



HM Prison &
Probation Service

Action Plan: HMP Berwyn

Action Plan Submitted: 16 September 2022

A Response to the HMIP Inspection: 16 – 27 May 2022

Report Published: 06 September 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, 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 priority and key concerns. Action plans provide specific steps and actions to address the priority and key concerns, that are clear, outcome focussed, measurable, achievable, and relevant with the owner and timescale of each step clearly identified. Action plans are sent to HMIP and published on the GOV.UK website. Progress against the implementation and delivery of the action plans will also be monitored and reported on.



ACTION PLAN: HMIP REPORT

ESTABLISHMENT: HMP BERWYN

1. Rec No	2. Concerns	3. Response Action Taken/Planned	4. Responsible Owner	5. Target Date
	Priority concerns			
1	<p>Patients waited too long to access routine primary care clinics. Primary care staffing and inconsistent prison officer escort arrangements led to long waits of up to 12 months for many routine clinics.</p>	<p>To improve waiting times for routine primary care clinics, HMP Berwyn has/will introduce the following actions:</p> <ul style="list-style-type: none"> • Waiting times for all services are reviewed and monitored each month at the Quality, Safety and Performance meetings which includes health and prison membership. • Waiting times for routine General Practitioner (GP) appointments have been addressed with the delivery of a routine GP waiting list initiative of temporarily increasing GP capacity, and by adopting a residential house delivery model to reduce non-attendance. Aligned with this is the commencement of residential house GP clinics on Ceiriog to improve efficiency of available GP sessions by reducing non-attendance. • A full-time recruitment officer in post to support timely recruitment to vacant clinical posts. • The establishment will review prisoner movement to support internal appointment attendance during the Core Day as part of the COVID Recovery Plan. This will support access to Health Services and reduce the pressure on officers to facilitate all movements to and from Healthcare. 	<p>Governor/Health Provider</p> <p>Governor/Health Provider</p> <p>Governor/Health Provider</p> <p>Governor/Health Provider</p>	<p>Complete</p> <p>Complete</p> <p>Complete</p> <p>November 2022</p>



		<ul style="list-style-type: none"> • The establishment has reviewed the Activity Profile and provided guidance and support to the Residential Areas surrounding Attendance to Activity and Appointments. This will be further supported by an increase in the prison officer support resource for Primary Care and GP Services within the new profile. • Funding for a routine care dental waiting list initiative of temporarily increasing dentist capacity to clear the backlog has been approved which includes the recruitment of an additional clinical resource to increase capacity for the duration of the initiative. The delivery of this initiative is dependent upon the recruitment of the additional clinicians. • The Health Provider and the Operational Team will monitor Attendance Rates at the Monthly Local Health Delivery Group Meeting, and a specific Improvement Sub-Group has been set up to run alongside the changes to Movement and Support Resource in order to monitor and drive improvement. 	Governor/Health Provider	November 2022
			Governor/Health Provider	December 2022
			Governor/Health Provider	December 2022
2	<p>Too many of the population did not have enough activity or time unlocked. There were insufficient education and workplaces for the population.</p>	<p>To increase the number of available education and workplaces, and time spent unlocked, HMP Berwyn will:</p> <ul style="list-style-type: none"> • Recruit to the industries staffing requirements, enabling the prison to ramp up to maximum capacity once the additional staff have been through HMPPS vetting and Induction processes. • Activity supervisors will monitor and feedback on targets against ramp up numbers and address any areas of slippage to ensure the prison stays on target. 	Governor	January 2023
			Governor	January 2023



		<ul style="list-style-type: none"> • The new recruitment of a Prison Employment Lead will allow the Learning & Skills (L&S) manager to scrutinise and focus work on L&S provision to ensure this is in line with contract expectations. • Extend embedded education provision to work areas which will be supported by the above actions. • A suite of jobs has been devised to support individuals who are self-isolating to encourage progression and improved interaction with other activities places. • Carry out a review of dedicated Vulnerable Prisoner (VP) provision to ensure at least part time activity can be provided to all men from these communities. A meeting with all relevant parties is scheduled for September 2022 to progress this piece of work and deliver a full VP prison regime for January 2023. • Activity spaces and attendance will be discussed at the morning operational briefing, monitored weekly (locally and nationally) using the regimes dashboard, and discussed quarterly at the Reducing Re-Offending meeting to identify and address any issues. • By December 2022 the prison will have at least 80% of eligible men allocated to work with a minimum expectation of 85% attending the workplace. 	Governor	January 2023
			Governor	January 2023
			Governor	September 2022
			Governor	January 2023
			Governor	October 2022
			Governor	December 2022
3	<p>Prisoners' attendance in education, training and employment was not good enough.</p> <p>Not enough was done to encourage prisoners to attend activities and often only about 60% of prisoners allocated to an activity turned up.</p>	<p>HMP Berwyn will drive incremental increases in attendance by:</p> <ul style="list-style-type: none"> • Band 4 Activity Supervisors will monitor and report activity numbers daily, via a Management Information attendance system, to monitor the delivery of ramp up plans to the expected capacity targets. The Activities Custodial 	Governor	December 2022



		<p>Manager will monitor improved delivery in partnership with Activity Supervisors on the Residential areas to drive improved activity attendance.</p> <ul style="list-style-type: none"> • Engagement and Utilisation of three Employment Peer Mentors, one on each houseblock, will support prisoner engagement and motivation to attend activities by speaking to all non-attendees on each community, emphasising the benefits of attendance. They will provide feedback from their conversations to the activity manager. • Education/Industries daily monitoring of attendance will complement the above actions to proactively monitor activity attendance and challenge non-attendance. When/if there is repeated non-attendance following engagement and motivational conversations, warnings will be issued in line with the Incentives Policy and discussed at the allocations board. • HMP Berwyn will complete a data cleanse of the current Nomis reporting to ensure ease of use for the Residential areas and accurate reporting via the regime dashboard. • Activity spaces and attendance will be discussed at the morning operational briefing, monitored weekly (locally and nationally) using the regimes dashboard, and discussed quarterly at the Reducing Re-Offending meeting to identify and address any issues. • At least 80% of eligible prisoners will be allocated to work with a minimum expectation of 85% attending the workplace. 	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>December 2022</p> <p>December 2022</p> <p>December 2022</p> <p>October 2022</p> <p>December 2022</p>
4	A national staff shortage was affecting leaders' ability to deliver a fully functioning rehabilitative regime.	To improve the delivery of services at HMP Berwyn the Governor, HMPPS, and NHS Wales are addressing the staff shortages through the following actions:		



<p>In particular, a severe shortage of band 3 officers, probation and health care staff affected the delivery of some services.</p>	<p>(1) To progress prison officer recruitment and retention HMPPS and HMP Berwyn will:</p> <ul style="list-style-type: none"> • From September 2022 every new starter, operational and non-operational, will be assigned a New Colleague Mentor to provide them with appropriate support. • From August 2022 HMP Berwyn will pilot the introduction of local recruitment to complement national recruitment structures for Prison Officers at the prison. • Developing retention and engagement strategies for all staff through the HMPPS Top 20 prisons project (a retention initiative sponsored by HMPPS, to improve the retention of staff where prison attrition rate is high). • Reviewing core Human Resource (HR) strategies to address any gaps in recruitment and retention activities as part of the Top 8 Prison project (a national initiative that monitors HMP Berwyn's delivery of staff retention against the MOJ's retention toolkit). • HMP Berwyn aim to see an improvement in delivery over the next twelve months and/or will take forward population reduction plans and/or regime adjustments to ensure that consistency of delivery is achieved against the resource envelope available to the prison. 	Governor/HMPPS	August 2023
	<p>(2) Probation staffing concerns are being addressed in the long term through HMPPS Wales recruitment of new and fully trained probation staff (PQiPs (Professional Qualification in Probation)). The long-term prognosis suggests the staffing pressures will not be fully addressed until 2024. To address the interim pressures an interim staffing structure will be agreed and put in place to</p>	Governor/HMPPS Wales	October 2024



		<p>maximise the use of trained probation service staff and introduce Probation Service Officers (PSO's) support until fully trained PQiP staff are available. The prison aims to have approval for these new interim arrangements in place by October 2022.</p> <p>(3) Healthcare staffing pressures are similar to those in England and Wales across health economies. Significant inroads to address some staffing pressures have already taken place (e.g., within the Mental Health Team). Longer term Primary Care Staffing pressures are being taken forward through proactive work taken by the health provider (Betsi Cadwaladr University Health Board). NHS Wales and the Governor are monitoring the success of this recruitment and the impact on the prison regime through the Local Health Delivery Group and Health, Wellbeing and Social Care Partnership Board.</p>	Governor/Health Provider	August 2023
	Key concerns			
5	<p>Not enough prisoners understood the rationale behind their allocation to education, training, and employment. Some prisoners felt they were allocated to activities that were not aligned to their interests and often disrupted classes.</p>	<p>To help prisoners understand the allocation process for education, training, and employment in conjunction with their aspirations and individual learning and work targets as part of the Regime Academy Structure, the Education and Learning and Skills Manager has:</p> <ul style="list-style-type: none"> Delivered work to introduce advertising boards explaining the roles of academies work areas across the prison. Initiated a more flexible allocations board process to allow prisoners to temporarily move to another academy to gain additional skills throughout their sentence, where appropriate, to help maximise attendance. 	Governor Governor	September 2022 September 2022



		<p>Longer term actions by December 2022 will be to:</p> <ul style="list-style-type: none"> • Introduce and establish the new Head of Education, Skills and Work as the senior lead responsible for ensuring appropriate and effective learning and progression opportunities for all those within the custodial environment. • Reducing Reoffending representatives will attend the Induction of all new staff to share information on the Academy Structure, so staff can brief prisoners on the allocation process. • The introduction of a presentation to prisoners during Induction, and on Berwyn TV, to improve understanding of the work and academy allocation process. • The Learning and Skills Manager will quality assure the Individual Learning and Work Plan to ensure the academy structure is being followed and address areas of non-compliance. This will be monthly basis and reported back via the local monthly management information report. 	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>December 2022</p> <p>December 2022</p> <p>December 2022</p> <p>December 2022</p>
6	<p>Levels of violence remained too high. Data were not used well to monitor and identify trends over time, or to inform an effective action plan.</p>	<p>HMP Berwyn will aim to reduce the levels of violence by:</p> <ul style="list-style-type: none"> • The monthly Safer Prisons Meeting will review how safety data is analysed, identifying drivers for violence, and agreeing actions to address the risks associated with these drivers. Actions will address both trends of violence and the needs of the individuals. The effectiveness of how data is analysed, and subsequent actions will be monitored closely at the meeting to ensure that levels of violence continue to reduce. 	<p>Governor</p>	<p>December 2022</p>



		<ul style="list-style-type: none"> • Guidance drawing on advice from the National Safety Team will be used to identify areas of best practice that can be shared and incorporated into the prison's own way of working. • Improvements the prison will develop include: <ul style="list-style-type: none"> - The development of joint residential and safety plans where there is heightened risk of committing acts of violence. - Engagement and use of Safety Peer Support workers. - Introduction of an improved Debt Management Strategy in partnership with the substance misuse team. • HMP Berwyn is part of an Enhanced Support Services project that will deliver improved managerial oversight of the prison's most violent and disruptive prisoners using a joint health, operations and psychology-based case management and intervention programme. 	Governor	December 2022
			Governor	December 2022
			Governor	April 2023
7	<p>Rates of self-harm remained too high. Key work was not used to support prisoners at risk of self-harm and debriefs following acts of self-harm were not always carried out. Analysis of self-harm data was too limited to measure progress and inform improved practice.</p>	<p>HMP Berwyn will aim to reduce the levels of self-harm by:</p> <ul style="list-style-type: none"> • Assigning key workers to all prisoners on an Assessment, Care in Custody and Teamwork (ACCT) to ensure consistent support is provided to the individual, with the key worker attending ACCT reviews, wherever possible, to provide additional contributions to the process. • Ensuring that all debriefs following an act of self-harm are completed within 24 hours of the incident, with serious acts of self-harm completed immediately. Residential Managers will ensure that Supervising Officers carry out debriefs within the prescribed timescales. 	Governor	January 2023



		<ul style="list-style-type: none">• Reviewing the ACCT and case management process to support the most complex prisoners within the prison. This work is informed by a current analysis showing that a significant proportion of those self-harming is committed by a small number of complex prisoners. Part of this work will be building the confidence of both case managers and staff in managing complex men and provide them with an avenue of escalation should guidance prove necessary.• ACCT version 6 is now embedded across the prison with quality assurance checks being completed by the Night Orderly Officer, Residential Managers, and the Safer Custody Team. Further work will be done to improve the quality of ACCT documents including the restructuring of the residential manager workflow to give greater accountability for the quality of ACCT documents in each residential area. This combined with additional training, coaching session, recognition of positive work and assurance exercises will be used to drive improvement for the quality of ACCTs.• Improving the way in which the safety team uses/analyses data in order to understand the drivers behind self-harm, and by utilising available data from the last 12 months to help identify trends and assign appropriate actions. Information regarding best practice will also be sought from the National Safety Team. Current processes will then be reviewed and changed to incorporate improved ways of working.• The effectiveness of how data is analysed, and subsequent actions will be monitored closely at the monthly Safer Prisons Meeting to measure progress in reducing levels of self-harm.		
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8	<p>The applications and complaints systems were not fully effective. Many prisoners waited too long for a response to their applications and complaints. Data were not analysed to understand and address common themes and there was a lack of effective quality assurance to drive improvement.</p>	<p>To improve the effectiveness of the applications and complaints system HMP Berwyn will:</p> <ul style="list-style-type: none"> • Address response times by introducing a new escalation process to deliver an improved application and complaint response time. • Develop monitoring processes starting with an initial email from the complaints team and, where no response is provided within 24 hours, the matter will be escalated to the Business Hub manager to raise with the Daily Operational Management Team. This process will also be applied to external complaints. • Work with the Chain breaker peer support workers and Prison Listeners to gain feedback on common issues with complaints and create some Frequently Asked Questions (FAQs) and signposting. The aim will be to respond proactively to improve awareness of issues and trends of concern, to help reduce the need to raise applications and complaints. • The timeliness and the Quality Assurance of complaints is monitored by the business hub who generate a weekly report and share it with respondents and the Head of Business Assurance to track progress and timescales to help drive improvement. • The business hub will analyse complaints and applications to understand and address common themes. Initial analysis has identified some issues that could be addressed differently to reduce the extremely large volume of applications and subsequently improve response times. 	Governor	December 2022
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		<ul style="list-style-type: none"> The application process will be monitored weekly to look at the number and types of application that have been submitted. Analysis of data will inform the rationalisation of the Unilink process to improve allocation of applications to the appropriate department or function. This will reduce duplication of work and provide prompter responses. Additionally, weekly monitoring of the process will look at the number of applications that are overdue. Areas will then be made aware of these to ensure prompt responses are given. The prison will reinstate Quality Assurance checks by Functional Heads to analyse common themes in complaints and identify strategies to address these concerns through engagement with the prisoner and staff focus groups. 		
9	<p>Several patients had been taken off antipsychotic and other psychiatric medicines which had led to a deterioration in their condition.</p> <p>This created potential difficulties when psychiatric treatment had to be reconstituted.</p>	<p>To improve oversight for the prescribing of antipsychotic and other psychiatric medicines the health provider will:</p> <ul style="list-style-type: none"> Introduce a weekly Prescribers Forum to support all prescribers by providing multi-disciplinary discussion around complex prescribing decisions or prescribing tradable medicines. This includes where there has been evidence of diversion or intoxication when prescribed medicines. Fortnightly forums will specifically focus on mental health medicines. When prescribing secondary care initiated mental health medicines, the prescriber will document a comprehensive plan describing the action to be taken by the General Practitioner (GP) in the event of intoxicification or diversion. 	<p>Head of Healthcare</p>	<p>Complete</p>
			<p>Head of Healthcare</p>	<p>Complete</p>



		<ul style="list-style-type: none"> • On arrival at HMP Berwyn should the GP assess concerns regarding the safety or appropriateness of secondary care initiated mental health medicines, these will be referred to the mental health team prescriber for early review and clinical decision. • Betsi Cadwaladr University Health Board (BCUHB) will develop a monthly Shared Accountability Meeting as a sub-group of the monthly Medicines Management Group (MMG) to produce pathways and processes for clear lines of accountability for prescribing of antipsychotic and other psychiatric medicines. Membership of this group will include, but not be limited to, the Mental Health Directorate Medical Director, GP Provider Medical Director and Lead Pharmacist. The Terms of Reference for this group are to be agreed at MMG. • The prescriber will provide a clear explanation to the patient explaining reasons for prescribing decisions. Patient information will be available to all patients explaining the rationale behind HMP Berwyn's medicines management strategy. • Introduce an increased psychiatry resource to support timely review of secondary care initiated mental health medicines. • The Head of Healthcare will oversee governance of prescribing at HMP Berwyn through the MMG. 	<p>Head of Healthcare</p> <p>Head of Healthcare</p> <p>Head of Healthcare</p> <p>Head of Healthcare</p> <p>Head of Healthcare</p>	<p>September 2022</p> <p>September 2022</p> <p>September 2022</p> <p>January 2023</p> <p>Complete</p>
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10	<p>Telephone and mail monitoring arrangements were in disarray. Phone monitoring was not always carried out when required to reduce the risks of harassment and further criminal activity.</p>	<p>HMP Berwyn will improve telephone and mail monitoring arrangements by:</p> <ul style="list-style-type: none"> • Revising Public Protection Delivery Responsibilities with clear identification of responsible functional heads for each area. The Head of Public Protection has moved to an assurance and compliance role in order to drive improved outcomes. These will be monitored monthly through the Public Protection Steering Group Meeting chaired by the Deputy Governor. • Implementing an Assurance and Reporting Framework where delivery is monitored and challenged to achieve improvement and sustained delivery. • A review of the Pin (Personal Identification Number) Phone Resourcing had been undertaken prior to the inspection, however, inconsistencies in delivery and oversight has since been addressed. This work is now monitored through the twice weekly Resource Meeting, with a commitment of targeted overtime to support PIN Phone monitoring. This Resource Review has identified a training requirement among new starters and a training plan has been agreed to address this deficit in personnel able to both access and use the Pin Phone Monitoring System. • Public Protection Functional Responsibilities will be agreed by the Executive Committee and improvement reported through the established Quarterly Review Process. • Reviewing the Public Protection Steering Group Quorum and Terms of Reference with requirement for attendance by responsible authorities. 	Governor	September 2022
			Governor	September 2022
			Governor	December 2022
			Governor	November 2022
			Governor	November 2022



		<ul style="list-style-type: none"> Action has been taken within the Offender Management Function to ensure that contact is made with sending establishments in order to provide a handover for those who have been subject to monitoring previously. This will ensure that only those for whom there is continuing risk or for whom there has not been any identification/monitoring prior to transfer will be placed under restrictions on arrival at HMP Berwyn. 	Governor	September 2022
11	<p>The frequency and quality of offender manager sessions with prisoners was not good enough to drive sentence plans. Work had become focused on timebound objectives such as parole reports, categorisation and OASys reports.</p>	<p>To improve the frequency and quality of offender manager sessions in the short to medium term, until the longer-term probation staffing concerns can be addressed, HMP Berwyn will:</p> <ul style="list-style-type: none"> Agree a Recruitment Strategy with HMPPS Colleagues to ensure that the Case Management Support Model can be fully established to enable qualitative contact and improve progression-based activity. This is an interim solution whilst the PQiP Qualification Process takes place to a level able to address the National Probation Officer deficit. This Recruitment Strategy combines Probation Support Officer Grades and an increase in Prison Offender Managers (POMs) Grades who will be aligned to Probation Officers in order to support Case Management effectively. The delivery of this strategy is dependent upon the recruitment of the Probation service officers and progression through recruitment and vetting. Implement a Case Management Support Model to support POM's and Prisoners in the short to medium term in order to ensure that Core Risk Management Tasks are undertaken effectively and in a timely manner. An 	Governor	September 2022
			Governor	December 2022



		<p>administrative support function has been agreed to ensure that these cases are managed and progressed appropriately. The delivery of this strategy is dependent upon the recruitment of the Probation service officers and progression through recruitment and vetting.</p> <ul style="list-style-type: none"> • Mobilise a clear Training and Supervision Plan by Senior Probation Managers in order to ensure that new staff are fully equipped and supported to manage the workload demands within this alternative model. • Senior Probation Officers will monitor the frequency and quality of offender manager sessions, identifying priorities to help drive sentence plans and prisoner's progression, and provide the Governor with a monthly progress update. • Commence Prison Offender Management Team Drop-in Clinics on each of the Houses to support staff and prisoners with Offender Management Unit (OMU) Queries and to help bridge the gap in knowledge among the inexperienced staffing group and support the absence of OMU focused Key Work. • Introduce a revised Offender Management in Custody Model, integrating the new resettlement provision, that is sufficiently resilient to withstand the current resource pressures but will grow incrementally as the recruitment strategy progresses. <p>Probation staffing concerns are being addressed in the long term through HMPPS Wales recruitment of new and fully trained probation staff (PQiPs). The long-term prognosis suggests the staffing pressures will not be fully addressed until 2025. To address the interim pressures, we are</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>HMPPS</p>	<p>November 2022</p> <p>December 2022</p> <p>September 2022</p> <p>March 2023</p> <p>December 2022</p>
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		<p>experiencing a new 'interim' staffing structure will be agreed and put in place to maximise the use of trained probation service staff and introduce Probation Service Officers (PSO's) support until fully trained PQiP staff are available. The prison aims to have approval for these new interim arrangements in October 2022.</p>		
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