



HM Prison &
Probation Service

Action Plan: HMP Feltham B

Action Plan Submitted: 25 April 2023

A Response to the HMIP Inspection: 03 – 13 January 2023

Report Published: 25 April 2023

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 His 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 FELTHAM B

1. Rec No	2. Concerns	3. Response Action Taken/Planned	4. Responsible Owner	5. Target Date
	Priority concerns			
1	<p>Levels of violence were too high, and prisoners had poor perceptions of their safety. Leaders, staff, and prisoners were over-reliant on keeping prisoners apart rather than addressing underlying causes of violence. Investigations into incidents were often delayed and sometimes of poor quality.</p>	<p>To identify, address, reduce the underlying causes of violence, and improve prisoner's perception of safety, the Head of Residence and Safety will:</p> <ul style="list-style-type: none"> • Ensure Challenge, Support, and Intervention Plan (CSIP) investigations are screened and allocated as soon as possible following a referral being submitted. Intel gained from the investigations will be utilised to improve understanding of the drivers and causes of violence, so pro-active measures can be put in place to reduce violence levels. • Ensure the CSIP process is used to support victims of violence and to challenge low-level behaviour such as bullying. • Review the governance of the weekly Safety Intervention Meeting (SIM) to provide better oversight of CSIP processes, including the timeliness and quality of investigations, and generate appropriate actions to address the causes of violence. • Introduce a system to identify and track prisoners who are self-isolating, to ensure they are provided with the necessary support and can access an adequate regime. • Ensure the Safety team collate and review all data relating to violence, including intel from investigations, the Safety Diagnostic Tool (SDT), Use of Force incidents, and the Incident Reporting System, for discussion at the multi-disciplinary Safety Meeting, so appropriate actions to reduce violence can be generated, added, and addressed through a more coherent and refreshed 5P's strategy (A strategy to reduce violence and improve safety that includes an action plan). 	Governor	<p>June 2023</p> <p>June 2023</p> <p>June 2023</p> <p>June 2023</p> <p>July 2023</p>



		<ul style="list-style-type: none"> Implement a daily assurance process to ensure any missing information on the SDT relating to drivers of violence are recorded to allow for accurate analysis of data at the monthly Safety Meeting. In consultation with prisoners the Incentives Policy (IP) will be reviewed to explore ways on how to improve, recognise and encourage positive behaviour. Set up regular meetings with the Metropolitan Police and Crime Commissioner to ensure adjudications and serious incidents of violence referred to the police are dealt with within reasonable timescales, in line with the guidelines set out in the <u>Crime in prison referral agreement</u> published in May 2019. Undertake an annual survey on prisoner's perceptions of safety and violence, that includes and invites feedback on what could be done to improve safety at the prison. Monitor the timescales, effectiveness, and impact of all the actions at the SIM, Safety, conflict resolution, and safety analysis meetings, measured against the 5P's strategy to provide governance and assurance. The Prison Group Directors Safety Team will support the prison in improving the local systems in place to manage those prisoners who engage in violence. 		<p>July 2023</p> <p>June 2023</p> <p>May 2023</p> <p>November 2023</p> <p>June 2023</p> <p>Ongoing</p>
2	<p>Too few prisoners had access to education, skills and work, based on their needs.</p> <p>Leaders did not ensure that enough prisoners were allocated to the available activity spaces.</p>	<p>To ensure all prisoners are allocated to an activity that is likely to benefit them, the Heads of Education Skills and Work, Reducing Reoffending (HoRR), Learning and Skills, and the Education Provider will:</p> <ul style="list-style-type: none"> Review the allocation process including how prisoners are assigned to an activity. Review the induction process to ensure individual needs are fully assessed, so they can be assigned an activity that benefits them that is in line with their aspirations and any succession planning. Ensure the safety team and the allocation team work collaboratively to minimise the chances of conflict in a prisoner's assigned activity. 	Governor/ Education Provider	<p>June 2023</p> <p>October 2023</p> <p>July 2023</p>



		<ul style="list-style-type: none"> • The conflict resolution team will work pro-actively to overcome resolvable conflict issues. Where conflict issues cannot be resolved, individuals will be offered and assigned an alternative activity once available. • The Activities Hub will allocate to 100% of available activity spaces every week, providing assigned individuals the maximum opportunity to engage in the regime. • Weekly assurance checks to ensure all activity spaces have been assigned, including any barriers to achieving them identified, will be completed by the HoRR, and provided to the Deputy Governor. • Improvements and progress of these actions will be monitored and tracked at the monthly Quality Improvement Group (QIG), Education Performance Meeting (EPM) and Reducing Reoffending Meetings, and quarterly through the Prison Education Framework meeting. 		<p>July 2023</p> <p>June 2023</p> <p>July 2023</p> <p>July 2023</p>
3	<p>The attendance and punctuality of prisoners to activities were poor. Leaders should ensure that the number of prisoners attending activities increases.</p>	<p>The Heads of Residence and Services and Reducing Reoffending (HoRR) will improve attendance and punctuality at activities by:</p> <ul style="list-style-type: none"> • Reviewing the Core Day and movements process to activities, to ensure that there is sufficient time for prisoners to be unlocked by staff and complete any domestic tasks, prior to leaving the wings to arrive at their allocated workplace on time. • Residential staff will support and encourage prisoners to attend activities through daily interactions and key work targets. • Referring prisoner's refusing to attend their assigned activity due to conflict issues to the conflict resolution team. • Utilising the IP scheme to address general non-attendance at activities in the first instance, if/where there is continued non-attendance the adjudication process will be used. • Changing the way attendance is recorded, allowing the HoRR to better understand the drivers for non-attendance at activities so appropriate actions can be put in place to address them. Strategic monitoring of attendance and punctuality will be discussed at the monthly Reducing Reoffending meeting to monitor improvements. 	Governor	<p>July 2023</p> <p>August 2023</p> <p>June 2023</p> <p>September 2023</p> <p>August 2023</p>



4	<p>Leaders and managers had limited oversight of the regime on residential units. There were regular delays in the core day. There was too little association and exercise which was inconsistent across wings.</p>	<p>HMP Feltham B will aim to increase the amount of time prisoners can spend out of their cell in domestic and purposeful activities, and improve oversight of the regime on residential units by:</p> <ul style="list-style-type: none"> • Reviewing the staff profiles and core day in consultation with staff and prisoners, to increase the amount of time prisoners can spend out of their cells engaged in domestic and purposeful activities. • Residential Managers ensuring wing staff adhere to the published core day timings, ensuring prisoners are unlocked at the published times to receive and access their daily entitlements. Any delays to the published times will be communicated to the Duty Governor stating the reasons why for discussion at the Senior Leadership Team (SLT) daily briefing. • The Head of Residence and Services and Residential Custodial Managers completing weekly assurance checks to ensure the regime is being delivered on time and consistently, presenting their findings to the Deputy Governor. • The regime monitoring process being reviewed to improve the monitoring and recording of time prisoners spend unlocked across all wings. • The Residential Management Team discussing regime delivery at the start of each week, discussing any issues encountered the previous week, so appropriate actions can be generated to improve delivery. 	Governor	<p>October 2023</p> <p>December 2023</p> <p>June 2023</p> <p>August 2023</p> <p>June 2023</p>
	Key concerns			
5	<p>The use of segregation was high, conditions on the unit were poor and the regime was limited.</p>	<p>The Head of Residence and Safety will review the use of segregation, conditions, and the regime by:</p> <ul style="list-style-type: none"> • Providing all staff with guidance to consider whether a prisoner should be placed on report or whether the matter could be more effectively dealt with through the Incentives Policy (IP). 	Governor	<p>May 2023</p>



		<ul style="list-style-type: none"> • Adjudication Liaison Officer trained staff in the segregation unit screening all prisoners placed on report to ensure the charge is appropriate, or whether it could be dealt with through the IP. • Adjudicating governors considering whether alternative awards can be used instead of segregation. Awards will be monitored and reviewed at the monthly Segregation Monitoring and Review Group (SMARG) meeting. • The Deputy Governor quality assuring 5% of all adjudications each month to determine if alternatives to segregation were considered, providing feedback to adjudicating governors. • Submitting an Additional Works Request (subject to available funding) by July 2023, to install electricity points into the segregation cells. • Exploring funding opportunities to install exercise equipment and improve the environment of the exercise yard. • Continuing to escalate delays in commencing work on the Segregation Unit roof to the Youth Custody Services Deputy Director, so the issue can be raised with the MOJ Property Directorate. • Reviewing the segregation regime offer, including the implementation of group support sessions for wellbeing and youth work. • Completing Individual risk assessments for each prisoner segregated; informing a bespoke regime to address the reasons for their separation. • Continuing to develop reintegration plans for all segregated prisoners, assisting the individual with reducing their own risk and their return to normal location. • Monitoring the use of segregation and the regime prisoners have access to through the SMARG meeting. 		<p>June 2023</p> <p>July 2023</p> <p>May 2023</p> <p>July 2023</p> <p>August 2023</p> <p>May 2023</p> <p>August 2023</p> <p>July 2023</p> <p>July 2023</p> <p>July 2023</p>
6	Prisoners who were on ACCT (assessment, care in custody and teamwork) plans did not feel cared for by staff. Care maps did not	<p>The Head of Residence and Safety will improve the care and support for prisoners on an Assessment, Care in Custody and Teamwork (ACCT) by:</p> <ul style="list-style-type: none"> • Discussing all complex prisoners on an ACCT at the weekly SIM, with an increased focus on prisoners who need significantly more multi-disciplinary 	Governor	<p>June 2023</p>



	<p>always reflect concerns raised by prisoners and family engagement was not used adequately to support prisoners.</p>	<p>support, to determine if current support plans are effective or if additional support is required.</p> <ul style="list-style-type: none"> • Reviewing the current Quality Assurance (QA) process of ACCT's, and who completes them, in line with prescribed processes for ACCT v6. • Learning from the weekly QA checks will be discussed at the safety meeting, to include the effectiveness of support plans, whether prisoner's views have been considered, and whether family involvement has been fully explored, so identified learning can be shared with case co-ordinators. • Ensuring there is an increased focus on reducing self-harm at the safety meeting, with all available data being analysed to understand the causes of self-harm, so appropriate timebound actions are being generated to support prisoners on ACCTs. • Taking steps to improve the number and availability of listeners, and the monitoring and recording of how often their services are required. • Monitoring the timescales, effectiveness, and impact of all the actions at the SIM, Safety, and safety analysis meetings, measured against the 5P's strategy to provide governance and assurance. 		<p>August 2023</p> <p>September 2023</p> <p>July 2023</p> <p>September 2023</p> <p>July 2023</p>
7	<p>Prisoners did not receive medication in a clinically appropriate environment and best practice guidelines for patient safety, confidentiality and decency were not met.</p>	<p>To improve the administration of medication the Health Provider and the Governor will:</p> <ul style="list-style-type: none"> • Review and explore all available options on how to administer medication in a clinically appropriate safe way. • Agree the most appropriate dispensing option and review clinical and operational staffing requirements to ensure medication can be facilitated appropriately, safely and with adequate supervision that has the least impact on the regime and allows prisoners to attend activities on time. • Review the in-possession medication policy and maximise its use where safe to do so following appropriate risk assessments and adhered to in line with dispensing guidelines. • Ensure all prisoners present an identification card prior to any medication being issued/dispensed to improve safety practices. • Review the use and purchase of lockable boxes to store in possession medication. 	Health Provider/ Governor	<p>September 2023</p> <p>October 2023</p> <p>September 2023</p> <p>May 2023</p> <p>August 2023</p>



		<ul style="list-style-type: none"> Ensure that monitoring and compliance against the contract including dispensing medication is discussed at the monthly contract performance meeting chaired by NHS England, and the prison governor chaired Local Delivery Quality Board (LDQB). 		May 2023
8	Leaders did not investigate data that indicated differences in treatment or access to the regime for prisoners with protected characteristics.	<p>The Senior Leadership Team will ensure sufficient priority is given to Diversity and Inclusion (D&I), focusing on all aspects of prison life to identify potential discrimination by:</p> <ul style="list-style-type: none"> The analyst, supported by the D&I Lead collating and analysing equalities data from all aspects of prison life for Feltham B, identifying and highlighting any disproportionality for discussion at the monthly D&I meeting. Restructuring the D&I meeting to ensure any disproportionality identified from the available data is recorded and discussed. Where disparity is identified the D&I Lead will ensure an action is raised to fully investigate it in advance of the following meeting to determine if further actions are required. All actions will be timebound and added to the D&I action plan. Each Protected Characteristic (PC) being led by a head of function to allow prisoners a chance to raise concerns, and any perceived discrimination. Discussions will be minuted, and any actions raised will be tracked for timely resolution. Feedback, themes, trends, and actions will be monitored at the D&I meeting. The Deputy Governor quality assuring all Discrimination Incident Report Forms (DIRF) responses prior to them being returned to the complainant. Any themes and trends from DIRF's will be identified and discussed at the D&I meeting with any learning being shared with investigators. Additional independent assurance and analysis will be carried out by the Zahid Mubarek Trust. Ensuring D&I peer mentors are unlocked at identified times to provide support to other prisoners on their wings. Reviewing the action plan at the D&I meeting to allow concerns about equality to be monitored and tracked. 	Governor	<p>September 2023</p> <p>August 2023</p> <p>July 2023</p> <p>June 2023</p> <p>October 2023</p> <p>September 2023</p>



		<ul style="list-style-type: none"> Completing an annual survey to provide feedback on prisoner's views and perceptions of D&I, including discrimination, to measure progress against the action plan. 		December 2023
9	Prisoners did not have access to enough accredited courses in industries that would help them gain employment once released. Leaders and managers should ensure that prisoners at work receive appropriate training for their roles and gain accredited qualifications where appropriate.	<p>The Governor and Education Provider will review the current and future Education, Skills, and Work (ESW) provision, with the aim of providing an increased suite of accredited courses to ensure they meet the needs of the population by:</p> <ul style="list-style-type: none"> The Youth Custody Service Head of Learning and Enrichment working with the Education contract manager, provider, and prison to improve access to and quality of the education offer. Reviewing the current provision in industries to determine if it can be adapted to deliver accredited qualifications. Reinstating delivery in areas where qualification delivery has lapsed, for example food handling and safety. Opening indoor and outdoor construction workshops that offer accredited qualifications. Ensuring all prisoners in accredited and non-accredited activities receive appropriate training for their roles that is recorded in their Individual Learning Plans (ILP). Working with the HMPPS New Futures Network (an HMPPS initiative to broker partnerships between prisons and employers) to invite employers into HMP Feltham B, to deliver alternative activities that deliver accredited courses that fill skills gaps and find prison leavers employment. Monitoring of the education providers provision, including data, delivery, and improvements, will be via the monthly QIG (Quality Improvement Group) and quarterly Prison Education Framework (PEF) governance meetings. 	Governor/ Education Provider	<p>July 2023</p> <p>August 2023</p> <p>September 2023</p> <p>October 2023</p> <p>November 2023</p> <p>September 2023</p> <p>August 2023</p>
10	The number of prisoners who	The Education Provider will improve the quality of teaching and raise the levels of achievement by:	Governor/	



	<p>achieved qualifications was too low. Leaders and managers should improve the quality of teaching in order to raise the levels of achievement in the prison.</p>	<ul style="list-style-type: none"> • Reviewing the induction process to ensure individual needs are fully assessed, including the implementation of a new writing assessment, and checking of the learner's previous achievements and functional skill levels. These will be shared with employment and Information Advice and Guidance (IAG) staff, to ensure appropriate allocation to the individuals chosen pathway. • Providing comprehensive advice or guidance to prisoners on selecting education, work, and skills during their sentence, prior to allocating them to the most appropriate activity. • Ensuring assessments are used by teachers and instructors prior to a prisoner commencing education or activities, so every prisoner has a personalised ILP, including those with additional learning needs, and the information is used to make sure that all prisoners have access to the support they require. • Implementing a reading strategy, including support with reading using Shannon Trust Peer Mentors, and planned learning activities in English Lessons. • Reviewing the curriculum for English functional skills to ensure it meets the needs of prisoners, and that there are sufficient teachers to deliver it. • Improving the planning in mathematics and increasing expectations that challenge prisoners so they can develop their knowledge and skills. • Updating the exam retake process supported by their teachers and instructors, with improved tracking and monitoring of results on the CURIOUS database. • Providing Continuing Professional Development (CPD) to staff via monthly staff training sessions, to support quality assurance and improvement. Individual CPD support identified from data, learning observations or book / folder sampling will be provided when identified. • Employing a Head of Education Skills and Work to support delivery and quality of the provision. • Monitoring the effectiveness of quality improvement measures closely at the Performance Review Meeting (PRM), Contract Review Meeting (CRM), the QIG and through quality monitoring visits by the YCS Education Lead. Data from the Teaching and Learning Dashboard is utilised at the PRM, CRM and QIG meetings 	<p>Education Provider</p>	<p>July 2023</p> <p>August 2023</p> <p>September 2023</p> <p>September 2023</p> <p>August 2023</p> <p>August 2023</p> <p>August 2023</p> <p>July 2023</p> <p>September 2023</p> <p>August 2023</p>
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		to measure the progress made by all prisoners, including those with special educational needs.		
11	<p>Staffing pressures in the OMU and resettlement teams were also present in many of the community probation teams that Feltham worked with, which affected prisoner progression and release planning. This contributed to a backlog of prisoner OASys assessments, delays in some home detention curfew releases and often limited contact with prisoners.</p>	<p>The Head of Offender Management Delivery (HoMD) will improve the delivery and quality of sentence planning and offending behaviour work to support prisoners through their sentence by:</p> <ul style="list-style-type: none"> • Recruiting Prison Offender Managers (POMs) to deliver offender management work, as prescribed in the Offender Management in Custody (OMiC) model. • Implementing the Workload Management Strategy (a framework for task prioritisation when POM vacancies exist) until vacancies are filled. • Submitting a business case for implementing the Case Management Support model to provide additional temporary Prison POM resourcing to support Offender Management Unit (OMU) delivery. This will include a request for staffing the Resettlement Practitioner Vacancy. • Working with the HMPPS Offender Assessment System (OASys) Taskforce to identify ways to support OASys backlog reduction. • Working with the HMPPS Home Detention Curfew (HDC) Taskforce to seek support in improving HDC efficiency. • Continuing to liaise with community probation teams for the management of high-risk prisoners, handovers, and completion of OASys to Community Offender Managers (COMs), and HDC checks. • Monitoring the quality and frequency of offender manager sessions by POM's, identifying priorities to help drive sentence plans and prisoner's progression, and to provide the POM with support and training as required. Face to face sessions will be delivered in accordance with national standards in the first three months of arrival and prior to the POM-COM handover date. Face to face appointments will also be delivered at key points in the prisoner journey such as parole and Category D reviews. • Ensuring improved and consistent attendance at the monthly Interdepartmental Risk Management Meeting (IRMM) in line with the terms of reference. The meeting 	Governor	<p>Complete</p> <p>August 2023</p> <p>Complete</p> <p>October 2023</p> <p>July 2023</p> <p>September 2023</p> <p>September 2023</p> <p>July 2023</p>



		<p>will discuss Multi-Agency Public Protection Arrangements (MAPPA) levels to identify actions to support safe release and continue to hold community teams to account for the timely assessment of prisoners.</p> <ul style="list-style-type: none"> Ensuring cases where no MAPPA Level has been identified, and who are within 5 months of release, will be tracked by the Public Protection administrator and in the IRMM, and escalated to the HoMD. MAPPA 'S' (Notification of MAPPA level form) escalation to Community MAPPA leads will take place 4 months prior to the release date. Imbedding a public protection steering group to keep prison-wide public protection arrangements under regular review. 		<p>June 2023</p> <p>November 2023</p>
12	<p>Release planning was not carried out consistently and too many prisoners did not have timely preparation and support before their release.</p>	<p>The Head of Reducing Reoffending will improve resettlement planning arrangements for prisoners by:</p> <ul style="list-style-type: none"> Ensuring all prisoners needs are assessed at least 12 weeks prior to discharge, including discussing employment needs with the prison employment lead. Embedding the prison Employment Lead whose focus will be on helping prisoners find employment for their release. The Employment Lead will also plan targeted job fairs. Requesting recruitment to the Resettlement Practitioner vacancy as part of the business case for implementing the Case Management Support model. Filling the vacancies in the programmes team to re-instate the delivery of the Thinking Skills Programme and Identity Matters (a programme to address gang issues). to Ensuring housing support referrals are completed by the OMU working with COMs so that all prisoners are housed upon release, and those that are not scrutinised through the monthly SLT performance meetings. Ensuring any cases who are not COM allocated at the handover date are escalated to the Probation Delivery Unit's (PDU) Senior Probation Officer (SPO). If allocation has not taken place 4 months prior to release the case will be escalated to the PDU SPO, Prison Lead for London and relevant Probation Head of Service. 	Governor	<p>September 2023</p> <p>September 2023</p> <p>Complete</p> <p>August 2023</p> <p>August 2023</p> <p>June 2023</p>



		<ul style="list-style-type: none">Tracking progress of release planning arrangements at the monthly Reducing Reoffending meeting to ensure the prison is providing the necessary support to prisoners.		June 2023
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