



Action Plan: HMP Lowdham Grange

Action Plan Submitted: 22nd September 2023

A Response to the HMIP Inspection: 15–26 May 2023

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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.

		<p>HMP Lowdham Grange will also</p> <ul style="list-style-type: none"> • Ensure current and future staff in the Security Intelligence department will attend the HMPPS Security Analyst training to enhance analytical capability on safety and security threats. • Use of Challenge, Support, and Intervention Plans (CSIPs) has increased. We will improve the timeliness of reviews, continuity of case managers, and appropriate individualised plans for prisoners managed under the process • An early days in custody review has taken place with a prisoner consultant and the outcomes from this will be implemented. Also, prisoner violence reduction representatives will be introduced on all residential units. • HMP Lowdham Grange's core day is under review which will ensure a greater availability of staff at key times of the day, such as prisoner movement to activity, improving the safety of both staff and prisoners. This will also allow staff to be visible and posted at key areas throughout the establishment at these times 	<p>Head of Security</p> <p>Head of Safety</p> <p>Head of Safety</p> <p>Head of Residence</p>	<p>May 24</p> <p>Nov 23</p> <p>Jan 24</p> <p>Nov 23</p>
2	<p>The level of self-harm was high and had risen in recent months. Not enough was being done to support prisoners in crisis and those at risk of self-harm.</p>	<p>In order to support prisoners in crisis and those at risk of self-harm the HMPPS safety team at HMP Lowdham Grange has already delivered risk and triggers training to some staff working in high-risk areas including Reception, Induction and the Care and Separation Unit, and will ensure all current and future staff working in these areas receive this.</p> <ul style="list-style-type: none"> • The Safety Team will investigate near miss events with learning appropriately drawn using a set template. The Safer Custody team will review the governance process for ACCTs (Assessment Care in Custody and Teamwork) and implement the results and improve continuity of case managers. The team will review and implement learning following recent self-inflicted 	<p>Head of Safety</p> <p>Head of Safety</p>	<p>Feb 24</p> <p>Jan 24</p>

		<p>deaths within the prison and ensure families of those managed under the ACCT process are invited to be involved in reviews as part of the multi-disciplinary team assembled for the review.</p> <ul style="list-style-type: none"> • The Safer Custody team will continue work with The Samaritans aiming to introduce a Listener scheme • The establishment will review and develop its Debt Strategy to ensure its effectiveness, as this is a local factor contributing to self-harm. Learning from this review will be acted on. • A review will take place of the well-being centre to ensure its potential is being maximised. This unit will be used to deliver additional support to prisoners at risk of self-harm and/or suicide. 	<p>Head of Safety</p> <p>Head of Safety</p> <p>Head of Safety</p>	<p>Feb 24</p> <p>Dec 23</p> <p>Dec 23</p>
3	<p>Longstanding staff shortages in health care resulted in lengthy waits for services and some poor outcomes for patients. This was exacerbated by limited strategic support and a lack of governance over the service.</p>	<p>Staffing shortages are impacted by vacancies, high turnover sickness with contributory factors including the environment and working practices at Lowdham, i.e., staff feeling safe when at work.</p> <p>Safety concerns have been flagged through the Healthcare Delivery Board and in direct discussion with the Prison Director and Prison Controller. Discussions remain ongoing and there is a current interim plan in place where it has been agreed, between the healthcare provider and NHSE, in response to staff safety concerns that staff are undertaking restricted practice if safe to do so i.e., only attending wings for emergency response calls, attending in pairs. If staff feel unsafe then they are not to go out on the wings even for codes. This is supported by NHSE H&J commissioners. Staff have been encouraged to incident report concerns within NHT procedures.</p> <p>From a recruitment perspective, we have initiated an internal workstream that focuses on workforce and has a number of key priorities attached to improve staffing such as: -</p>	<p>Head of Healthcare NHS England</p>	<p>November 2023</p>

- Adverts are being reviewed, refreshed, and amended in a bid to attract staff and are scheduled to go out by beginning of August 2023.
- Expedite delays within the vetting process.
- Review of internal recruitment processes.
- Recruitment events.
- Engaging with Universities and Colleges to attract newly qualified staff.
- Look at ways we can support new recruits from attraction through to being new in post, such as pastoral support, buddying, maintaining regular contact throughout recruitment.
- Development of recruitment pipeline.

Waiting Times (General)

- Currently the healthcare unit is developing a process to strengthen the reporting mechanism for patient waiting times, which will enable the extraction of accurate data for performance monitoring and further provide operational teams with a mechanism for managing their waiting times effectively.
- A training package is currently being developed in collaboration with the Trust's Applied Information Team and will be rolled out across all Offender Health sites within the coming weeks.

		<ul style="list-style-type: none"> Oversight of performance reporting will be provided by the Quality Assurance Manager with performance being a standard discussion item at the monthly Finance & Performance meeting External appointments in the main have been affected by staffing strikes but we recognise the need to develop better exception reporting on what was within NHT control. <p>Dental</p> <ul style="list-style-type: none"> The current number of patients waiting for dental as of June 2023 is 217. Work is currently in progress to reduce this number through the implementation of additional sessions, which will commence from 1st September 23. A trajectory to track progress for dental recovery has been agreed and will be monitored on a weekly and monthly basis between Offender Health and the dental provider, Time for Teeth. Upon commencement of the additional sessions, monthly monitoring reporting will be submitted to Commissioners 		March 2024
4	There were not enough places in education, skills and work for the population. Allocations took too long and were not informed by prisoners' career goals.	<p>In order to increase the number of places in education, skills and work for the prison population HMP Lowdham Grange will:</p> <ul style="list-style-type: none"> Undertake a review of activity places with the aim of increasing available places. Increase the number of representative roles, e.g., Violence Reduction Representatives and Decency Representatives, for prisoners in line with our transition plan. Establish ways of ensuring each prisoner leaving the Early Day Centre has employment. 	<p>Head of Regimes</p> <p>Head of Regimes</p> <p>Head of Regimes</p>	<p>Jan 24</p> <p>Feb 24</p> <p>Feb 24</p>

		A review of the allocations process/allocations board agenda will take place to ensure allocations are properly informed by prisoners' needs and career goals and reduce the times allocations take.	Head of Regimes	Jan 24
5	There were not enough opportunities for prisoners to complete offending behaviour work and other programmes aimed at reducing their risks.	<p>In response to there not being enough programmes HMP Lowdham Grange will carry out a Needs Analysis to identify the needs of the prison population.</p> <p>Depending on the outcome of this Needs Analysis the interventions team are aiming to introduce Intimate Partner Violence programmes (Building Better Relationships).</p> <p>The Offender Management Unit (OMU) managers will brief their staff to promote and encourage prisoners to participate in such programmes that are identified on their sentence plans.</p> <p>Additionally, the establishment is planning to increase Kaizen delivery as new staff are recruited into vacant positions. This includes recruiting a new Head of Psychology.</p> <p>HMP Lowdham Grange aims to increase the overall provision of higher intensity OBP delivery to better meet the risks and needs of the population. The plans are to re-direct resource from moderate intensity programmes (higher volume and shorter duration) to increase delivery of higher intensity programmes (longer duration and as such smaller volumes). This is better suited to address the risks and needs of the population at Lowdham Grange. The establishment have also progressed with plans to increase LDC (Learning Difficulties and Challenges) interventions to promote better equality of access for those identified with learning difficulties and challenges. Their 3-year delivery plan outlines this expansion of Higher intensity and LDC provision as</p>	<p>Head of Reducing Reoffending</p> <p>Head of Reducing Reoffending</p> <p>Head of Reducing Reoffending</p> <p>Head of Reducing Reoffending</p> <p>National Psychology Services OBP National team</p>	<p>Dec 23</p> <p>Apr 24 reviewed annually</p> <p>Oct 23</p> <p>Feb 24</p> <p>Dec 24</p>

		<p>well as plans to additional moderate intensity provision for those who are medium risk of interpersonal violence.</p> <p>Locally, Lowdham Grange have had a number of staffing issues, impacting on delivery and as a result of the recent contract changes additional retention issues were a challenge for the new provider given the number of staff leaving Lowdham Grange to remain under the employment of Serco. SODEXO have worked hard to recruit and replace staff, including developing contracts with private psychology services pending local recruitment.</p>		
6	<p>Public protection processes were not robust. Too few prisoners had been assessed for their suitability to have contact with children. Managers did not have a comprehensive understanding of all emerging risks and could not therefore manage them effectively. Public protection and pre-release arrangements were not good enough.</p>	<p>A review of local public protection measures has taken place at HMP Lowdham Grange to ensure compliance. This has resulted in an increase in the number of prisoners subject to monitoring by the Public Protection team. The resources for telephone monitoring will be reviewed and staff identified and trained to complete telephone monitoring as required by national guidelines.</p> <p>Prisoner in-cell technology facility will be investigated to ensure that there are no breaches of public protection. An assurance process will be introduced to verify all usage in the future is appropriate and safe.</p> <p>The Probation team based on-site at the prison will conduct a review of pre-release/release processes to ensure risks are identified and prisoners are provided with appropriate support. This will include the prisons' commitment to MAPPA processes.</p> <p>The Interdepartmental Risk Management Team (IRMT) meeting agenda and attendance will be reviewed to ensure representatives are provided and attend regularly from relevant areas to ensure effective monitoring of risks. This meeting will also be used to discuss pre-release planning for prisoners nearing the end of their custodial sentence.</p>	<p>Head of Security</p> <p>Head of Security</p> <p>Senior Probation Officer(s)</p> <p>Senior Probation Officer(s)</p>	<p>Nov 23</p> <p>Nov 23</p> <p>Feb 24</p> <p>Oct 23</p>

		Guidance will be issued to management within the prison aimed at increasing their awareness of local public protection measures.	Senior Probation Officer(s)	Nov 24
	Key concerns			
7	There was insufficient oversight and accountability for custody officers, particularly in their use of force. The pervading culture among officers was not focused on responding to prisoner need and the delivery of effective support. Managers did not provide robust oversight to hold officers to account and we were, for example, told about very poor behaviour by some staff working in the segregation unit. Leaders had also failed to investigate serious concerns about the use of force against some prisoners.	<p>HMP Lowdham Grange will introduce enhanced assurance checks when reviewing use of force incidents, including robustly investigating serious concerns raised following force being used. Oversight of use of force sits with the Deputy Director and investigations will be conducted by independent management following any complaints being made by prisoners.</p> <p>The prison will adapt local processes to ensure prisoner debriefs are carried out following force being used by staff.</p> <p>Newly selected staff are being positioned in the unit based on the national Separation and Care unit (SCU) staff selection procedure. Any vacancies in SCU will be filled with the right people (skills, experience etc) based on the SCU selection procedure.</p>	<p>Deputy Director</p> <p>Deputy Director</p> <p>Head of Safety</p>	<p>Dec 23</p> <p>Dec 23</p> <p>Nov 23</p>
8	Too many prisoners were segregated for long periods without access to a decent and meaningful regime and there were no clear reintegration plans.	<p>HMP Lowdham Grange will introduce the use of reintegration plans within the SCU. These plans identify prisoners' specific needs and the necessary support required whilst they are resident on the unit. Furthermore, a review of the prisoner regime within the SCU is taking place to assess the suitability of the existing core day.</p> <p>The establishment will deliver a multi-departmental approach to prisoner management within the SCU to ensure all needs and risks are identified and managed. Departments including Education, Psychology and the Offender Management Unit (OMU) will form this new support team - in addition to the prison healthcare provider - by attending fortnightly segregation reviews.</p>	<p>Head of Safety</p> <p>Head of Safety</p>	<p>Jan 24</p> <p>Dec 23</p>

		The Segregation Monitoring and Review Group (SMARG) agenda is being reviewed and it will be relaunched to monitor progress, and ensure relevant support is being delivered to prisoners. Prisoners will be provided with a copy of the daily regime when they arrive in the unit so they know what to expect.	Head of Safety	Nov 23
9	Arrangements to meet the needs of prisoners with protected characteristics were weak.	<p>The newly appointed Equalities manager at HMP Lowdham Grange has scheduled Diversity Inclusion Action Team (DIAT) meetings, with prisoner Equality Representatives, and the prison Senior Leadership Team.</p> <p>The establishment will identify senior and middle manager grade protected characteristic leads who will be responsible for delivering prisoner forums, monitoring diversity and inclusion throughout the prison, and working in collaboration with prisoner Equality representatives.</p> <p>The Equalities manager will also seek support and guidance from regional teams to ensure local processes are effective.</p>	<p>Head of Safety</p> <p>Deputy Director</p> <p>Head of Safety</p>	<p>Complete Sept 23</p> <p>Dec 23</p> <p>Nov 23</p>
10	Partnership working between the health care provider and the prison was poor. The clinical judgment of health care staff was sometimes ignored; this included a lack of investigation into several serious safeguarding concerns they had raised.	Following escalation of staff concerns and incidents within the prison, weekly meetings have been initiated between healthcare and prison provider to address concerns as they arise. Staff have also been encouraged to incident report concerns within NHT procedures but to also escalate these through the internal prison escalation system (Oscar One, Victor Two) The Director and Deputy Director are very keen to understand issues as they arise so they can investigate and address immediately.	Head of Healthcare/ Director	Complete

11	<p>The education, skills and work curriculum was too narrow and lacked ambition. There was no reading strategy. Most accredited programmes were only available at level 1 and below. In work, prisoners could not acquire accredited qualifications.</p>	<p>The education provider at HMP Lowdham Grange, Novus, have carried out a curriculum review in line with the bid and a new curriculum has now been agreed.</p> <p>Novus are recruiting a horticulture tutor and waste management tutor, to fill vacancies, with interviews scheduled for the end of September 2023. Novus will work with Clinks, aiming to make catering qualifications available to prisoners. Clinks is a company who work in a number of prisons offering catering and hospitality qualifications and employment upon release.</p> <p>Currently, the following courses are available for prisoners to complete:</p> <ul style="list-style-type: none"> English Maths Pro-Social Behaviour Change Peer Mentoring Art Industrial Cleaning Painting Decorating H/S, F/S & MH (when sanctions are lifted) Alcohol Awareness Smoking Cessation <p>Horticulture, and Waste Management will be available when the tutors have been recruited.</p> <p>A combined prison and Novus reading strategy is now agreed and will be driven forward by Quality Improvement Group (QIG) which will adopt a whole-prison approach to reading that facilitates reading for pleasure, purpose and rehabilitation.</p> <p>The prison continues to receive support from HMPPS regional Education leads.</p>	<p>Head of Education</p> <p>Head of Education</p> <p>Head of Education</p>	<p>Complete</p> <p>Jan 24</p> <p>Complete</p>
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12	Leaders did not make sure that prisoners with additional learning needs had the support they needed. In nearly all cases that identified an additional learning need, further detailed assessments had not taken place.	All prisoners at HMP Lowdham Grange receive a screening as part of their induction, including in-depth screening where necessary. Current recruitment for the Neurodiversity Support Manager (NSM) is underway; this person will work with those prisoners identified with additional learning needs to ensure they receive individualised correct support.	Deputy Director	Jan 24
13	The number of prisoners being released was increasing, but the prison had no dedicated resettlement staff or provision for housing support.	<p>Regional Probation Directors (RPDs) are responsible for the delivery of resettlement services with key interventions delivered by Commissioned Rehabilitative Services (CRS) providers. East Midlands Probation service offer pre-release support to prisoners at HMP Lowdham Grange via an in-reach support provided by community probation practitioners (CPP) and are actively recruiting staff to strengthen their offer.</p> <p>The CPP, as allocated, support prisoners with pre-release planning activity after the hand-over from Prison Offender Manager (POM) to Community Probation Practitioner, which takes place 8.5 months before their release date. This includes interactions between the prisoner and the CPP to identify any resettlement needs and progress referrals to CRS suppliers based on need. For support such as accommodation, the CPP will make a referral pre-release which will include the accommodation CRS provider meeting with the prisoner during the last 12 weeks in custody to understand needs and progress with a referral.</p> <p>Further pre-release support includes mentoring with up to 3 meetings pre-release. Further CRS support will be provided in the community on release, including for other needs such as education training and employment, support with family and significant other relationships, lifestyle and associates, emotional wellbeing, finance benefit and debt.</p>	RPD	Complete

		<p>During the pre-release period the CPP can provide a point of contact for CRS suppliers seeking to engage with the individual in the prison.</p> <p>To further support the delivery and provision of Community Offender Management, Regional Probation Directors are working to recruit dedicated pre-release teams and to improve service delivery to all people in prison.</p> <p>HMP Lowdham Grange is not a resettlement prison so is not automatically resourced for pre-release or CRS, unless the prison was recategorised. Recognising though that releases do occur there is an excellent relationship between the OMU and remote pre-release teams, which between May and July 23 ensured all 21 releases were into appropriate accommodation with no NFAs reported. This model will continue to ensure releases are appropriately managed.</p>		
14	The applications and complaints systems were not fully effective and consultation with prisoners led to relatively few changes in practice.	<p>HMP Lowdham Grange have sought guidance from the Prison & Probation Ombudsman (PPO) who will carry out a support visit. The PPO team will review existing complaints processes, and conduct focus groups with prisoners and staff aiming to improve the quality and timeliness of complaint replies.</p> <p>Furthermore, the establishment will introduce a system under which applications and complaints can be discussed with houseblock managers in a bid to resolve issues. We will produce a guidance sheet which will be attached to all complaints highlighting good examples of replies. A Quality Assurance process will be introduced whereby a manager will review a percentage of replies to ensure complaints are answered to the required standard.</p>	Deputy Director	Dec 23
			Deputy Director	Dec 23