



HM Prison &  
Probation Service

Action Plan: HMP Rochester

Action Plan Submitted: 13<sup>th</sup> December 2024

A Response to the HMIP Inspection: 12<sup>th</sup> – 22<sup>nd</sup> August 2024

Report Published: 11<sup>th</sup> November 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: HMCIP REPORT

ESTABLISHMENT: HMP ROCHESTER

1. Rec No	2. Concerns	3. Response Action Taken/Planned	4. Responsible Owner	5. Target Date
	<b>Priority concerns</b>			
1	<p><b>Levels of safety in the prison was deteriorating, and both violence and self-harm were increasing.</b> The safety strategy was out of date, not well informed by data and lacked an action plan.</p>	<p>Working in collaboration with the National Safety Team, HMP Rochester will refresh the Safety Strategy. Leaders will consult with prisoners and staff to focus on best practices which will address the drivers of violence, self-harm and debt management.</p> <p>An overarching Safety Action Plan will be developed. Actions and progress will be monitored at the monthly Safety Meeting and weekly Safety Intervention Meeting. Attendance to these meetings will be monitored by the Deputy Governor to drive collaborative working.</p> <p>Each residential unit will employ a prisoner safety representative to liaise with the safety team on a weekly basis to help communicate prisoners' voice and ideas on how to decrease the levels of violence and self-harm in the prison. These will be logged and discussed at the monthly Safety Meeting.</p> <p>Leaders will drive improvements in risk management processes used to identify and support prisoners who present a risk to self and others. This will include a review of the reception and induction process to ensure prisoners are supported on their</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>March 2025</p> <p>March 2025</p> <p>March 2025</p> <p>March 2025</p>



		<p>early days at Rochester. Reception and First Night unit officers will be upskilled in risk awareness to improve the understanding of the risks of violence and self-harm.</p> <p>Training has been organised for Safety Analysts to improve the effective use of data analysis to identify trends and inform decision-making processes. The training will take place in January 2025.</p> <p>The Safety Team will complete 20% weekly quality assurance checks on opened ACCT documents and open CSIP plans, with findings shared with relevant staff. This will improve the consistency of support and care available to prisoners.</p>	<p>Governor</p> <p>Governor</p>	<p>February 2025</p> <p>January 2025</p>
2	<p><b>Many cells and communal facilities were in a very poor state of repair, were vermin-infested and required substantial investment.</b></p>	<p>Funding has been approved for a number of refurbishment projects including:</p> <ul style="list-style-type: none"> <li>• Boiler replacements planned for A and D wing</li> <li>• Shower refurbishment in Care and Separation Unit and D wing</li> <li>• Feasibility study for education roof and D wing windows</li> <li>• Work has commenced on windows on B and E wing</li> </ul> <p>Baiting efforts have increased to tackle the vermin infestation, and results are noticeable in the reduced number of sightings. GFSL will continue to monitor and manage this.</p> <p>Since the inspection, a full cell audit on living conditions has been completed. Immediate works to repair in-cell furniture and cell painting are ongoing, which has been supported by the expansion of a prisoner-led refurbishment party to increase</p>	<p>HMPPS, National Services Estates &amp; Gov Facilities Service Ltd (GFSL)</p> <p>Gov Facilities Service Ltd (GFSL)</p> <p>Governor &amp; GSFL</p>	<p>September 2025</p> <p>Completed</p> <p>June 2025</p>



		<p>opportunities for prisoners to demonstrate skills learned in workshop activities.</p> <p>Heads of Residence will review 'room ready' and decency checks on residential units to ensure improved standards of accommodation. The induction cells will also be redecorated and fully equipped before being made available for new prisoners. The unit manager will perform a pre-occupancy check to ensure all cells are equipped and fit to be occupied.</p>	Governor	March 2025
3	<p><b>Rochester was failing in its function as a training and resettlement prison.</b> There were insufficient spaces in education, skills and work to meet the needs of the prison population, and too few prisoners were able to attend.</p>	<p>Conduct a review of all Education, Skills, and Work activities, incorporating feedback from the recent prisoner survey as a crucial part of the consultation process. This will include an assessment of Education, Training, and Employment needs to ensure that the offerings are aligned with the specific requirements and preferences of the population. We will also maximise activity spaces and through collaboration with the Employment Advisory Board, enhance progression opportunities and identify skills gaps.</p> <p>Revise the Allocation Board terms of reference, policy and sequencing process to ensure that prisoners are assigned to activities that align with their educational needs and personal development goals. Prisoners who are not allocated work/education or are unemployed for more than a month will be escalated at the weekly Allocation Board. Individual work-based risk assessment will be completed within 4 weeks of arrival by Security and Activities Allocations.</p> <p>Reducing Reoffending Managers will be upskilled in collating activity figures and presenting the data to inform decision-</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>May 2025</p> <p>May 2025</p> <p>May 2025</p>



		<p>making processes. Activities attendance data will be reported and monitored at the Daily Operational Briefing and at the monthly Senior Leadership Team meeting.</p> <p>Complete a full Reducing Reoffending needs analysis that incorporates all criminogenic needs to inform a refreshed Reducing Reoffending Strategy.</p> <p>Develop a Physical Education offer that incorporates more educational and accredited course delivery, including the reintroduction of the Duke of Edinburgh's Award.</p> <p>Develop and implement a strategy to incentivise positive behaviour and attendance in purposeful activity, by reviewing the local prisoner pay policy to ensure engagement in activity is appropriately rewarded.</p> <p>Since the inspection employment events have taken place including:</p> <ul style="list-style-type: none"> <li>• Thames Lower Gateway event</li> <li>• Gallagher construction event</li> <li>• Greene King hospitality event</li> <li>• Monthly "Work Ready Programme"</li> <li>• Business Builder self-employment program</li> <li>• Department for Work &amp; Pensions funded two traffic management courses</li> </ul>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>May 2025</p> <p>May 2025</p> <p>May 2025</p> <p>Completed</p>
4	<p><b>The availability and use of illicit drugs posed a major threat to safety and security.</b> The positive drug testing rate</p>	<p>Leaders will address the issues identified from the full risk assessment of physical security measures to tackle the illicit economy, including actions to improve vulnerable areas and</p>	<p>Governor</p>	<p>February 2025</p>



	<p>was among the highest for this type of prison.</p>	<p>implement appropriate security provisions. These will be tracked and monitored at the monthly Drug Strategy meeting.</p> <p>Formalise collaboration with the Area Intelligence Unit and Kent Crime in Prisons Police Team to disrupt and identify persons involved in the conveyance of contraband to bring offenders to justice and reduce ingress.</p> <p>Revise the Security Meeting to ensure it is action focused and intelligence led, with clear security objectives and actions that are understood by the wider staffing group.</p> <p>The Drug Recovery Wing (A Wing) will be rerolled to ensure prisoners with substance misuse issues are appropriately supported and managed.</p> <p>Introduction of rehabilitative adjudications awards including community payback, for prisoners found under the influence or failing drug test.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>March 2025</p> <p>March 2025</p> <p>March 2025</p> <p>February 2025</p>
5	<p><b>Clinical practice and poor oversight were allowing health care provision that was unsafe, ineffective and inefficient.</b> For example, patients waited too long to be seen by a GP and both internal and external clinics were routinely cancelled.</p>	<p>A dedicated Operational Health Lead has been identified and once in post, will drive forward partnership working and healthcare enablement, supporting the Healthcare provider to deliver actions within the Care Quality Commission action plan.</p> <p>Since the inspection, all non-attendance at clinics and hospital appointments have been challenged where appropriate, with reasons for non-attendance documented.</p>	<p>Governor</p> <p>Governor &amp; Head of Healthcare</p>	<p>January 2025</p> <p>Completed</p>



		<p>Healthcare managers will ensure waiting lists are triaged regularly. Each week, managers will follow up non-attendance, treatment plans, mental health provisions of counselling, pharmacy management and temperature control requirements and completing quality assurance checks.</p> <p>A Quality Improvement Steering Group has been introduced to address enablement of both internal and external medical appointments and will report to the Local Delivery Quality Board with monitoring and oversight by Oxleas' (healthcare provider) Assurance Oversight Group to ensure effective progress is made.</p>	<p>Head of Healthcare</p> <p>Governor &amp; Head of Healthcare</p>	<p>January 2025</p> <p>January 2025</p>
6	<p><b>The offender management unit (OMU) was critically under-resourced and unable to deliver its core functions.</b> There were weaknesses in public protection and risk management work, and insufficient contact between prison offender managers and prisoners, limiting support for sentence progression.</p>	<p>An additional Custodial Manager and four Supervising Officers are now part of the OMU department. This will allow the introduction of unit-based drop-in sessions to respond to prisoner offender management queries, thereby improving communication between prisoners and their offender managers.</p> <p>OMU will improve record keeping of work delivered – this includes accurate records on Digital Prison Service as well as local databases. OMU managers will implement 10% monthly dip tests to ensure all new receptions are seen within 14 days. Feedback will be shared with the Prison Offender Managers (POMs) in one-to-one supervision.</p> <p>In addition, two new OMU prisoner peer supporters will be appointed and will attend inductions to speak with all new receptions. Part of their duties will include wing walks to support other prisoners.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>January 2025</p> <p>March 2025</p> <p>January 2025</p>





		<p>Monthly Risk Management Meetings and Public Protection Meetings will be re-established to enable appropriate identification, assessment and mitigation of risk.</p>	Governor	March 2025
		<p>Appoint a Hub Manager to coordinate allocation of key workers and assurance of session completions, which will improve key work delivery, reinforce sentence progression interventions and help to maintain communications between POMs and prisoners.</p>	Governor	March 2025
7	<p><b>The high number of inexperienced officers did not always enforce standards of good behaviour among prisoners. Leaders were not sufficiently visible, and staff lacked support.</b></p>	<p>Conduct a comprehensive review to restructure all leadership positions to ensure roles are recruited to and occupied by staff with relevant experience and skills.</p>	Governor & Prison Group Director	January 2025
		<p>Introduce a programme of structured communications across the establishment, including monthly all-staff meetings, to ensure standardisation and consistency of delivery of work.</p>	Governor	March 2025
		<p>Develop a clear expectations document which outlines the roles and responsibilities of an Orderly Officer, Assistant Orderly Officer and Duty Governor with a particular focus on visibility, presence and communication to help support inexperienced staff.</p>	Governor	February 2025
		<p>Re-profile Supervising Officer and Custodial Managers staff group to ensure their availability and presence at key times of the core day to provide visible leadership.</p>	Governor	February 2025
		<p>All Officers and Supervising Officers to be issued copies of the Prison Officer and Supervising Officer Guides to assist staff in answering prisoners' queries. The New Colleagues Mentor will</p>	Governor	Completed



		continue to provide ongoing support and guidance to all new staff.		
	<b>Key Concerns</b>			
8	<b>Use of force was high, and oversight and accountability were lacking.</b>	<p>Recruit a dedicated Use of Force (UoF) Coordinator to provide an enhanced focus on UoF practices, including de-escalation techniques and quality of written incidents paperwork. The UoF Coordinator will identify good practices and challenge poor professionalism, with support from the Operational Response and Resilience Unit (ORRU).</p> <p>Post-incident prisoner debriefs are being implemented to enable leaders to identify drivers for physical interventions. Debriefs are to be carried out by Residential Supervising Officers or UoF Coordinator, which will include ensuring prisoners have been assessed by healthcare after an incident.</p>	Governor & ORRU	February 2025
			Governor	February 2025
9	<b>Work to ensure fair treatment and inclusion was inadequate.</b> Prison data had indicated disproportionate outcomes for prisoners in some protected groups, and Muslim prisoners reported more negative experiences.	<p>A Fair Treatment Lead will be appointed and will develop a programme of forums to review all areas of Diversity and Equalities, including the negative experiences of Muslim prisoners with support from chaplaincy. Through consultation and engagement with prisoners and staff, areas of concern will be identified, and an action plan will be developed to address immediate concerns.</p> <p>Reintroduce the prisoner forums calendar focused on each Protected Characteristic, chaired by the assigned senior leader, with prisoners invited to share their views and concerns. Actions will be recorded, and progress will be monitored at the monthly Fair Treatment Meeting.</p>	Governor	January 2025
			Governor	January 2025



10	<p><b>Medicine administration and supply arrangements were poorly managed and took too long. Supervision was limited and there was no patient privacy.</b> Expected administration times were not being adhered to, and patients missed or faced delays in receiving important medicines.</p>	<p>NHSE Commissioners commissioned review of the supply, process, and governance of medicines administration, including an evaluation of whether the dispensary areas within the prison are fit for purpose.</p> <p>As part of the regime planning review, attendance to healthcare appointments, medication collection and supervision of medication will be explored and integrated into regime to minimise the delays in receiving medications.</p> <p>A designated medication officer will be assigned to supervise medication queues and provided with a clear role description outlining procedures for managing these queues appropriately. Wing managers will perform daily checks to ensure queues are correctly supervised by staff.</p> <p>The Head of Healthcare has implemented a new system to ensure all in possession risk assessments are reviewed within a 12-month framework. These risk assessments can be reviewed earlier should there be a clinical need.</p> <p>A Quality Improvement Steering Group, including HMPPS colleagues, has been convened to identify the root causes and drive sustained improvements to length and management of queues, supervision, privacy and medication administration facilities, including supply and administration processes.</p> <p>Leaders are working with Healthcare and MoJ Property to identify and construct suitable locations for additional medicine dispensaries.</p>	<p>NHSE Commissioners</p> <p>Governor</p> <p>Governor &amp; Head of Healthcare</p> <p>Head of Healthcare</p> <p>Governor &amp; Head of Healthcare</p> <p>Governor, Head of Healthcare &amp; GFSL</p>	<p>February 2025</p> <p>February 2025</p> <p>February 2025</p> <p>February 2025</p> <p>February 2025</p> <p>February 2025</p>
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11	<p><b>Leaders had been too slow to implement a prison-wide reading strategy.</b> Reading was not promoted sufficiently across the prison and too many prisoners did not receive appropriate support to develop their skills.</p>	<p>Reading strategy implementation plan will be developed, with clear actions to ensure reading needs are promptly identified and support is provided consistently. This will allow prisoners to embrace a love of reading with opportunities to develop and practice their reading skills.</p> <p>As part of the prisoner induction review, a clear referral process will be implemented for prisoners identified as needing support from the peer-led Shannon Trust programme.</p> <p>The Neurodiversity Support Manager will liaise with the education department to ensure additional learning support is provided for individuals who are identified and assessed as needing further support and/or reasonable adjustments.</p> <p>To improve the delivery of the reading strategy, all classrooms and workshops (including prison industries) will have relevant reading material available in all areas with time allocated to include reading activities on a weekly basis.</p> <p>To promote reading and awareness of the prison's reading strategy, a series of reader development activities will be planned quarterly across the prison, education and the library.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>January 2025</p> <p>January 2025</p> <p>January 2025</p> <p>January 2025</p> <p>January 2025</p>
12	<p><b>Not enough enrichment activities were provided.</b></p>	<p>Review all education, skills and work activities, incorporating feedback from the recent prisoner survey as a crucial part of the consultation process, to develop a curriculum design and planning strategy that ensures enrichment and personal development is part of the prison wide curriculum.</p>	<p>Governor</p>	<p>February 2025</p>



		<p>Use data gathered from the Reducing Reoffending needs analysis to establish which enrichment activities can be incorporated into regime delivery. Collaborate with current and new organisations that could provide these services.</p> <p>The regime on the enhanced unit (I Wing) is being reviewed to allow more privileges, enrichment activities and a better living environment. This will encourage other prisoners to strive for better behaviour to be able to be considered to moving on the unit.</p>	Governor	February 2025
			Governor	January 2025
13	<p><b>The vast majority of prisoners did not benefit from access to high quality education, skills and work.</b> The prison's quality improvement group, and its associated planning to address weaknesses, were ineffective at driving change.</p>	<p>HMP Rochester will design and implement a quality assurance calendar. This will include leaders completing bi-weekly learning walks with a specific curriculum area focus, which will consider development of resources and enhancing learner experience. Feedback will be shared with providers to ensure learners are completing work around areas identified.</p> <p>Review the terms of reference for the Quality Improvement Group (QIG) to ensure it reflects the concerns highlighted by inspectors, including curriculum, delivery and behaviour management. Quality Improvement Plan to be revised to ensure actions are clear, appropriate and regularly updated to enable leadership to monitor and drive the quality activities needed to improve the provision.</p> <p>The scheduling and sequencing of meetings will be adjusted to ensure improved attendance and preparation to promote better participation in discussions and a more effective challenge function.</p>	Governor	February 2025
			Governor	February 2025
			Governor	February 2025

