



HM Prison &  
Probation Service

Action Plan: HMP Swaleside

Action Plan Submitted 8 July 2019

A Response to the HMIP Inspection 3 – 13 December 2019

Report Published 8 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>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.
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ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMP SWALESIDE

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	<b>Main recommendation</b>				
	<b>To HMPPS</b>				
5.1	HMPPS and the prison should develop a strategy that reduces the level of harm presented by prisoners convicted of a sexual offence; progresses them through their sentence; and protects the public during custody and on release. (S43)	Agreed	<p>A policy and strategy will be developed and published to encompass the risk specifically presented by sex offenders. This will be managed through a dedicated action plan which will be produced by the Head of Reducing Reoffending and the Head of Psychology.</p> <p>HMP Swaleside will reduce risk by:</p> <ul style="list-style-type: none"> <li>• Enabling transfers, where appropriate interventions are not available, for those convicted of sexual offending to other parts of the Long Term High Security Estate (LTHSE) that can offer appropriate interventions to address risks of reoffending. This will redress the population balance of those wishing to address their risks against those that deny their offences and choose not to engage with risk reduction measures.</li> <li>• Incentivising motivation and engagement with sentence progression by ensuring the benefits of engagement are realised by prisoners through Key Workers who are officers that will ensure all prisoners will receive regular meaningful contact, regular support and sentence guidance.</li> <li>• Introducing a dedicated Offender Supervisor to assist with risk recognition and reduction.</li> </ul> <p>7 Months prior to release (or 9 months prior to parole) prisoners' cases are handed over to the Community Offender Manager (COM) following a comprehensive discussion with the Prisoner Offender Manager (POM). At this point any outstanding needs or treatment will be discussed and included in Licence conditions upon release.</p>	<p>Governor</p> <p>Governor</p> <p>Senior Probation Officer</p>	<p>September 2019</p> <p>September 2019</p> <p>Completed</p>



	<b>Main recommendations</b>				
	<b>To the governor</b>				
5.2	Prisoners should be and feel safe. The management of violence reduction should include input from all relevant agencies; be informed by accurate data; include prompt and robust investigations; and draw existing initiatives together in a coherent way. (S39)	Agreed	<p>HMP Swaleside will further embed the weekly Safety Intervention Meeting (SIM) and Partnership Meeting chaired by the Head of Safer Custody. A terms of reference and standing agenda items on the management of violence reduction for both meetings will be published to ensure quorum attendance from Healthcare, Security and the Offender Management Unit (OMU). The Safer Custody policy and strategy will be reviewed and republished, with actions monitored through an action plan, which will include a coordinated use of a Violence Diagnostic tool (VDT) and Safety Diagnostic Tool (SDT), the Custodial Performance Tool (CPT) and use of the Incident Reporting System (IRS).</p> <p>A VDT and SDT has been introduced and these are used to measure and provide analysis on assaults over daily/weekly and monthly periods, which will be discussed at the SIM and inform the level of investigation needed to address these incidents, which will be led by the Head of Safer Custody.</p> <p>Safer Custody Leads will ensure the VDT will be used in conjunction with the CPT and the IRS, where violent incidents are reported and uploaded onto a database and further analysed in order to identify interventions and processes (such as activity bans, Incentives and Earned Privileges scheme (IEP), more highly supervised education in the Day Centre) for those using violence and outreach services to victims.</p> <p>Reductions in violent incidents will be monitored throughout 2019/20 and the Action Plan revisited in 2020 to update and revisit actions where appropriate.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>September 2019</p> <p>Completed</p> <p>September 2019</p> <p>May 2020</p>
5.3	Special accommodation should only be used in extreme circumstances and as a last resort. It should always be properly authorised and justified, and prisoners should be returned to normal	Agreed	<p>A Notice to Staff will be published to establish the legitimate use of special accommodation and reinforce the requirement for the Duty Governor to complete an algorithm and justifiable approval for all uses of special accommodation. All instances will be Quality Assured (QA) by the Deputy Head of Safer Custody and the Healthcare function. The Independent Monitoring Board (IMB) and Deputy Governor/Governor will be informed of every use of Special Accommodation.</p>	Governor	Completed



	conditions as soon as possible. The practice of routinely stripping prisoners of their clothing should cease. (S40)		<p>Prisoners are no longer routinely left without their clothing and all those placed in special accommodation are offered decent, clean clothing (such as underwear, t-shirts, jogging bottoms).</p> <p>In order to manage those in special accommodation back to ordinary location, each prisoner will be reviewed on a case-by-case basis resulting in a bespoke management process, as some may need to progress to the segregation unit before returning to ordinary location whereas some may need to follow the regime of the highly supervised prison Day Centre, where ongoing progress can be assessed.</p> <p>All special accommodation cases are discussed in the Monthly Segregation Monitoring and Review Group meeting (SMARG)</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>July 2019</p> <p>Completed</p>
5.4	Prisoners should spend sufficient time out of their cells and engage in activities that support their rehabilitation. Attendance and punctuality in education, training and work should significantly improve so that they are good. (S41)	Agreed	<p>A total review of the Reducing Reoffending function has been commissioned which will include a review of all work, education and activity spaces, including attendance.</p> <p>Prisoners will participate in a formal induction process when received into HMP Swaleside which will be used to assess activity/education need and ensure appropriate activity allocations, which will be supported by individual prisoners Key Workers.</p> <p>Attendance to activity will be competitively analysed 3 times per week at the morning meeting, where managers will compare and challenge the data provided to ensure accuracy and monitor attendance against comparative sites in the LTHSE. A set of guidelines has been issued to residential managers on managing attendance as well as an unlocking and employment guide. A Custodial Manager (CM) will be specifically allocated to the Activities function, who, along the Reducing Reoffending team will use the IEP process, to support HMP Swaleside's Employment policy to incentive participation and punctuality in attending activities that support rehabilitation.</p> <p>Risk Assessments previously used to preclude some prisoners from certain activities has resulted in increases in the employment of wing cleaners, to the point where this employment has become unsustainable for HMP Swaleside, however this will be countered by a greater use of higher supervised activities (e.g. in the Day Centre), lower risk activity allocations or revisions to the pay</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>September 2019</p> <p>September 2019</p> <p>September 2019</p> <p>September 2019</p>



			policy where prisoners will earn more if they progress within better quality jobs or education. This work will be supported by Key Workers.		
5.5	Prisoners should be helped to reduce their likelihood of reoffending and their risk of harm should be managed effectively. Prisoners should have regular contact with an offender supervisor and an up-to-date OASys document to help them address their offending behaviour and ensure their progression is monitored effectively. (S42)	Partly Agreed	<p>This recommendation is Partly Agreed for Operational reasons as there are routinely around 800 high and very high risk prisoners at Swaleside requiring management by the National Probation Service (NPS).</p> <p>The majority of prisoners who arrive at Swaleside have no initial OASys or current review, which has a negative impact on time available for face to face supervision of offenders. HMP Swaleside is not currently resourced to carry out this work, however the prison continues to prioritise higher risk prisoners and to carry out as much of this work as possible. Offender Management in Custody (OMiC) case management is anticipated to be introduced at HMP Swaleside in September 2019 where prison staff Offender Supervisors (OSs) will be based in the establishment. This will see an increase in resources in the OMU leading to better coordinated rehabilitation and release planning.</p> <p>Key Workers highlight the Offender Management (OM) contact needed and arrange contact meetings, however Offender Supervisors (OSs) are available at movement times twice daily, for general advice. OSs carry out three way meetings with the Prisoner Offender Manager (POM) on a regular basis, answer applications in a prompt fashion and all prisoners are interviewed prior to parole and are supported through the parole process.</p> <p>HMP Swaleside will be increasing the number of Offender Supervisors and have plans to introduce OMU clinics on residential units. HMP Swaleside will be the last establishment to receive staffing resources, which will take place once all other establishments in Kent are fully staffed. However, HMP Swaleside is recruiting for POMS, a probation resource, on an ongoing basis as there will be projected shortages of this resource in the South East area until 2021. At the current time discussion is taking place with regard to outsourcing work to Local Delivery Units (LDUs) in Sussex and staff at HMP Chelmsford.</p> <p>As part of the LTHSE, HMP Swaleside does not have access to the Community Rehabilitation Company resource of lower risk assessment and management, but where parole is forthcoming, POM and OS contact is prioritised in order to address risks. The Senior Probation Officer allocates cases based on dynamic assessments of risk of those due for release.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Senior Probation Officer/Governor</p> <p>Senior Probation Officer</p>	<p>September 2019</p> <p>Completed</p> <p>May 2020</p> <p>Completed</p>



	<b>Recommendations</b>				
	<b>Managing behaviour</b>				
5.6	Prisoner mediators should have sufficient managerial oversight and ongoing support. (1.19)	Agreed	<p>Prisoner mediators note their own interactions and report daily to a prison officer, employed as a mediator coordinator (until September 2019 upon which this resource will be reviewed against competing priorities). The coordinator reports directly to the Head of Safer Custody who Quality Assures (QA) the mediator process and will increase the mediator provision where it recognised there is greater need. A policy for the management of the function has been drafted and published.</p> <p>Mediators receive certificated training and additional support through the Crying Sons charity, who work with those involved in gang cultures.</p>	Governor  Governor	Completed  Completed
5.7	Punishments for negative behaviour should not breach published HMPPS guidance. (1.20)	Agreed	<p>The policy for managing negative behaviour with regard to work and activity has been immediately suspended. Prisoners are no longer prevented from attending the gym for 28 days and placed onto nil pay.</p> <p>The Head of Reducing Reoffending will review local policy, checking for consistency with national guidelines, and all conflicting measures will be removed.</p>	Governor  Governor	Completed  September 2019
5.8	Adjudication standardisation procedures should identify trends, reduce the number of charges dismissed or not proceeded with, and inform local tariff guidelines. (1.24)	Agreed	<p>The Terms of Reference for the quarterly Adjudication Standardisation meeting will be reviewed, and combined with Segregation Monitoring and Review Group (SMARG) and Use of Force meetings. HMP Swaleside will use trend data for competitive analysis (analysing data from comparator prisons), and will include analysis of adjudications laid relating to prison location, specific prisoner groups/age/associations and types of offence.</p> <p>HMP Swaleside will use this analysis to inform a Rehabilitative culture and introduce Restorative Justice measures to both reduce the amount of initial adjudications laid, depending on the type of offence committed and to inform tariff guidelines, seeking alternative outcomes where appropriate.</p>	Governor  Governor	July 2019  September 2019
5.9	All segregated prisoners should have plans to help them to address the issues that caused their segregation. (1.34)	Agreed	CSIP (Challenge, Support, Intervention, Plan), an initiative launched to focus on those who pose a raised risk of being violent and works to change their behavior, has been introduced at HMP Swaleside, and working with the Psychology team and relevant partners, a case management approach has been introduced to the Care, Separation and Reintegration Unit.	Governor	Completed





			Every segregated prisoner is issued a segregation guidance document: which has been produced by psychology, and an individual, bespoke progression plan is opened for those segregated on behavioural grounds. This process embeds Key Work (KW), where individuals KW officers as well as healthcare professionals are invited to segregation case reviews and contribute to Care Maps.	Governor	Completed
	<b>Security</b>				
5.10	The supply of illicit drugs should be greatly reduced. The drug strategy should be fully embedded and senior managers should monitor its efficacy over time. (1.41)	Agreed	<p>The impact of the new Drug Strategy is yet to be embedded, but the management post leading this strategy has been confirmed for a further 12 months till March 2020. HMP Swaleside will closely monitor the effectiveness this role has in reducing the supply of illicit drugs at quarterly meetings. All drug related intelligence is now disseminated to the Drug Strategy lead, to analyse and implement disruption techniques which will include.</p> <ul style="list-style-type: none"> <li>- Local transfers around the prison.</li> <li>- Use of the Incentives and Earned Privileges (IEP) scheme.</li> <li>- Removal to the Segregation Unit under Good Order or Discipline (GOoD) rules.</li> </ul> <p>Analysis of drug supply, disruption techniques and reduction is analysed and now monitored at the Monthly Performance Assurance Review chaired by the Performance Manager.</p>	Governor	Completed
5.11	Suspicion drug testing should be reintroduced. (1.42)	Agreed	Suspicion testing has been reintroduced, with a dedicated Security Group delivering all Drug Testing.	Governor	Completed
	<b>Safeguarding</b>				
5.12	Strategic action to prevent suicide and self-harm should address the specific needs of Swaleside prisoners, take account of local trend analysis and be monitored over time against an up-to-date action plan. (1.51)	Agreed	HMP Swaleside will continue working to further embed the weekly Safety Intervention Meeting (SIM) and Partnership Meetings. A Terms of Reference for these meetings will be published to ensure quorum attendance from Healthcare, Security and the Offender Management Unit (OMU). The SIM will provide the forum by which self-harm trends and analysis is discussed, 'safe-haven' locations agreed and use of the Emotional Well-Being unit and SOS (Day Care) centre will be considered for those in need.	Governor	September 2019



			The local Safer Custody policy and strategy will be reviewed and republished, with actions monitored through an action plan.	Governor	September 2019
5.13	Actions taken in response to recommendations from the Prisons and Probation Ombudsman should be regularly reviewed, to ensure that they are embedded in practice. (1.52)	Agreed	<p>Actions made by the Prison &amp; Probation Ombudsman (PPO) will be tracked through the Business Assurance function. Compliance with these recommendations will be managed through the local assurance process, which includes discussion of actions taken in response to recommendations from the Prison and Probation Ombudsman, led by the Business Hub Manager at the Monthly Performance and Assurance Reviews, and will be Quality Assured (QA), monthly, by the Performance &amp; Assurance Manager.</p> <p>All PPO actions have been added to HMP Swaleside's Consolidated Action Plan, which is reviewed monthly, as a whole, to ensure responses are regularly revisited and assured.</p>	Governor  Governor	September 2019  July 2019
	<b>Staff-prisoner relationships</b>				
5.14	There should be visible leadership on the wings, to support inexperienced staff and model appropriate standards. (2.4)	Agreed	<p>HMP Swaleside have increased the size of the Custodial Manager (CM) group, and have introduced a new shift pattern where managers have more time in their areas at key times. HMP Swaleside has also increased resource amongst the Heads of Residence, expanding the residential senior manager group to five, including an NHS funded Head of the Psychologically Informed Planned Environment (PIPE) unit, allowing them greater time for oversight of their areas, and increasing visibility. HMP Swaleside delivers a morning briefing to all operational staff, supporting inexperienced staff by covering different topics, daily, to support knowledge of prison processes and any emerging risks.</p> <p>The impact and effectiveness of these initiatives will be monitored via the monthly assurance process and standards of performance in both managers and inexperienced staff will be assessed through the Staff Performance and Development Reporting (SPDR) system.</p>	Governor  Governor	Completed  September 2019
	<b>Daily life</b>				
5.15	Prisoners should be provided with decent and respectful living conditions. (2.12, repeated recommendation 2.7)	Agreed	<p>All prisoners at HMP Swaleside have access to showers on a daily basis. This is checked by residential management and is evidenced through the local assurance process.</p> <p>The Heads of Residential units will oversee the standards relating to wing cleaning and rubbish removal through Healthy Test leads (Operational unit staff)</p>	Governor  Governor	Completed  July 2019



			<p>as part of HMP Swaleside's decency agenda and ensure spot checks are made on the residential units twice a week.</p> <p>Some wing shower refurbishments have been completed to a high standard, Nine on A wing and Four on B wing, however at this time they have yet to be signed off as fully completed due to water pressure issues. The Facilities Management (FM) provider has analysed the system to complete a resolution to the problem, which should be completed in August 2019.</p> <p>The continuance of the shower refurbishments remains a priority for the Prison Maintenance Group (PMG) at HMP Swaleside. The team have successfully tendered the work for the remainder of B Wing and remain in a position to award the contract once / if funds are allocated. In anticipation of further work, Prison Maintenance Group (PMG) are also obtaining costs for a similar exercise for C &amp; D Wings, again subject to funding. Once funding has been agreed it is anticipated these will be completed this financial year. The existing showers remain in operation whilst works to refurbish the bathrooms is taking place. Once the new showers are ready for occupation, funding will be sought to refurbish the existing showers.</p>	<p>Government Facility Services Ltd</p> <p>Government Facility Services Ltd/PMG</p>	<p>August 2019</p> <p>March 2020</p>
5.16	Wing serveries should be well supervised, to ensure that workers are appropriately dressed, serveries are kept clean and unused food is promptly cleared away. (2.19)	Agreed	<p>A full review, including a prisoners consultation of the management of food delivery at the hot plate will be led by the Catering Manager who will also be responsible for ensuring availability of servery workers clothing, with wing staff ensuring all servery workers are appropriately dressed at the point of service.</p> <p>The Heads of Residential units will oversee the standards relating to servery cleaning and rubbish removal through Healthy Prison Test leads as part of HMP Swaleside's decency agenda and ensure spot checks are made on all residential unit serveries twice a week.</p>	<p>Governor</p> <p>Governor</p>	<p>September 2019</p> <p>July 2019</p>
5.17	There should be robust governance in place to support and manage all peer workers, including job descriptions. (2.26)	Agreed	<p>A review of the Peer Support strategy and the Prisoner Community Hub will be commissioned by the Head of Reducing Reoffending, along with how peers are managed, supported and coordinated. All Peer Worker roles, responsibilities and boundaries will be clearly identified with a job description drafted for each by the departments employing them.</p>	<p>Governor</p>	<p>September 2019</p>



5.18	The applications system should provide timely and helpful responses to prisoners and be subject to robust checks by managers. (2.27)	Agreed	The applications process will be fully reviewed, to ensure that applications are tracked and responded to in reasonable time. As part of the review, guidance will be produced to ensure that applications and complaints are differentiated and 10% of all applications will be Quality Assured, by residential management, to ensure responses, from prisoner Key Workers and other staff, are helpful and respectful.	Governor	September 2019
5.19	Regular analysis of complaints should identify patterns and trends, and systematically address prisoners' concerns. (2.28)	Agreed	Data collected from complaint submissions will be collated, and trends analysed. Findings will be discussed with the Prisoner Consultative Committee. This information will inform the overall complaints system assured by the Business Hub, who will identify patterns, trends and concerns at monthly review meetings.	Governor	September 2019
	<b>Equality, diversity and faith</b>				
5.20	The prison's equality and diversity group should meet regularly and use up-to-date analysis of outcomes for prisoners, to identify inequality and implement remedial action. (2.33)	Agreed	The Equalities Action Team (EAT) meets quarterly and is chaired by the Custodial Manager for Equalities. Data from a range of outcomes for prisoners with Protected Characteristics is collated monthly by the Equalities Team using the HMPPS Equality Monitoring Tool (EMT) and this is discussed at the EAT, meetings where analysis is produced in response to disproportionate outcomes (on IEP, Use of Force, Adjudications etc) for minority prisoner groups, which will be used to inform ongoing strategy to reduce disproportionate outcomes. Following EAT meetings, EMT data is shared with prisoner consultation groups.  A policy and strategy for the management of equality will be developed and published, with the actions tracked through a dedicated Equalities action plan.	Governor  Governor	Completed  September 2019
5.21	Prisoner carers, with appropriate training and regular staff supervision, should be reintroduced and their progress closely monitored. (2.41)	Agreed	HMP Swaleside met with Kent Social Care Service in April 2019 and established the working parameters of prisoners carrying out this type of role.  A new prisoner group of wing orderlies will be formed who will assist with non-intimate care of residents when required. Training will be provided by the prison Healthcare function, jointly with IC24, the prison's healthcare Primary Care Trust (PCT). HMP Swaleside's Safety Team will provide assurance on the welfare of those benefiting from the peer care service, through visits and completing management check lists, which will be overseen by the Head of Safety.	Governor  Governor	September 2019  September 2019



5.22	All prisoners should be able to attend corporate worship regularly and on time. (2.45, repeated recommendation 2.32)	Agreed	HMP Swaleside does not restrict access to corporate worship in any way. HMP Swaleside acknowledges that staffing issues have sometimes meant that not all prisoners could attend corporate worship sessions, however this is not a regular occurrence and has affected only a small number of prisoners. Staff detailing arrangements will be made to address the issues that have on occasions disrupted attendance and timings of corporate worship events	Governor	September 2019
	<b>Health, well-being and social care</b>				
5.23	Prison officers should ensure that health service areas, including queues for medication, are safely and effectively managed. (2.57)	Agreed	In partnership with Integrated 24 (IC24), the Healthcare provider, diversion training is currently being rolled out to all officer supervising staff at the point of delivery, who will be in attendance at medication queues to ensure the safety of those prisoners receiving medication.	Governor	September 2019
5.24	Professional telephone interpreting services should always be used for confidential consultations when a prisoner does not speak good English. Information should be available in a range of languages. (2.62)	Agreed	There is a telephone interpreting service in place that healthcare professionals and prisoners can use, in confidence, with access to a variety of languages. Staff have been made aware of the need to use these services when a prisoner does not speak or understand English well enough to understand medical consultations. A notification has been sent to staff advising them how to access this service.	Governor	Completed
5.25	The number of missed appointments should be reduced further, to ensure that patients receive prompt treatment within effective use of clinical resources. (2.72)	Agreed	Healthcare appointments are entered on P:NOMIS, a prisoner database, to ensure forthcoming appointments are known to residential officers. This is reflected on the wing daily unlock lists to inform movement officers. This is supported by appointment slips which are printed and issued to the prisoners.  A member of Healthcare follows up all non/late attendance by telephoning wing staff to inform of the appointment during both morning and afternoon sessions in order to reduce non-attendance and ensure prisoners are brought to health clinics or that missed appointments are rebooked.	IC24/Governor	Completed



5.26	Arrangements for prisoners convicted of a sexual offence attending health care appointments should be safe and respectful. (2.73)	Agreed	Discussions have commenced with the Governor to review the waiting area for sex offenders with a view to improving the current situation, however it will be scoped if the clinic times for those living on the Vulnerable Prisoner (VP) unit can be moved to a specific day/time in order that movement to Healthcare can be more timely and waiting times are greatly reduced and can be better supervised for decency and safety.	Governor	September 2019
			Health services that can be held on the VP unit will be transferred, to mitigate the need for central waiting areas in healthcare where possible. HMP Swaleside will commence a review to scope the possibility of transferring specific dental and optometry clinics to the VP wing.	Governor/IC24	September 2019
5.27	There should be sufficient escort staff available to ensure that prisoners' treatment at outside hospitals is not delayed. (2.74)	Agreed	Operational staffing has now increased at HMP Swaleside since the inspection which will have a direct correlation on the numbers of hospital appointments that are rescheduled. The Governor is working in conjunction with NHS England to plan the required staffing arrangements for escorts beyond the prisons profiled numbers.	NHS England/Governor	September 2019
			It is anticipated that telemedicine (remote diagnosis and treatment) may be used in future for some services which will potentially reduce the numbers of external appointment needed. Hospital appointments are monitored monthly and discussed at the partnership boards with Health Commissioners and Governors.	NHS England	December 2019
5.28	Patients on the in-patient unit should have access to a range of therapeutic activities to support their well-being and recovery. (2.75)	Agreed	HMP Swaleside has reviewed access to therapeutic activities in IPD (The in-patient department). Two newly resourced mental health nurses will support the therapeutic activity offering on the unit.	Governor	Completed
			Patients in the IPD unit now have access to education, gymnasium and work placements as part of their care plan. Activities such as painting, drawing, current affairs and relaxation groups are also available.	Governor	Completed
5.29	The referral pathway should ensure that all prisoners with social care needs are identified and supported. (2.77)	Agreed	The joint operational policy in relation to Adult Social Care will be revisited and updated. The criteria for social care will be better promoted for all staff working within the establishment. The reception template has been revised to identify social care needs for all new receptions.	Governor	September 2019



5.30	Prisoners should have timely access to counselling services. (2.87)	Agreed	Kent counselling services have been reviewed and under the new Mental Health contract, counselling will be provided by Oxleas at times equivalent to those in the community.	NHS England/IC24/Kent County Council/Governor	September 2019
5.31	The in-possession policy should be followed, to ensure that the prescribing of medicines is suitable for patient treatment in a secure environment, overseen by the medicines management committee. (2.102)	Agreed	A monthly report is completed by the clinical pharmacist to inform prescribers of those whose medication falls outside of the in-possession policy, and for those individuals to be reviewed for clinical need, or to move to supervised medications.  An additional pharmacy technician has been recruited to oversee medicines management and compliance issues. Prescribing data is discussed at the medicines management committee.	NHS England/IC24  NHS England/IC24	Completed  Completed
5.32	All medication that cannot be held in possession should be administered at times that ensure clinical efficacy. (2.103)	Agreed	There are now three medication times available for medicines administration to ensure clinical efficacy Those on QDS (four times a day prescribing) dosing will be dispensed medication by the night staff where applicable.	IC24	Completed
5.33	Risk assessments for in-possession medicines should be regularly reviewed and updated when a prisoner's circumstances change. (2.104)	Agreed	All prescribers have been advised of the need to review the risk assessment when there is a change of circumstances. The pharmacy technician will move all offenders on ACCT to supervised medications until reviews can be carried out. Additional pharmacy support will enable more frequent and regular reviews to be carried out.	IC24	September 2019
5.34	Prisoners requiring routine dental appointments should receive them within six weeks. (2.106)	Agreed	A dentist has been introduced for AM and PM sessions, 5 days per week, after consultation with commissioners.	Governor	September 2019
	<b>Education, skills and work activities</b>				
5.35	The English and mathematics needs of prisoners should be	Agreed	The new education contract with MK College stipulates that English and mathematics needs of prisoners will be prioritised.	Milton Keynes (MK) College/Governor	September 2019



	prioritised when allocating them to activities. (3.19)		The new provider will provide administrative support to allocate prisoners to education, which will commence upon prisoner induction into HMP Swaleside. This will be supported by individual prisoners Key Workers, where encouragement will be given through the 'Prisoner Passport' (An education journey document) process. A tiered system of allocations will also introduce minimum education levels required for each activity in any given pay band. Lower level functional skills will be embedded into industries and the education department will become a higher education facility.	Governor	September 2019
5.36	All activity spaces should be filled. (3.20)	Agreed	<p>HMP Swaleside has commenced consultation on reducing the number of allocated positions to general wing-based work in order to disincentivise such options that currently pay more than many formal activity appointments.</p> <p>HMP Swaleside will investigate centralising activity allocations in the Activities Hub, overseen by the Head of Reducing Reoffending, to avoid any conflicts with the Security function which has previously resulted in some prisoners unable to be allocated to all activities. The local prisoner pay policy will be investigated and allocation to more progressive, appropriate and meaningful activity, work or education will be incentivised through fairer pay.</p> <p>A business case has been submitted for the resource required to carry out the work required to manage centralised allocations. A dedicated resource within the Security Department has been identified to reduce the number of outstanding security risk assessments.</p>	Governor  Governor  Governor	September 2019  September 2019  Completed
5.37	All wing work should be purposeful, productive and of good quality. (3.21)	Agreed	<p>A review of all wing work has taken place and the number of prisoners employed will be reduced to realistic levels meaning those left in role will have a fuller, more purposeful and productive job.</p> <p>HMP Swaleside will review all job descriptions and local pay policy will be revised to reflect the nature and quality of the work allocated. A basic training package for all wing workers will be introduced and rolled out over the next few months. With revised job descriptions, to ensure wing based workers are productive and compacts to ensure prisoners produce a good standard of work, work will be more easily challengeable by wing staff and Key Workers through the IEP process.</p>	Governor  Governor	September 2019  July 2019





5.38	Prisoners seeking protection on B wing should have access to a broader and more suitable range of activities. (3.22)	Agreed	A new, broader curriculum will be introduced through Milton Keynes College, who will also formalise and make use of trained and employed Peer Tutors. The B wing provision is being reviewed with the plan to locate B wing workshop to a new location, increasing the work places available to them from 40 to 60. Additionally the two classroom areas will be utilised to deliver a broader range of activities.	Governor	September 2019
5.39	The range of accreditation available in training and work should be further increased. (3.23)	Agreed	The new curriculum will deliver more at higher levels of the existing accredited provision and HMP Swaleside will be introducing a multi-skills workshop, radio, multi-media, coding, barbering, history and literature, debating and music activities within the new Prison Education Framework (PEF) which will offer national Management Information System (MIS) agreed data and further adult education training at Level 3. Additionally HMP Swaleside will provide a flexible provision based on emerging needs of the population. Expansion into waste management and engineering will also provide additional outlets for accreditation.	Governor	September 2019
5.40	Prisoners should develop their employment-related skills to a good standard, even when they are not allocated to purposeful activity. (3.34)	Agreed	HMP Swaleside will investigate the development of a soft skills capture document within a prisoner's personal development plan. Entries in this anticipated document will be used so that staff and Key Workers will be able to measure and challenge areas, such as poor attendance and hygiene if they start to decline. This will be monitored via the weekly meeting between prisoners and their Key Worker, and will be Quality Assured and analysed for trends by the Head of Reducing Reoffending.	Governor	September 2019
5.41	The 'portfolio of progress' should be embedded in all areas of purposeful activity, with priority given to the areas where accredited qualifications are not yet available. (3.40)	Agreed	The oversight of the Prisoner Learning Plan (PLP - A revised 'Portfolio of Progress') will be primarily the remit of the Reducing Reoffending function, but will be supported through weekly meetings with a prisoner's Key Worker.  The planned introduction of sequencing boards, in September 2019, will provide the platform by which the PLP will become embedded in all purposeful activity. Key Workers will sit on each prisoner's board and will ensure PLP goals are addressed when considering each activity allocation.	Governor	September 2019



5.42	The proportion of prisoners who achieve their functional skills qualifications should increase. (3.41)	Agreed	The new education contract will see functional skills being increased across the prison in classrooms, embedded in industries and in wing based jobs. Additionally the tiered employment working model will financially incentivise prisoners who are participating in education and open higher pay rates to those who strive to achieve more.	Governor	September 2019
			HM Swaleside will meet with MK College to scope how increases in achievements in functional skills can be monitored, meaningfully raised and Quality Assured.	Governor	July 2019
5.43	A greater proportion of prisoners should achieve qualifications in information technology, particularly at levels 1 and 2. (3.42)	Agreed	Technological qualifications will be introduced as part of the new education provision within the new Prison Education Framework (PEF) which will offer national Management Information System (MIS) agreed data and further adult education training at all levels.	Governor	September 2019
			Improvements in achievements in qualifications will be monitored at the monthly Quality Improvement Group (QIG) meeting.	Governor	September 2019
	<b>Children and families and contact with the outside world</b>				
5.44	Visits should start at the advertised times. (4.10, repeated recommendation 4.39)	Agreed	To assist with the timely start of visits sessions, HMP Swaleside have introduced an extra Custodial Manager (CM) into the Operations Group, with a focus on ensuring the movement of prisoners to visits is timely.	Governor	Completed
			Collectively, the prison will work to reduce 'regime drift', and coordinate prisoners attending visits on time, however HMP Swaleside confirms that the window for visits is wider than the allocated time for each visit, so visits are not shortened if they do not start at the advertised time.	Governor	September 2019
	<b>Reducing risk, rehabilitation and progression</b>				



5.45	Work to reduce reoffending should be informed by a needs analysis based on an accurate, up-to-date range of data. Progress should be routinely measured against an action plan by senior managers. (4.21)	Agreed	The out of date needs analysis will be rewritten using contemporaneous OASys (a prisoner risk database) data, which is continuously updated. This will form part of a full review of the Reducing Reoffending function, with involvement from HMP Swaleside's local psychology team. The findings will form part of the new policy, strategy and needs analysis, and will be supported by a dedicated action plan, the progress of which will be driven forward by the Head of Reducing Reoffending.	Governor	September 2019
	<b>Public protection</b>				
5.46	Monthly public protection meetings should routinely consider all high-risk prisoners and those due for release who will potentially be subject to multi-agency public protection arrangements (MAPPAs) in the community. MAPPAs management levels should be confirmed far enough ahead of release to ensure that effective supervision arrangements can be implemented. (4.26)	Agreed	MAPPAs levels are requested for all MAPPAs eligible offenders upon reception at HMP Swaleside. The prison's new process is to escalate through the Senior Probation Officer (SPO) any delays in response from the NPS.  7 Months prior to release (or 9 months prior to parole) cases are handed over to the Community Offender Manager (COM) following a comprehensive discussion with the Prisoner Offender Manager (POM). At this point all risks will be outlined and the MAPPAs level will be reconfirmed. This will ensure there is enough time to ensure a robust release risk management plan can be completed.	National Probation Service/Senior Probation Officer  Senior Probation Officer	Completed  Completed
5.47	Child contact restrictions should be implemented and reviewed in accordance with the latest HMPPS guidance. (4.27)	Agreed	This recommendation has been identified within the Public Protection meetings and processes have already been implemented to instigate yearly reviews at the point of recategorisation.  HMP Swaleside is now fully compliant with this recommendation, however without the requisite number of Offender Supervisors (OSs) in place, this has had a detrimental effect on other OS work; which will not be fully resolved until early 2021.	HMPPS/Governor  HMPPS/Governor	Completed  January 2021
	<b>Interventions</b>				



5.48	There should be enough places on accredited offending behaviour programmes to meet the needs of the population. (4.38)	Agreed	A full review and needs analysis on the provision of accredited offending behaviour programmes (OBPs) was commissioned and is now completed. There are now more places available on accredited OBPs which is sufficient for this specific population.	Governor	Completed
5.49	The prison should monitor whether prisoners have maintained their planned accommodation after release. (4.39)	Not Agreed	This recommendation is Not Agreed for commissioning and operational reasons as HMP Swaleside does not have probation 'Through the Gate' provision.  However, since the inspection, HMP Swaleside have built arrangements with local prisons with external probation monitoring facilities to ensure pathway needs are supported.  Accommodation after release will be tracked via performance monitoring (of MAPPA risk based data).	Governor  Governor	Completed  September 2019
	<b>Release planning</b>				
5.50	A trained member of staff should interview prisoners, to identify their resettlement needs. (4.46)	Partly Agreed	This recommendation is Partly Agreed as HMP Swaleside does not offer a Through the Gate resettlement provision. However, since the inspection, HMP Swaleside are no longer relying on peer interviewing from the prison Community Hub and have built arrangements with local prisons with facilities to ensure resettlement pathway needs are supported.	Governor	Completed

Recommendations	
Agreed	47
Partly Agreed	2
Not Agreed	1



<b>Total</b>	<b>50</b>
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