



HM Prison &
Probation Service

Action Plan: HMP Oakwood

Action Plan Submitted 11 September 2018

A Response to the HMIP Inspection 26 February 2018 – 9 March 2018

Report Published 10 July 2018

INTRODUCTION

HM Inspectorate of Prisons (HMIP) is an independent inspectorate which provide scrutiny of the conditions for and treatment of prisoners. They report their findings for prisons and Young Offender Institutions across England and Wales to Ministry of Justice (MOJ) and Her 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 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 provides 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, Measureable, 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 must 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 must 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 OAKWOOD**

1. Rec No	2. Recommendation	3. Agreed / Partly Agreed / Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	Main recommendation to HMPPS				
5.1	The National Probation Service should work with the prison to ensure that all prisoners presenting a high risk of serious harm to others have a comprehensive and defensible risk management plan that is delivered well enough ahead of release. (S54)	Agreed	<p>The establishment and the National Probation Service (NPS) will work together to meet this recommendation.</p> <p>The NPS now have a standard suite of Management Information System (MIS) reports identifying Multi-Agency Public Protection Arrangements (MAPPA) eligible prisoners pre-release at 4 month and 1 month timeframes. This is to be used to ensure both Multi-Agency Public Protection Arrangement (MAPPA) screening and Risk Management Plans (RMP) are completed.</p> <p>A new process has been implemented and RMPs now commence 6 months prior to Prisoners Conditional Release Date (CRD) where all details are disseminated to the Offender Manager. This enables sufficient time to ensure a comprehensive and defensible RMP is provided ready for release.</p>	<p>Director of Probation and Women's Estate (HMPPS)</p> <p>Director</p>	<p>Completed</p> <p>Completed</p>
	Main recommendations to the Director				
5.2	Staff should be equipped with the skills and confidence to de-escalate incidents, and incidents of use of force should be monitored and quality assured to ensure that de-escalation is used and that force is used only as a last resort. (S52)	Agreed	Prison Staff will continue to be supported to maintain a safe and secure prison. Immediate action has been taken to strengthen the frontline by recruiting over 3000 additional Prison Officers, which will help to deal with emerging threats and improve safety. The poor staff and prisoner relationships are one of the biggest drivers of violence, so as part of the roll-out of the Offender Management in Custody (OMiC) Model, the extra staff are being used to move to a new Key Worker model through which Officers	Director	Completed



			<p>can mentor, challenge and support a small caseload of prisoners. Having more staff will allow Prison Officers more time to take a Dedicated Officer role and build constructive relationships with prisoners, reducing levels of frustration and ultimately violence. There have also been over 5,600 body-worn cameras rolled out across the Prison Estate, alongside training for staff on how to improve their interactions with prisoners which will contribute to making the prisons safe and effective.</p> <p>The Use of Force (UoF) training is delivered by qualified instructors and annual refreshers are provided to all staff. The UoF training includes an emphasis on managing conflict through communication. All UoF incident documentation and body worn video camera footage is reviewed by a qualified instructor. Lessons learned are communicated in all instances, where it is believed that de-escalation techniques could have been used more effectively prior to UoF being applied. A weekly meeting between the Controller and UoF Instructors is held and a random selection of the aforementioned is viewed to provide an extra level of assurance.</p>	Director	Completed
5.3	The quality of care for prisoners at risk of suicide and self-harm, evidenced in written assessment, care in custody and teamwork (ACCT) processes, should be improved and should focus on the underlying causes of distress. (S53, repeated recommendation S59)	Agreed	<p>The Assessment, Care in Custody and Teamwork (ACCT) process is the principal tool to manage the risk of suicide and self-harm in prisons. To make this tool easier to use, the ACCT process will be revised. This will focus more on the setting and carrying out of actions to support prisoners, and to make clear the inherent flexibility of the ACCT process to be adapted for different prisoners' needs.</p> <p>Prison Safety and Reform are rolling out revised and improved suicide and self-harm prevention training for new and existing Staff. Prison Safety and Reform have worked with the Samaritans to produce a new suicide prevention learning tool that is designed to give staff more confidence in engaging with prisoners, or who may be at risk of suicide.</p>	Prison Safety and Reform	Completed and ongoing Completed and ongoing



			<p>Prison Safety and Reform continue to work with the Samaritans to provide their valuable Listeners Scheme. There is a new Samaritans pilot initiative designed to build emotional resilience in prisoners during their early days in custody, which is known to be a difficult period.</p> <p>Further training, development and support is being provided to all those involved in the ACCT processes with an emphasis on identifying the underlying causes of distress. The additional training will also drive up the standards of written assessment and care plans.</p>	Director	
	Recommendation to HMPPS				
	Reducing Risk, Rehabilitation and Progression				
5.4	Prisoners should not be transferred to Oakwood without an offender assessment system (OASys) assessment and sentence plan. (4.18)	Not Agreed	<p>There has been a review of Offender Management in custody (OMiC) and this will address the issues which prisons currently face around completing OASys reports. The new model will move the resource for OASys report completion into the training / resettlement estate and away from local / reception prisons, where there is more time for engagement with the prisoner and for the action plan to be produced.</p> <p>The roll out of the new Offender Management model has commenced starting with the key worker role in all prisons within the male closed estate (phase 1).</p> <p>In the interim, prioritisation criteria for the current OASys backlog remain in place to support the Prisons Estate to ensure the highest priority cases are completed in full, with a reduced assessment for lower risk cases, ensuring all cases have some form of risk assessment and sentence plan.</p>	<p>Director</p> <p>Director of Prison Improvement (OMiC Project SRO)</p> <p>Executive Director, Prisons</p>	<p>September 2019</p> <p>Completed and Ongoing</p>
	Recommendations to the Director				
	Managing Behaviour				



5.5	A violence reduction strategy should be developed which sets out the reasons for violence, the progress made and the work still to be done. (1.16)	Agreed	The Violence Reduction Strategy has been reviewed and includes in depth analysis of all incidents of violence. This falls into a prevention strategy and a weekly action plan that reduces risk of further incidents. All areas of the prison are represented at the Violence Reduction meeting and the actions are shared with a peer led 'Peace and Community Engagement team'.	Director	Completed
5.6	The prison should investigate prisoners' negative perceptions of the incentives and earned privileges scheme and ensure that it provides equitable opportunities to progress and regress through the levels. (1.17)	Agreed	<p>The prison have reviewed the Incentives and Earned Privileges (IEP) scheme and the prisoners made a valuable contribution to the review. The outcome is a policy that is less punitive and provides absolute clarity to residents and staff on how it will be managed.</p> <p>HMP Oakwood conduct surveys on the prisoners Nforce kiosks. The kiosks are located on all wings and prisoners' respond to surveys regularly. The Kiosks are used by prisoners to order meals, visits, check finance status and read notices, which are published from time to time informing prisoners of the various activities and regime matters.</p> <p>Prisoners are also represented by a Prisoner Forum, which meet with the Senior Managers at least once per month to raise matters of concern, ideas and proposals.</p>	Director	Completed
5.7	Prisoners requiring multiple staff for unlocking should be subject to a formal risk assessment and regular review. (1.29)	Agreed	Risk levels are reviewed daily and formally. The variations are recorded and implemented. The daily reviews are conducted by the Duty Director and weekly by the Director and decisions are recorded on the HMP Oakwood risk assessment form.	Director	Completed
5.8	Time in the open air for segregated prisoners should be individually risk assessed, to allow them to exercise together when this is appropriate. (1.30)	Agreed	<p>Residential Services PSI 75/2011 notes that prisoners are afforded a minimum of 30 minutes in the open air daily, as defined in the SLA/Contract.</p> <p>Suitability for taking time in the open air is assessed and reviewed by the Care and Separation Unit (CSU) Manager and the Duty Director. The prison encourage time in the</p>	Director	Completed



			<p>open air to be taken in pairs but many prefer to do so in isolation.</p> <p>Decisions regarding shared exercise are made during Good Order reviews and recorded as such. The exceptions to that would be those classed as high risk, who are not permitted to exercise with others.</p>		
	Security				
5.9	Suitability assessments for peer workers should be comprehensive and rigorous, and include an offending behaviour assessment. (1.38)	Agreed	Forensic suitability assessments are now in place. The Deputy Director has responsibility for approvals. The Offender Management Unit (OMU) which includes Offender Supervisor contributions and the Head of Security provide intelligence as a vital contribution to the assessments.	Director	Completed
5.10	The prison should have an up-to-date drug supply reduction strategy to direct and support the supply reduction action plan. (1.39)	Agreed	<p>There is a newly appointed Executive Director for Prison Improvement and National Lead for Drugs, and a multi-agency drugs taskforce has been formed to respond to the threat that drugs pose. The 2018-19 HMPPS Business Plan states that we will “develop a comprehensive drug strategy for HMPPS”. This work is underway and it will include specific guidance for prisons about reducing the supply and demand for drugs.</p> <p>The National Drug strategy will provide a strategic overview against the three key strands of the HMPPS Drug Strategy: restricting supply, reducing demand and building recovery. In addition, it will act as a template for establishments, setting out the key components that should be included in their drug strategy as well as the most up to date guidance and best practice for prisons to use when developing processes within their individual prison.</p> <p>Locally at HMP Oakwood the Drug Strategy policy has been updated. The supply reduction action plan has also been reviewed and updated and now fully supports the Drug Supply Reduction Strategy for the establishment,</p>	<p>Director</p> <p>Director</p>	<p>December 2018</p> <p>Completed</p>



5.11	Closed visits should only be used when there is evidence that a prisoner has abused visits arrangements. (1.40, repeated recommendation 1.45)	Agreed	<p>The PSI 15/2011 for security at visits is under review. The current policy states that closed visits may be imposed as administrative measures where necessary for the grounds specified in Prison Rule 34(3) (YOI Rule 9(3)). A ban on a visitor may only be imposed if the grounds within Prison Rule 35A (4)/YOI Rule 11(4) are satisfied.</p> <p>The policy on placing residents on closed visits is now entirely aligned with the abuse of the visits process. Abuse of the visits process is when prisoners' fail to act appropriately during visiting times and includes such matters as violent or sexual behaviour and attempting to pass illicit goods. Closed visits would apply if any of the above have been breached.</p>	Director	Completed
	Safeguarding				
5.12	The decrease in the number of referrals to Listeners should be investigated, to determine whether prisoners in need of a Listener are being denied access or are not aware of the service, and any remedial action identified should be taken. (1.49)	Agreed	The prison has investigated the reasons for the decrease in the number of referrals to Listeners and are satisfied that there are sufficient support initiatives for those vulnerable to self-harm. This has led to a reduction in the demand for Listeners. The prison will continue to monitor and review the position.	Director	Completed
5.13	Residential staff should be aware of adult safeguarding procedures and competent in identifying and referring prisoners who should be considered for an intervention. (1.53)	Agreed	All Residential Staff will take part in a safeguarding training session. This will enhance their knowledge and empower them to identify and refer such residents appropriately.	Director	December 2018
	Daily life				
5.14	Cell call bell response times should be monitored routinely, to ensure timely responses. (2.12)	Agreed	<p>Residential Services PSI 75/2011 - Residential staff must respond promptly to calls for assistance.</p> <p>HMP Oakwood aim is to respond to emergency cell bell calls within an average response time of 5 minutes. Night staff have been tasked with recording average response times so that the progress can be monitored.</p>	Director	Completed



5.15	Lunch should not be served before noon, and the evening meal not before 5pm. (2.17)	Agreed	At HMP Oakwood, lunch is now served at noon and the evening meal is served at 5 pm in line with the published regime.	Director	Completed
	Equality, diversity and faith				
5.16	The prison should explore the reasons behind the poor survey results from black and minority ethnic prisoners concerning respectful treatment by staff, and from prisoners with disabilities in relation to feelings of safety. (2.35)	Agreed	The prison has met with Black And Minority Ethnic (BAME) groups and found no evidence that they are disadvantaged in anyway. The prison meets regularly with residents with disabilities and have found no evidence of them fearing for their safety. On the contrary, HMP Oakwood have found evidence of residents with disability being well cared for.	Director	Completed
5.17	The reasons why, in our survey, prisoners with disabilities felt less safe than able-bodied prisoners should be explored. (2.36)	Agreed	HMP Oakwood have conducted a number of prisoner focus groups and have found no evidence of prisoners with disabilities feeling less safe than able bodied prisoners and on the contrary, HMP Oakwood have found evidence of prisoners with disabilities being well cared for. The prison will continue to meet regularly with prisoners with disabilities to discuss their views on safety.	Director	Completed and ongoing
5.18	All staff should be able to identify prisoners with a personal emergency evacuation plan and their particular needs. (2.37)	Agreed	A notice has been issued to all staff; this will remind staff of their responsibility and process of identifying residents who have Personal Emergency Evacuation Plans (PEEPS) and their specific needs. Regular night visits by the Duty Director ensures that night staff are also aware of the identity and location of all residents subject to PEEPS.	Director	Completed
	Health, Well-being and Social Care				
5.19	Prisoners should have timely access to required external hospital appointments. (2.66)	Agreed	Cancellations have been the result of the NHS hospital sending appointments directly to prisoners which impede the Security procedures; preventing prisoners' prior knowledge of transport arrangements outside of the custodial setting which in turn reduces the risk of planned escape. Any other cancellations are due to local hospital staffing resources.	Head of Healthcare (CareUK) NHS England	January 2019



			<p>NHS England Health and Justice commissioners are working with the West Midlands performance delivery team. This team have agreed to discuss issues on the number of appointments being cancelled and rearranged for residents at HMP Oakwood by Royal Wolverhampton Hospital NHS Trust.</p> <p>NHS England and the Head of Healthcare will meet with the Deputy Chief Operating Officer and Head of Nursing at the Royal Wolverhampton NHS Trust to discuss closer working to support prisoners who access the Trust for treatment and care.</p>		
5.20	A memorandum of understanding, describing how social care will be delivered for prisoners, should be established formally between the prison, local authority and care provider. (2.71)	Agreed	Care UK (Since 1 April 2018) has been the provider of the domiciliary care aspect of the social care contract. A memorandum of understanding is now in place between Care UK, Staffordshire Council and G4S.	Head of Healthcare (CareUK)	Completed
5.21	Requests for mental health practitioners to attend assessment, care in custody and teamwork (ACCT) reviews should be prioritised. (2.78)	Agreed	<p>The processes will be agreed to ensure ACCT reviews are planned in advance and the Care Coordinator is informed accordingly. A Local Operating Policy is currently in draft format.</p> <p>Once in place the Mental Health Team will be facilitated to prioritise their workload, ensuring they attend high risk ACCT reviews.</p>	Head of Healthcare (CareUK) / Director	October 2018
5.22	Patients requiring a transfer to external mental health facilities should be transferred within the current transfer guidelines of 14 days. (2.79)	Partly Agreed	<p>This recommendation is partly agreed. Although every effort is made to expedite transfers and assess patients promptly, transfers are dependent on several factors outside the control of the establishment and HMPPS, such as the completion of appropriate assessments and administrative processes within the NHS and the availability of accommodation in mental health hospitals.</p> <p>The Prison Transfer and Remission Guidance published by the Department of Health in 2011 has not been agreed by NHSE. NHSE is consulting on new guidance in relation to</p>		



			<p>transfer and remissions, with timescales that consider clinical urgency and need.</p> <p>There is currently a national shortage of secure beds; however every attempt is made by the Mental Health provider to ensure a transfer occurs at the earliest opportunity. Any significant delays in transfers to medium and high secure hospitals will be escalated to specialist commissioners.</p> <p>Nationally NHS England is developing plans to improve services for prisoners with mental health issues, which includes specific reference to timely transfer and remission of patients and information about how this will be implemented and sustained. NHSE hopes to publish guidance in 2018-2019, with timescales that take into account clinical urgency and need.</p>	<p>Head of Healthcare (Care UK)</p> <p>NHS England (NHSE)</p>	<p>March 2019</p>
5.23	Prisoners with drug and alcohol problems should have ready access to a greater range of psychosocial interventions and peer support, independent of location. (2.86)	Agreed	Midlands Partnership Foundation Trust (MPFT) will designate Substance Misuse workers to individual house blocks, which has been implemented across the whole establishment. There are no vacancies within the team, which will enable house block workers to re-establish group and individual interventions.	Head of Healthcare (CareUK)	Completed
5.24	Closer collaborative working arrangements between the psychosocial and clinical treatment teams should be established, to ensure optimum outcomes for prisoners. (2.87)	Agreed	<p>A closer collaborative working relationship has already commenced, through the Multi-Disciplinary Team Meetings (MDT) and the Team Leader for integrated substance misuse.</p> <p>A member of the MPFT team also attends the Clinical 13 week reviews to ensure the optimum outcome for patients.</p>	Head of Healthcare (CareUK)	Completed
5.25	Pharmacy staffing should reflect patient need and include a dedicated pharmacist to provide enhanced governance and direct advice to patients. (2.94)	Agreed	Lloyd's pharmacy are engaging with Care UK to appoint a dedicated pharmacist at HMP Oakwood as a part of the contract renewal.	NHS England / Head of Healthcare (CareUK)	April 2019



5.26	Prisoners should consistently receive their prescribed medication on time, without gaps in provision. (2.95)	Agreed	<p>NHS England will be facilitating a workshop between Lloyds and Care UK to review their current model to ensure there is appropriate pharmacist time available where most needed.</p> <p>Over the past months, the prison had a successful recruitment drive in attracting Pharmacy Technicians to work at HMP Oakwood. There is currently a further 3 whole time equivalent (WTE) Pharmacy Technicians going through clearance which, will enhance the Medication Management Team.</p>	Head of Healthcare (CareUK)	December 2018
5.27	Prisoners should receive timely access to routine dental assessment and care. (2.99)	Agreed	<p>An action plan was developed whilst the inspectors were on site to improve timely access to dental assessment and care. Monthly sub-contractor meetings take place between The Head of Healthcare / Deputy Head where a review of waiting lists and demand are analysed. Sessions are monitored by need, and where possible amended to meet the demand of the population. For example, vulnerable prisoner (VP) appointments have recently been changed to mains appointments to reduce the wait for mains patients. Work continues with the dental sub-contractors to improve their clinical provision.</p>	Head of Healthcare (CareUK)	December 2018.
	Education, skills and work activities				
5.28	Prisoners' attendance at appointments during the working day should be carefully monitored, to ensure that prisoners return to activities once their appointment is finished. (3.23)	Agreed	<p>Prisoners are permitted to attend appointments during the working day and must return to activities once the appointment is complete. The movement slips are issued by Officers to permit attendance at appointments and the reverse of those slips permit movement back to their allocated place. This may be Education, Industries or back to the wing. The route patrolling Officers ensure passage is only allowed to those areas identified on the movement slip.</p>	Director	Completed
5.29	The technical difficulties with the virtual campus should be resolved, so that it can be used to help prisoners to find work after their release. (3.24)	Agreed	<p>The service provider has rectified the technical problems which caused the outage of Virtual Campus.</p>	Director	Completed



5.30	Additional training and development support for teachers of English and mathematics should be provided, to ensure consistently effective provision in these subjects. (3.33)	Agreed	The additional training and development of teachers for English and Mathematics have been addressed through various continued professional development (CPD) and the implementation of new delivery resources and methodologies to ensure a consistent provision is delivered in these subjects.	Director	Completed
5.31	Prisoners should be able to benefit from vocational qualifications and higher-level skills development opportunities during workshops activities. (3.34)	Agreed	The new curriculum designed for year 2018/19 (commencing August 2018) will incorporate additional Level 3 delivery and expand on the vocational skills available throughout the establishment. New delivery includes Building, Wall and Floor Tiling and Functional Skills availability in the workshop areas. In addition to the plastering and tiling qualifications, the prison will expand on Level 3 Certificate in Personal Training, Level 3 Diploma in Art and Design, Level 3 Leadership and Management and level 3 Learning Support Practitioner.	Director	April 2019
5.32	Prisoners' achievements in English and mathematics at levels 1 and 2 should be improved. (3.41)	Agreed	Functional Skills delivery has been further divided into specific tutor responsibility. Each tutor delivering their specialist area has their own level and house block location. Prisoner achievement in English has shown a positive increase in success rates. The impact of the Maths changes cannot be reflected at this early stage. (5.30 is expected to contribute further improvement to this recommendation.)	Director	December 2018
	Reducing Risk, Rehabilitation and Progression				
5.33	The reducing reoffending strategy should set out the important role of offender management and be informed by comprehensive needs analyses which explore the specific needs of the wide range of prisoners held at the establishment. (4.17)	Agreed	The OMiC model will change Offender Management in custody. The case management part of the model is being implemented in prisons during 2019, including private prisons. Governors become responsible for custodial offender management which will raise the profile of offender management. A new Head of OMU Delivery is being introduced with a remit for quality of work within OMU. They will provide the strategic view of offender management to	Director	Completed and ongoing



			the Senior Management Team. As part of the changes, prison Offender Managers, who will replace the offender supervisor role, will be resourced for one to one work where this is identified as a need.		
	Interventions				
5.34	A strategy should be developed for delivering specific offence-focused work to sex offenders, including improved access to accredited programmes and the provision of alternative opportunities for those assessed as unsuitable. (4.33)	Not Agreed	<p>Prisoners arriving at HMP Oakwood are expected to arrive having completed Sex Offender Focused work at one of the sending establishments. It is not in the remit of HMP Oakwood's contract to carry out assessments of suitability for offence focused work for Sex Offences.</p> <p>The establishment will take reasonable steps to transfer any prisoners to suitable alternative establishments that provide appropriate interventions not available at HMP Oakwood.</p>	Director	

<i>Recommendations</i>	
Agreed	31
Partly agreed	1
Not agreed	2
Total	34

