



HM Prison &  
Probation Service

Action Plan: HMP & YOI Nottingham

Action Plan Submitted 16<sup>th</sup> May 2018

A Response to the HMIP Inspection 8<sup>th</sup> – 11<sup>th</sup> January 2018

Report Published 16<sup>th</sup> May 2018

## INTRODUCTION

HM Inspectorate of Prisons (HMIP) is an independent inspectorate which provides scrutiny of the conditions for and treatment of prisoners. They report their findings for prisons and Young Offender Institutions across England and Wales to the Ministry of Justice (MOJ) and Her Majesty's Prison and Probation Service (HMPPS). In response to the reports HMPPS / MOJ are required to draft a robust and timely action plan to address the recommendations. The action plan confirms whether recommendations are agreed, partly agreed or not agreed (see categorisations below). Where a recommendation is agreed or partly agreed, the action plans provide specific steps and actions to address these. Actions are clear, measurable, achievable and relevant, with the owner and timescale of each step clearly identified. Action plans are sent to HMIP and published on the HMPPS web based Prison Finder. Progress against the implementation and delivery of the action plans will also be monitored and reported on.

Term	Definition	Additional comment
Agreed	All of the recommendation is agreed with, can be achieved and is affordable.	The response should clearly explain how the recommendation will be achieved along with timescales. Actions should be as SMART (Specific, Measurable, Achievable, Realistic and Time-bound) as possible. Actions should be specific enough to be tracked for progress.
Partly Agreed	Only part of the recommendation is agreed with, is achievable, affordable and will be implemented. This might be because we cannot implement the whole recommendation because of commissioning, policy, operational or affordability reasons.	The response must state clearly which part of the recommendation will be implemented along with SMART actions and tracked for progress. There <b>must</b> be an explanation of why we cannot fully agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.
Not Agreed	The recommendation is not agreed and will not be implemented. This might be because of commissioning, policy, operational or affordability reasons.	The response must clearly state the reasons why we have chosen this option. There <b>must</b> be an explanation of why we cannot agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.



ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMP &YOI Nottingham

1. Rec No	2. Recommendation	3. Agreed/Partly Agreed/Not Agreed	4. Response Action Taken/Planned	5. Function Responsible/Policy Lead	6. Target Date
	<b>Main recommendation to the governor and HMPPS</b>				
5.1	HM Prison and Probation Service and the governor should ensure new and inexperienced staff and managers receive the mentoring and support they require to discharge their duties effectively. (S49)	Agreed	<p>All prospective members of uniformed staff are offered the opportunity of joining as an Operational Support Grade for up to 8 weeks, in order to be introduced to the challenges of working within a prison with an embedded route and management support towards retention as an officer.</p> <p>After initial training, all new officers are now being given an extra week of familiarisation and induction into working roles; this increase from a 1 week to 2 weeks induction will have full management supervision and support.</p> <p>A POELT mentor scheme has been put in place to support new starters, during and beyond induction and we are reviewing its impact. This will be in place for a period of 12 months subject to review and will increase the number of mentors from 1.5 to 2.5.</p> <p>First line managers will be issued an electronic management induction pack, both simplifying and formalising HR areas, to assist managers in areas such as attendance management and performance appraisal.</p> <p>To support staff on entering the senior management role we will conduct one to one interviews to agree a bespoke package of development activity, to include:</p> <ul style="list-style-type: none"> <li>• Resilience training</li> <li>• Challenging conversations</li> <li>• Leadership development</li> </ul>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>June 2018</p> <p>September 2018</p> <p>June 2018</p> <p>September 2018</p>



			<ul style="list-style-type: none"> <li>• Performance and assurance</li> </ul> <p>All new first line managers will receive a skills assessment and a bespoke training plan will be developed, utilising civil service learning, to include:</p> <ul style="list-style-type: none"> <li>• Attendance management</li> <li>• Performance Management</li> <li>• Difficult conversations</li> </ul> <p>An additional training day will be scheduled on a weekly basis to support training delivery to new and existing staff.</p> <p>First line managers will receive management coaching and support through a monthly meeting delivered by the HRBP.</p>	Governor	June 2017
				Governor	Completed
				Governor	September 2018
	<b>Main recommendations to the governor</b>				
5.2	<p>The prison should ensure the response to violence and disorder is evidence-based, coordinated and effective, addressing both the causes and effects of the problems. There should be measurable reductions in violent incidents and measurable improvements in prisoner perceptions of safety. (S45)</p>	Partly Agreed	<p>This recommendation is partly agreed. The Violence Reduction strategy will be evidence-based, coordinated and effective, and address both the causes and effects of violence. However, improvements in prisoners' perceptions of safety cannot be guaranteed, and may be impacted by a range of factors, and to recommend reductions in violent incidents is to recommend an outcome rather than an action, and cannot be committed to with certainty.</p> <p>The violence reduction strategy will include:</p> <ul style="list-style-type: none"> <li>• investigation of all violent incidents so we can develop an evidence base to understand the issues behind violence</li> <li>• trends and outcomes will be reviewed, analysed and updated on a weekly basis</li> <li>• improved coordination of our response to violence, so that we allocate our resources appropriately</li> <li>• introduction of a process for monitoring perpetrators and victims of violence</li> <li>• pilot a challenge support intervention landing</li> <li>• assurance that high risk perpetrators will have case management in place in line with available services</li> </ul>	Governor	November 2018



			<ul style="list-style-type: none"> <li>development of an engagement strategy, so that staff understand and utilise the violence reduction strategy, measured through staff and prisoner surveys and forums</li> <li>provide guidance on the management of violent incidents, circulated to all staff via a full staff briefing, residential wing meetings, Community Notices (a notice to inform staff)</li> <li>Logs have been introduced for any prisoners (victim and perpetrators of violence) in order to identify appropriate response to incidents, such as mediation, reduce likelihood of repeat incidents, removal from wings or removal from activities (for perpetrators)</li> </ul> <p>Activity will be reviewed and monitored through the introduction of the safety intervention meeting.</p> <p>Additionally, the Head of Safer Custody will ensure that investigations are up to date and that information is gathered in a timely way. Following a violent incident:</p> <ul style="list-style-type: none"> <li>suspected perpetrators of violence are placed on report (an adjudication)</li> <li>key Body Worn Video (BWV) will be systematically reviewed</li> <li>CCTV will be reviewed where available</li> <li>profiles produced on prolific violent (in custody) offenders</li> <li>all investigations will be recorded for assurance purposes</li> </ul> <p>A Head of Engagement will be recruited, part of whose remit will be to co-ordinate prisoner focus groups, wing meetings and the proposed Prison Council. Violence will be a standing item for these focus groups, which will help address prisoners' perceptions of safety, initially for a 12 month period subject to review.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>November 2018</p> <p>November 2018</p>
5.3	Managers should ensure that force is used proportionately. They should also promote the routine use of de-escalation techniques	Partly Agreed	<p>This recommendation is partly agreed. The prison will ensure that use of force is used proportionately and will continue to promote de-escalation techniques. However, to recommend a reduction in the frequency with which force is needed or used is to recommend an outcome rather than an action, and there are other factors that will impact on the frequency at which force is needed, for example the cohort of prisoners.</p>	Governor	



	and reduce the frequency with which force is needed or used at the prison. (S46)		<p>A process for the management and oversight of use of force will be introduced including:</p> <ul style="list-style-type: none"> <li>• a use of force (UoF) Supervising Officer will be introduced to manage the UoF process, which will include the issuing of advice and guidance on paper work completion</li> <li>• a process will be put in place for oversight to ensure UoF paperwork is completed within 72 hours, to a satisfactory standard and to provide appropriate challenge</li> <li>• the Head of Safer Custody will introduce a quality assurance process with CMs to ensure proportionality. Paperwork will be reviewed and learning disseminated</li> <li>• management checks will be undertaken to ensure that the UoF data base is up to date</li> <li>• The prison will introduce a monthly quality assurance of a proportion of UoF paperwork and cross reference to BWVC and CCTV footage to examine use of de-escalation and act appropriately if required.</li> </ul> <p>The Governor has instructed that staff performance will be reviewed if non-completed UoF reporting is not rectified. This process will be circulated to all staff via a formal staff notice.</p> <p>The daily Duty Governor will be responsible for ensuring nurses are available when planned UoF is used, and to respond ensure that they respond promptly when use of force is used to ensure F213 forms (Report of Injury to prisoner) are being completed. The Head of Safer Custody will escalate to the Head of Healthcare if healthcare are not attending UoF incidents.</p> <p>The UoF committee meeting runs bi-monthly, chaired by the Deputy Governor and will provide governance for the processes described above.</p> <p>Annual refresher training in C&amp;R will continue to promote de-escalation of UoF. De-escalation will be also be promoted via full staff briefings, wing briefings, posters, and staff notices.</p>	Governor	November 2018
				Governor	June 2018
				Governor	June 2018
				Governor	Completed
				Governor	November 2018
5.4	Managers should take a strategic approach to reducing the supply of, and demand for, drugs at the prison, including	Agreed	<p>The prison has taken active steps to strengthen our existing strategy to reduce the supply and demand of drugs in the prison.</p> <p>A drug diagnostic exercise has been undertaken and this will inform review of the drug reduction strategy by August 2018.</p>	Governor	
				Governor	August 2018
				Governor	August 2018



	ensuring testing arrangements are effective and timely. (S47)		<p>A comprehensive Prison Vulnerability Assessment has been completed to assess where the physical and systemic weaknesses are. The assessment will be used to inform the overarching drugs strategy on how to reduce the supply of drugs.</p> <p>Security Liaison Officers have been identified to provide advice and guidance to newer/probationary staff in areas such as vigilance and confidence in submitting IR (security reports) on drugs related issues.</p> <p>The prison has re-introduced and will maintain a suspicion testing process, routine MDTs are now completed against targets and a new MDT suite is in the process of being created. With an increase in staffing levels suspicion testing has improved and allows for an extension of the provision of target cell searching and night searches. This will be further enhanced as more staff are recruited.</p> <p>The prison is recruiting four substance misuse posts to augment drug services. This will enable the re-introduction of a range of psychosocial interventions to reduce drug demand.</p> <p>A Drug Strategy meeting is held monthly chaired by the Head of Reducing Reoffending and includes all relevant internal stakeholders and other external partners (e.g. drug user agency Ad Action, Housing providers). This meeting helps inform the ongoing Drug Strategy and Action Plan. The plan ensures that daily actions are taken to disrupt the demand and supply chains of drugs in the establishment.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>June 2018</p> <p>August 2018</p> <p>Completed</p>
5.5	The prison should ensure that prisoners at risk of self-harm are identified promptly and that a care plan is developed and adhered to. Prisoners at risk should be supported and feel cared for. Staff working practices should support prisoner safety. (S48)	Partly Agreed	<p>This action is partly agreed. The prison commits to taking all reasonable steps to ensure that prisoners presenting or with a recent risk of self-harm are identified where possible and fully supported. It is not always possible to identify the risk of self-harm promptly, and in some cases there is no prior indication of risk from the prisoner or elsewhere.</p> <p>Officers will conduct risk interviews upon reception in private interview rooms and will assess perceived and evidenced based risk, considering all available information, looking at PER (Escort records), NOMIS (Prisoner Intelligence Reporting system) and healthcare considerations. Risk based reviews, to supplement concerns raised upon induction, will be provided on the first night centre. The training needs for staff undertaking reviews will be assessed.</p> <p>In order to support prisoner safety working practices the prison will:</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Not applicable</p> <p>October 2018</p> <p>July 2018</p>



			<ul style="list-style-type: none"> <li>• deliver ACCT case management training to all band 4 and 5 staff, and SMT members</li> <li>• cell call bells will be checked daily during AFCs and reported, cells will be taken out of use until repairs have been undertaken</li> <li>• senior managers will complete daily management checks of auditable emergency cell call systems</li> <li>• where prisoners are found to have blocked observation panels on daily AFCs, this will be addressed through use of the IEP system</li> <li>• the roll out of the key worker role will be determined by risk rather than location based case allocation, to improve support and care for prisoners at risk</li> <li>• feedback from prisoners during post closure review will be used to inform strategy.</li> </ul> <p>The prison will introduce an outcome focused quality assurance process on ACCT documentation. Management reviews will be used to ensure that staff receive necessary training and that development needs are addressed and that this is evidenced.</p> <p>The Head of the Offender Management Unit (OMU) will ensure that risk of self-harm information will be provided for licence recalls and those coming from community sentences when re-entering custody at HMP Nottingham; and that risk information, support plans and other associated data, recorded on nDelius (Probation database) is transferred on to NOMIS (Custodial database).</p> <p>For licence recalls, any vulnerability issues are detailed on the Recall Report containing details of any risk areas currently being managed in the community. This process will be assured by a Senior Probation Officer with oversight from the Governor.</p>	Governor	October 2018
				Governor	July 2018
				Executive Director of Probation & Women	Completed
5.6	Consultation with prisoners should be structured, routine and meaningful and the applications process responsive. (S50)	Agreed	<p>A plan has been put in place for engagement with prisoner groups:</p> <ul style="list-style-type: none"> <li>• Prison wing Supervising Officers and Custodial Managers will ensure that monthly wing consultation meetings are conducted to include a broad range of prisoners at different Incentive and Earned Privilege (IEP) levels. These meetings will be minuted and assured by Residential Managers. Separate consultations will also be provided for prisoners from protected characteristic and other minority groups (such as gypsies and travellers).</li> </ul>	Governor	June 2018





			<ul style="list-style-type: none"> <li>• A Bi-monthly full Prison Council will comprise of 2 representatives from each wing, who will be able to put forward all issues consulted during the monthly wing meetings. This consultation will be chaired by the Governor or Deputy Governor and along with wing representatives, all prisoner areas from main functions of prison (e.g. Industries, Kitchen, and Education etc.) will also provide representation.</li> <li>• The prison is currently trialling a Prison Information Desk (PID) on one large residential unit to assist with the general application process. Funding for a networked computer has been agreed and a Prisoner Peer Supporter will sit alongside a residential Prison Officer who will utilise the computer to answer all general (non-confidential) applications during association periods. It is envisaged that this system will be able to be rolled out across the establishment during September 2018.</li> <li>• Applications of a confidential or personal nature are able to be posted in a wing based secure box which will be collected by Night Staff and processed by the Business Hub on a daily basis. This process will be quality assured by the Head of Business Assurance who will sample a percentage of application responses each month.</li> </ul>	Governor	June 2018
				Governor	September 2018
				Governor	June 2018
5.7	Allocations to activities, attendance and punctuality should be improved. (S51)	Agreed	<p>The regime is being reviewed at SMT level to encourage and support more allocations to full time work. Proposals to support this will include:</p> <ul style="list-style-type: none"> <li>• The prison will introduce a regime which allows more prisoners to participate in full time activity with improved access to exercise, wing regimes (showers, phone calls, laundry etc.)</li> <li>• a trial productivity bonus for full time workers to be introduced</li> <li>• review the prisoner pay policy to incentivise attendance at activities.</li> </ul> <p>The prison will improve allocation, attendance and punctuality by:</p> <ul style="list-style-type: none"> <li>• monitoring of allocation levels to activities will be undertaken daily at the morning meeting and reviewed as part of the quarterly Quality Improvement Plan review meeting</li> <li>• the Education Manager now attends the Segregation Unit to increase opportunities for access to wing based education materials</li> <li>• residential Managers will consult with the Head of Reducing Reoffending who, when raising activity attendance issues, will support</li> </ul>	Governor	December 2018
				Governor	June 2018



			<p>punctual attendance and timely movement from residential units to activities with the IEP process and warning system</p> <p>The custodial managers will ensure that wing briefings are started and concluded in a timely fashion so that movement from wings to activities are not unduly delayed. This will be reinforced via governor's notices to staff and management briefings.</p>	Governor	June 2018
5.8	<p>Low and medium risk prisoners should be subject to effective offender management, and have an OASys report and sentence plan completed before they are moved to a training prison. (S52)</p>	Partly Agreed	<p>This recommendation is partly agreed. OASys will be completed in line with policy although it may be necessary, for operational reasons, to move sentenced prisoners on prior to an OASys completion to provide space for remand prisoners.</p> <p>Prison Offender Managers (POM) can be subject to re-deployment within the prison at short notice due to staffing shortage and this effects the ability of the OMU to complete sentence plans. 5 new Non-Operational POMs have been recruited and are subject to vetting and training. The priority will then be to clear the OASys and sentence plan backlog, in line with OASys prioritisation policy which provides an option to complete a fast track OASys risk assessment and sentence plan for suitable prisoners who are likely to move within a short timeframe.</p>	<p>Executive Director of Probation &amp; Women</p> <p>Governor</p>	<p>Not applicable</p> <p>October 2018</p>
	<b>Recommendation to HMPPS</b>				
	<b>Reducing risk, rehabilitation and progression</b>				
5.9	<p>There should be a strategy for managing prisoners staying at the prison for longer periods. It should include resources for appropriate</p>	Not Agreed	<p>HMP Nottingham is a local prison that is not resourced for delivering interventions and although remand times can be lengthy it is not appropriate to deliver interventions to unsentenced prisoners.</p> <p>Transfers on the basis of sentencing considerations will be identified to the Population Management Unit (PMU), who deal with the national transfer of prisoners according to the availability of space throughout the estate. The timeliness of transfers cannot be guaranteed.</p>	<p>Governor</p> <p>PECS</p>	



	interventions and timely transfer arrangements. (4.24)		The prison transfers out between 50-75 prisoners a week into the training estate where they can access a wide range of interventions. Some transfers take longer than others to arrange, particularly if the offender is facing multiple charges but such delays can be justified if it allows all risks associated with the offender to be identified. The Prison Estate Transformation Programme is reconfiguring the estate so that the majority of prisoners will be moved out of local prisons within 10 working days of being convicted.	HMPPS Population Management Unit	
	<b>Recommendations to the governor</b>				
	<b>Early days in custody</b>				
5.10	The reception should be welcoming, prisoners should have something to do while they are waiting and they should be managed through induction promptly and efficiently. (1.11)	Agreed	<p>An early days in custody working committee, including key stakeholders and partners, has been set up to implement the findings of the 'bus to bed' review which was undertaken with input from regional and national subject matter experts.</p> <p>Re-profiling work is ongoing, analysing how the staff can be detailed and whether working hours and patterns can be altered or whether the physical reception space can be reconfigured to support the work needed in the reception function to improve efficiency and waiting times.</p> <p>Wider improvements will include:</p> <ul style="list-style-type: none"> <li>the reception area and reception cells have recently been repainted</li> <li>the holding rooms are stocked with information leaflets and booklets and there is a TV already showing normal terrestrial transitions. Plans are currently being put forward to show a rolling prisoner induction video</li> <li>updated furnishings have also been identified for the holding areas. The Head of Operations will ensure that Custodial Managers check and log cleanliness in the reception area and that waiting areas are free from graffiti</li> <li>private interview rooms have been built, which will enhance the reception procedure by providing privacy for part of the interviewing process</li> </ul>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>September 2018</p> <p>September 2018</p>



			<ul style="list-style-type: none"> <li>we are currently working with a psychologist to introduce a values based interview with the aim that those staff selected to work in early days and custody have clear focus on welcome and care.</li> </ul> <p>Once key changes have been implemented induction waiting times will be monitored and feedback from prisoners will be sought through surveys. A review of management information will be undertaken by the early days in custody working group.</p>	Governor	October 2018
	<b>Security</b>				
5.11	Intelligence reports should be processed quickly and all required actions should be completed promptly to ensure the process is effective. (1.40)	Partly Agreed	<p>This action is partly agreed. All efforts have been made to clear the backlog of Intelligence Reports (IRs), including the use of temporary external support, however the current local resource has not always been sufficient to ensure that this can be maintained.</p> <p>A business case will be submitted for permanent increases to local resources in order to support the timely completion and management of IRs.</p> <p>Trends within IRs are discussed daily during the Operational Briefing chaired by the Governor and supported by the Head of Security. Outcomes from these briefings are reported back to the security team.</p> <p>The weekly Operational Managers Meeting discusses current issues and trends, hotspots for security concerns and what resources are need to combat security incidents.</p> <p>The Security Management team will take responsibility for the dynamic risk management of IRs and prioritisation of resources.</p> <p>The Head of Security chairs a Monthly Security Meeting which manages intelligence, analysis of incidents, and knowledge sharing with other agencies and prison departments, outcomes are used to update dynamic security assessment across HMP Nottingham. A further Intelligence Tasking meeting is held weekly, to share information across the Police Liaison Officer, Head of Security, and the Security Team Officers, reviewing management of corruption, prominent nominal prisoners and the targeted searching of staff and prisoners.</p>	Governor	Completed
				Governor	June 2018
				Governor	Completed
				Governor	Completed
				Governor	Completed
				Governor	Completed



5.12	The MDT suite should be relocated to an appropriate waiting, searching and testing environment. (1.41, repeated recommendation 1.37)	Agreed	The MDT suite will be relocated to an appropriate, self-contained area by June 2018	Governor	June 2018
	<b>Daily life</b>				
5.13	Cells should be adequately equipped and suitably furnished. (2.10)	Partly Agreed	<p>The prison is working towards ensuring that cells meet required standards, and in general cells will be taken out of use where they are not adequately equipped in line with local specification. However, the HMIP expectation that all cells will have privacy screens, which cannot be committed to at this time due to financial constraints and issues with the delivery of reactive repairs.</p> <p>A programme to provide adequate cell furnishings is in place and Custodial Managers ensure a monthly inventory of every cell is completed and Senior Managers assure this process and conduct a regular sample of cell inspections.</p> <p>It is our aim that all cells will have privacy screens, however vandalism and the ability of the provider of works to keep up with reactive repairs will mean that this is not always achieved.</p> <p>As a busy local prison, cells are not expected to be routinely used by the same prisoner for long periods so flasks are issued at no charge. However kettles can now be purchased as an in possession item, which forms part of an individual prisoner's personal property.</p>	<p>Governor/ HMPPS Regional Estates Manager (REM)</p> <p>Governor/AMEY</p> <p>Governor</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p>
5.14	Prisoners should be able to shower every day. (2.11)	Agreed	<p>The regime is being reviewed at SMT level to encourage and support full access to necessary facilities:</p> <ul style="list-style-type: none"> <li>The prison will introduce a regime which will allow more prisoners to participate in full time activity with improved access to daily showers</li> </ul>	Governor	December 2018



			Whist the majority of prisoners currently have access to a shower every day this is not the case for those in Segregation or those prisoners who work Full-Time. In order to provide sufficient time for full-time workers to access showers. The staffing of the prison will be re-profiled with resources moved to allow this to happen.	Governor	December 2018
5.15	Lunch should not be served before noon and the evening meal not before 5pm. (2.16, repeated recommendation 2.97)	Partly Agreed	<p>This recommendation cannot be fully agreed as a roll check (reconciliation of the number of prisoners on each wing) needs to be carried out at certain times due to activity timings and evening association and this affects the times meals can be served. Lunch is served as a cold meal from Monday to Saturday which is suitable for midday dining in cell.</p> <p>The evening roll check has to be reconciled at 17.30. To offer the evening meal later would impact upon evening association (time out of cell) for prisoners. The prison will review the core-day when available resources allow for full staffing, however the current measure allows for greater provision of time out of cell for purposeful activities, which is a priority for the prison.</p>	Governor  Governor	December 2018
	<b>Equality, diversity and faith</b>				
5.16	DIRFs should be freely available on all wings and submissions should be answered promptly by an appropriate manager. (2.29)	Agreed	<p>DIRFs will be made freely available where prisoners reside and daily management checks by Custodial Managers will ensure they are always available. The Senior Management Team will spot-check their availability monthly.</p> <p>A new Equalities Advisor is due to be recruited, who will quality assure the responses, including timeliness of replies.</p> <p>DIRFs form a standing agenda item at Equality Action Team meetings (EAT) which are chaired by the Governing Governor.</p>	Governor  Governor  Governor	April 2018  August 2018  Completed
5.17	The prison should better understand the specific concerns and issues for prisoners with protected characteristics and ensure efforts are being	Agreed	A new Equalities Advisor will be in post by July 2018 and will be responsible for introducing consultations with all appropriate protected characteristics groups which will be monitored at Quarterly Equality Action Team (EAT) meetings, chaired by the Governing Governor. Stakeholders will feed into consultations on food, canteen provisions and other local and 3 <sup>rd</sup> sector provisions. External stakeholders will be invited to provide talks on different appropriate topics each month. Outcomes from these meetings will feed into the bi-monthly Prisoner	Governor	September 2018



	made to meet their needs. (2.41)		<p>Council. SMT members will act as champions for specific protected characteristics.</p> <p>The Equalities Advisor will present recent consultation outcomes to the bi-monthly SMT performance meeting, in order to inform SMT champions on the needs and experiences of prisoners with protected characteristics.</p>	Governor	September 2018
5.18	Where possible foreign national detainees should be moved to an immigration detention centre once their criminal sentence has been served. (2.42)	Agreed	<p>This is a Home Office area of responsibility and the decision making for ongoing movement to Immigration Detention Centres may be affected by risk and seriousness of offence.</p> <p>HMPPS accept that the best place for the detention of a detainee is in an Immigration Removal Centre (IRC) but this will not always be possible. However, HMPPS is committed to ensuring the needs of all prisoners are met wherever it is reasonable. Immigration detainees should only be held in a prison when they present specific risk factors that indicate they pose serious current risk of harm to the public or to the good order of an IRC, including the safety of staff and other detainees, which cannot be managed within the regime applied in IRCs.</p>	Detention & Escorting Services (DEPMU), Immigration Enforcement HMPPS	Completed
			<p>Where detention under immigration powers is necessary, a prison remains a lawful place of detention. Immigration detainees are entitled to remand conditions with the same status and privileges as un-convicted prisoners.</p>	Governor	Completed
5.19	Information about the prison should be translated into common languages. (2.43)	Agreed	<p>A newly revised Induction Booklet will be translated into the top 12 (identified) – languages. This will be Quality Assured by the Head of Safer Custody</p>	Governor	December 2018
			<p>The prison will ensure that all community notices to prisoners will be translated into the top 12 languages.</p>	Governor	December 2018
5.20	Staff, including those working at night, should be aware of the PEEP system and which prisoners on their wings	Agreed	<p>A daily handover structure will be provided for visiting staff (those not used to working in a specific area), overseen by wing managers, which will include and identify needs relating to those on PEEP on a daily basis. This will include a handover sheet which will be passed on to night staff.</p>	Governor	May 2018



	need assistance in the event of an evacuation. (2.44)		<p>CMs will undertake monthly assurance checks and wing inspections to make sure the PEEPs continue to be identified and are up to date.</p> <p>The Management of PEEP documentation will be overseen by the Head of Safer Custody. The identification of prisoners requiring PEEP along with the central database of those on PEEPS will be maintained by the Equality Advisor with oversight from the Head of Safer Custody.</p>	<p>Governor</p> <p>Governor</p>	<p>May 2018</p> <p>August 2018</p>
	<b>Health, well-being and social care</b>				
5.21	Responses to prisoners' health care complaints should show evidence of investigations having taken place and be signed by respondents. (2.57)	Agreed	<p>Senior clinicians who are responsible for formulating responses to health care complaints will be given refresher training, provided by the Service Liaison Team based at Rampton. This training will form the basis of how investigations take place and provide the skills needed to fully manage them.</p> <p>Quality Assurance, including appropriateness and completeness of conclusions to complaints will be provided by Clinical Matrons / Head of Healthcare.</p>	Head of Commissioning (North)	July 2018
5.22	Newly arrived prisoners who smoke should have easy access to nicotine replacement treatment and psychosocial support that meets their individual needs. (2.61)	Partly agreed	<p>Nicotine Replacement Therapy (NRT) is currently able to be given on request to new receptions and newly identified prisoners who wish to give up smoking.</p> <p>Current funding does not support continued access to NRT at the levels witnessed at the time of the HMIP/CQC Inspection, but a range of NRT and 'vaping' products is available from the prison canteen for purchase.</p> <p>Psychosocial support will, however be made available and the prison has the expectation that this will be fully met with clinical staff due to be trained on an e-learning module which is based on the 'Breaking Free' (drug and alcohol dependency) model. Scrutiny of the course details has not yet been fully concluded, so the design of intended support has not been finalised. Funding support for psychosocial support has been reduced but is still available currently for this work stream.</p>	<p>Governor</p> <p>National Director of NHSE</p> <p>Head of Commissioning (North)</p>	<p>Completed</p> <p>Completed</p> <p>September 2018</p>





5.23	Men should see a nurse promptly on arrival and receive a scheduled follow-up health assessment within the first seven days after their arrival to ensure risks and concerns can be identified. (2.73)	Partly Agreed	Upon reception into HMP Nottingham, men are seen within the scheduled 4 hours which is within the NHS Service Level Agreement (SLA) guideline. This process for seeing healthcare upon reception is assurance checked by SystemOne (a centrally controlled clinical control system) which provides data on the time seen.	Head of Commissioning (North)	Completed
			Reception screening of initial assessments is provided to commissioners on a monthly basis. The KPI Compliance target is 98% which is consistently achieved through the quarterly reporting process.	Head of Commissioning (North)	Completed
			The Public Health Practitioner Certification Board (PHPCB) monitors health assessment compliance. Not all men wish to be seen on a scheduled seven day assessment, however a second scheduled screen is available on demand within the seven day period. All men are offered an application to be secondary screened and the process is fully explained; however, all parts of the secondary screening process are covered on the primary screen with the sole exception of family medical history considerations. This recommendation cannot be fully agreed, as not all men will receive an automatic follow-up health assessment unless there is an identified need and to offer it routinely, would have an impact on the available clinic time.	Head of Commissioning (North)	July 2018
			All specific needs identified at the Primary Screen will be referred to specialist services upon reception (e.g. Mental Health and Substance misuse needs).	Head of Commissioning (North)	Completed
			Assurance for the appointments system is provided by the Quarterly Prison Health and Social Care Partnership Board which is chaired by the Governor, and attended by healthcare and providers. Appointment waiting times are discussed as a standing agenda item.	Head of Commissioning (North)	Completed
			An ongoing Prisoner Wellbeing function, overseen by the Head of Healthcare, also focuses on the empowering and enabling of prisoners to take the opportunity to manage some of their own health screening concerns. Following induction there is an invitation to attend an Open Screening Clinic from the following day, dependent on clinic space, to discuss any concerns beyond the initial Primary Screen.	Governor	July 2018
5.24	The prison and health care department should	Partly Agreed	The Social Care PSI 20/2016 supports the implementation of the mandated actions of the Care Act 2014. Prisons are required to ensure all men and	Rehabilitation Services Group	



	<p>have a memorandum of understanding with the local authority. The prison should have a formal social care protocol and prisoners who support others should be risk assessed and trained. (2.78)</p>		<p>women have access to social care assessments equitable to the community when in custody, and as such, mandated policies and process are required to be in place. A MOU is mandated in the Care Act between all prisons and Local Councils and Local Authorities where applicable</p> <p>A Memorandum of Understanding between HMP Nottingham, Healthcare and the local authority will be drawn up through the PH&amp;SCLDB</p> <p>Expertise will be sought from HMP Ranby who are aligned to HMP Nottingham's healthcare commissioned provision, to help shape the intended MOU and ensure that consistency amongst local healthcare services is achieved.</p> <p>The Care Act and PSI does not mandate Governors to have peer to peer schemes (Buddies)</p> <p>It is not possible to consistently maintain an appropriately formal system of prisoners to be prisoner supporters as HMP Nottingham is a local prison with a highly transient population, and formal 'Buddy' training and accreditation takes time to achieve. The longest placed prisoners are those on remand who cannot be guaranteed to be in place long enough for training to be achieved. Other local prisons will be scoped to help inform a potential appropriate alternative to such a scheme, but this part of the recommendation cannot be fully agreed at this time.</p>	<p>Head of Commissioning (North) /Governor Governor</p> <p>Governor</p>	<p>September 2018</p> <p>September 2018</p>
5.25	<p>Prisoners needing a secure hospital bed should be moved promptly. (2.89)</p>	Partly Agreed	<p>This recommendation is partly agreed, as although every effort is made to expedite transfers and assess patients promptly, transfers are dependent on a number of factors such as the completion of appropriate assessments, administrative processes within the NHS and the availability of accommodation in psychiatric facilities.</p> <p>NHS England has developed a plan to improve services for prisoners with mental health issues, and includes specific reference to timely transfer and remission of patients and information about how this will be implemented and sustained.</p>	<p>Head of Commissioning (North)</p> <p>National Director of NHSE</p>	<p>Completed</p> <p>Completed</p>



			<p>NHSE will be consulting on new guidance in relation to transfer and remissions in the first quarter of 2018-19, with timescales that take into account clinical urgency and need.</p> <p>All guidelines are followed as part of Mental Health Act and provisions to ensure patients at HMP Nottingham are assessed and transferred in a timely manner to secure premises. Once warrants are received, both prison and healthcare are currently working collaboratively to transfer within 14 days.</p>	National Director of NHSE	Completed
				National Director of NHSE	Completed
<b>5.26</b>	Prisoners with drug and/or alcohol problems should have timely access to a full range of psychosocial support interventions and regular face-to-face reviews with a prescriber	Agreed	<p>The prison is recruiting four substance misuse posts to augment drug services. This will enable the re-introduction of a full range of psychosocial interventions to reduce drug demand.</p> <p>The prescriber will be made integral to the 13 week reviews process.</p>	<p>Head of Commissioning (North) /Governor</p> <p>Head of Commissioning (North)</p>	<p>June 2018</p> <p>June 2018</p>
<b>5.27</b>	Prisoners requiring stabilisation support for drugs and/or alcohol should be in dedicated stabilisation cells that allow unrestricted observation overnight. (2.98)	Not Agreed	<p>This recommendation cannot be agreed as no dedicated Stabilisation Cells with door hatches that allow for unrestricted observation are able to be built. This would require substantial capital investment which has not been agreed or approved as a business case at this time.</p> <p>This will be discussed as an ongoing issue at a Healthcare Commissioning meeting, which the healthcare commissioners will be invited to attend.</p>	Head of Commissioning (North)/ Governor/ HMPPS Regional Estates Manager (REM)	
<b>5.28</b>	Prison officers should properly supervise medicine administration to ensure confidentiality and prevent bullying and diversion. (2.108)	Agreed	<p>Where medication is issued from treatment hatches, on the wing role briefings will be provided to support inexperienced staff and specifically highlight the requirements needed to effectively supervise the issuing of medication.</p> <p>Residential Managers will assure this process providing spot checks at prisoner association times and staff will be directed to maintain supervision levels where there is a risk of bullying and diversion of medication.</p>	<p>Governor</p> <p>Governor</p>	<p>June 2018</p> <p>June 2018</p>



5.29	A pharmacist should be at the prison regularly to provide prescribing oversight, medicines use reviews and pharmacy-led clinics to help men understand the reason for and effects of their medicines. (2.109)	Agreed	<p>An Area Pharmacist covers three prisons, including HMP Nottingham, which is visited once a week.</p> <p>The Area Pharmacist attends the bi-monthly Drugs and Therapeutics meeting where prescribing oversight is provided but is not resourced to run pharmacy-led clinics, however they do so anyway. This meeting is also attended by the Head of Healthcare, Clinical Matrons and GPs.</p> <p>Pharmacy Technicians are in place and will lead on agreed medicine clinics, to include pharmacy reviews and enhance men's understanding of medicines prescribed. They will consult to identify what these clinics are to provide and any training needs will be assessed. Further pharmacy functions needs will be also assessed in order to shape the design of the agreed clinics.</p> <p>Nottinghamshire Healthcare Trust are recruiting a pharmacist who will provide prescribing oversight, medicines use reviews and pharmacy-led clinics to help men understand the reason for and effects of their medicines.</p>	<p>Area Pharmacist</p> <p>Area Pharmacist</p> <p>Area Pharmacist</p> <p>National Director of NHSE</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p> <p>September 2018</p>
	<b>Time out of cell</b>				
5.30	Men separated for their own protection on D wing should have time out of cell and access to activities comparable with the mainstream population. (3.9)	Agreed	<p>An accommodation review went before the prison's SMT during April 2018. This review analysed the potential benefits of relocating the Vulnerable Prisoner (VP) Induction unit from 'D' to 'F' wing. As a conclusion, it was agreed that men separated for their own protection will no longer reside on 'D' wing. The new location within 'F' wing will allow VPs to associate with VPs on 'G' wing and have enhanced access to comparable wing based activities.</p> <p>Until this work has been concluded and, as an interim measure, the activities based on 'D' wing are now used as part of a split regime, where no mainstream 'D' wing prisoners are allowed to use equipment in the afternoons which is set apart for the VP regime.</p>	<p>Governor</p> <p>Governor</p>	<p>July 2018</p> <p>Completed</p>
5.31	Gymnasium staff should identify the reasons for	Agreed	A prisoner consultation exercise will take place to investigate poor attendance at the gym and this will inform future work to promote attendance.	Governor	May 2018



	poor attendance at PE sessions and take corrective action to improve attendance. (3.10, repeated recommendation 3.37)		<p>A second gym has been opened to increase gym provision, increasing the allocation capacity available and enhancing the specialised courses available (remedial gym, GP/Safer Custody referrals etc.).</p> <p>Posters/timetables will be displayed on all wings and evening gym sessions (for full time workers) will be monitored for enhanced attendance. Disincentives to attendance such as conflicting education/work allocations will be explored via the Regime Review.</p> <p>Weekly Gym attendance will be added to the weekly Regimes Meeting.</p>	Governor	July 2018
				Governor	June 2018
				Governor	June 2018
	<b>Education, skills and work activities</b>				
5.32	Managers should utilise the needs analysis and other available data to improve the education, skills and work provision. (3.23)	Agreed	<p>An updated 2018 needs analysis will be used to refresh the Curriculum Plan which will help shape potential course provisions for 2018.</p> <p>Learning Walks will be used to provide Quality Assurance on the quality of learning provision. These walks will also allow tutors to be supported and dynamically assessed.</p> <p>The monthly Education Performance Monitoring (EPM) meeting monitors the contract and KPI (upwards and downwards trends, QA, external quality visits, learning support) and is chaired by the Governing Governor. This meeting discusses the Engagement of Learning agreement between the prison and Milton Keynes College. Staff have been identified for completing a needs analysis to form part of the agreement, which will inform improvements need in the education provision.</p>	Governor	June 2018
				Governor	August 2018
				Governor	August 2018
5.33	Instructors should recognise and accurately record the skills that prisoners develop in prison work. (3.31)	Agreed	<p>Instructors will start to record skills and ability levels on arrival and during their time in employment, so that progress can be monitored, documented and rewarded. This will be completed on an individual training record for each learner.</p> <p>This data will form part of the Quality Improvement Plan (QIP) which is reviewed quarterly.</p>	Governor	June 2018
				Governor	Completed



5.34	Prisoners should be provided with appropriate learning support to help them make good progress and succeed in their learning. (3.32)	Partly Agreed	<p>This recommendation cannot be fully agreed as the provider is not resourced to deliver this recommendation in full. Milton Keynes College management has identified the need for a Learning Support Officer in order for progression to be monitored and actioned in vocational workshops. The QIP has also identified a limited scope to offer progression through the current learning delivery model, although distance learning options are currently being discussed.</p> <p>A pilot Bronze/Silver/Gold awards scheme is currently being scoped which will encourage prisoners' ownership of their learning achievements (Employability Soft Skills, general learning plus English and Maths) and encourage progression.</p> <p>Level 2 progressions in various disciplines (Catering, Business, Textiles, Recycling, KTL, IT, English and Maths) has been planned to increase, and is discussed at the quarterly QIP meetings.</p>	Governor  Governor  Governor	June 2018  August 2018
5.35	Prisoners should receive support to improve their English and maths skills in their workplaces. (3.37)	Agreed	<p>Learning support for English and Maths (E&amp;M) in the workplace will be improved by instructors being reminded to utilise all opportunities to include learning advancements in their specific courses/jobs that relate to English and Maths. Teaching staff will continue working with the advanced learning practitioner for improving learner skills and success in English and Maths.</p> <p>Industries will be supported with learning walks, improving promotion of E&amp;M and supporting the implementation of Bronze, Silver, and Gold awards work-skills achievements.</p> <p>This will be discussed at the month Quality Improvement Group (QIG) – Chaired by Head of Reducing Reoffending, the Head of Learning and Skills (when the post is filled) and course stakeholders.</p>	Governor  Governor  Governor	Completed  August 2018  Completed
5.36	Managers should collect accurate data about the employment and training destinations of all prisoners on release. (3.42)	Not Agreed	<p>Due to the resource required to collect data on all prisoners released from Nottingham (approximately 1200 a year), this is not agreed. Moreover, HMPPS is developing methods for such data to be recorded by Probation providers, rather than prisons.</p> <p>All the Probation Providers (NPS Divisions and CRCs) have been asked to record Employment and Training outcomes for released prisoners subject to</p>	MOJ Contracted Services	



			<p>supervisor, as well as verifying and updating those outcomes over the course of the Licence and Post Sentence Supervision period. This data can then be processed by the Community Provider, the Through the Gate Provider, and the Releasing Prison.</p> <ul style="list-style-type: none"> <li>• While previous measures of prison employment outcomes used self-reported outcomes from prisoners at the time of release, these data suffered three major issues: Prisoners have been found to be over-optimistic about their circumstances on release and/or to provide inaccurate information.</li> <li>• As prisons typically don't interact with the offender following their release, there is no way to verify their stated outcomes, or update those outcomes in the event of changed circumstances.</li> <li>• Many of the most favourable outcomes (i.e. the offender gaining a permanent job) won't happen immediately on release, and thus can't be captured by the prison.</li> </ul>		
	<b>Reducing risk, rehabilitation and progression</b>				
<b>5.37</b>	All prisoners eligible for HDC should be assessed and those approved should be released on their earliest eligibility date. (4.25)	Partly Agreed	<p>This recommendation cannot be fully agreed as some eligible prisoners may decline assessment for HDC, and some offenders can already be on their Home Detention Curfew (HDC) eligibility date on the day of sentencing or soon after, due to lengthy remand periods. The Home Detention Curfew process can take several weeks to fully complete and cannot be commenced whilst a prisoner remains unsentenced.</p> <p>The Offender Management Unit already ensures a high percentage of those prisoners eligible are released on their HDC eligibility date, with the process for HDC beginning four weeks prior to eligibility.</p> <p>HDC approvals are reported to the Morning Meeting by OMU Custodial Managers. The Head of OMU provides managerial oversight on the HDC processes and assures the work of the HDC clerks, who prepare the eligibility lists for consideration. Hub Managers Quality Assure the HDC paperwork.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>Completed</p>



5.38	There should be more systematic support and information for prisoners who have been recalled. (4.26)	Agreed	A recall surgery has been introduced to provide support to prisoners on 3 types of licence recall (14, 28 day and standard recall). Prisoners are invited to a recall interview where details of the recall are explained and support is given as to how prisoners can make representations against their recall.	Governor	Completed
			PPCS has delivered briefing sessions to prison and probation staff as part of a wider national programme of delivering best practice guidance in dealing with recalled offenders. In addition, all standard recalled offenders receive a generic leaflet attached to their recall dossier that provides information about the recall process (the leaflet has the Crystal Mark). Recall leaflets dealing with fixed-term and HDC recalls are due to be issued in the summer.	Governor	Completed
			Those on a 14 day recall are generally released before a full support process is able to be put in place, although they will receive a support interview. All those on a 28 day and standard recall (for longer recall periods) are met for a wing based interview. These systems are overseen by the Head of Offender Management	Governor	Completed
			Notifications are systematically issued to prisoners on the terms of their recall if there are any special conditions attached to their recall, such as public protection issues restricting contact with persons relevant to the reasons they have been recalled.	Governor	Completed
	<b>Release planning</b>				
5.39	There should be adequate interview space for OMU and CRC staff to carry out confidential interviews. (4.35)	Not agreed	This recommendation cannot be agreed due to funding constraints. The necessary work would require capital funding and an extensive physical buildings reconfiguration to enable Offender Management and Rehabilitation interviews to be conducted in private.	Governor HMPPS Regional Estates Manager (REM)	

