



HM Prison &  
Probation Service

Action Plan: HMP Nottingham

Action Plan Submitted: 9<sup>th</sup> September 2024

A Response to the HMIP Inspection: 13<sup>th</sup>-24<sup>th</sup> May 2024

Report Published: 19<sup>th</sup> August 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 NOTTINGHAM

1. Rec No	2. Concerns	3. Response Action Taken/Planned	4. Responsible Owner	5. Target Date
	<b>Priority concerns</b>			
1	<b>Levels of self-harm remained high and there was no bespoke local strategy to reduce them.</b>	<p>A bespoke self-harm strategy and action plan will set out HMP Nottingham's aim to reduce incidents of self-harm and improve support for prisoners at risk of self-harming. The strategy will be informed by the available evidence and will be developed to identify priority groups, risk factors and steps that need to be taken to reduce incidents of self-harm by:</p> <ul style="list-style-type: none"> <li>Utilising prison/national data and outcomes to inform the Safety Strategy and generate actions to reduce the drivers of self-harm and violence, that will be incorporated into the safety action plan.</li> <li>Reviewing the case management of the most complex cases and prolific self-harmers to ensure they are being appropriately supported by the Safety Team, with findings communicated to all staff.</li> <li>For prisoners on constant supervision ensuring that the Care Plan fully explores options to provide prisoners with a suitable regime.</li> <li>Conducting a review of in cell activities to identify increased access to reduce boredom.</li> <li>Case managers and key workers encouraging and supporting high-risk prisoners to engage in the regime, working collaboratively with the allocations team to allocate these prisoners to a suitable activity.</li> <li>Continuing to collate and review all data relating to self-harm and deaths in custody to identify trends and drivers of self-harm. This information will be analysed at the Safety Strategy Meeting, where appropriate actions to reduce self-harm will be added to the safety action plan.</li> </ul>	Governor	<p>October 2024</p> <p>October 2024</p> <p>November 2024</p> <p>September 2024</p> <p>October 2024</p> <p>December 2024</p> <p>October 2024</p>



		<ul style="list-style-type: none"> <li>Key milestones and targets will be incorporated into the action plan through which success can be measured.</li> </ul>		October 2024
2	<p><b>Time out of cell was too limited for many prisoners.</b> Approximately 40% were unemployed and unlocked for only two hours each day.</p>	<p>The prison will achieve its regime delivery commitments as set out in its Regime Progression Plan (RPP) by:</p> <ul style="list-style-type: none"> <li>Completing an in-depth analysis of unemployed prisoners to determine 'who' and why these prisoners are not engaged in education, skills or work activities and a robust attendance strategy will be implemented.</li> <li>Increasing the number of prisoners employed in full-time work from 26% to at least 30% and those employed in part-time work from 30% to at least 50%. (see also responses to recommendations 3, 4, and 15).</li> <li>Reviewing the Incentives Policy Framework (IP), with a particular focus on improving the offer available to prisoners who engage in activities, rehabilitation, and reducing reoffending work.</li> <li>Providing an improved regime offer for all prisoners, regardless of their IP status, who wish to engage in activities, increasing the amount of time prisoners can spend out of their cells engaged in a purposeful activity to relieve boredom and frustration.</li> <li>Managers adhering to the prisons core day regime and achieving its full daily provision of time in open air of 60 minutes rather than the 45 minutes currently provided.</li> <li>Strategic monitoring of attendance will be discussed at the Reducing Reoffending meeting, including oversight of allocations, to monitor improvements and raise actions to identify and address any barriers to attendance.</li> </ul>	Governor	<p>November 2024</p> <p>October 2024</p> <p>October 2024</p> <p>September 2024</p> <p>November 2024</p> <p>October 2024</p> <p>November 2024</p>
3	<p><b>There were insufficient activity places to meet the population's needs.</b> The unemployment rate was too high, and there was not enough provision to meet the needs of the 90% of the prison</p>	<p>The Head of Reducing Reoffending (HoRR) and Head of Education Skills and Work (HoESW) will review and improve the activity provision available to provide a more engaging regime. This will</p>	Governor	February 2025



	<p>population whose English and mathematics was at entry-level 3 or below.</p>	<p>include reviewing the Annual Delivery Plan (ADP) for education. This will also include:</p> <ul style="list-style-type: none"> <li>• Conducting a risk assessment of education classroom numbers, in conjunction with education provider, with the aim of increasing spaces and access to education, especially in English and mathematics.</li> <li>• Reviewing prison industries workshops to ensure the prison is maximising the available capacity and making the most efficient use of part-time versus full-time work opportunities.</li> <li>• Conducting a wholesale review of prisoner/work placement (i.e. security) risk assessments process to ensure decisions are proportionate to risk and do not unnecessarily restrict prisoners from accessing medium and high-risk activities. The risk assessment process will also be streamlined to speed up the allocation process.</li> <li>• Prison managers expanding the opportunity for more prisoners to access the gym during the evening period.</li> <li>• Expanding the availability of workshop spaces for prisoners convicted of sexual offences.</li> </ul>		<p>December 2024</p> <p>January 2025</p> <p>November 2024</p> <p>December 2024</p> <p>January 2025</p>
4	<p><b>The process for allocating prisoners to activities was inefficient and ineffective.</b> The number allocated was often well below capacity, and too many new arrivals experienced long delays between their induction and being assigned to education, skills and work.</p>	<p>HMP Nottingham will aim to improve the allocations to activities by:</p> <ul style="list-style-type: none"> <li>• Reviewing the allocations waiting lists daily to ensure all prisoners who have the necessary information to enable allocation are allocated swiftly.</li> <li>• Ensuring all prisoners have a Personal Learning Plan (PLP) that have 'SMART' (specific, measurable, achievable, relevant, and time-bound) actions to work towards their targets completed swiftly within the induction period and utilised to ensure swift allocation. As an interim measure, a prison manager has 'stepped in' to supervise case management and allocation of Careers Information, Advice and Guidance (CIAG) staff workload which has led to a significant improvement in the number of</li> </ul>	<p>Governor</p> <p>Governor</p>	<p>October 2024</p> <p>October 2024</p>



		<p>prisoners having a timely assessment of their learning and receiving a digital PLP and reducing the backlog.</p> <ul style="list-style-type: none"> <li>• Quality assurance of the whole allocation process will be conducted. Targets for improvement will be documented, monitored, and tracked at weekly sequencing meetings and monthly Reducing Reoffending meetings.</li> <li>• An Introducing an activities hub prisoner job role and role brief. The role will support prisoner engagement, particularly those prisoners who are unemployed or have non-attendance issues, and notify prisoners when they are allocated an education, skills or work placement.</li> </ul>	Governor	January 2025
			Governor	Completed
5	<p><b>There were weaknesses in public protection arrangements.</b> The interdepartmental risk management meeting did not consider the risk of all the prisoners that it needed to, telephone monitoring was not adequately resourced and there were gaps in oversight for prisoners subject to child contact restrictions.</p>	<p>HMP Nottingham will improve public protection arrangements by:</p> <ul style="list-style-type: none"> <li>• Reviewing the processes within the offender management, prioritising public protection systems and processes.</li> <li>• Workshops and increased supervision and support is now being offered to Prison Offender Managers (POMs) and this will continue throughout the year.</li> <li>• Undertaking a review of comparator prisons to identify best practices.</li> <li>• The Heads of Offender Management (OM) Delivery reviewing the Terms of Reference for the Interdepartmental Risk Management Meeting (IRMM) to improve oversight of all high-risk prisoners approaching release.</li> <li>• POMS now brief the IRMM chair ahead of a meeting if they are not able to attend and a more robust approach to attendance is taken, to ensure appropriate stakeholders regularly attend these meetings.</li> <li>• OM unit managers will oversee and monitor that staff assigned to them to listen to prisoners' calls attend these duties. Staff assigned to listen to calls will also be given additional and ongoing training to improve the level of detail in telephone monitoring logs.</li> </ul>	Governor	February 2025
			Governor	Completed
			Governor	January 2025
			Governor	September 2024
			Governor	Completed
			Governor	December 2024



		<ul style="list-style-type: none"> <li>Briefing and reminding Public Protection staff that all newly arrived prisoners have their suitability for ongoing contact reviewed. Reviews of child contact levels will be completed via the IRM meeting (included in the updated Terms of Reference) and through improved timeliness of completed social care assessments. A nominated OM unit Hub Manager will be responsible for ensuring photographs of children with whom prisoners are allowed contact is available to visits staff.</li> </ul>	Governor	September 2024
6	<p><b>There were gaps in support for prisoners approaching release.</b> Prisoners' immediate resettlement needs were not reliably identified and addressed. A large proportion of prisoners were excluded from getting any help. About a quarter of sentenced prisoners had been released homeless in the previous 12 months, and the outcomes for many others were largely unknown.</p>	<p>HMP Nottingham will improve release planning arrangements by:</p> <ul style="list-style-type: none"> <li>Ensuring a 'fit for purpose' resettlement strategy is implemented which focuses on all prisoners within the population receiving the support required pre-release, including support for accommodation, employment and continuity of care.</li> <li>Implementing an action plan to support the resettlement strategy, monitored at the Reducing Reoffending meeting to track completion of actions and improvements.</li> <li>Introducing an enhanced and effective employment offer through the Employment Hub.</li> <li>Delivering Education and Resettlement pre-release courses through the contract.</li> <li>The pre-release team introducing a performance and quality framework to ensure effective monitoring of outcomes against referrals made for prisoners due for release.</li> <li>The Head of Reducing Reoffending (HoRR) ensuring the effective coordination of the Multi-Agency Release Board (MARB) to ensure that attendance from all functions is improved and strategic actions are carried out and monitored.</li> <li>Devising a Recall Strategy to manage the risk of fixed term recalls that links in with community partners and health support.</li> <li>Remand prisoners identified as likely to be released from court will generate a 'Duty to Refer' (DtR) form that is shared with partner agencies to help support the prisoner's accommodation</li> </ul>	Governor	December 2024







8	Levels of prisoner-on-prisoner assaults were increasing and there was no overarching action plan to reduce violence.	<p>HMP Nottingham will introduce a bespoke Violence Reduction Strategy and Action Plan to reduce incidents of violence and improve support to both victims and perpetrators of violence by:</p> <ul style="list-style-type: none"> <li>• Embedding an effective Challenge Support Intervention Plan (CSIP) policy, so the most violent individuals and those who are being supported by CSIP as victims receive appropriate support, so they understand the targets set to improve their behaviour and reduce levels of violence.</li> <li>• A multi-disciplinary approach to CSIP, including mental health and psychology practitioners, will improve understanding of individual needs and help identify different or new ways to support individuals on a plan.</li> <li>• The CSIP policy will be communicated to all staff to increase awareness and improve competence of the process to understand the actions needed to address the prisoner's behaviour, utilising the safety summit to inform actions and improve communication around who are significant individuals involved in harm.</li> <li>• Ensure all prisoners being supported by CSIP, perpetrators and victims, are discussed at the weekly Safety Intervention Meeting (SIM), with multi-disciplinary actions being formulated to ensure appropriate support and targets are put in place and plans are quality assured.</li> <li>• Ensuring the safety team collate and review all data relating to violence, including intel from investigations, to improve the understanding of causes and drivers of violence for discussion at the multi-disciplinary Safety Strategy meeting where appropriate actions to reduce violence will be generated and added to the consolidated safety action plan. The timescales, effectiveness and impact of all the actions will be monitored at the meeting.</li> <li>• Improve the use of the Wellbeing Centre to support prisoners with mental illness and reduce self-harm and violence.</li> </ul>	Governor	<p>October 2024</p> <p>January 2025</p> <p>January 2025</p> <p>November 2024</p> <p>January 2025</p> <p>September 2024</p> <p>October 2024</p>
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9	<p><b>Too little key work was taking place.</b> A large percentage of sessions recorded as key work had in fact been first night interviews, and frequent staff redeployments undermined delivery.</p>	<p>HMP Nottingham will improve the allocation and delivery of key work by:</p> <ul style="list-style-type: none"> <li>Increasing the volume of keywork sessions delivered.</li> <li>Allocating a Custodial Manager lead for Keywork delivery and quality. This includes introducing keywork targets per wing based on need and national policy.</li> <li>Complying with national keywork policy.</li> <li>Introducing Supervising Officer and Officer Keywork champions to promote and drive keywork.</li> <li>Reviewing the prisons Regime Management Plan (RMP), to ensure staff are adequately detailed to complete increased numbers of keywork sessions.</li> <li>Editing the prisoner induction / welcoming video on the first night centre to provide up-to-date information on the frequency of key work following the outcome of the RMP review.</li> <li>Introducing monthly meetings with Residential Managers, Head of Residential Services and Offender Management Unit (OMU) Managers on keyworker progress, ensuring constructive relationships are being developed fostering positive behaviours. This will be supported by a 10% monthly Quality Assurance (QA) check of key worker notes by Residential Case Managers (CMs), with the Head of Offender Management Delivery and Head of Offender Management Services checking 10% of the CM's checks.</li> <li>Ensuring first night interviews, whilst continuing, are not recorded as key work, but continue to be monitored through key work quality assurance processes.</li> </ul>	Governor	November 2024



10	<p><b>Prisoners reported negatively about the quantity and quality of the food.</b></p>	<p>The food budget cost allocation has been increased.</p> <p>HMP Nottingham will take further actions as follows:</p> <ul style="list-style-type: none"> <li>• Prison managers will relaunch catering and canteen prisoner focus groups which will be held quarterly and use prisoner food comments (via the self-serve kiosks or food comments books) to inform these meetings.</li> <li>• Promotion of the menu in advance and diversification of the meal options.</li> <li>• A prisoner food survey will also be commissioned and conducted at least twice a year with results and actions taken from the survey discussed at these focus groups.</li> <li>• Prison managers will improve the robustness of daily and weekly food monitoring to improve food portion control and ensure health and safety checks are completed. This will be supported by the Catering Manager who will be responsible ensuring staff conduct the checks and provide assurance. HMP Nottingham will invest in supporting and building staff confidence and competence so supervising staff challenge inequitable food portion controls.</li> </ul>	Governor	<p>Complete</p> <p>December 2024</p> <p>December 2024</p> <p>December 2024</p> <p>March 2025</p>
11	<p><b>Senior leaders had not identified or mitigated all the risks associated with the health care provision.</b> We saw issues such as delaying recruitment, gaps in critical training and risks associated with the oversight of pharmacy and prescribing of medicines.</p>	<p>The issues noted by HMIP have been raised with the healthcare provider and will be reviewed via the quarterly Contract Review meetings with resolution via end of quarter three 2024/25.</p> <p>The prisons and Healthcare Trusts senior leadership teams will review Nottingham Healthcare Foundation Trust (NHFT) governance meeting structures to ensure Terms of Reference and attendance achieves their purpose and minutes of these meetings accurately reflect the actions or assurance for all areas of risk and performance.</p> <p>Leaders will undertake an impact analysis of complaints, incidents, gaps in staffing, safeguarding and other areas to identify all potential</p>	<p>NHSE / NHFT</p> <p>Head of Drug Strategy and Healthcare Provision Governor</p>	<p>End of February 2025</p> <p>October 2024</p> <p>January 2025</p>



		risks. The risk register will be reviewed quarterly at the Local Delivery Board partnership meeting.		
12	<b>Prisoners with serious mental illnesses were waiting too long to be transferred under the Mental Health Act.</b> These prisoners were held in the segregation unit while waiting for transfer, despite having been assessed as unsuitable for segregation.	<p>Responsibility for the commissioning of secure mental health beds rests with Mental Health Provider Collaboratives in each region. NHS England continue to escalate to them the demands for places within the prison population. Delays have been escalated to the Provider Collaboratives and mental health specialised commissioners both regionally and nationally, given this is a widespread issue. Fortnightly multi-agency calls are held and chaired by NHS England Health and Justice Midlands Team to support prioritisation of patients and expedite transfers.</p> <p>NHFT have management plans in place whilst patients are waiting for access to Mental Health beds with patients being monitored daily.</p>	NHFT	Complete and ongoing
13	<b>Prisoners who were withdrawing from alcohol could not be adequately observed in the induction wing cells, where hatches were bolted shut.</b> The multiple occupancy of these cells added risk.	<p>This will be monitored via the Local Delivery Board. NHFT are aware of this risk and this is part of the overall Risk Register for healthcare in HMP Nottingham.</p> <p>The adult male prison estate has been under acute capacity pressure for the last 12 months. HMPPS has been required to take decisive action to quickly increase capacity in the existing estate. This has involved many decisions, including additional crowding where it is safe and decent to do so.</p> <p>Amey have been instructed to unbolt the special medical observation hatches already installed on F Wing and ensure these cells are allocated to prisoners detoxing therefore enabling better observation.</p>	<p>HMPPS / NHFT</p> <p>HMPPS Prison Operations Directorate</p> <p>Head of Drug Strategy and Healthcare Provision</p>	<p>December 2024</p> <p>Ongoing</p> <p>September 2024</p>



14	<p><b>The overall quality of education provision, particularly in English, was not of a good standard.</b></p>	<p>To improve the overall quality of education, prisons leaders will review the provision provided by the education contractor, People Plus, especially the English curriculum. This will include:</p> <ul style="list-style-type: none"> <li>• The Education Provider completing a 'deep dive' to assess the quality of delivery of English, sharing findings with the HoESW and Learning and Skills Manager (LSM) to agree actions to address them as necessary.</li> <li>• Ensuring teachers and tutors are accessing the starting point information for prisoners to set relevant targets for each subject area, to be quality assured by prison leaders.</li> <li>• Ensuring teachers plan effectively, focusing on the development of knowledge and skills, through monthly quality assurance activities with the HoESW/LSM reporting findings to the provider.</li> <li>• The ESW provision will be monitored through weekly and monthly assurance checks by the Education Provider and the LSM, monitoring starts, attendance, and achievements from the CURIOUS database.</li> <li>• Allocations to education, particularly English, will be monitored and tracked at the QIG, Education Performance Meeting, Reducing Reoffending and Prison Education Framework meetings.</li> </ul>	Governor	<p>November 2024</p> <p>November 2024</p> <p>November 2024</p> <p>September 2024</p> <p>September 2024</p>
15	<p><b>Attendance in vocational training and workshops required improvement. Prisoners were regularly scheduled medical, legal and other appointments during activity times, resulting in low and erratic attendance.</b></p>	<p>HMP Nottingham will improve attendance in vocational training and workshops by:</p> <ul style="list-style-type: none"> <li>• Reviewing the allocations and timetable scheduling to minimise disruptions, so learners do not have to choose between a variety of activities.</li> <li>• Reviewing attendance in vocational training and workshops. The review will consider the sequencing and prioritisation of activities and appointments during activity times. HMP Nottingham will seek out best practices from comparator prisons and adopt new ways of working where identified.</li> </ul>	Governor	<p>March 2025</p> <p>February 2025</p> <p>February 2025</p>



		<ul style="list-style-type: none"><li>• Adopting, subject to staffing resilience, movements officers to mitigate the impact of unavoidable absences and ensure prisoners can attend an appointment without missing a full vocational training/workshop session.</li><li>• The movement of vulnerable prisoners is now staggered so they are unlocked prior to all other prisoners first (without delaying the movement time of all other prisoners). This means that vulnerable prisoners now have the same time in education, skills and work as all other prisoners.</li></ul>		October 2024  Complete
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