



HM Prison &
Probation Service

Action Plan: HMP Cardiff

Action Plan Submitted: 03 June 2024

A Response to the HMIP Inspection: 29 January – 05 February 2024

Report Published: 08 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 CARDIFF

1. Rec No	2. Concerns	3. Response Action Taken/Planned	4. Responsible Owner	5. Target Date
	Priority concerns			
1	<p>Ten prisoners had committed suicide since we last inspected. Although the rate of self-harm had reduced over the same period, the implementation of recommendations from the Prisons and Probation Ombudsman following their investigation into these deaths was poor.</p>	<p>The Head of Safety will improve the care and support for the most vulnerable and those in crisis, including learning from Prisons and Probation Ombudsman (PPO) recommendations by:</p> <ul style="list-style-type: none"> • The prison has conducted a full review of the current PPO recommendations action plan to track progress and improve outcomes and learning, including a rating system to prioritise specific recommendations. • Continued oversight of the implementation of recommendations made by the PPO, including those relating to health care provision, with learning reinforced with staff every six months. • A bespoke meeting has been put in place to review the progress of PPO recommendations, chaired by the Deputy Governor, with minutes recorded and action points directed to monitor and maintain progress. Any updates or changes will be reflected in the monthly safer custody meeting. • The Head of Safety and Head of Healthcare will hold regular review meetings to review any joint PPO recommendations which will be reflected in the Healthcare Operational Group. • Ongoing Suicide and Self-Harm (SASH) training delivery to all members of staff will be tailored to include awareness of relevant and specific PPO recommendations. • Significant work has taken place to understand the reasons for the higher levels of Self-Harm (SH) at the prison, including the satisfactory completion of HMPPS 'cluster site' arrangements. Levels of SH will be kept under regular review, deploying additional regional support when required. 	Governor	<p>Complete</p> <p>Complete</p> <p>May 2024</p> <p>May 2024</p> <p>Complete</p> <p>Complete</p>



		<ul style="list-style-type: none"> • All incidents of SH classed as 'near misses' will be investigated to identify learning points. • The safety team will support case managers with Assessment Care in Custody Teamwork (ACCTs) to improve care plans and case management. • Weekly Quality Assurance (QA) checks by managers and the safety team will ensure case co-ordinators are not changed unless in exceptional circumstances, and daily checks are recorded correctly as per the prescribed frequency. • Ensuring all prisoners being supported by the ACCT process are triaged for discussion at the weekly Safety Intervention Meeting (SIM), where multi-disciplinary actions will be generated to ensure appropriate support and targets are put in place. • Ensuring any use of anti-ligature clothing is authorised by an appropriate manager and recorded in a central log, clearly stating the reasons why it has been authorised. • The safety team will improve the collation and review of all data relating to self-harm and deaths in custody to identify trends and drivers of self-harm. This information will be discussed at the multi-disciplinary safer custody meeting where appropriate actions to reduce self-harm will be added to the consolidated safety action plan. • Monitoring the timescales, effectiveness, and impact of all the actions will be at the SIM and Safer Custody meetings, monitoring improvements through the consolidated safety action plan. 		<p>Complete</p> <p>Complete</p> <p>Complete</p> <p>Complete</p> <p>June 2024</p> <p>Complete</p> <p>Complete</p>
2	<p>There were too many illegal drugs getting into the prison. Just under a quarter of all random drug test results were positive and, in our survey, far more prisoners than in similar prisons said it</p>	<p>HMP Cardiff will aim to reduce the availability of drugs through:</p> <ul style="list-style-type: none"> • Appointing a new Drug Strategy lead who will be responsible for the oversight of work regarding illicit substances, pulling together data from all areas of the prison and working with key partners to address substance misuse issues. • Significant capital investment work to vastly improve/increase Closed Circuit Television (CCTV) coverage throughout the prison is currently being undertaken, providing the prison with the ability to monitor and record from the Control Room to increase capability and effectiveness. It will improve perimeter security and lower the risk of throwovers and drones. The improved CCTV coverage will enhance intelligence gathering and allow the prison to monitor and react to risks/threats, such as passing illicit items on visits. 	Governor	<p>Complete</p> <p>March 2025</p>



	<p>was easy to get hold of illegal drugs.</p>	<ul style="list-style-type: none"> • Suspicious payments to prisoners are reported and actions include challenging prisoners in receipt of suspicious payments, withholding the payments and sharing the information with partner agencies including the Police and Financial Investigations Unit. • Increasing covert operations to assure processes and procedures, including testing of enhance gate security and visits procedures. • Developing the 'supply reduction plan', identifying risk and actions to mitigate any risks. This will be discussed at the monthly security and drug strategy meetings. • Continuing to develop the provision offered within the Incentivised Substance Free Living Unit. • Disrupting illicit drug supply by deploying regional search and detections sources based on any developing intelligence, coordinated by the regional lead for security with input from other key stakeholders. • Improving communication with South Wales Police colleagues to deal with the serious offences referred to them for incidents such as assaults and drug finds, to improve accountability and deterrence. • Continue to refer all prisoners who test positive or are adjudicated on for drug-related behaviour, including items found during cell searches to the substance mis-use service provider (Dyfodol) to support desistance. • Continuously monitoring security intelligence to identify emerging threats and trends through the monthly Local Tactical Assessment (LTA) and Local Tactical Board (LTB), so key priorities and threats can be identified, and resources deployed accordingly. 		<p>Complete</p> <p>Complete</p> <p>October 2024</p> <p>Complete</p> <p>Complete</p> <p>Complete</p> <p>Complete</p> <p>Complete</p>
3	<p>There were weaknesses and inconsistencies in the oversight and planning of care for patients with long-term health conditions. This created the risk that deterioration in</p>	<p>Cardiff and Vale University Health Board (CVUHB) and HMPPS Wales will improve the oversight and care for patients with Long Term health Conditions (LTC) by:</p> <ul style="list-style-type: none"> • Recruiting staff that is centred on employing individuals that have skills appropriate for the patient's needs. A healthcare work force review is ongoing, with the CVUHB recruiting senior staff with experience in both accident & emergency and district nursing. • The CVUHB has a dedicated development nurse to embed training within the work force. Four staff nurses are already trained in Diabetes and respiratory and cardiac. Two further nurses are currently on courses that finish in May, to undertake their own clinics. 	<p>CVUHB/ HMPPS Wales</p>	<p>Ongoing</p> <p>Complete</p>



	patients' health could go unnoticed.	<p>Electronic Health Systems (SystemOne) have created specific LTC templates to support this training, for positive outcomes for the individuals in our care.</p> <ul style="list-style-type: none"> • Adding a General Practitioner (GP) surgery onboarding with experience of LTC and recruiting two new GP's, ensuring that there will be two dedicated LTC sessions for GPs when all new employees are in place. • Implementing a new prison regime from June 2024 that will free up healthcare staff to provide LTC provision. • Commissioning a health needs assessment of the services provided at HMP Cardiff to ensure it meets the needs of the population. • Data analysis is shared with the Healthcare Operational Group (HOG) bi-monthly and fed into the health Prison Partnership Board (PPB) on a quarterly basis, to aid the identification of improvements. • Regular engagement occurs with Public Health Wales, who support the partnership agreement between CVUHB, Welsh Government and HMPPS. We recognise the many benefits that improving the health and wellbeing of those in prison can bring, not only for the individual, their families and wider community but also by contributing to rehabilitation, reducing reoffending and maintaining a safe prison environment. Arrangements for LTC planning will be added into the next partnership agreement for offender health with Welsh Government 		<p>November 2024</p> <p>June 2024</p> <p>November 2024</p> <p>Complete</p> <p>Complete</p>
4	<p>There were weaknesses in teaching and the curriculum. The provision, including for neurodiverse learners, did not meet needs. There was also insufficient face-to-face education and vocational provision</p>	<p>The Head of Education Skills and Work (HoESW) will improve the quality of education provision by:</p> <ul style="list-style-type: none"> • Reviewing the neurodiversity curriculum for learners to develop their broader knowledge and skills, with individual learning plans in place to support the individual needs of learners. These will be reviewed monthly by local managers for quality assurance purposes and future reviews. • Reviewing the overarching curriculum and vocational provision for all learners and written higher level qualifications for all courses, to improve the offer available, including in-person provision for level 2 and 3 learners. • The workshop provision to deliver additional vocational qualifications will be reviewed on completion of a maintenance project due for completion in May 2024. • Promoting library services on the wings and during induction to inform prisoners on how to access the library and the services provided. 	Governor	<p>June 2024</p> <p>July 2024</p> <p>August 2024</p> <p>June 2024</p>



	for level 2 and 3 learners.	<ul style="list-style-type: none"> • Explore ways to increase the available Information Technology (IT) infrastructure and devices available to allow learner's access to suitable materials, incorporating and expanding its use across the provision to develop their IT skills. • Increasing the provision available to enable speakers or learners of Welsh to use and develop their Welsh language skills. • Ensuring all teachers receive appropriate feedback to improve the quality of their teaching. • The delivery and impact of improvements will be monitored by the education Quality Manager and reviewed at the bi-monthly Quality Improvement Group (QIG) meeting. 		<p>July 2024</p> <p>September 2024</p> <p>October 2024</p> <p>October 2024</p>
5	Poor reporting processes in education meant that senior leaders had failed to identify the negative impact of recent changes to the curriculum for some learners.	<p>The HoESW will improve reporting processes to monitor the impact of the curriculum by:</p> <ul style="list-style-type: none"> • Reviewing ESW curriculum. The focus of the review will surround the impact of curriculum changes on all learners and staff within the education team. • Approving any future changes to the curriculum at the QIG meeting. Senior leaders will ensure that all staff across ESW are updated and understand their roles in relation to curriculum updates. • Reviewing the Quality Framework (QF) to provide the Quality Manager with a more robust and consistent annual planner for teaching observations and learning walks. Staff, unit managers and other senior leaders will participate in providing additional assurance and learning as part of the QF annual cycle of assurance. • Ensuring prisoners are assigned an activity that aligns with their interests and that allocation arrangements are equitable for all prisoners. • The Head of ESW and the Quality Manager will use CURIOUS (a database that captures prisoner initial assessments, participation and achievement in courses) data, Continual Professional Development (CPD) information, along with teachers and learners' feedback to monitor the effectiveness of the curriculum which will be discussed at the QIG. 	Governor	<p>July 2024</p> <p>June 2024</p> <p>October 2024</p> <p>August 2024</p> <p>July 2024</p>



6	<p>Too many prisoners had been released homeless or without sustainable accommodation.</p>	<p>HMPPS Wales, Wales Probation Service (WPS) and HMP Cardiff will improve accommodation outcomes for prisoners being released by:</p> <ul style="list-style-type: none"> • The Probation pre-release team will interview all prisoners upon arrival at the prison to identify their resettlement needs (including accommodation) using the Wales Early Adopter Resettlement Model Guided Interview which is included in the national development of Prepare someone for Release, the replacement for BCST2, where Wales is a pilot region. This allows any homeless intervention work to begin at the earliest possible stage. This will be followed up by a pre-release planning meeting 12 weeks prior to the individual being released, to ensure a co-ordinated approach occurs regarding referral to appropriate community services and communications with the Community Probation Practitioner. • Wales Probation performance against pre-release activity is reported to PGD and RPD via monthly Senior Leader Forum (SLF) meetings. Additionally, data analysis and outcomes to monitor progress and identify possible areas of improvement are an agenda item at the bi-monthly reducing reoffending meeting, where appropriate actions will be generated to address areas of concern. • The prison based Senior Probation Officer (SPO) will track all POM to Community Offender Manager (COM) handovers, to ensure resettlement requirements are being addressed by the COM in advance of the transition from custody to the community. If the POM identifies issues/delays in addressing actions, or a lack of response from COMs, the SPO will escalate their concerns to the Head of the Probation Delivery Unit concerned. • Probation Resettlement Practitioners (PRR)/ Community Probation Practitioners (CPP) will expedite referrals to Commissioned Rehabilitative Service (CRS) providers for prisoners who are serving short sentences of under 20 days or left to serve at sentence. • Accommodation Pathway Coordinators (APC) have been appointed in each region by the Homelessness Prevention Taskforce (HPT) Team, the role of the APC is to provide a link between Prison, Probation and Local Authorities. APC's meet weekly with Local Authorities (LA's) to review all upcoming releases for their selected release areas. 	HMPPS Wales/WPS/ Governor	<p>Complete</p> <p>Complete</p> <p>Complete</p> <p>October 2024</p> <p>Complete</p>
---	---	---	------------------------------	---



	Key concerns			
7	<p>The prison was extremely overcrowded. Almost two-thirds of prisoners were paired up in cells originally designed for one.</p>	<p>HMPPS's cell certification framework requires that cells are only shared where a Prison Group Director has assessed them to be of adequate size and condition. There are other standards set out in the framework, including adequate lighting, heating, ventilation, fittings, and access to water and sanitation. These standards ensure that prisoners are accommodated safely even when held in crowded conditions.</p> <p>We are delivering 20,000 additional modern uncrowded prison places, the largest prison build programme since the Victorian era, ensuring the right conditions are in place to rehabilitate prisoners, helping to cut crime and protect the public. We have already delivered c.5,900 places including through our two new 1,700-place prisons, HMP Five Wells and HMP Fosse Way <u>and 10,000 will have been built by the end of 2025.</u></p> <p>HMPPS, the Prison Group Director (PGD), and the Governor will continue to review operational capacity at HMP Cardiff in line with the framework for the certification of prisoner accommodation to reduce overcrowding where/if possible.</p>	HMPPS/PGD/ Governor	Ongoing
8	<p>The key work scheme was not operating effectively. Most prisoners did not have regular sessions with a named officer.</p>	<p>HMP Cardiff will improve the delivery and quality of key work to support prisoners sentence progression through:</p> <ul style="list-style-type: none"> • A reprofile exercise of staff resources has been undertaken with the new profile planned to be implemented in June 2024, this will release keyworkers to complete sessions with more predictability and reliability. • The implementation of the revised Regime Management Plan (RMP) will standardise the knock down list to ensure that keywork is not at the detriment of other areas. This will be monitored for consistent delivery at the daily operational briefing and weekly resourcing meeting. • Providing training and support to the Custodial Managers (CMs) to ensure they understand the RMP and implement it accordingly to reduce the impact on Key Work delivery. 	Governor	<p>June 2024</p> <p>June 2024</p> <p>Complete</p>



		<ul style="list-style-type: none"> • Delivering a minimum of one key work session per month for every prisoner in line with national policy. Prisoners identified as requiring increased support due to vulnerabilities will receive two sessions per month. • Allocating a key worker to complete an initial key work session for all new receptions within 14 days of arrival at the prison. • Introducing bi-monthly meetings with Residential Managers, Heads of Residence and Offender Management Unit (OMU) Managers on keyworker progress, ensuring constructive relationships are being developed fostering positive behaviours. Supported by a 10% monthly Quality Assurance (QA) check of key worker notes by Residential CMs, with the Heads of Offender Management Unit Services and Delivery checking 10% of the CM's checks. • Rolling out a revised Key Worker Strategy and action plan, including a new keyworker allocation process, that will include the upskilling and development of staff groups involved in Offender Management in Custody (OMiC) and Keyworker strategies. The quality and delivery of keyworker, including frequency, purposeful and rehabilitative conversations will be monitored by the Head of Offender Management Services and reported at the monthly performance and assurance meeting. 		<p>July 2024</p> <p>July 2024</p> <p>September 2024</p> <p>September 2024</p>
9	<p>Some aspects of pharmacy practice fell below expected standards. The management and use of stock medicines, secondary dispensing and the lack of restrictions to drug storage areas were not in line with good practice.</p>	<p>CVUHB and HMP Cardiff will improve the standards of medicine management by:</p> <ul style="list-style-type: none"> • Continually reviewing the management of and use of medications at the monthly Medicines Management (MM) Meeting. • Reminding staff that only authorised persons are permitted to enter dispensing rooms, communicated to all healthcare and prison staff through notices, with regular ongoing checks to check for compliance. • Implementing a programme of weekly cell checks as part of the medication In-Possession (IP) policy. • Exploring options to provide lockable lockers in cells for prisoners to safely store their IP medication. 	CVUHB/ Governor	<p>Complete</p> <p>Complete</p> <p>Complete</p> <p>November 2024</p>



		<ul style="list-style-type: none"> The Deputy Governor and the Head of Healthcare will explore options to increase the available storage so medicines and trollies can always be secured safely. Residential CMs and Supervising Officers will ensure all medication queues are appropriately supervised to allow patients privacy at the hatch and to prevent medication being withheld. Oversight of pharmacy practices will be at the prison partnership agreement for prison health in Wales, who strive to assist CVUHB in developing standards for MM in prisons in Wales. This group strives towards a consistent approach to prescribing in Welsh prisons through development of standards for MM and an all Wales formulary. Consideration will be given to medicine delivery, storage and preventing diversion. Access to alternative therapies offered in the community will be reflected. 		<p>November 2024</p> <p>Complete</p> <p>Complete</p>
10	Prisoners waited far too long to receive urgent dental treatment.	<p>CVUHB and HMP Cardiff will improve dental waiting times by:</p> <ul style="list-style-type: none"> Ongoing liaison with the dental provider to increase the available dental sessions available to accommodate demand. Allocating four emergency appointments for each clinic to reduce waiting times. Ensuring all patients attending a dental appointment are offered advice leaflets for common dental and self-care issues, to promote oral health improvement. Detailing escorting prison staff to ensure clinics continue to operate on staff training/shutdown days. The re-profiling exercise of staff resources and the accompanying RMP will ensure prison staff are always detailed to escort prisoners to appointments to reduce the number of do not attends. 	CVUHB/ Governor	<p>July 2024</p> <p>Complete</p> <p>Complete</p> <p>Complete</p> <p>June 2024</p>
11	Evaluation of teaching and the analysis of data was not used well enough to identify	<p>The HoESW will improve the evaluation of teaching and analysis of data to identify areas of improvement by:</p> <ul style="list-style-type: none"> Reviewing the Quality Framework to support a more robust and consistent evaluation of teaching, alongside an annual planner for teaching observations and learning walks that 	Governor	<p>October 2024</p>



areas for improvement.	<p>will identify areas for improvement and CPD for staff, including appropriate feedback to improve the quality of teaching.</p> <ul style="list-style-type: none">• Managers will evaluate all available data, including but not limited to, CURIOUS data, CPD information, teachers and learners' feedback to identify areas requiring improvement. The QIG will have a standing agenda item to discuss the data and generate appropriate actions that will be included in the education delivery action plan. The Regional Quality Manager will provide additional support and review the findings.• Data will be used to identify areas of the prison regime that may affect attendance or delivery, including scheduling, non-attendance and behaviour sanctions. Identified issues will be raised at the daily operational briefing to explore options to overcome barriers to delivery.		July 2024 August 2024
-------------------------------	---	--	------------------------------

