

Action Plan: HMP & YOI Moorland

Action Plan Submitted 15th August 2019

A Response to the HMIP Inspection 11th – 21st February 2019

Report Published 11th 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 <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 & YOI MOORLAND

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	Data analysis and consultation with prisoners should be used to understand the root causes of self-harm. Results should inform an effective strategy and action plan to reduce the high levels of self-harm. (S37)	Agreed	An Analyst has been employed to gather evidence from prisoner exit surveys, prisoner safety surveys, Violence Diagnostic Tool (VDT), Safety Diagnostic Tool (SDT), Inter Departmental Risk Management Team (IDRMT), Safety Interventions Meeting (SIM), Incident Reporting System (IRS), observation books and provides a weekly analysis identifying self-harm trends and hotspots.  One to one consultation is undertaken with prisoners after an act of self harm to identify triggers and provide appropriate support.  Single Points of Contacts (SPOCs) have been allocated to house blocks to consult with prisoners where self harming trends are identified.  The quarterly safety survey is distributed to prisoners.  Safer Custody representatives will attend prisoner consultation meetings.  Weekly safety analysis is delivered at the morning briefing and overarching monthly analysis is delivered at the Safer Custody meeting and is used to inform any required strategy changes.	The Governor	Completed
5.2	Routine consultation and engagement with community organisations should inform an up-to-date equality and diversity strategy and action plan. Robust oversight by managers should ensure that the needs of prisoners with protected	Agreed	Protected characteristics leads will be reinstated at Senior Management Team (SMT) level. Regular forums will then be held to capture the needs of individual protected characteristics groups including disability, age, Foreign National Offenders (FNO's), gender and religion with any specific needs identified and discussed at Equalities Action Team (EAT) meetings.	The Governor	October 2019

	characteristics are consistently identified and met. (S38)		The Head of Equalities will work in partnership with local community groups to develop a strategy and action plan to improve relationships with Black and Minority Ethnic (BAME) group prisoners.  The equalities action plan will be updated at the EAT meetings and strategy reviewed annually.  Perceptions of BAME and Muslim prisoners will be addressed through a procedural justice working group chaired by the Deputy Governor.		
5.3	Public protection procedures should be given urgent and sustained attention, to ensure that prisoners' risks, both in custody and on release, are managed effectively. (S39)	Agreed	Public protection arrangements have been reviewed in line with the public protection manual and recommendations from Investigatory Powers Commissioners Office (IPCO).  A public protection meeting has been introduced, with an emphasis on release planning and Multi Agency Public Protection Arrangements (MAPPA) levels for all High-Risk cases due for release in the next 3 months. This will ensure that the risk management plan and MAPPA levels are understood by those responsible for custodial management and the community offender manager before release.  The IDRMT considers individual cases and the appropriateness and proportionality of monitoring subject to public protection measures.	The Governor	Completed
	Early days in custody				
5.4	All new arrivals should be able to have a shower, see health services staff and have a meal before being locked up on their first night. (1.8)	Agreed	All prisoners are seen on reception by Healthcare and all prisoners are provided with a meal. A checklist to record that showers and meals have been offered and taken prior to lock up on the first night unit has been introduced in the induction booklet.	The Governor	Completed
5.5	Prisoners should be allocated to activities at the earliest possible opportunity, instead of being locked up on the induction wing. (1.9)	Agreed	Allocation systems will be reviewed to ensure that prisoners are allocated Education, Training and Employment (ETE) at the earliest opportunity, this would not normally exceed 5 days. All partners will participate in the review which will consider the induction process, and access to the gym and education. It will focus on a streamlined approach to ensure that individual prisoner needs are assessed quickly and activity is allocated.  The activity manager will also review the waiting list process.	The Governor	October 2019
	Managing behaviour				

5.6	An up-to-date analysis of the causes of violence at the establishment should be used to formulate an action plan to reduce violence. (1.20)	Agreed	An analyst is now in post and gathers data from prisoner exit surveys, prisoner safety surveys, VDT, SDT, IDRMT, SIM, IRS, observation books and will provide weekly analysis identifying trends and hotspots.	The Governor	September 2019
	action plan to reduce violence. (1.20)		SPOCs are allocated to house blocks to consult with prisoners where violence trends are identified and there is safer custody representation at prisoner information desk (PID) worker meetings.  SPOCs will provide support and coach staff in improving the quality of referrals to Safer Custody.	The Governor	Completed
			A template has been developed for Challenge, Support and Intervention Plan (CSIP) to improve investigation quality and identify root causes of violence enabling these to be effectively addressed through CSIP.	The Governor	Completed
			An up to date Action Plan to reduce violence will be developed and delivery will be coordinated through the Safer Prisons Meeting.	The Governor	October 2019
5.7	Intervention plans to manage perpetrators and victims should include individualised targets to address prisoners' poor behaviour effectively. (1.21)	Agreed	Training is being delivered by the Regional Group Safety Lead to develop the skills of staff and managers in using CSIP and creation of individual plans and targets. Progress will be reviewed through quality assurance of the CSIP process by the safer custody team and monitored at the Safer Custody and Security meetings.	The Governor	November 2019
5.8	The daily regime for self-isolators should be reliable and provide exercise, a shower and a telephone call. (1.22)	Agreed	All self isolators are managed by CSIP. All prisoners self-isolating now have access to in-cell telephones, and have a separate regime from the main prison which provides daily access to showers and exercise. Participation in daily domestic activities is recorded on Prison National Information Management System (PNOMIS) case notes. Assurance will be provided by the Custodial Managers on weekly and monthly checks. This process will be reviewed on implementation of the PNOMIS on the move devices.	The Governor	September 2019
5.9	The purpose of the reintegration unit should be clearly defined, its effectiveness routinely evaluated and the regime from arrival there should be purposeful. (1.23)	Agreed	A multi-disciplinary working group, including psychology will review the future function of the reintegration unit. This will include a review of the job specification; selection and admission criteria; Incentive and Earned Privileges (IEP) policies; Aim, purpose and ethos; safeguarding	The Governor	September 2019

			mechanisms; behaviour management policy, establishment referral process and access to interventions.  An action plan will be created to address the issues raised by the inspection. An evaluation has been completed by Regional Psychology and the recommendations from this will be addressed through the working group. An evaluation of the strategy and effectiveness of the unit will be undertaken annually in the future.		
5.10	Governance of the use of force should be informed by robust data analysis which identifies trends. Senior managers should routinely scrutinise incidents to identify good practice and learn lessons. (1.31)	Agreed	A Quality Assurance process has been introduced which includes a review of 5% of all incidents of force undertaken by the Control and Restraint (C&R) Instructors. These reviews are monitored by the Use of Force committee. The committee reviews 100% of all incidents of planned interventions including a review of Closed Circuit Television (CCTV) and Body Worn Video Camera footage. Lessons learnt and good practice will be disseminated to staff through direct communications and C&R refresher training.	The Governor	Completed
5.11	All drawing or use of baton incidents should be investigated. (1.32)	Agreed	Duty Governor will conduct a management enquiry into any incident where a baton has been drawn during their period of duty and provide the report to the Deputy Governor, if necessary a more thorough investigation may be considered and commissioned. All incidents where batons are drawn will be reviewed at the Use of Force committee meeting with any lessons learnt disseminated to staff.	The Governor	Completed
	Security				
5.12	Strip-searching and instructions to squat during cell searches should only be authorised when supported by an individual risk assessment and supporting intelligence. (1.41)	Agreed	HMP YOI Moorland operates a programme of Intelligence led Searching. This searching is defined as Routine Plus Searching. Staff deployed to searching will be briefed as to the type of search to be undertaken and any intelligence relating to the search. In deciding on the level of the search several factors will be considered and as appropriate a full search and a squat would be indicated in the assessment with the supporting intelligence.	The Governor	Completed
5.13	Prisoners should not be locked onto exercise yards without staff supervision. (1.42)	Partly Agreed	This recommendation is partly agreed as whilst HMP YOI Moorland is not profiled or resourced for the direct staffing of exercise yards there is provision for staff supervision whilst prisoners are locked on exercise	The Governor	Completed

			yards. This is achieved through random patrolling of exercise yards in accordance with risk assessments and Safe Systems of Work (SSOW) and Closed-Circuit Television (CCTV) monitoring where staff can be alerted and respond to prisoner need for assistance. If the volume of prisoners on the exercise yards increases staff resources will be flexibly redirected to monitor the yard activity from association duties as agreed in the SSOW.		
	Safeguarding				
5.14	The segregation of prisoners subject to assessment, care in custody and teamwork (ACCT) procedures should be regularly reviewed. (1.51)	Agreed	The cases of all prisoners' subject to Assessment Care in Custody and Teamwork (ACCT) arrangements in the segregation unit will be regularly reviewed in accordance with their risks, triggers, care maps and as directed by actions and frequency of their case reviews by the Head of Residence or Duty Governor in their absence. Defensible decisions about continued segregation will be recorded at each review and any necessary changes to the care plan or triggers will be made.	The Governor	Completed
5.15	Actions in response to recommendations by the Prisons and Probation Ombudsman should be monitored by managers, to ensure ongoing compliance. (1.52)	Agreed	A process for continuous random testing of Prison and Probation Ombudsman (PPO) recommendations to ensure action has been taken and resolutions are embedded will be set up and a review of the PPO recommendations will take place prior to Safer Custody meetings with any issues and required actions to be taken forward at the meeting.	The Governor	September 2019
5.16	There should be sufficient Listeners to meet the needs of the population. (1.53)	Agreed	Listener recruitment is now being constantly managed and reviewed to ensure the number of trained prisoners does not reduce to unacceptable levels. HMP YOI Moorland will continue to liaise with the security department to review listener recruitment criteria so that the number of appropriate prisoners who volunteer can be maximised.	The Governor	October 2019
	Daily life				
5.17	Toilets and showers should be fully screened. (2.11)	Agreed	A rolling programme of work to screen all in cell toilets has been in place since December 2018 and will be completed by October 2019. A full review of showers on all House blocks will take place by June 2019, to identify any additional screening required, to increase decency.	The Governor	October 2019

5.18	Meals should be served at appropriate times. (2.19)	Not Agreed	This recommendation is not agreed. Meals are currently served in line with the published core day, and in accordance with the requirements of Prison Service Instruction (PSI) Catering-Meals for prisoners. This provides for lunch at 11.40am and the tea meal at 4.30pm. The timing of meals also supports the provision of a decent and safe regime for self-isolating prisoners. It is not possible currently to change the core day and provide additional resources and staff to alter the lunch and tea meals to a later time as this would cause significant disruption to other prisoner services, regimes and activities.		
5.19	Consultation arrangements should be effective in identifying prisoners' concerns and result in prompt actions where necessary. (2.26)	Agreed	The terms of reference for the HMIP and PID workers forums have been revised, to ensure clearer objectives, with officers on each House block identified to support the progression of these meetings.  Terms of reference will be agreed for House block level prisoner forums and designated staff identified to deliver these. Clear objectives will be set to increase consistency of the forums across the prison. This will be supported by well publicised 'you said, we did' poster campaigns, displayed on 'What's happening in Moorland' noticeboards. Custodial managers will provide assurance, via the bi-lateral meeting process that actions have been promptly addressed and that meetings are being held.	The Governor The Governor	Completed October 2019
5.20	The application system should not compromise prisoners' confidentiality, and responses to prisoners should be tracked. (2.27)	Agreed	A new applications system is in place and processed by wing staff, to ensure confidentiality. Responses are required within a seven-day timeframe, the timeliness of responses are closely monitored by residential Custodial Managers, who will provide a monthly analysis of both the subjects of applications, responses received and the timeliness of these.	The Governor	October 2019
5.21	Managers should consult prisoners, to understand their negative perceptions of the complaints system and provide assurance that the system is fair. (2.28)	Agreed	A working group including ten prisoners has been set up to consider procedural justice and fairness of the complaints system. The findings of the group have been submitted for consideration and those elements taken forward will be aligned with the requirements of the new prisoner complaints policy framework and introduced at HMP YOI Moorland.	The Governor	September 2019

	Equality, diversity and faith				
5.22	Effective consultation and support should be in place for all protected groups. (2.45)	Agreed	SMT members have been allocated a protected characteristic group stream for which they will assume lead consultative responsibility. They ensure there is a minimum bi-monthly prisoner consultation session with their respective groups. A minute of the meeting is taken and this along with any issues or actions are submitted to the Equalities Action Team meeting for review and analysis.	The Governor	Completed
5.23	Personal emergency evacuation plans should be kept up to date. (2.46)	Agreed	Healthcare will provide an updated list of prisoners who have a Personal Emergency Evacuation Plan (PEEP) to Safer Custody managers. Heads of Residence and Activities will ensure PEEP's appropriate to the prisoners in residential and activity areas are communicated to staff responsible for their care and stored securely in both areas. An updated PEEP and refreshed list will be provided to the safer custody managers and communicated to residential and activity area managers at least once every month or when a new prisoner requires a PEEP to be opened.	The Governor	October 2019
5.24	Corporate worship for Muslim prisoners should routinely meet the demand. (2.51)	Agreed	Whilst Muslim prisoners are never prevented from observing prayers the current building has limited capacity. A recent bid submitted to the Prison Estate Transformation Programme (PETP) to expand the Chapel to accommodate the religious needs of an increase in the population at HMP YOI Moorland as a result of re-configuration has been approved. This will significantly increase the capacity and allow the facility to comfortably meet the demands for worship for Muslim prisoners and those of other denominations.	The Governor Prison Estates Transformation Programme (PETP)	March 20
	Health, well-being and social care				
5.25	Automated electronic defibrillators should be easily accessible to prison staff, particularly when nurses are not on site. (2.59)	Agreed	HMP YOI Moorland will procure additional and sufficient electronic defibrillators for each residential unit.	The Governor	October 2019
5.26	Patient information should be readily accessible in a range of formats and languages. (2.67)	Agreed	Care UK will source leaflets for patients in a range of languages and formats. These leaflets and posters will be sourced through the	Chief Executive Officer Care UK Health and	September 2019

			translation services and displayed and available for issue in all patient areas.	Rehabilitation Services Limited	
5.27	Prisoners with identified mental health needs should be able to access a full range of individual and group psychological interventions. (2.78)	Agreed	Care UK has recruited an Integrated Access psychological therapy (IAPT) worker and a Cognitive behaviour therapy (CBT) therapist to deliver low and high level psychological interventions to improve access to psychological therapies specific to mental health.  The staff will deliver psychological therapies identified in the mental health service specification to patients referred from the mental health case management team.	Chief Executive Officer Care UK Health and Rehabilitation Services Limited	October 2019
5.28	Patients requiring a transfer under the Mental Health Act should be transferred within the current transfer time guidelines. (2.79)	Partly Agreed	This recommendation is partly agreed as although every effort is made to expedite transfers and assess patients promptly, transfers are dependent on several factors such as the completion of appropriate assessments, administrative processes within the National Health Service (NHS), and the availability of accommodation in the mental health estate. As part of commissioning reporting Care UK reports monthly to National Health Service England (NHSE). This informs monitoring against required standards for patients who require sectioning under the mental health act in line with best practice guidance timescales and allows commissioners to identify bed availability issues. If a breach is evident the commissioner and provider will then escalate this with the mental health commissioning team and dependant on patient need and criteria for section will determine if the bed is urgent or not. If a bed is not available then a clinical operational management plan will be in place to support the patient and negate any risks. NHS England is working with partners in HMPPS and Public Health England (PHE) to improve and redesign services for people in prison with mental health needs. This includes revising approaches to secure hospital transfers under sections 47 and 48 of the Mental Health Act 1983 when a person needs to be in a hospital for their mental health.	Chief Executive Officer Care UK Health and Rehabilitation Services Limited NHS England	September 2019
			HMPPS and NHS England have collected evidence and have increased understanding of where transfers work well and how delays arise, identifying areas for improvement. NHS England has committed to action across policy, commissioning and operation, and will be consulting in Autumn 2019 on revised guidance on transfer and	NHS England	October 2019

			remissions to and from prison to mental health settings. This will include the definition of new expectations for achieving timely transfer with greater priority being given to urgent cases.		
5.29	The range of psychosocial interventions should meet identified need and include the provision of medium and high-intensity courses. (2.85)	Partly Agreed	This recommendation is partly agreed as whilst a range of low, medium and high intensity interventions are planned, this work is subject to funding approval. Care UK will review the psychological interventions and following completion of a health needs assessment will identify suitable programmes and interventions to be delivered. Substance Misuse Services (SMS) are currently writing interventions for, Harm Reduction (low intensity), Tolerance on discharge (low intensity), Immediate life support (ILS) (high intensity), Use of Naloxone (medium intensity), Alcohol (medium intensity).  These will be delivered in group sessions on a planned timetable by current workers in the team commencing in September 2019.  A business case has been submitted to NHSE to increase Psycho Social Interventions (PSI) group facilitators to be dedicated and responsible for PSI group work and a decision is awaited.	Chief Executive Officer Care UK Health and Rehabilitation Services Limited	September 2019
5.30	Clinical substance misuse services should offer sufficient prescribing input to meet increased demand and complexity of need. (2.86)	Agreed	Care UK will increase provision to 1 day per week to achieve prescribing needs and complete 13-week reviews.  The SMS matron will complete the prescribing course starting in September 2019 which will then ensure dedicated prescribing for this service.	Chief Executive Officer Care UK Health and Rehabilitation Services Limited	September 2019
5.31	Patient medication should be supplied in a timely fashion, to ensure that treatment is not interrupted. (2.92)	Agreed	Care UK has completed a full Care Quality Commission (CQC) submission action notice as to how this will be achieved. A comprehensive series of actions have been agreed and will be undertaken to deliver the requirements of this recommendation. This will be monitored for effectiveness by the Head of healthcare and the Local delivery board.	Chief Executive Officer Care UK Health and Rehabilitation Services Limited	October 2019
5.32	In-possession risk assessments should be reviewed in line with the local policy, to ensure that all risks are appropriately managed. (2.93)	Agreed	Care UK will complete monthly In Possession (IP) risk assessment audits to ensure reviews are completed in line with the In-Possession Policy and to negate risks.	Chief Executive Officer Care UK Health and	August 2019

			Care UK will complete a monthly IP recall report and complete all IP risk assessments due. Results will be fed back at the Substance Misuse Meeting.	Rehabilitation Services Limited	
	Time out of cell				
5.33	All prisoners should have regular and predictable time out of cell which is sufficient to promote rehabilitation and mental well-being. (3.9)	Agreed	The current time out of cell provided through HMP YOI Moorland published core day is 9.75 hours. HMP YOI Moorland will plan to provide purposeful activity or education for all prisoners to engage in daily throughout the published core day. An individualised programme will be developed for prisoners on the Re-integration Unit to provide regular time out of cell which will provide for Incentive and Earned Privileges (IEP) reviews and interventions including, A to Z and Time wise and domestic routines and access to exercise and association in accordance with Incentives and Earned Privileges (IEP) and Adjudication policies.	The Governor	September 2019
5.34	All prisoners should have access to an hour in the open air every day. (3.10)	Not agreed	This recommendation is not agreed as National policy (PSI 75/2011 Residential Services), states that prisoners are afforded a minimum of 30 minutes in the open air daily. This provision is mandatory subject to weather conditions and the need to maintain good order and discipline. HMP YOI Moorland will provide 30 minutes formal exercise every day including weekends.		
5.35	There should be effective monitoring of library and gym use, to ensure equitable access to these services. (3.11)	Agreed	HMP & YOI Moorland will undertake an analysis of attendance for Gym and Library use every six months. The data from this review will be presented at the Equality Action Team (EAT) meeting to ensure access is equitable. The provision will be adjusted accordingly if necessary to ensure equality.  Access to both Library and the Gym will become a standing agenda item at all equality consultation forums. The action points from these forums are also presented at the EAT meeting.  Data and statistics on attendance will be discussed at the bi-monthly Reducing Reoffending meeting. This action will be incorporated in the Reducing Reoffending action plan.	The Governor	September 2019
	Education, skills and work activities				

5.36	Managers' observation of tutors and trainers should have a clear focus on the progress that prisoners have made. (3.21)	Agreed	Managers and senior leaders will be retrained in the completion of Observation of Teaching and Learning (OTL) to ensure that observations are less descriptive and reflect the progress made by learners.  The Education provider manager is working with the industrial manager to ensure OTL's meet the required OFSTED standard providing an independent review and evaluative feedback on leaner progression.  A quality assurance check of OTL's both in industries and Education will be undertaken. This will be conducted by the Learning and Skills manager and reported at the bi monthly Prison Education Framework (PEF) meeting.  Consistency and quality will be continually monitored with managers through bilateral support meetings.  Joint observations between the education provider and HMPPS managers will take place in accordance with the PEF (Prison Education Framework) contract.	Director of Novus The Governor	August 2019
5.37	Prisoners should complete their education induction promptly, to ensure timely allocation to activities. (3.22)	Agreed	The induction process will be reviewed with a specific output requirement to improve the time taken to allocate prisoners to activities after induction is completed.  Activities will ensure where there are delays in the completion of the induction process this will not impede the progress of prisoners in allocation to activities. This will be assured by the education provider managers.  Timetabling and sequencing will be managed and monitored by the new Curious Management Information System (MIS) used to display the full curriculum offer and allowing the review of what educational services are running in the prison.	Director of Novus The Governor	October 2019
5.38	Prisoners on the reintegration unit should be able to access work and education from week one of the reintegration programme. (3.23)	Partly Agreed	This recommendation is partly agreed as each prisoner on the reintegration unit will have specific targets, support and issues which need to be addressed. A multi-disciplinary working party, including psychology has undertaken a review of the re-integration unit and provided a report to the governor on suggested changes to the regime.  An individual regime programme will be developed and agreed for each prisoner on the unit based on a risk assessment. This will consider	The Governor	Completed

			access to work and education from week one of the re-integration plan, however this may not be appropriate for some prisoners who may only access this progressively from week two.		
5.39	The number of prisoners allocated to contract workshops should be commensurate with the amount of work available. (3.24)	Agreed	A full industrial review is being undertaken which will consider the performance of individual work areas, the work available and the number of prisoners allocated to that workshop. Careful consideration will be given to risk assessments in industries and individual prisoner pathways. The review will also consider resettlement outcomes from the work being carried out in these areas and that it is compatible with the needs of the prisoners and the communities they are released to. A weekly monitoring system will be introduced to ensure that prisoners are not allocated to areas where work is unavailable or limited. They will alternatively be reallocated temporarily to areas where demand for work is high, ensuring full engagement.	The Governor	September 2019
5.40	Targets set for prisoners should be individualised and enable them to develop their skills and improve the standard of their work. (3.33)	Agreed	Targets have been reviewed and these are now individual and relevant to the development needs of the prisoner. Targets are quality assured during joint inspections of the learning provision between the education and learning and skills managers.  An agreed frequency of quality reviews of learner targets will be determined and validated by the new education hub manager.	Director of Novus The Governor	Completed
5.41	Prisoners on distance learning courses should receive good support to complete their programmes. (3.34)	Agreed	Resources are now in place to monitor and support learners on distance learning providing improved communication between learners and their tutors.  A full Virtual Campus (VC) refresh is being carried out which will provide learners to access a bespoke, updated VC platform. A comprehensive digital refresh, including access to VC, will also being undertaken as part of the revised PEF contract identifying improvements required at HMP YOI Moorland to improve the digital structure and capabilities.	Director of Novus	September 2019
5.42	Prisoners with poor English language skills should be well supported to	Agreed	English for Speakers of Other Languages (ESOL) has been replaced and updated as part of the PEF contract. Teaching resources will be	Director of Novus	September 2019

	develop their speaking and writing skills. (3.35)		monitored in future by joint learning walks to ensure they allow good learner progression.  Delivery staff will be challenged as part of the OTL process. Current ESOL tutors will undergo a vigorous assessment of their teaching skills. This will be monitored through the bi monthly PEF meeting.  A robust allocation process will ensure learners are on the right courses at the right time. This will be scheduled utilising the new PEF curious system.  Under the new PEF contract ESOL will be incorporated and taught through the functional skills provision. Teachers will tailor deliver to prisoners based on their individual need and skills.		
5.43	The proportion of prisoners who achieve their functional skills mathematics qualifications should increase. (3.41)	Agreed	Under PEF the functional skills provision has decreased increasing the importance of the role of reception prisons in helping prisoners to achieve qualifications before arrival at HMP YOI Moorland. Work is underway regionally to improve the education provision at reception prisons so prisoners complete this mathematics qualification before arriving at HMP YOI Moorland. This is improving the number of prisoners who have their functional skills mathematics qualification. The regional Head of Learning and Skills (HOLS) will continue to monitor this to further improve the completion rates.  Prisoners awaiting functional skills mathematics are monitored and this is reported weekly at the Senior Management Team (SMT) morning meeting and bi monthly PEF and Reducing Reoffending meetings.	Head of Novus The Governor	September 2019
	Children and families and contact with the outside world				
5.44	Emails to prisoners should be delivered without compromising confidentiality. (4.8)	Agreed	Only prison staff will issue correspondence to prisoners. Prisoner Information Desk (PID) workers or other peer mentors will not undertake this work.	The Governor	Completed
	Reducing risk, rehabilitation and progression				
5.45	The reducing reoffending strategy and action plan should be informed	Agreed	HMP & YOI Moorland will undertake a needs analysis of the prison population. This will include:	The Governor	November 2019

	by a comprehensive and up-to-date population needs analysis. (4.20)		Prisoner questionnaires; Prison Segmentation Data; Offender Assessment System (OASys) Report of Criminogenic need; current Intervention data from within the prison and links to our programmes needs analysis; Accommodation; Education / Training, & Employment; Health; Drugs and Alcohol; Finance, Benefit, & Debt; Children & Families; Attitudes, Thinking, & Behaviour  The above analysis will be used to develop the Reducing Re-Offending Strategy and inform a review of the provision at HMP YOI Moorland.		
5.46	All eligible prisoners should have an up-to-date offender assessment system (OASys) assessment of their risk and needs. (4.21)	Partly Agreed	This recommendation is partly agreed as whilst there is a structured process to monitor and reduce the OASys backlog to ensure that all eligible prisoners, serving over 12 months have an assessment in accordance with the HMPPS prioritisation tool there are a number of assessments the prison is not responsible for which are owned by the National Probation Service (NPS).  HMP YOI Moorland have appointed an OASys administration clerk, who now tracks outstanding assessments to better manage the HMPPS owned cases.	The Governor	Completed and ongoing
5.47	Prison offender supervisors should receive sufficient training and professional supervision to manage high-risk prisoners and those convicted of sexual offences. (4.22)	Agreed	Prison Offender Supervisors (OS) will not manage high risk offenders under the new Offender Management in Custody (OMiC) case management system. All current Offender Supervisors have commenced the Prison Offender Manager (POM) /Probation Service Officer (PSO) Core Concept and Risk Assessment workbooks. A training needs analysis has also been completed for all Offender Supervisors. POM development sessions have been introduced to discuss individual cases with the emphasis on improving the management of risk and OS staff are receiving one to one support with OASys completion.	The Governor	Completed and ongoing
	Categorisation and transfers				
5.48	Categorisation reviews should be completed in advance of eligibility dates, to maximise the amount of time that prisoners can spend in open conditions. (4.34)	Agreed	The process to complete categorisation reviews has been changed and now commences 4 weeks prior to the individual prisoner's review date to ensure the case is given appropriate consideration and a decision is made in advance of the categorisation date.	The Governor	Completed

5.49	Only appropriately trained, knowledgeable staff should assess risk and make recommendations about re-categorisation. (4.35)	Agreed	The re-categorisation process has been reviewed. Case administration staff now generate the review form through the equip process management system. Only sufficiently experienced Offender Supervisors complete the risk assessment and make recommendations.	The Governor	Completed
5.50	Foreign national prisoners should be considered for recategorization on the basis of their individual risk and circumstances. (4.36)	Agreed	HMP YOI Moorland has agreed a new system with Home Office Immigration Enforcement. Prison case administration staff now contact the responsible immigration case worker for details of risk issues and clarify what stage is being pursued. These details are then passed to the appropriate Offender Supervisor to enable them to complete the Risk Assessment (RA) for categorisation consideration. Processes for Immigration Enforcement involvement during the assessment period will ensure there is an audit trail for the justification of any outcomes.	The Governor	Completed
	Interventions				
5.51	The provision of offending behaviour programmes should meet the needs of the population. (4.43)	Partly Agreed	This recommendation is partly agreed. HMP YOI Moorland needs analysis assesses the intervention needs of the population. Although this identifies prisoners who meet the risk and need criteria for specific courses, it does not indicate their readiness to engage in an offender behaviour programme. Whilst a bid to deliver identified programmes may be submitted to commissioners, not all programmes will be placed at HMP YOI Moorland In these cases some prisoners may need to undertake these interventions at another suitable prison as part of a progressive transfer.	The Governor	Completed
			Following the recent commissioning round and with current staff in post-delivery of course completions for 2019-2020 will increase from 88 to 126 for the Thinking Skills Programme (TSP) Resolve and Horizon programmes.	The Governor	March 2020
			A bi monthly report from a needs analysis will continue to monitor need and delivery throughout the year.  Consideration is being given to the delivery of non-accredited offending behaviour programmes above the current agreed commissioned targets. These include A>Z, Timewise and the maturity toolkit.		

5.52	There should be more treatment opportunities for prisoners convicted of sexual offences. (4.44)	Agreed	Following the business commissioning round 2019/20 HMP YOI Moorland will deliver 4 Horizon programmes during the next 12 months providing an increase of 18 completions.  HMP YOI Moorland will continue to apply for further resources to increase the delivery of treatment opportunities for prisoners convicted of sexual offences as identified through needs analysis.	The Governor	March 2020
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Recommendations	
Agreed	44
Partly Agreed	6
Not Agreed	2
Total	52