

Action Plan: HMP/YOI Foston Hall

Action Plan Submitted-15th August 2019

A Response to the HMIP Inspection- 4th -15th February 2019

Report Published-19th June 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 mus 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 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/YOI FOSTON HALL

| 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 the Governor | | | | |
| 5.1 | Management oversight, personal support and training should ensure that all wing staff provide | Agreed | Becoming Trauma Informed (BTI) and Five-Minute Intervention (FMI) training is now mandatory in the Womens estate for all Keyworkers. All Band 3 officers will be BTI trained by the end of December 2019. | The Governor | December 2019 |
| | prisoners with day-to-day help that is proactive and effective, reflecting the principles of trauma- informed working. (S43) | | Additionally, all other operational and non-operational staff will undertake the training once Offender Management in Custody (OMIC) has been implemented which is expected by January 2020, so full delivery of BTI for all staff will be complete by the end March 2020. | The Governor | March 2020 |
| | miorined working. (6 16) | | Management oversight to ensure the effective and supportive daily management of prisoners by staff will be achieved through the SPDR (Staff Performance and Development Record) process and regular interaction with and supervision of staff. | The Governor | Completed & ongoing |
| | | | Further support will be provided by BTI trainers who will act as 'floorwalkers' when on duty. | The Governor | March 2020 |
| | Recommendation to HM Prison and Probation Service | | | | |
| | Reintegration planning | | | | |
| 5.2 | More prisoners should have suitable and sustainable accommodation to go to | Agreed | The Government is investing £6.4m in a pilot to provide improved accommodation support for prisoners on release through a new partnership approach between prisons, Probation Providers and Local Authorities (LA) to plan, secure and sustain accommodation for prisoners | Head of Policy, Offender Accommodation; | August 2019 |

| | and their housing situation should be monitored over the first three months following release. (4.38) | | on their release. Lessons from the pilots will be used to inform the future provision of accommodation for prisoners on release from custody. The pilot will run from August 2019 until late 2022. Under the Homelessness Reduction Act 2017 prison and probation providers have a 'Duty to Refer' lack of accommodation on release to the | Reducing Reoffending Division Head of Policy, Offender | Completed |
|-----|---|--------|---|---|--------------------|
| | | | LA to provide support and avoid homelessness. There will be a review of progress and guidance October 2019. The Ministry of Justice will continue to ensure this duty is carried out. | Accommodation; Reducing Reoffending Division | |
| | | | Proposals under consideration for wider probation reform, include the introduction of intermediate performance measures relating to accommodation. These will apply to probation providers and will be at the three month point following release and upon completion of supervision. The introduction of shadow measures will start 2020/21 and become fully operational 2021/22. | Head of Policy, Offender Accommodation; Reducing Reoffending Division | April 2020 |
| | | | HMPPS are investing an additional £22m per year during the remaining Community Rehabilitation Company (CRC) contract terms to ensure the delivery of an enhanced Through the Gate (TTG) service to prisoners released from custody. The investment will support approximately 500 additional CRC staff to deliver TTG in prisons. This new specification includes the requirement that CRCs complete specific, tailored, tasks to help prisoners to secure and maintain settled accommodation, gain employment and manage debt and financial affairs. The new specification has been fully operational in most prisons since 1 April this year. | TTG - Community Interventions Business Delivery Unit, | Complete & ongoing |
| | Recommendations | | | | |
| | Early days in custody | | | | |
| 5.3 | The initial reception interview for new prisoners should be conducted in private so that sensitive matters are discussed confidentially. (1.11) | Agreed | An interview room was created in Reception following the inspection. Staff have been instructed to use the room to interview all new prisoners received at the prison. There is a robust management focus to ensure the consistent use of the room. | The Governor | Completed |

| | Safe and supportive relationships | | | | |
|-----|---|--------|---|--------------|-------------|
| 5.4 | Investigations following a violent incident should be completed on time and effective support plans for victims and meaningful targets for perpetrators should be established. (1.19) | Agreed | A Violence Reduction database linking in with the Challenge, Support and Intervention Plan (CSIP) process and Safety Strategy policy is in place to ensure that all violent incidents are investigated on time in line with policy. Investigations are completed by the wing managers and supported by the Safer Custody department. As part of this process and where required wing managers put in place clear support plans for victims and targets are set for perpetrators. The Safer Custody department monitor compliance through checking incidents recorded on operational briefings and ensuring that CSIPs have been raised for these. If slippage in reporting timescales is identified these will be will be addressed by managers and where required escalated to the Deputy Governor. | The Governor | Completed |
| | | | The violence reduction strategy has been reviewed to ensure it is responsive and supportive to the CSIP process. This provides managers with the necessary sanctions and tools to manage the behaviour of violent individuals and perpetrators through a three-stage violence reduction plan. This incorporates Incentives and Earned Privileges (IEP) reviews, monitoring booklets, violence reduction representatives and support from partner agencies. Victims are supported by the Safer Custody representatives, support documents and partner agencies. | | |
| 5.5 | The IEP scheme should be reviewed and relaunched, and robust quality assurance processes implemented. (1.20) | Agreed | The IEP policy will be reviewed to ensure prompt boards are held and there is consistency with decision making. Information about boards and appeals will be recorded on the documents within the policy and held on wings. All IEP reviews and their outcomes will be recorded on the Information technology (IT) Prison National Offender Management Information System (PNOMIS). The reviewed IEP policy will be completed in consultation with staff and prisoners. Following agreement and prior to launch of the new policy, meetings will be held with staff to explain the changes and their roles. As part of this review, the policy will mandate that prisoners must not be automatically placed on entry level. | The Governor | August 2019 |

| | Self-harm and suicide | | The policy will include a clearly defined structure and timetable for quality assurance processes to monitor and underpin delivery of IEP and ensure the required policy outputs are adhered to. | | |
|-----|--|--------|---|--------------|------------------------------|
| 5.6 | A robust analysis of data should inform a strategic plan to reduce the large number of self-harm incidents. (1.28) | Agreed | The Head of Safer Prisons will ensure that any analytical data including the Self-Harm Diagnostic Tool (SDT), is discussed at the monthly Safer Custody and weekly Support and Intervention Meetings (SIM) as an agenda item and that this analysis is recorded in the meeting minutes with actions intended to reduce the number of incidents. A strategic plan will be developed from the outcomes and trends of the SDT. The plan will be appropriately communicated to ensure staff caring for and supervising prisoners can deliver the actions and improve outcomes to reduce the prevalence of self harm behaviour. This approach will be reflected in the Safer Custody policy. Enhanced Support Services funded through the National Health service (NHS) will be introduced to provide interventions and support to the most complex and prolific prisoners who self-harm to further reduce the level of | The Governor | October 2019 September 2019 |
| | Safeguarding (protection of adults at risk) and prisoners with complex needs | | self-harming behaviour in this group. | | |
| 5.7 | The prison's nominated safeguarding manager should attend the local adult safeguarding board. (1.34) | Agreed | The Head of Offender Management Unit (OMU) now attends the Quarterly Safeguarding Meetings with the addition of the Governing Governor attending annually. | The Governor | Completed |
| | Security | | | | |
| 5.8 | Security objectives should be shared with the wider | Agreed | Security objectives are discussed and ratified and agreed at the Senior Management Team (SMT) monthly meeting and are shared monthly via global e-mail to all staff. Additionally, the objectives will be displayed in the | The Governor | Completed |

| | prison and monitored for effectiveness. (1.41) | | Trakka room which is the entrance foyer which staff pass through to collect their Keys. They will also be displayed in the Security/Administration corridor. Outcomes will be monitored through the intelligence cycle and by the Security Manager and discussions at the Security meetings. Additional investment and resource has recently been put into this area to further support the department. | | |
|------|---|--------|--|--------------|-------------|
| 5.9 | Prisoners on external escorts should only have restraints applied if an individual assessment finds they pose a relevant risk. (1.42) | Agreed | HMP YOI Foston Hall adheres to the National policy on external escorts which mandate that where a prisoner is not suitable for Release on Temporary Licence (ROTL) a security escort with restraints is required. Risk assessments are carried out and identify relevant individual prisoner risks. Restraints will only be removed where the risk assessment indicates an absence of risk, or under the specific circumstances mandated through national policy and stated within the risk assessment. If pregnant prisoners are scheduled for an external escort then the pregnant prisoner protocol is followed. Healthcare will inform the OMU of any medical appointments so that consideration can be given to either authorising Release on Temporary Licence or escorting without restraints, to those prisoners who have been categorised as suitable for open conditions. | The Governor | Completed |
| 5.10 | The prison should have more sophisticated drug detection equipment, such as X-ray machines. (1.43) | Agreed | The government has announced a £100 million investment to tackle crime in prisons. Tough airport-style security, including X-ray scanners and metal detectors, will be put into prisons across the estate to clamp down on drugs, weapons and mobile phones. Technology to detect and block mobile phones will be brought in to better identify and stop those who organise drug supply or harass victims. All prisons across the estate will benefit from the measures, with airport-style security being concentrated in the closed estate which will include HMP YOI Foston Hall. | HMPPS | April 2020 |
| | Disciplinary procedures | | | | |
| 5.11 | The prison should ensure all staff use body-worn cameras during any | Agreed | A new assurance process will be implemented to provide confidence that staff have collected Body Worn Video Cameras (BWVC) when on duty and are switching them on. Duty Managers will challenge any staff not | The Governor | August 2019 |

| | incidents involving force. (1.52) | | activating BWVC during incidents. Line managers will be informed and address this with the member of staff. | | |
|------|--|--------|---|--------------|--------------------|
| 5.12 | The prison should use information gathered from reviews to inform individual handling plans for prisoners with complex needs and only place such prisoners in special accommodation in exceptional circumstances. (1.53) | Agreed | HMP YOI Foston Hall does not have any certified special accommodation cells, there are however safer cells that have been used to appropriately manage some prisoners who need closer observation to support their needs. Behaviour support plans will be used to manage the most complex and challenging prisoners. The safer cells will only be used as a last resort in exceptional circumstances. Instances of the use of the safer cells will only be authorised by the Duty Governor or a more senior manager. All prisoners placed in a safer cell will be managed through the same protocols as that of special accommodation if deemed necessary. | The Governor | Completed |
| 5.13 | Prisoners should not be automatically segregated pending an adjudication. (1.58) | Agreed | Prisoners will not be routinely segregated ahead of an adjudication hearing. Only the Duty Governor or a more senior manager will authorise segregation before the hearing. Compliance will be monitored at the morning meeting and reviewed at the quarterly Segregation Management and Review Group (SMARG) meeting. | The Governor | Completed |
| | Residential units | | | | |
| 5.14 | The applications system should be confidential and responses and their timeliness should be monitored. (2.7) | Agreed | The application process has been re-launched. The process is now fully managed by staff rather than prisoner peer workers to ensure confidentiality. All wings have application books and applications are tracked monthly. Assurance checks have been introduced for residential managers to monitor compliance with confidentiality and that responses are suitably promptly dealt with. | The Governor | Complete & ongoing |
| | Staff-prisoner relationships | | | | |
| 5.15 | Staff should apply wing rules consistently to ensure prisoners are treated equitably. (2.11) | Agreed | Supervising wing officers will promote greater visibility of officers on wings and ensure they are demonstrating proactive daily interactions with prisoners. If managers identify staff are failing to challenge prisoners appropriately or are inconsistently applying wing rules matters will be managed through performance improvement plans. | The Governor | Complete & ongoing |

| | | | All operational staff are due to complete Five Minute Intervention (FMI) and Key Worker training by December 2019 which will further develop staff and improve interactions with prisoners. Once Keyworkers have been launched it will further support consistency across wings and improve equitable outcomes for prisoners. Residential managers will also carry out monthly assurance checks on IEP consistency. | The Governor | December 2019 |
|------|--|--|---|--------------|--------------------|
| | Equality and diversity | | | | |
| 5.16 | Diversity and equalities work should be given a higher priority across the | Agreed | The Equalities and Diversity function resources have been increased with the appointment of a band 3 administrative officer and band 7 manager. | The Governor | Completed |
| | prison, with each lead manager and department contributing to progress against the overall action plan. (2.14) | Managers are assigned as leads for each protected characteristic group with job descriptions in place. To further promote and embed a whole-prison approach, HMP YOI Fostor | The Governor | Completed | |
| | | | | The Governor | Complete & ongoing |
| | | | The attendance at the Equalities meeting has improved and there will be a drive to maintain this. The Governor or Deputy Governor now chair the bimonthly Equalities meeting. | The Governor | Complete & ongoing |
| | | | The agenda will be reviewed to ensure that the meeting is robust and provides effective discussions around equalities to further support each strand and contributes to the prison's equality action plan. | The Governor | Completed |
| | | | Prisoner led training is provided for the transgender protected characteristic, which was identified as best practice by inspectors during their visit. Additional support is also provided from the Womens Estate Regional Equalities manager which has enabled HMP YOI Foston Hall to meet all the Lammy recommendations. | The Governor | Complete & ongoing |

| 5.17 | Interpretation services should always be used when required and usage should be recorded accurately. (2.25) | Agreed | Interpretation services are used as necessary during the reception process, first night and induction, during the Basic Custody Screening (BCS) and any other interviews that take place with prisoners for whom English is not their first language or there is an inability to communicate with them meaningfully in their own language. | The Governor | Completed |
|------|---|--------|--|---------------------------|-----------------------|
| | | | HMP YOI Foston Hall has recently received "dual handsets" from Big Word interpretation services that enable three-way conversations between staff, prisoners and interpreters on office phones on residential units. These have been distributed to the appropriate areas alongside clear instructions for usage. | The Governor | Completed |
| | | | A list of contacts for independent legal advice will be collated by Offender Supervisors and provided to those prisoners who need this information. | The Governor | Completed |
| | | | All uses of interpretation services will be recorded on a spreadsheet on the shared Information Technology drive which will be available to all staff. | The Governor | August 2019 |
| | Faith and religious activity | | | | |
| 5.18 | The chaplaincy provision should always meet the needs of the population in full. (2.30) | Agreed | A new Band 7 Managing Chaplain has now been appointed. A full review of the chaplaincy provision for all faiths will be completed to ensure the needs of the population are met, including services, festivals and appropriate chaplaincy staffing. | The Governor The Governor | Completed August 2019 |
| | Health services | | | | |
| 5.19 | Cleaning schedules should be in place and monitored regularly to ensure the cleaning has been done and infection prevention standards are met. (2.49) | Agreed | A process will be agreed with the facilities management contract provider to ensure cleaning schedules are in place and records are signed and monitored to ensure cleanliness standards are being met. Deep cleaning is carried out twice a year in line with Infection Prevention Control standards. | CEO Care UK | September 2019 |

| 5.20 | All clinical staff should receive regular clinical supervision. (2.50) | Agreed | A process has been put in place to ensure all clinical staff receive regular clinical supervision. This is achieved through management supervision undertaken each month in the form of a performance one to one meeting. The month after the supervision meeting clinical supervision takes place with a nominated clinical supervisor. This can be carried out at HMP YOI Foston Hall or at an external location as appropriate. | CEO Care UK | Completed |
|------|---|---------------|---|-------------------------|---------------|
| 5.21 | A prison-wide strategy should be established to support health and wellbeing, and it should include easy access to barrier protection. (2.51) | Partly Agreed | This recommendation is partly agreed HMP YOI Foston Hall will expand the existing wellbeing strategy to develop a joint strategy including other stakeholders including health and social care, kitchen and catering. Future planned well-being developments will include a joint approach to the delivery of In- reach perinatal services to meet the Mental Health needs of pregnant women in the women's prison estate and those who have given birth up to 12 months prior to arriving at HMP Foston Hall. The strategy will be formulated as a standard agenda item on the Local HMP Foston Delivery Board Meeting and monitored quarterly. HMP YOI Foston Hall has a clear vision in respect of healthy relationships, but this does not extend to the promotion of intimate relationships. Therefore, in respect of easy access to barrier protection, the women's estate has a clear strategy around healthy relationship therefore any proactive promotion in respect of women specific barrier protection will be considered on an individual risk assessed basis to ensure the overall risk of potential harm and exploitation of prisoners is minimised. Easy and unregulated access to barrier protection would undermine this position and introduce increased risk. A joint contingency plan has been agreed which has been signed by the Governing Governor and Healthcare Provider Care UK, in respect of the control of infectious diseases. | Governor CEO Care UK | December 2019 |
| 5.22 | Health-related peer worker activities should not compromise patient confidentiality. (2.61) | Agreed | The job description of the health-related peer mentors has been revised to specifically ensure that their duties and activities do not compromise patient confidentiality. Any information passed to prisoners by peer mentors is now provided in sealed envelopes. | CEO Care UK | Completed |
| 5.23 | The environment in which medication is administered should | Not Agreed | This recommendation is not agreed. There is no other alternative building from which medication can be administered and there is no funding currently available to make the necessary changes to the building to | | |

| | ensure patient confidentiality. (2.71) | | deliver this recommendation. Capital bids to undertake this work have previously not been approved and whilst HMP YOI Foston Hall will continue to submit bids for this work there is no likelihood of this progressing in the foreseeable future. HMP YOI Foston Hall and Care UK however accept that confidentiality for medicines administration and privacy for patients is important and to this end will jointly explore further opportunities to address confidentiality and improve the process for prisoners awaiting dispensing of medication. | | |
|------|---|---------------|---|--------------|----------------|
| 5.24 | In-possession medication should not be provided in transparent bags. (2.72) | Agreed | Transparent bags have been withdrawn and In-Possession (IP) medication is now provided in opaque bags. | CEO Care UK | Completed |
| | Catering | | | | |
| 5.25 | Prisoners should be able to cater for themselves. (2.95, repeated recommendation 2.101) | Not Agreed | This recommendation is not agreed due to the fabric of the accommodation which does not provide sufficient space for full catering equipment to be installed. To do so would require structural changes and a considerable upgrade in the electrical system. Funding is not available to undertake this work and is unlikely to become available. Microwaves and toasters have been made available on all wings. Some self-catering facilities are available on the enhanced wing but this only caters for eleven women and cannot be expanded. | | |
| | Learning and skills and work activities | | | | |
| 5.26 | Steps should be taken to ensure that education sessions are not routinely disrupted because of health or other appointments. (3.13) | Partly Agreed | This recommendation is only partly agreed as prisoners receiving maintenance medication must attend healthcare during the core day as part of the routine. Changes to the core day will be made as part of the staff re-profiling exercise to ensure that prisoners who are undertaking education can receive their first medication prior to commencing classes, which will minimise some disruptions. | The Governor | September 2019 |
| | | | HMP YOI Foston Hall will continue to prescribe in-possession medication whenever possible to minimise disruptions. | | |

| 5.27 | Tutors should provide all prisoners with sufficiently challenging activities to keep them purposefully occupied during lessons. (3.27) | Agreed | Tutors will provide learners with Stretch and Challenge activities during lessons to keep them occupied and this will be related to their current learning and is an enhancement to this. This will be recorded and monitored in the prisoners Individual Learning Plans (ILP) and one to one discussions on a weekly basis with the tutors. | Director People Plus | October 2019 |
|------|---|--------|---|----------------------|--------------------|
| 5.28 | Prisoners should receive clear and constructive feedback to ensure that they know what they must do to improve their work. (3.28) | Agreed | Prisoners will receive an Individual Learning Plan (ILP) following induction and before embarking on Education and Vocational Studies which will be provided by the Education Provider. Clear and constructive feedback will be provided and captured in the ILP and learner workbooks. The ILP includes individualised personal targets, learners will receive weekly learner evaluation and tutorials on their progression and areas for improvement. The Education, Learning & Skills Manager will conduct monthly quality assurance checks on learners' ILP documents. | Director People Plus | October 2019 |
| 5.29 | Prison and college leaders should ensure that all prisoners, including those with the most complex and challenging barriers to learning, participate in purposeful activity. (3.35) | Agreed | Following assessment and induction, prisoners identified with complex needs are discussed at the weekly sequencing and support & intervention meetings to formulate a multi-disciplinary approach to encourage participation in purposeful activity. HMP YOI Foston Hall adopts various approaches to encourage engagement through tools such as in cell learning, Way2Learn, supervised work placements in gardens to provide a supported and structured learning and working environment. HMP YOI Foston Hall will promote the benefits of this to prisoners attending the Well-Being Centre. Work will continue with Adult Social Care to gain insight, consider barriers and implement measures to improve prisoner participation in purposeful activity. | Director People Plus | Complete & ongoing |
| | | | The Activities team will conduct a review of the sequencing policy to ensure the process supports and drives departmental input and is prisoner focussed. | Director People Plus | September 2019 |
| 5.30 | Prison managers should ensure that workshop staff record the range of employment skills that prisoners develop during | Agreed | The ILP individualised learner personal targets include employability skills which prisoners can develop during their time in custody. In addition, the Education Learning & Skills Manager will introduce the Passport to Employment within the vocational workshop areas. Supervising staff within these areas have received training in using and managing the passport. Supervisor and prisoner tutorials will take place on a weekly basis to check | Director People Plus | August 2019 |

| | their time in custody. (3.40) | | and record progress. The ILP and Passport to Employment will be issued to prisoners on release. The Education Learning & Skills Manager will conduct monthly quality assurance checks on prisoner passports. | | |
|------|--|---------------|--|--------------|--------------------|
| 5.31 | Library opening times should be increased to improve access. (3.45) | Not Agreed | This recommendation is not agreed as HMP YOI Foston Hall cannot increase the opening times of the library as these are restricted by the staff resources provided within the delivery contract by Derbyshire County Council and it is not possible to fund this locally. The Learning Skills and Employment Manager will review the current contract for library services during the renewal process to be undertaken during 2019. | | |
| | Strategic management of resettlement | | | | |
| 5.32 | An updated needs analysis should be completed and should include OASys data. (4.5) | Agreed | There is an up-to-date needs analysis in place, however a review will take place to include Offender Assessment System (OASys) data to ensure that those prisoners with an OASys have their distinct needs met. | The Governor | September 2019 |
| 5.33 | ROTL should be promoted and used more extensively to support resettlement, including for employment. (4.6) | Partly Agreed | This recommendation is partly agreed. Release on Temporary Licence (ROTL) opportunities have been significantly increased over the previous 6 months and HMP YOI Foston Hall will continue to promote its use. As a local prison most low risk prisoners or those suitable for open conditions are transferred to the resettlement establishments HMP Drake Hall and HMP Askham Grange. Those prisoners not suitable for resettlement prisons are unlikely to meet the necessary criteria and therefore there is little opportunity for extensive use of ROTL. There is an anticipated potential for some increase with the implementation of ROTL for hospital escorts. The Business Community Engagement & Industries Manager has commenced work with OMU, Education and external employers to seek an increase in ROTL employment opportunities. | The Governor | Complete & ongoing |
| | Offender management and planning | | | | |
| 5.34 | Pre-release risk management planning undertaken by the prison- | Agreed | All Offender Managers with prisoners' subject to Multi Agency Public Protection Arrangements (MAPPA) will be contacted and invited to attend the Interdepartmental Risk Management Team meeting to discuss MAPPA | The Governor | December 2019 |

| | based probation officer and the community-based offender manager should be more proactive and carried out more frequently. It should include a discussion about and agreement on required MAPPA management levels. (4.14) | | levels or submit information pertinent to the discussion. The implementation of OMIC and the employment of a full-time Senior Probation Officer by the end of 2019, will ensure that pre-release risk management planning undertaken by the prison-based probation officer and the community-based offender manager are more proactive, consistent and meaningful. | | |
|------|---|--------|---|--------------|--------------------|
| 5.35 | Indeterminate sentence prisoners should receive better support through an up- to-date strategy based on their needs, including more opportunities to develop independent living skills. (4.20) | Agreed | Opportunities to develop independent living skills will continue to grow by the introduction of a new retail park, which will enable the prisoners to undertake skills that will be transferrable when released. E Wing offers a degree of self-sufficiency as does Luke House the family bonding unit. HMP YOI Foston Hall will continue with the introduction of lifer buddies and lifer meetings (bi-monthly) to develop the needs of all Indeterminate Sentenced Prisoners (ISP). | The Governor | September 2019 |
| | | | The ISP policy is currently under review and will be ratified by the SMT and published to all staff. | The Governor | Complete & ongoing |
| | | | Following re-categorisation of ISP's those identified for open conditions are offered the opportunity of transferring to an establishment with open conditions or offered ROTL locally should the outcome of a multidisciplinary meeting deem it appropriate. | The Governor | September 2019 |
| | Reintegration planning | | | | |
| 5.36 | The number of prisoners using the virtual campus to prepare for employment and training should be improved further. (4.41) | Agreed | Prisoners can access and undertake nine sessions per week on the Virtual Campus (VC). Prisoners on Induction to Education use the VC. The VC has recently been upgraded, prisoners can access it either in the Library or in the classrooms within Education. Prisoners can undertake Job Search, CV Writing, Access to the Open University Platform, Mandatory training in Health & Safety, and Food Hygiene resulting in an Award which is beneficial for short term prisoners and the Study Skills class use the VC on a weekly basis. | The Governor | Completed |

| | | | A timetable of VC availability will be managed by the Activities team. The Education, Learning & Skills Manager will develop a process to advertise the availability of the VC to prisoners to further increase usage specifically to prepare prisoners for employment and training. | The Governor | August 2019 |
|------|---|--------|---|---|--------------------|
| 5.37 | Data collection on prisoners' destinations after release should be improved and used to measure and increase the effectiveness of the provision. (4.42) | Agreed | HMPPS collect data to track prisoners' accommodation and employment status from the point of release and throughout community supervision. New performance measures have been included in the frameworks for both prisons and the National Probation Service (NPS) for 2019/20. These assess status on release and six-weeks after release for prisons for accommodation and employment respectively, and at termination of supervision by the NPS. Additional measures are being considered for future probation frameworks. prisons and probation providers are being encouraged and supported to work together more effectively and monthly data will be available to prisons and probation to support these actions from August 2019. | Prison & Probation Analytical Services (PPAS) | August 2019 |
| | | | Data on accommodation circumstance for prisoners after release from custody is published on the Gov.uk website, statistics for the period 2018/19 were published on 25 July 2019 to show: accommodation circumstance for prisoners on release from custody and on community sentences; and the number of prisoners employed six weeks after release from custody and on community sentences. | Prison & Probation Analytical Services (PPAS) | Complete & ongoing |

| Recommendations | |
|-----------------|----|
| Agreed | 31 |
| Partly Agreed | 3 |
| Not Agreed | 3 |
| Total | 37 |