

Action Plan: HMP Garth

Action Plan Submitted 28th June 2019

A Response to the HMIP Inspection 17<sup>th</sup> December 2018 –18<sup>th</sup> January 2019

Report Published 9th May 2019

## 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, Community Rehabilitation Companies (CRCs) and youth offending services 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 <b>mus</b> t 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 GARTH

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	Main recommendations to the Governor				
5.1	The prison should be made safer through significant reductions in the number	Agreed	The number of searches carried out by the Dedicated Search Team (DST) has increased to include out of hours and night searching.	Governor	Completed and ongoing
	and seriousness of violent incidents. (S43)		More dynamic covert intelligence processes will be introduced and embedded to ensure a proactive response to risk.	Governor	September 2019
			Greater scrutiny and sharing of information regarding the most violent and disruptive prisoners will be carried out at the morning operations meeting to alert colleagues to those prisoners posing the greatest risk to others. This will include sharing of scores from the Anvil safety diagnostic tool to ensure that prisoners are identified appropriately and colleagues have a level of understanding in relation to their propensity for violence. Monitoring of the violence data will be further scrutinised at the Population Management Meeting and Senior Management Team to ensure there is balance in terms of those scoring in higher levels of risk.	Governor	July 2019
			There is now greater oversight of difficult and violent prisoners which is achieved through the multi-disciplinary complex case management process.	Governor	Completed and ongoing
			A violence reduction summit will be undertaken to consult key stakeholders, including prisoners, to identify drivers of violence in a custodial setting.	Governor	September 2019
			A review will be undertaken of the supervision of prisoners. This will include the use of Closed Circuit Television (CCTV), patrol staffing and current and proposed prisoner location.	Governor	September 2019

			Mediation between prisoners has been implemented and ongoing support for trained staff and prisoner mediators is being developed.	Governor	Completed and ongoing
5.2	The availability of illicit drugs and associated debt, violence and victimisation	Agreed	All mail entering the prison is now being tested with specialist equipment to reduce the amount of illicit substances entering the prison via correspondence.	Governor	Completed and ongoing
	should be reduced significantly. (S44)		There has been a physical security measure upgrade to the exercise yard netting on E wing to prevent items being thrown into and collected by prisoners on the yard.	Governor	Completed and ongoing
			Physical security upgrades including CCTV, improved visits furniture and increased perimeter patrols have been undertaken and are continuing.	Governor	December 2019
			Evidence gathering via CCTV and Body Worn Video Cameras (BWVC) is now overseen by the Dedicated Search Team (DST) to maximise prosecutions where prisoners have been involved in violent incidents.	Governor	Completed and ongoing
			Exploration of best practice in relation to debt management will be undertaken to inform a local policy.	Governor	October 2019
			Challenge Support Intervention Plans (CSIP) which were not previously used will now be utilised to support victims of violence.	Governor	July 2019
			Greater use of trends analysis will be undertaken to better understand the dynamic risks within HMP Garth, this will include use of the violence diagnostic tool in a more proactive way by ensuring that Safer Custody colleagues provide a commentary on trends which can be shared with all staff at HMP Garth through the Operational Morning Meeting.	Governor	July 2019
5.3	Prisoners should be able to access all hospital and primary care services within community-equivalent waiting times. (S45)	Agreed	All internal waiting times have significantly improved and are now in line with community equivalent waiting times. This is due to external agencies attending the establishment on a more regular basis including improved GP provision. Waiting times will continue to be monitored through Health and Justice Indicator Performance (HJIPs) measures by the Commissioner, Governor and Head of Healthcare.	Director of Primary Health Provider NHS	Completed and ongoing

5.4	A robust risk management plan for release should be developed in conjunction with the community-based offender manager. It should include a confirmation of the MAPPA management level. (S46)	Agreed	Prisoner cases subject to release planning are now referred to the Interdepartmental Risk Management Team (IRMT) at the seven month point prior to release. The Offender Supervisor (OS) presents the profile document, this covers an overview of the prisoner and the risks they pose and who to, and what key actions have been completed to assist in release planning to date. The Offender Manager (OM) will be invited to attend the IRMT in person or via telephone conference facility. The OS will summarise the profile to the IRMT and the OM will contribute to the meeting with regards to the prisoner's release plans and Multi Agency Public Protection Arrangements (MAPPA) management levels. Risk management actions are set at this meeting and robustly reviewed at the IRMT four month prior to release to ensure all set actions are complete including MAPPA levels.	Governor	Completed and ongoing
			Under implementation of the Offender management in Custody (OMiC) model from September 2019 the Prison Offender Manager (POM) will be required to complete the MAPPA F prison contribution form. The Community Offender Manager (COM) will then be responsible for completing the risk management plan with the POM. A new criterion under the OMiC model will indicate at what stage this process will commence dependent upon the status of the prisoner. A hand-over meeting will then take place involving the prisoner, POM, COM and Key worker. After this meeting the COM becomes responsible for the case with the POM providing support until release.	Safety Rehabilitation Directorate Governor	September 2019
	Recommendations to HMPPS				
	Categorisation and transfers				
5.5	Prisoners achieving recategorisation should be transferred promptly. (4.39)	Partly agreed	This recommendation is partly agreed as matters relating to prison transfers are agreed between sending and receiving prisons. However, receiving prisons are under no obligation to accept a re-categorised prisoner from HMP Garth and may refuse to accept them on the grounds of criteria or individual risks or circumstances. The Head of Offender Management Unit (OMU) prioritises prisoners for transfer in order of time since re-categorisation and individual circumstances are considered as appropriate. Good links with Population Management Unit (PMU) have been developed and all allocated transfer spaces	Governor	Completed and ongoing

			are filled when provided. Whilst work is underway nationally to improve transfer opportunities for prisoners convicted of sexual offences these are currently limited and this is challenging due to National population pressures. Progress is mapped weekly by the Prison Group Director.		
	Release planning				
5.6	Prisoners should be transferred to the appropriate resettlement prison three months before their release. (4.54)	Partly agreed	This recommendation is partly agreed as HMPPS remains committed to, wherever possible, releasing prisoners from a resettlement prison (which may also be an open prison, rather than necessarily a local prison) allocated to their 'home' Community Rehabilitation Company (CRC). Progressive transfers of prisoners are however subject to space in the appropriate part of the prison estate becoming available. The speed of transfers reflects this constraint. Consequently, there may be occasions where a prisoner starts their resettlement journey in a non-resettlement establishment. HMPPS headquarters does however endeavour to book transport for prisoner transfers in a timely fashion once the appropriate spaces are available.	Director of Prison Estate Transformation Programme (PETP)	Completed & Ongoing
			The Head of OMU prioritises prisoners for transfer six months prior to release to arrange local discharge. There continue to be a small number of men released from HMP Garth through resettlement prisons refusing to accept them due to security issues. This has been acknowledged nationally and provision is planned for through the gate services to commence in Spring 2019. This will provide some resettlement opportunities for this small cohort of prisoners which is not currently available. In addition, where establishments refuse to accept prisoners due for local release this will be escalated through the Long Term High Security Estate (LTHSE) population manager and Group Director.	Governor	July 2019
	Recommendations				
	Early days in custody				
5.7	All newly arrived prisoners should be offered the chance to talk to a Listener	Agreed	A trained Listener will be recruited as the reception orderly.  A review of induction provision has been undertaken and the outcome has concluded a bespoke induction unit should be created. A Listener will reside on	Governor	August 2019 September 2019

	before being locked up on their first night. (1.11)		the unit providing improved access for all newly received prisoners. The move to a bespoke induction unit will be included in the population move which is scheduled to take place in September 2019.		
	Managing behaviour				
5.8	Disciplinary hearings should be dealt with promptly. (1.26)	Agreed	A sessional adjudicator has been employed to reduce the backlog of remanded adjudications.  A review of the scheduling of adjudications will be undertaken by the end of May 2019 to ascertain where the specific issues are occurring and causing delays in adjudication hearings. Meanwhile some remedial action has already been undertaken to speed up processes. This has included a smaller number of colleagues coordinating adjudications to ensure there is improved planning. Access has been granted to the HMPPS staff detailing system INVISION to ensure that colleagues are available for adjudication hearings and they are not unnecessarily adjourned. A greater attention has been placed on natural justice to ensure the focus is around the circumstances relating to the delay rather than a six-week measure.	Governor	Completed and ongoing September 2019
5.9	The segregation regime for longer-stay prisoners should include some purposeful activity. (1.37)	Agreed	A review of the provision for activities within the segregation unit will be undertaken by June 2019. These plans will include consideration of an increase in access to education provision and converting some cellular accommodation into activity rooms.	Governor	December 2019
5.10	Assessments to determine the number of officers needed to unlock prisoners should be carried out every day. (1.38)	Agreed	Supervising officers now undertake a daily review to determine the risk posed by an individual prisoner who has been the subject of increased staff supervision when being unlocked. Reviews and the appropriate level of staff required to unlock a prisoner are recorded on the HMPPS Information technology (IT) platform PNomis. A quality assurance check is undertaken weekly by the Custodial Manager.	Governor	Completed and ongoing
	Safeguarding				

5.11	The use of the constant observation cell in segregation should cease. (1.57, repeated recommendation 1.29)	Not agreed	This recommendation is not agreed. Due to operational reasons HMP Garth have retained one of the previous two constant observation cells in segregation. Occasional extreme acts of violence by prisoners also subject to monitoring under Assessment Care in Custody and Teamwork (ACCT) have demonstrated there is a need for a constant supervision cell to manage these most disruptive, but also most vulnerable prisoners in a secure environment. However, this provision is only used in the most extreme of circumstances.		
	Staff-prisoner relationships				
5.12	All staff should consistently enforce the rules and prisoners who break them should be challenged and their behaviour addressed. (2.3)	Agreed	Expected standards of prisoner behaviour and local rules will be integrated into HMP Garth's prisoner induction process. Prisoner adherence to local rules and staff challenge of rule infringements will be overseen by wing supervisors and managers through daily observations and strengthened through Staff Performance and Development Record (SPDR) objectives. Assurance will be provided through bi-lateral staff meetings which will be scrutinised by Heads of function.  The importance of addressing low level rule breaking will be reviewed by the rehabilitative culture committee to ensure that rules are procedurally just and are applied consistently.  A review of the Incentives and Earned Privileges policy will be undertaken to incorporate procedural justice.	Governor	October 2019  August 2019  September 2019
	Daily life				
5.13	More sophisticated consultation about the food provided should be undertaken at regular intervals and steps taken as a result to improve prisoners' perceptions. (2.15)	Agreed	HMP Garth will consult with the prisoner council to explore ways in which food quality and variety can be improved. There will be a bi-annual food survey which will be published with progress being measured and themes identified acted upon. This will be monitored by the Head of Residence through bi-lateral meetings with the catering manager.	Governor	September 2019
5.14	The applications process should be improved – it should include the	Agreed	HMP Garth will undertake a review of the current applications process in consultation with Prisoner information desk (PID) representatives. This will include the development and implementation of a tracking system. The review	Governor	December 2019

	introduction of a system to track and quality assure responses. (2.21)		will further consider and introduce a process for management oversight of the applications system which will be monitored through bi-lateral meetings between the Head of Residence and wing managers to assess progress and performance of the system.		
	Equality, diversity and faith				
5.15	All prisoners with protected characteristics should have a support forum and access to external specialist agencies. (2.38)	Agreed	Protected characteristic groups without consultation forums have been identified and plans to improve support are progressing. This includes a plan for a meeting venue for prisoners who are over 55 years of age and those who are disabled. A timetable of regular consultation groups will be established and communicated.	Governor	December 2019
	openanot againates. (2.00)		Third sector organisations are being approached to provide guidance and support to specific prisoner protected characteristics groups within the prison in particular, but not exclusively those prisoners in groups including foreign nationals, young adults and transgender prisoners.	Governor	September 2019
			Prisoner equalities representatives will receive accredited training which will enable them to support protected characteristic groups consistently.	Governor	September 2019
5.16	Interpretation services should be better used across the prison to ensure that all needs are met.	Agreed	Staff awareness training of interpretation services is continuing on a rolling programme throughout the prison through equalities awareness roadshow presentations.	Governor	December 2019
	(2.39)		Signage informing prisoners and staff about access to the interpretation service provided will be displayed on wing notice boards throughout the prison to raise awareness.	Governor	September 2019
			An increased number of staff and prisoner equalities representatives will be trained to increase the delivery of awareness of the interpretation service.	Governor	September 2019
			A leaflet outlining the availability of interpretation services will be produced in a range of the most common languages and distributed to all key workers who will be able to guide and advise prisoners about the service.	Governor	September 2019

	Health, well-being and social care				
5.17	All health and substance use service providers should contribute to a single patient record to ensure relevant information is shared effectively. (2.57)	Agreed	The psycho social substance misuse service at HMP Garth will be live with System One from the 1st May 2019. This will allow all providers access to a single medical health information sharing platform. This will be overseen by Greater Manchester Mental Health (GMMH) substance misuse lead. A Standard Operating Procedure (SOP) is being written to support the system.	Director of Primary Health Provider Greater Manchester Mental Health NHS Foundation Trust, Phoenix Futures	Complete & Ongoing
5.18	All prisoners should be able to wait in a suitable waiting room that provides a respectful and safe environment. (2.58)	Not Agreed	This recommendation is not agreed. Several previous funding bids to convert current accommodation in healthcare to a more suitable waiting room have not been successful on affordability grounds. There is at the present time no ability to improve the room further in its present position and prohibitive costs prevent a relocation. Further bids for funding will be submitted if funds become available however there is currently no likelihood of this and therefore the recommendation cannot be agreed.	Governor	
5.19	Discipline staff should provide the health care department with adequate support so that a safe environment is maintained. (2.59)	Agreed	A re-profile of the prison is being undertaken in May 2019. Changes to staffing profiles, duties and regime commitments are likely to be implemented in September 2019 because of this exercise. Stipulated within the terms of reference for the re-profile is the identification of a need for additional resources to provide operational supervision within the healthcare environment.	Governor	September 2019
5.20	There should be a 'whole- prison' strategy to promoting health and well- being. (2.62)	Agreed	The Head of Healthcare is developing a health and well-being strategy which will include all relevant stakeholders. There is a current recruitment campaign for a dedicated health promotion practitioner.	Director of Primary Health Provider	September 2019
			Patient information in leaflet format regarding health promotion will be made available to prisoners in a number of other languages.	Director of Primary Health Provider	July 2019
5.21	An updated memorandum of understanding between all key stakeholders and regular meetings to monitor the provision	Agreed	The Head of Healthcare is writing an updated memorandum of understanding between all key stakeholders. A monthly meeting between the social care provider (Lancashire County Council) and the primary health provider is now in place to discuss all aspects of the provision and governance of care for men who	Director of Primary Health Provider	July 2019

	should be in place to ensure that prisoners receive a good level of social care. (2.72)		require it at HMP Garth. All aspects of social care delivery will be measured at the health contract meeting.		
5.22	All discipline officers should receive mental health awareness training, to enable them to recognise and support prisoners with mental health problems. (2.80, repeated recommendation 2.81)	Agreed	The new Suicide and Self Harm training being rolled out across Her Majesties Prison and Probation Service (HMPPS) is mandatory for all staff. Module six is specifically related to mental health awareness. All discipline staff will receive this training in the next 12 months and will be better able to recognise and support prisoners with mental health problems.	Governor	March 2020
5.23	Transfers to hospital under the Mental Health Act should take place within the Department of Health's established guidelines. (2.81)	Not agreed	This recommendation is not 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 mental health hospitals and other related issues.  HMP Garth cannot commit to transfer within Department of Health guidelines ('The Prison Transfer and Remission Guidance' published by the Department of Health in 2011), which in any event is not agreed by NHS England. NHS England guidance, published in March 2018, sets out timescales that consider clinical urgency and need. The health care provider and NHS England Health and Justice, and NHS England Specialised Commissioning, continue to robustly manage this challenging pathway.		
5.24	Appropriate options for clinical treatment should be available in line with national clinical guidance. (2.89)	Agreed	Greater Manchester Mental Health (GMMH) trust will explore and implement alternative available options for clinical treatments in relation to substance misuse at Garth in addition to methadone which meet national guidelines. This will consider the use of prolonged-release injection treatments which are currently being trialled. These treatments would provide greater service user choice, assist in reducing diversion improving patient safety and supporting rehabilitation.	Director of Greater Manchester Mental Health NHS	December 2019

5.25	The TC should have an operating policy and appropriately trained dedicated officers should support the ethos of the unit. (2.90)	Agreed	The operating policy has been requested from Phoenix Futures who operate the Therapeutic Community (TC) to provide clarity of delivery. Meetings have taken place with stakeholders to review the provision and determine if the current model is suitable to meet the needs of the population at HMP Garth. The future model will include a multi-disciplinary approach including dedicated appropriately trained officers.	Governor Director of Greater Manchester Mental Health NHS Phoenix futures	December 2019
5.26	Medicine administration rounds should be supported in all areas by adequate officer supervision. (2.95)	Agreed	The provision of supervising staff for medicine administration in all areas of the prison is included in the terms of reference for the staff re-profile and population review which is planned for implementation in September 2019.	Governor	September 2019
5.27	Robust governance arrangements should be embedded and involve key stakeholders to ensure oversight of medicine management and prescribing practice is effective. (2.96)	Agreed	Monthly medicines management meetings are now taking place. A Clinical Pharmacist has commenced in post who is a prescriber. He will be carrying out medication review clinics and, he will be involved in prescribing at reception and on transfer as well as looking at repeat prescribing including medications prescribed by when patients attend outpatients or return from a hospital admission. His work will be supported by the Clinical Director who provides professional oversight to the General Practitioner (GP).  The minutes of the medicines management meeting are received and reviewed and these are discussed in conjunction with the risk register, incidents and complaints and so information regarding medicines management is triangulated to ensure there are no themes or concerns which are not being managed.  Monthly medicine management meetings are now taking place. These meetings are attended by all relevant stakeholders and the minutes are reviewed by the partnership Quality Governance, Finance Oversight Group. Additionally, there are scheduled Multi-Disciplinary Team (MDT) meetings every two weeks to consider prescribing decisions about changing patients' medication who are on controlled drugs. A pharmacist has recently been appointed who has oversight of medicine management and provides assurance of effective prescribing to the Head of Healthcare through bi-lateral meetings.	Director of Primary Health Provider	Completed and ongoing
	Time out of cell				
5.28	Prisoners should not be routinely locked behind	Agreed	A review of all activity places will be undertaken through a core day review project. This will ensure alignment of activities, population, needs and security	Governor	December 2019

	their cell doors during the core working day. (3.9)		banding. Terms of reference for this work will be issued in July 2019 with recommendations planned for implementation by September 2019.	0	D
			A recent successful bid for additional dental provision will allow for routine examinations to take place in the activities area which will reduce the confinement of those prisoners' awaiting appointments.	Governor	December 2019
			A "walk-in centre" for health triage will also be located in the activities centre by December 2019, this again will reduce the need for prisoners to be confined to their cells whilst waiting to be seen by healthcare colleagues.	Governor	December 2019
5.29	Library closures should be addressed to ensure all prisoners have access at least once a week. (3.10)	Agreed	A review of library services provision and access will be undertaken to explore whether there is a more suitable location to enable improved access. The review to be completed by September 2019 and agreed recommendations implemented by December 2019.	Governor	December 2019
	Education, skills and work activities				
5.30	Prison and education managers should ensure that prisoners attend education, training and work sessions regularly and on time. (3.21)	Agreed	A review of the role of the current regime enabler role (a supervising officer whose task is to ensure the regime runs effectively) has been undertaken and proposals made which include options for maximising attendance whilst ensuring the core day is adhered to. Relocating the enabler role to within the activities complex is part of the proposals. Progress will be measured at the morning operations meeting to ensure adherence to core day timings. Progress against attendance at work targets will be monitored through the weekly performance management meeting.	Governor Director Milton Keynes College	September 2019
5.31	Wing workers should have sufficient work to keep them fully occupied. (3.22)	Agreed	A review of wing based activity is being undertaken by the activities hub in conjunction with the Head of Residence. This review will ensure that there is sufficient meaningful work and consistency across the residential function.	Governor	September 2019
5.32	Teachers should challenge the most able prisoners so they can make more rapid progress. (3.31)	Agreed	Individual learning plans will set specific stretching targets for the identified more able prisoners. This will be overseen and quality checked by the Head of Learning and Skills (HOLS.)	Director Milton Keynes College	December 2019

5.33	Prisoners should receive effective developmental feedback to help them improve the quality of their work. (3.32)	Agreed	Workshop and education appraisal reviews will be implemented to ensure that HMP Garth is able to measure prisoner's development needs and improve work quality. Quality assurance will be undertaken by the Industrial manger and HOLS.	Governor Director Milton Keynes College	December 2019
5.34	Prisoners with additional support needs should receive effective support during lessons to ensure they progress. (3.33)	Agreed	The new Prison Education Framework which enables Governors to have more autonomy over education provision will enable those identified as requiring it to be provided with alternative support and provision to ensure progress. This will be overseen and quality checked by the HOLS.	Governor Director Milton Keynes College	December 2019
5.35	Instructors and work supervisors should ensure that prisoners improve their English and maths skills in prison work. (3.40)	Agreed	The provision of functional skills will be at the core of all work. This will include accredited units covering numeracy, literacy and communication in the work place. Standardised work and education notices will be displayed in different formats (including pictorial) throughout the establishment to encourage participation in improving functional skills. This will be overseen and quality checked by the HOLS.	Governor	December 2019
5.36	The number of accredited qualifications available for prisoners in vocational training and work should be increased. (3.45)	Agreed	The current offender needs analysis will be used to assist in prioritising and increasing the number of accredited vocational qualifications. These will also be aligned with labour market information. This will be overseen and quality checked by the HOLS.	Governor Director Milton Keynes College	December 2019
5.37	Prison and education managers should ensure that more prisoners achieve full qualifications, particularly in English and maths. (3.46)	Agreed	The local teacher quality management plan and monthly contractual meeting will identify enrolment outcomes and achievements. Emphasis will be given to more prisoners achieving full qualifications in English and mathematics. This will be overseen and quality checked by the HOLS.	Governor Director Milton Keynes College	September 2019
	Children and families and contact with the outside world				
5.38	Visits should start on time. (4.9)	Agreed	The implementation of bio-metrics to facilitate prisoners wearing their own clothes on visits has initially impacted on the entry timings for visitors. Additional staffing resource has now been dedicated to expediting the registration process and therefore improve access times.	Governor	Completed and ongoing

			A review of prisoner movement to visits is being undertaken in conjunction with the staff re-profile which is due for implementation in September. This is intended to ensure that prisoners can access the visits hall at the earliest opportunity before movement to activities allowing visits to start promptly.	Governor	September 2019
5.39	The visits booking system, including the telephone booking line, should be reviewed to ensure it is effective. (4.10)	Agreed	A review of the opening times of visits booking via telephone and emails is being undertaken to ascertain if the current provision needs to be increased. If the conclusions of the review are that these services require further resource this will form part of the staff re-profile exercise which is being implemented in September 2019.	Governor	September 2019
5.40	Prisoners' access to visits should not be linked to their IEP level. (4.11)	Not agreed	This recommendation is not agreed as violence and drugs are two key areas that HMP Garth is trying to reduce. Part of HMP Garths' local policy on measures includes reducing the time prisoners on the basic privilege level are allowed on visits in comparison to other privilege levels. The impact of this means that families challenge the anti-social behaviour of prisoners which supports our violence and drug strategies in acting as a deterrent. This is also in accordance with Prison Service Instruction (PSI) 30/2013 Incentives and Earned privileges policy where visits are a key earnable privilege.		
	Reducing risk, rehabilitation and progression				
.41	All prisoners should have an up-to-date offender assessment system (OASys) assessment and a high-quality sentence plan which are reviewed following a significant change in the prisoner's situation. (4.24, repeated recommendation 4.10)	Agreed	The Offender Management in Custody Model (OMiC) will address the national issue in respect of initial OASys and when it's appropriate to review OASys when there has been a significant event. Once new Prison Offender Managers (POMs) are recruited during 2019 the OASys will be completed at HMP Garth and supervised by the Senior Probation Officer (SPO.) This will mean that all prisoners at HMP Garth will have an up-to-date OASys which will be reviewed following a significant change in the prisoner's situation. The implementation of OMiC stage two will carry on throughout 2019 with expectation of full recruitment of POMs anticipated by September 2019.	Governor	September 2019
5.42	The frequency and type of contact with offender supervisors should be	Agreed	The cross deployment of prison discipline staff within the OMU inevitably impacts on their capacity to proactively see prisoners. With the implementation of OMiC there will be more Probation staff and contact levels will improve	Governor	September 2019

	based on the prisoner's level of risk and need. It should provide meaningful engagement and encouragement to progress, alongside appropriate offence-focused work. (4.25, repeated recommendation 4.11)		including meaningful engagement and encouragement to progress. Under OMiC POMs will work closely with Key Workers to ensure regular contact and collaborative work to address the prisoner's sentence plan objectives.  Meetings and actions directed from the Interdepartmental Risk Management Team (IRMT) are driving greater contact between Offender Supervisors and prisoners prior to release.  The implementation of OMiC stage two will carry on throughout 2019 with anticipation of full recruitment of POMs expected by September 2019.	Governor	Completed and ongoing September 2019
	Public protection				
5.43	Offender supervisors should be in regular contact with community-based offender managers to share information about ongoing risk of harm. In the months leading up to release they should confirm the risk management plan, including the most appropriate MAPPA management level. (4.35)	Agreed	Cases come into the IRMT at the seven months prior to release point. The new process is that the Offender Supervisor (OS) will now present the profile document. This covers an overview of the prisoner and the risks they pose and who to, and what key actions have been completed to assist in release planning to date. The community Offender Manager (OM) will be invited to attend the IRMT in person or through teleconferencing. Any concerns in relation to levels of contact or release planning will be escalated to the community Senior Probation Officer (SPO) by the prison SPO. The OS will summarise the profile to the IRMT and the OM will contribute to the meeting in respect of what the plans are in regards the prisoners release and Multi Agency Public Protection Arrangements (MAPPA) management levels. Risk management actions incorporating public protection concerns are set at this meeting, shared with relevant agencies and will now be robustly reviewed at the IRMT four months prior to release stage to ensure all set actions are followed up and complete including MAPPA levels.	Governor	Completed and ongoing
			After September 2019 under OMiC the COM will be assigned prisoner cases dependent on status. Early Assignment Cases (EAC) will be 15 months and determinate sentence cases 7.5 months before release. Indeterminate Sentence Prisoners (ISP) 8 months before the parole window. At this point the COM, POM, Key worker and prisoner will meet and the COM will become the responsible officer. The POM will continue to support through sharing information and matters about risk ahead of release.	Safety Rehabilitation Directorate Governor	September 2019

Recommendations	
Agreed	37
Partly Agreed	2
Not Agreed	4
Total	43