



HM Prison &  
Probation Service

Action Plan: Buckley Hall

Action Plan Submitted: 10 June 2024

A Response to the HMIP Inspection: 12-23 February 2024

Report Published: 20 May 2024

## 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 BUCKLEY HALL

1. Rec No	2. Concerns	3. Response Action Taken/Planned	4. Responsible Owner	5. Target Date
	<b>Priority concerns</b>			
1	<p><b>Rates of self-harm were much higher than at the last inspection and were still rising.</b> The prison had a limited understanding of the issues that might have contributed to this.</p>	<p>Greater use of data will also be used at the monthly tripartite meeting and the weekly SIM meeting. This will be managed by the Head of Safety, supported by the safety analyst. Using the violence diagnostic tool and the performance monitoring tool HMP Buckley Hall will track progress against performance in this area. This will be presented to the SMT by the Head of Safety.</p> <p>HMP Buckley Hall will hold a whole establishment Safety Summit in June 2024 and increase the number of forums with staff and prisoners. This will include world café events on Drivers of self harm. Themed safety days will also take place within the staff training days.</p> <p>The HMP Buckley Hall safety strategy is under review and an action plan will be produced as part of the review. The Prison and Probation Ombudsman independent death in custody action plan will be reviewed with the Prison Group Director quarterly. The actions will be reviewed quarterly by the Head of Safety. Action reviews will take place at the weekly establishment performance meeting and monthly at the performance meeting.</p> <p>To develop the safety team in data management, coaching will be supplied by the area safety team on understanding safety data including drivers and triggers.</p> <p>ACCT reviews will only be held when the make up of the team is multi-disciplinary. There will be more focus on setting and reviewing</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Area Safety Lead</p> <p>Governor</p>	<p>June 2024</p> <p>June 2024</p> <p>September 2024</p> <p>June 2024</p> <p>September 2024</p>



		<p>specific targets to support the prisoners in crisis. Custodial Managers will complete weekly Quality Assurance checks on all ACCT documents. These will be quality assured at the weekly and monthly performance meeting.</p> <p>The Governor has met with the Samaritans and the lead listener, to understand some of the barriers that listeners face at the establishment. They analysed data looking specifically at access to listeners, the use of the duty rota, follow up calls and access to listeners during patrol states. This data will now be analysed at the monthly safety meeting.</p>	Governor	September 2024
2	<p><b>Weaknesses in many important processes, including prisoner consultation, complaints and applications, had undermined the prison's rehabilitative culture.</b></p>	<p>The Prisoner Consultation (Queensland Meeting) will continue to be held quarterly, however, to reduce the amount of time between meetings a new monthly meeting will take place with a smaller attendance list. Queensland meetings will be chaired by the Governing Governor one month and the Deputy Governor the following month to allow prisoner representatives to have direct access to the Governing Governor or the Deputy Governor each month. HMP Buckley Hall will ensure that 'you said, we did' posters are visible around wings so prisoners can see what action has been taken to address their concerns.</p> <p>HMP Buckley Hall will hold monthly focus groups with prisoners which will be held on all residential units. The purpose of these is to improve communication with prisoners and discuss any issues and encourage them to raise any unresolved issues with the prisoner representatives at the Queensland Meeting. These focus groups will be chaired by the unit Custodial Manager and held monthly. This will be monitored by the Head of Residence and credible action plans will be agreed at these meetings which will be monitored via the formal functional head bilats that take place with the Governor/Deputy Governor.</p> <p>The Prisoner Information Desk (PID) workers have access to master</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>June 2024</p> <p>June 2024</p> <p>June 2024</p>



		<p>copies of applications and complaint forms to ensure all are readily available. Supervising Officers will check the applications boxes on a weekly basis. They will ensure that responses are recorded prior to being distributed back to the original author. This will be monitored by the unit Custodial Managers as part of their monthly assurance checks. The Business Hub Manager will complete a bi-monthly check to ensure that the correct versions of forms are in place. An additional quality assurance process will be implemented whereby supervising officers will perform a 10% check on all applications weekly. The process will be managed by the Head of Residence and be monitored via the bi-lateral process between the Deputy Governor and Head of Residence.</p> <p>5% of complaints are now quality assured monthly by a senior management team member provide a report to the Business Hub outlining their findings for discussion at the monthly business assurance meeting. This focuses on ensuring that the responses are set out in line with procedural justice guidelines. Relevant actions are set for line managers to coach and develop staff who respond to complaints, where answers fall short of these guidelines. 100% of all staff related complaints are reviewed monthly by the Deputy Governor and the Head of Business Assurance.</p> <p>5% of redacted complaints will be scrutinised by a panel of prisoners. This will take place on a monthly basis and the meeting will be chaired by the Business Hub Manager and the Neurodiversity Manager. Where the scrutiny panel find examples of the complaint not being answered correctly, examples will be fed back into the Business Assurance Meeting. Any identified earning actions will then be set for the author of those identified complaints.</p> <p>A notice to prisoners will be published by the business hub to provide transparency on the data relating to complaints. This will include the correct process for submitting a complaint form and the total amount of complaints and totals upheld or not.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>September 2024</p> <p>June 2024</p>
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		<p>HMP Buckley Hall will review the equality forums that take place taking into consideration how attendance and engagement can be improved. SMT leads, supported by the equalities manager will set up forums specifically focusing on the experiences of prisoners who identify within that protected characteristic. This will help to better understand their experiences and provide us with the opportunity to influence policy and processes within the establishment based on these experiences. A calendar of meetings will be published which will have a set agenda, terms of reference and an action plan. These will be monitored via the strategic equalities meeting monthly.</p> <p>The Rehabilitative Culture strategy will be reviewed by the Deputy Governor. Findings of this review will help to shape the culture over the next 12 months which will be monitored via an action plan. This will be reviewed at the monthly Senior Management Team meeting.</p>	Governor	June 2024
			Governor	June 2024
3	<p><b>The prison service had not invested enough money in the fabric of the jail.</b> Too many prisoners still lived in cramped conditions and many cells, especially on the induction unit, were grubby. There were unreasonably long delays for major repairs of boilers and showers on some units.</p>	<p>HMP Buckley Hall will work closely with partners Amey to track, monitor, and improve timescales of small repairs. The monitoring of all repairs will take place through the monthly estates meeting and performance challenged at this meeting when necessary.</p> <p>HMP Buckley Hall will revisit and review the current room ready representative roles. A quality assurance process will be introduced on all residential units to ensure every cell is ready for use, clean and fit for purpose. This will be monitored daily by the residential Supervising Officer. The unit Custodial Manager will also complete a weekly assurance check to ensure that cells are in an acceptable standard. The Head of Residence will complete a monthly assurance sample of cells on each unit. This will be monitored via bi-lateral meetings between the Governor and Head of Residence.</p>	Governor	June 2024
			Governor	June 2024
4	<p><b>There were insufficient spaces in education, skills and work to meet the needs of the prison population.</b> Not all prisoners were able to attend</p>	<p>HMP Buckley Hall have a local target to offer 100% employment opportunity for the population. The activity target will be monitored</p>	Governor	June 2024



	<p>purposeful activities, and there was no assurance that the spaces available supported the prisoner's pathway or goals.</p>	<p>by the Head of Reducing Reoffending and reported through the weekly performance meeting.</p> <p>Upon entry to HMP Buckley Hall all prisoners will undertake a prison induction which includes documented starting points of their education attainment levels, with identified personal pathways via the digital personal learning plan. This will place the prisoners into the correct personalised pathway to meet their own need. The prison has been selected to run a pilot scheme which is a digital process that follows a prisoners pathway progression. The pilot scheme is called "Learning and Work Progress".</p> <p>HMP Buckley Hall will meet monthly with its education provider (Novus) to ensure waiting lists and effective sequencing align to maximise classroom and activity space.</p> <p>A quality assurance process will be introduced at HMP Buckley Hall to monitor effective prisoner pathways against digital personal learning plans. The Activity hub manager, Learning and skills manager and Advice and guidance manager will review 10% of plans each month. They will review the right goals and targets and ensure that the targets are SMART. They will also review if the activities team have placed the prisoners into the right activity to achieve their individual goals within their plan.</p> <p>A risk assessment will take place to review classroom sizes with a view to increasing classroom sizes. Within the review HMP Buckley Hall will look to increase the overall attendance in education.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>November 2024</p> <p>June 2024</p> <p>July 2024</p> <p>July 2024</p>
5	<p><b>Leaders had been too slow to resolve the significant weaknesses within the industrial workshops.</b> Instructors in workshops did not routinely promote the development of prisoners' English and mathematical skills, nor did they support prisoners with learning difficulties well</p>	<p>HMP Buckley Hall will introduce a monthly industries performance assurance meeting where the Industries Manager will produce a report on the quality of industries and present that at the meeting. Actions agreed at the meeting will raise standards within the industries staffing group and will ensure that the progression of</p>	<p>Governor</p>	<p>June 2024</p>



	<p>enough, monitor prisoners' progress or routinely promote reading for pleasure.</p>	<p>prisoners is implemented. The Industries Manager, in line with the quality assurance calendar, will review the progress in work booklets and this will provide evidence of where individual prisoners have progressed.</p> <p>Accredited and uncredited qualifications will be introduced into workshops. HMP Buckley Hall will implement an apprenticeship style framework to track the progress of prisoners to ensure that they are work ready on release.</p> <p>HMP Buckley Hall will reallocate line management responsibility of industry workshop instructors to the Learning and Skills Manager. The Head of Learning and Skills is a specialist in this area and will provide support and coaching to the industries staff. This will drive up quality and greater outcomes for prisoners. This will be monitored via tracking documents so that the prisoners' journey is documented. The Head of Learning and Skills will check these documents to measure improvements monthly.</p> <p>A relaunch of the reading strategy will see events taking place across the year, including world book night events. Themed reading learning walks will also take place within industry workshops to provide feedback on how we can encourage reading for pleasure. Story Book dads will also be reintroduced.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>August 2024</p> <p>August 2024</p> <p>August 2024</p>
	<b>Key concerns</b>			
6	<p><b>Patients requiring an assessment under the Mental Health Act waited too long for a decision about their needs.</b> They subsequently faced significant delays in being transferred to hospital once a transfer was recommended.</p>	<p>NHS England Health and Justice North West continues to maintain oversight of long waits and access to secure inpatient treatment in a mental health hospital. Delays have been escalated to the mental health (MH) Provider Collaboratives and MH Specialised Commissioners both regionally and nationally, given this is a widespread issue. Increased patient acuity, reduced bed capacity and staffing issues within secure settings were observed as a result of the pandemic, which affected bed availability and transfer times. A national data exercise is underway to determine the scale of demand</p>	NHS England	October 2024





		and waiting times for all patients and a data collection portal has been set up to facilitate this. Once completed, further delivery actions can then be agreed. Placement into segregation will take place following a risk assessment involving clinicians on site and may sometimes be the preferred option to reduce risk.		
7	<b>Almost a third of prisoners were locked up during the core day, which was too many for a category C training prison.</b> Much of this was attributed to regime slippage during roll reconciliation (see Glossary), and staff being unsure of the regime, including when to unlock prisoners.	<p>HMP Buckley Hall have designed a new core day and prison regime which is due to roll out in June 2024, in line with the national future regime design guidelines. This will ensure less regime slippage. HMP Buckley Hall will review the roll reconciliation process in partnership with the Security Group and the Prison Group Director Operations Manager. This will make improvements to the process and maintain its security objective.</p> <p>Supervising officers will have their daily roles changed from a roving supervisory role, to being located on residential units throughout the core day which will provide greater leadership at labour movement. Custodial managers will manage the labour movement process so will give greater operational oversight.</p> <p>Supervising officers will review daily why prisoners have not attended their activity. They will also be responsible to ensure that sanctions are implemented where appropriate if prisoners are not complying with their allocated activity space. Where prisoners refuse to engage in activity there will be a co-ordinated approach to encourage prisoners into activity. This will be a multi-disciplinary approach with the wing staff, keyworkers, Prisoner Offender Managers, Learning and Skills Manager and activities staff.</p> <p>A working party will be set up to concentrate and provide support to prisoners who are currently unemployed and refusing to engage with employment, work and skills at HMP Buckley Hall.</p>	Governor	June 2024
			Governor	June 2024
			Governor	June 2024
			Governor	June 2024
8	<b>The personal development curriculum (see Glossary) was relatively new and did not yet have sufficient structure to be effective.</b>	The education provider (Novus), Learning & Skills manager (LSM) and Head of Education Skills and Work are working together to provide a more sequenced personal development curriculum. This is	Governor	June 2024



	<p>Sessions were ad hoc and not systematically planned or sequenced to make sure prisoners could build their knowledge over time.</p>	<p>to be implemented in consultation with the Group Head of Learning and Skills.</p> <p>HMP Buckley Hall have introduced a 'More for You' curriculum. Promotion of this includes a prisoner induction, prisoner focus groups, and via posters and leaflets. These have been published to promote the personal development opportunities on offer at Buckley Hall. HMP Buckley Hall provide locally designed activities which may include, but not limited to, charity work, on-wing structured activity and prisoner-led enterprises so that prisoners can learn technical skills alongside gaining qualifications. The impact of these is that prisoners can gain technical skills required to be successful in further education or employment on release.</p>	Governor	Completed
9	<p><b>Most prisoners had not yet benefited from a mid-sentence review of the career and education advice and guidance they had been given at the start of their sentence.</b> As such, their progress against agreed personal action plans was not measured or checked.</p>	<p>At HMP Buckley Hall all prisoners will have mid-sentence reviews within agreed timeframes dependent on length of sentence. Personal development courses and opportunities will be documented through attendance monitoring and logged on the Digital Prison Service platform (DPS).</p>	Governor	June 2024
10	<p><b>Public protection arrangements to monitor high-risk prisoners were not robust.</b> We found examples where prisoners were not subject to telephone or mail monitoring when they should have been. Attendance at the interdepartmental risk management team meeting (which focused on prisoners who posed the highest risk of harm to others) was inconsistent, and discussions and actions were not always documented and tracked.</p>	<p>The interdepartmental risk management team meeting (IRMT) at HMP Buckley Hall has been reviewed. Minute taking is completed 'live' on screen and actions are clearly identified, and an action tracker has been created. Attendance and actions will be reinforced and tracked through Functional Head bilats by the Deputy Governor to ensure changes from the review are fully embedded.</p> <p>Through the IRMT meeting HMP Buckley Hall will also review all prisoners who are subject to mail and phone monitoring and ensure that they are individually reviewed.</p> <p>Telephone and mail monitoring will be placed onto the weekly performance meeting as a set agenda item. This will allow closer</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>September 2024</p> <p>September 2024</p> <p>June 2024</p>



		scrutiny of the data available by the Senior Management Team.		
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