking patient identity. (To the governor)</p>	Agreed	<p>A review of medication administration in areas where medication is administered by nurses is underway, and pharmacy technicians are expected to take over medication administration in the remaining medication hatch in January 2022, to ensure a standardised approach to medication administration in accordance with professional standards. Medicines management including the administration and storage of controlled drugs is audited monthly and reported to Clinical Governance and Medicines Management meetings.</p> <p>HMP Wandsworth Offender Healthcare service are exploring the use of fingerprints to obtain opiate substitute medication, to improve upon the current system of using prison-issued identity cards.</p>	Oxleas	March 2022.
7.24	<p><b>Recommendation Error! Reference source not found.:</b> Officers should manage medication queues to maintain patient confidentiality, enable supervised consumption of medicines and prevent any diversion. (To the governor)</p>	Agreed	<p>In the reprofile exercise staff members will be allocated to supervise medication queues as part of the profiled work on residential units.</p> <p>Staff will be provided with the roll brief and reminded via the daily wing briefings of the importance of effective queue supervision in order to improve consistency.</p>	Governor	April 2022
7.25	<p><b>Recommendation Error! Reference source not found.:</b> Leaders should ensure that they fully use all activity spaces, so that a high proportion of prisoners</p>	Agreed	<p>A reprofile of the prison will deliver a full-time working day, increasing the attractiveness of activities and the pace of learning. Post Covid-19 restrictions, it has been planned to increase the current activity provision on offer.</p> <p>Allocation processes have been improved to increase numbers in activities and the right allocation at the right time. These include improvements in the induction process and</p>	Governor	June 2022

Actions with future target dates maybe delayed due to Covid-19 related disruptions to service delivery.

	participate in purposeful activity. (To the governor)		educational assessments. Allocation to activities is monitored through the monthly Quality Improvement Group (QIG) chaired by the Head of Reducing Reoffending. Attendance at activities will be reported and captured through the daily morning Governor meeting.		
7.26	Recommendation 5.21: Leaders should ensure that staff understand the prior knowledge of English and mathematics that prisoners have, so that they can place them on to suitable courses. (To the governor)	Agreed	<p>Maths and English Assessments (MEA) will be completed online at activities induction under Novus supervision and reported to activities and IAG.</p> <p>Allocations will not be made without MEA information being available, this will be checked weekly and overseen by the activities manager.</p> <p>With current restrictions the online completion of MEAs is not possible until restrictions are lifted and whereby are currently MEAs are delivered to prisoners in-cell and allocations are not made without them being completed.</p>	Governor  Novus	May 2022
7.27	Recommendation <b>Error! Reference source not found.</b> : Leaders should introduce accredited qualifications in a wider variety of subjects, so that prisoners gain qualifications that will help them in their future careers or with further study. (To the governor)	Agreed	<p>Accredited qualifications were withdrawn due to Covid-19 restrictions but have since been reintroduced. British Institute of Cleaning science (BICS) qualifications have been running since summer 2021. Accredited education qualifications were reintroduced in September 2021 and are for English, maths, ESOL, health and safety, Construction skills certification scheme (CSCS) and food safety, with health and safety accreditation under process with learners preparing for the exam pending its approval. The dry lining workshop has also has now reopened and also offers qualifications.</p> <p>The curriculum has been amended to reflect the increased churn of population following reconfiguration so most are unitised and can be continued in transfer prisons or the community.</p>	Governor & Novus	May 2022
7.28	Recommendation <b>Error! Reference source not found.</b> : Prison offender managers should not be cross-deployed to other duties and	Agreed	<p>A reprofile was commissioned in January 2022 to create sufficient resource across the establishment, to endeavour to avoid the need of cross-deployment of Prison offender managers (POMs).</p> <p>Where there is an operational need to make the decision for cross-deployment the Duty Governor will make this defensible decision and report these to the Deputy and</p>	Governor	April 2022

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	be allowed to carry out their intended work to support prisoners to progress. (To the governor)		Governing Governor.		
7.29	<b>Recommendation Error! Reference source not found.:</b> The monitoring of mail and telephone calls should be consistently applied in line with national guidelines. (To the governor)	Partly Agreed	This recommendation is partly agreed because, whilst HMP Wandsworth endeavour to monitor mail and telephone calls in line with the national guidelines, it is resource intensive and so at times a risk-based decision is made.  A review of the current resources will be conducted to assess whether further resources can be assigned to mail and telephone monitoring and ensure national guidelines are being met in accordance with PSI 49/2011 Prisoner Communications Services.	Governor	April 2022

Recommendations	
Agreed	22
Partly Agreed	7
Not Agreed	0
<b>Total</b>	<b>29</b>

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