



HM Prison &
Probation Service

Action Plan: HMP & YOI Styal

Action Plan Submitted: 26 January 2022

A Response to the HMIP Inspection: 20 September – 8 October 2021

Report Published: 12 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, Measureable, Achievable, Realistic and Time-bound) as possible. Actions should be specific enough to be tracked for progress.
Partly Agreed	Only part of the recommendation is agreed with, is achievable, affordable and will be implemented. This might be because we cannot implement the whole recommendation because of commissioning, policy, operational or affordability reasons.	The response must state clearly which part of the recommendation will be implemented along with SMART actions and tracked for progress. There must 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 STYAL

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	Key Recommendations				
	To the Governor/ To HMPPS				
7.1	<p>Key concern (1.46): Plans to improve supervision of the houses had been delayed because of staff shortages. This hindered the oversight of women at risk of self-harm and meant that staff were not always available to address violence promptly or respond to requests from women in a timely way.</p> <p>Key recommendation: Sufficient staff should be in post to provide effective supervision of the women living in the houses so that they feel safe from harm.</p>	Agreed	Officer requirements have now been finalised to support the implementation of Offender Management in Custody (OMiC) and HMPPS and MOJ Resourcing will seek to recruit enough officers to meet the staffing levels. HMP & YOI Styal is in an area with a competitive labour market, which is challenging for recruitment purposes. An initiative by the prison in 2020 to recruit more experienced staff from other prisons was only partly successful. Recruitment planning is based on projected need over a six to nine-month period but at present projections do not suggest that the current shortfall can be rapidly improved unless the loss of officers (currently running at four per month) is significantly reduced. Action is being taken at all prisons with significant retention problems, including HMP & YOI Styal, to reduce the number of officers leaving, applying a toolkit of remedies and particularly focusing on understanding why individuals are choosing to leave. This work is actively managed by the Human Resource Department to support the Governor and the senior team.	Governor/HMPPS	December 2022
	To HMPPS				
7.2	Key concern (1.47): About 70% of the population lived in houses. These were kept clean by the women, but some were dilapidated and not fit for purpose. There were numerous	Partly Agreed	The recommendation is partly agreed, whilst HMPPS acknowledge the need for refurbishment to address the areas highlighted by the inspection it is considering options to address these concerns.		



	<p>outstanding repairs, many houses suffered from damp and window frames were rotting and damaged. Toilet and bathroom facilities were limited and some houses only had two toilets for about 20 women. Showers and baths were often unpleasant and in a poor state. Bedrooms were sometimes too small to hold three or four women comfortably. Furniture in these rooms was often in a poor condition</p> <p>Key recommendation: All residential accommodation should be decent and in a good state of repair including sufficient facilities for the numbers of women.</p>		<p>MOJ Property Directorate have recently received a Fire Safety and Decency report reviewing the condition of the residential houses. HMPPS is considering options to address these concerns and improve the condition of accommodation at HMP & YOI Styal, a decision on which option has been approved is expected in early 2022 with a subsequent start date to be arranged for any refurbishments to commence.</p> <p>In the interim, MOJ Property Services are currently working closely with the establishment to deliver a local programme of works targeted at improving conditions. As a result, the need for repairs has reduced considerably.</p>	<p>HMPPS</p> <p>HMPPS</p>	<p>April 2022</p> <p>Ongoing</p>
	To the Governor/ To Spectrum				
7.3	<p>Key concern (1.48): Some of the practices used to administer medicines to patients unable to attend the medicine hatches were poor and presented risks to the women. The transport of controlled drugs in an insecure bag was unacceptable.</p> <p>Key recommendation: The dispensing of medicines, including controlled drugs, should be carried out legally, safely and in line with established policy.</p>	Agreed	<p>Clear instructions have been issued on how to transport medications including controlled drugs from the medicine hatch. Standard Operating Procedures have been reviewed to ensure the process of administering medications when patients are unable to attend the hatch are robust, clear to follow with workable solutions that are safe and in line with established policies.</p> <p>New medication trolleys and other lockable transportation systems have been introduced to support staff in this process.</p>	Governor/Spectrum	Completed
	To the Governor				
7.4	<p>Key concern (1.49): There were not enough opportunities for women to progress. Release on temporary</p>	Agreed	<p>HMP & YOI Styal will continue with their COVID-19 recovery planning progression. This will allow further expansion of the regime including the opportunity to access Release on Temporary</p>	Governor	May 2022



	<p>licence (ROTL) had been very slow to restart after the pandemic which had badly affected women living on the mother and baby unit and the open unit. The open unit had lost its purpose and women living there were poorly supported and rarely visited by prison staff. There were few incentives to progress to the unit which women did not regard as a worthwhile progression opportunity.</p> <p>Key recommendation: All eligible women should have the opportunity to build family ties and develop links with the community through ROTL. The prison should take a more proportionate approach to ROTL, including releasing women to access provision in the local community.</p>		<p>Licence (ROTL) for building family ties and community links. The timescales for this will be determined by external factors relating to the progression of the pandemic.</p> <p>A review and re-launch of Bollinwood Unit will take place regarding facilities and activities that can be accessed when residing on the unit. This will include ROTL and the access to services within the establishment.</p>	Governor	May 2022
	Recommendations				
	To the Governor				
7.5	Recommendation 3.17: ACCT documents should record identified risk and care plans should reflect the specific concerns and circumstances of each woman.	Agreed	<p>ACCT awareness/coaching sessions will continue to be delivered on training days.</p> <p>All ACCT coordinators will attend ACCT refresher training.</p> <p>Weekly ACCT coordinator drop-in sessions will be introduced to discuss specific cases, facilitate coaching and talk through any concern's coordinators have.</p> <p>The manager with responsibility for Suicide and Self Harm (SASH) will provide weekly assurance that the required ACCT quality assurance checks are taking place as per national guidelines. Any</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>May 2022</p> <p>January 2022</p> <p>March 2022</p>



			trends and actions identified will be shared at the monthly Safer Prisons meeting.		
7.6	Recommendation 3.35: The segregation unit should provide a decent and comfortable environment for women, including the installation of electricity sockets in each cell.	Agreed	<p>HMP & YOI Styal will improve the living conditions in the Segregation Unit, this will include decorating and installing electricity sockets in each cell. The unit will also be separated into two areas one for mentally unwell women and the other for women with challenging behaviour. The décor will reflect the different purposes of the unit with a softer tone for the area designated for women who are unwell.</p> <p>The establishment provide individualised plans which allow those appropriately risk assessed to engage in the prison regime and reside in the Segregation Unit. All entitlements are also now risk assessed on an individual basis however, daily access to showers and the open air are provided to all prisoners.</p>	Governor	April 2022
				Governor	Completed
	To HMPPS				
7.7	Recommendation 3.45: Appropriate technology should be made available to detect women secreting illicit items on arrival.	Partly Agreed	The recommendation is partly agreed as although the use of body scanners on women is not currently permitted alternative technology including Cellsense portable security poles are available.	HMPPS	Completed
	To the Governor				
7.8	Recommendation 4.7: Women living on the mother and baby unit should have access to the full prison regime.	Agreed	<p>Increased nursery provision will be included in new contracts to allow women living on the Mother and Baby Unit (MBU) to attend full-time activity.</p> <p>All timetabled activities will take place on the MBU with assurance provided by managers to ensure these are accessible.</p>	Governor	April 2022
				Governor	April 2022
7.9	Recommendation 4.8: Babies and children living on the mother and baby unit should have opportunities to experience community activities in accordance with their development needs and well-being.	Agreed	<p>Community Contact has been reinstated, this has allowed approved carers to collect babies and children from the establishment and take them out into the community.</p> <p>Community visits with the nursery provider will continue to help babies and children to socialise.</p>	Governor	Completed



7.10	Recommendation 4.11: The range of peer support roles should be increased to develop women's mentoring skills and support the well-being of other prisoners.	Agreed	The peer mentoring scheme will be relaunched at HMP & YOI Styal. They will provide information, advice and support to their peers including facilitating focus groups. The establishment will also increase the range of roles for peer mentors to include young adults and care leavers.	Governor	March 2022
7.11	Recommendation 4.13: Women should receive a timely and good quality response to their applications.	Agreed	<p>HMP & YOI Styal will be undergoing an IT refresh, this will allow applications to be logged and monitored more effectively. The Business Hub will conduct a 10% monthly assurance check on all applications to ensure responses are timely and of the required quality.</p> <p>Applications will also be covered daily in the Operational Meeting to support the process and ensure timely completion.</p> <p>Application forms are now readily available on all residential units, weekly management checks are in place to assure this.</p>	<p>Governor</p> <p>Governor</p>	<p>March 2022</p> <p>Completed</p>
7.12	Recommendation 4.16: Women should receive a prompt and full response to their complaints.	Agreed	<p>HMP & YOI Styal will be undergoing an IT refresh, this will allow complaints to be logged and monitored more effectively. Complaints will also be covered daily in the Operational Meeting to support the process and ensure timely completion.</p> <p>The Governor, Deputy Governor and Head of Business Assurance (HOBAs) will conduct a 10% monthly assurance check on all complaints to ensure responses are of the required quality. Any findings or trends will be reviewed at Senior Management Team meetings as part of the Strategic Improvements agenda with actions identified.</p> <p>Complaints forms are now readily available on all residential units, weekly management checks are in place to assure this</p>	<p>Governor</p> <p>Governor</p>	<p>March 2022</p> <p>Completed</p>
7.13	Recommendation 4.89: Prison officers should consistently monitor and manage medication administration queues to reduce the opportunities for bullying and diversion.	Agreed	<p>Staff are now supervising the medication queues to reduce the opportunities for bullying and diversion.</p> <p>Staff will be briefed at morning meetings on the importance of supervising medication queues. Management assurance checks will be completed weekly to ensure this is taking place.</p>	Governor	February 2022



7.14	Recommendation 4.97: Responses to complaints of discrimination should be thorough, timely and subject to external, independent scrutiny.	Agreed	Complaints of discrimination are completed via Discrimination Incident Reporting Forms (DIRF's). A new database will be introduced which enables responses to DIRF's to be tracked and measured for timeliness.	Governor	March 2022
			All Managers will be trained to effectively investigate complaints of discrimination.	Governor	April 2022
			The Governor will quality check all completed DIRF's with feedback provided by Safer Prisons Department	Governor	April 2022
			An appropriate community partner will be identified to provide external independent scrutiny to responses the establishment provide.	Governor	April 2022
7.15	Recommendation 5.22: Leaders and managers should carry out induction and initial assessment promptly for women who have missed these activities.	Agreed	The timing and arrangements for education induction sessions will be reviewed to ensure they are in line with the whole prison induction programme. This will guarantee appropriate sequencing to activities will take place.	Governor	March 2022
			The education induction process and how this benefits individuals during their time in custody will be publicised throughout the establishment to increase the awareness for both staff and prisoners.	Governor	March 2022
			Robust arrangements to follow up non-attendance to induction sessions will be implemented. These will be recorded on C-NOMIS and there will be greater collaborative working between the Activities Hub and residential staff to increase attendance.	Governor	March 2022
			Any prisoners who repeatedly refuse to attend induction sessions will be subject to proportionate sanctions.	Governor	March 2022
7.16	Recommendation 5.23: Managers should provide detailed support plans for all women who have declared additional learning needs.	Agreed	All Learning, Difficulties and Disabilities (LDD) screening results will be shared on the Curious Data System so that all partners can access them. The results will inform learning support plans including in Industries and Work.	Governor	March 2022



			<p>Those with additional learning needs are now discussed at the weekly Safety Intervention Meeting to allow a whole prison approach.</p> <p>A series of training sessions will be provided to support prison staff and partner agencies in order to develop support plans using the outcome of the LDD rapid screener assessment.</p> <p>Training and support will be introduced to those who deliver training to prisoners. This will allow processes and practices used to support learners in education to be replicated across all areas of learning, skills and work within the establishment.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>March 2022</p> <p>March 2022</p>
7.17	Recommendation 5.24: Managers should provide rigorous accreditation for the skills that women gain while in work.	Partly Agreed	This recommendation is only partly agreed as whilst HMP & YOI Styal recognise the importance of accreditation, some qualifications provide softer skills which assist in building the women's esteem and self-confidence but lack accreditation. It is important to strike a balance so there will always be an element of non-accredited qualifications at the establishment. Accredited courses will, however, be provided for Cleaning; Warehousing, Functional skills and IT.	Governor	February 2022
7.18	Recommendation 6.15: Women serving short sentences and recalls should be able to undertake a range of brief interventions to address their attitudes, thinking and behaviour.	Agreed	<p>Working with Anger, a national programme designed by Psychology services, will be introduced. Women with short sentences will be able to access this intervention as it is delivered over eight sessions.</p> <p>Several courses will also run throughout the year over reduced timescales which address attitudes, thinking and behaviour. These include Employment preparation (Steps to a Brighter Future), Life Skills, Music, (focussing on communication and socialisation) and a Resettlement course.</p> <p>The Prison Education Framework Governance Board will also consider expanding interventions and services via Dynamic Purchasing System (DPS) expenditure.</p>	Governor	April 2022
7.19	Recommendation 6.16: Women should be able to undertake short, structured	Agreed	One Small Thing, a registered charity who facilitate trauma-informed programmes for the justice sector will resume	Governor	April 2022



	interventions to address their experiences of domestic abuse.		interventions for the women at HMP & YOI Styal as well as providing training for staff.		
7.20	Recommendation 6.25: Public protection procedures should be strengthened to manage women's risks to people living in the community effectively during custody and on release.	Agreed	<p>HMP & YOI Styal have urgently addressed the backlog of outstanding phone calls requiring monitoring. Training has commenced for staff who work in the mail room and Visits to ensure that they are fully aware of all risks and restrictions that are in place.</p> <p>A simplified public protection database has been introduced. Cases are easier to track resulting in a more effective and efficient process.</p> <p>A new tracking system has been implemented to ensure all high-risk women in addition to those subject to Multi-Agency Public Protection Arrangements (MAPPA) are discussed at the Interdepartmental Risk Management Meeting (IRMM) prior to release. Prison Offender Managers will continue to build strong relationships with Community Offender Managers in developing risk management plans for release.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>February 2022</p> <p>Completed</p> <p>Completed</p>

Recommendations	
Agreed	17
Partly Agreed	3
Not Agreed	0
Total	20



