



HM Prison &  
Probation Service

Action Plan: HMP Pentonville

Action Plan Submitted 3<sup>rd</sup> September 2019

A Response to the HMIP Inspection: 1<sup>st</sup> April – 12<sup>th</sup> April 2019

Report Published: 21<sup>st</sup> August 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.



ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMP PENTONVILLE

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 to HMPPS</b>				
5.1	Physical security should be enhanced through the prompt replacement of windows and installation of CCTV coverage where necessary. (S53)	Partly Agreed	<p>This recommendation is partly agreed as the capital and maintenance budget is limited, with only the highest priority works currently being carried out in accordance with the following order of priority; fire safety, health and safety, statutory/regulatory/legal obligations, business critical investment and departmental reform programmes; and subject to approval by HMPPS and MOJ estates governance board.</p> <p>A window replacement programme is underway and to date 340 windows have been replaced – budgetary and capacity considerations means that the full programme will take another four years to complete.</p> <p>Implementation of A Wing CCTV projects is part of the national MOJ Estates Delivery Programme, which we are awaiting to be mandated subject to funds being available. A bid will be submitted at the next opportunity for funding for CCTV on E and F wing, the only remaining residential areas without it.</p>	<p>MOJ Estates</p> <p>Governor</p>	<p>2020 / 2021</p> <p>December 2019</p>
	<b>Main recommendations to the Governor</b>				
5.2	A suitably resourced safer custody team should work proactively and	Agreed	The establishment has agreed a new safer custody team structure which includes additional resources. Recruitment into new posts has commenced and is expected to be concluded by September 2019. The	Governor	September 2019



	collaboratively with other departments in the prison to reduce levels of violence. This violence reduction work should include prompt investigations into incidents of violence and suitable interventions to manage perpetrators and support victims. (S47)		<p>team has already started to develop links with other departments to adopt a whole prison approach to reducing violence. This will be supported and reviewed through the monthly Good Order and Safety committee, chaired by the Head of Safety with multi-disciplinary attendance.</p> <p>Additional resources in the team will allow for investigations into violent incidents to be carried out and ensure appropriate follow up actions are taken. The investigations will be quality assured by managers within the safety team.</p> <p>The prison will roll-out the Challenge Support Intervention Plan (CSiP) so that those who are involved in violence are case managed to progress towards more positive behaviour. The prison will consider how best to support victims of violence through the roll out of CSIP.</p> <p>Catch 22 are currently providing some mediation and their contract is expected to be extended until April 2020. The prison will also explore options for additional interventions, such as trauma support and gang diversion, subject to available funding</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>December 2019</p> <p>December 2019</p> <p>March 2020</p>
5.3	Managers should ensure that regular and effective scrutiny is undertaken of key safety processes, including violence reduction, segregation, adjudications and use of force. This should be underpinned by the review of routinely collected reliable and comprehensive data. (S48)	Agreed	The prison will identify the range of data that needs to be captured to ensure effective scrutiny can be completed. This will include Management Information (MI) on use of force, segregation, adjudications, violence and self-harm. Recording systems will be introduced to allow accurate MI to be analysed and presented at relevant meetings to inform discussion of safety processes and actions identified to improve outcomes.	Governor	December 2019



5.4	Use of force should be accountable. Use of force documentation, video footage and incidents involving use of batons should be routinely reviewed and lessons learned; this should be overseen by regular and well attended use of force meetings. (S49)	Agreed	A weekly use of force scrutiny meeting will be introduced which will be chaired by the Head of Safety and will include a review of a percentage of incidents, focusing on assuring use of force documentation, review of CCTV and/or Body Worn Video Camera (BWVC) footage where available. All incidents involving the drawing and/or use of batons will be reviewed in this meeting. Feedback and learning opportunities will be provided to staff who require it.	Governor	October 2019
			Use of Force data will also be captured and discussed at the monthly Use of Force meeting which will be chaired by the Head of Safety to ensure trends and themes are identified and appropriate actions and learning taken forward to improve accountability and governance. The terms of reference for the monthly meeting will be updated to ensure relevant staff are involved and the Head of Safety will ensure their attendance.	Governor	October 2019
5.5	Prisons and Probation Ombudsman recommendations should be fully implemented and subject to continuing and repeated reinforcement. (S50)	Agreed	All agreed actions from Prisons and Probation Ombudsman reports have been consolidated within a single action plan to allow for improved oversight.	Governor	Completed
			The Head of Safety is reviewing progress against all actions and will ensure that any that remain incomplete are prioritised for implementation. Implementation of actions will be monitored through the Good Order and Safety Committee.	Governor	October 2019
			A programme of dip testing and assurance regarding historical actions considered to be completed will be introduced. Feedback and learning will be shared with staff through staff meetings and briefings, as well as in newsletters, staff notices and safety themed bulletins.	Governor	October 2019
			Assurance will also be carried out at group level to provide further scrutiny of actions taken.	Prison Group Director	October 2019



5.6	Robust management of ACCTs should include consistent case managers who take ownership of cases and provide continuity of care, multidisciplinary reviews and a robust quality assurance process. (S51)	Agreed	The prison will implement a dedicated case management approach to improve accountability in the care of prisoners, as well as improving the quality of reviews by identifying those staff who require additional development and support in ACCT processes.	Governor	December 2019
			This will be supported by implementing an effective Assessment, Care in custody and Teamwork (ACCT) quality assurance (QA) process with support from the national safety team. This will focus on driving up standards of ACCT processes, sharing good practice and identifying themes and trends to improve outcomes, which will be overseen by the Good Order and Safety committee.	Governor	November 2019
			Required attendance at ACCT reviews will be clarified, which will include prison and healthcare staff as well as other relevant attendees such as chaplaincy, substance misuse support and keyworkers. Attendance at reviews will be checked through the QA process and managers will be made aware of a lack of attendance from their department, as well as highlighting examples of good practice.	Governor	November 2019
			A review of ACCT quality will be completed at group level to measure progress towards this recommendation, alongside the national safety team.	Prison Group Director	January 2020



5.7	The prison should implement a supply reduction strategy, which is overseen by a multidisciplinary team at regular meetings. Action planning should ensure that all facets of the strategy, such as intelligence-led drugs testing, are carried out efficiently. (S52)	Agreed	<p>The Demand and Supply Reduction Plan has been published within the Substance Misuse Strategy. A monthly multi-disciplinary committee has been established to oversee this work, chaired by the Head of Drug Strategy.</p> <p>Activities included in the action plan will all be quality assured annually in a rolling monthly schedule to ensure they are implemented effectively. This will be done using data from finds, intelligence, management checks and covert tests. Where further improvements are identified, these will be highlighted at the monthly committee and relevant actions agreed, along with timescale and action owners.</p> <p>A priority system will be introduced to triage intelligence which will inform the scheduling of drugs testing.</p>	Governor  Governor  Governor	Completed  October 2019  October 2019
5.8	Managers should ensure that staff behave respectfully towards prisoners, actively supporting them and challenging poor behaviour, in line with the principles of a rehabilitative culture. (S54)	Agreed	<p>The Governor and Deputy Governor have met with all managers to outline the Governor's vision and expected standards as part of a Local Delivery Plan for 2019/20. Group manager meetings have been held with senior managers and middle managers to outline expectations desired outcomes for prisons and staff.</p> <p>The principles of procedural justice will be regularly communicated and explained to staff through staff meetings and as part of the local Communication Strategy. Procedural Justice will also underpin our Local Delivery Plan.</p> <p>Regular staff briefings and bulletins have been introduced to inform staff about expected standards of behaviour when dealing with prisoners in a more positive and courteous manner and highlight where this has been achieved. These briefings will support the prison values and promote a healthy culture where procedural justice and respect / decency are seen as non-negotiable.</p>	Governor  Governor  Governor	Completed  October 2019  Completed



			<p>Wing Managers will ensure that staff engage pro-actively with prisoners by holding regular Wing Prisoner Consultation Forums where issues can be raised by prisoners and resolved. These will feed into the User Voice / Prisoner Committee and will be reviewed monthly for common themes.</p> <p>Jail-craft training is now taking place which is aimed at improving relationships between stakeholders as well as staff prisoner relationships.</p> <p>All key work entries will be quality assured with any issues highlighted to line managers for challenge via performance management. Best practice examples will also be shared and recognised.</p> <p>All allegations submitted against staff relating to unprofessional behaviour are initially examined by a senior manager who completes a Local Decision Log. This will include recommended further action which may include a Code of Conduct investigation, management advice or development and support. Good practice will also be identified and shared with staff</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>Completed</p>
5.9	Cells should provide decent and hygienic conditions, including properly screened toilets and sufficient space for each occupant. (S55)	Partly Agreed	<p>This recommendation is partly agreed as whilst steps will be taken locally to improve basic hygiene and decency there is currently no funding for toilet screening and capacity pressures within London will prevent the removal of double occupation cells at Pentonville.</p> <p>A Respect &amp; Decency Programme has commenced with resources and support from the national Clean &amp; Decent project to improve cell conditions. The Respect and Decency programme will ensure that cell conditions are improved through the introduction of decency checks, a painting programme, cleaning schedules and replacement programme for missing or damaged in cell items, based on an agreed inventory.</p>	<p>Governor</p>	<p>December 2019</p>





			<p>The Clean Rehabilitative Enabling &amp; Decent (CRED) Programme will continue to work on cells to refurbish them to a decent standard. The current refurbishment rate is six cells a month</p> <p>A London Prisons Group set of decency standards have been published and all Governors have been encouraged to implement them. The group assurance team will conduct regular dip testing/ decency checks to assess progress against the group standards.</p>	Governor	Completed
				Prison Group Director	September 2019
5.10	The new equality strategy should cover all protected groups and be overseen by regular equality meetings to ensure effective implementation. It should include actions in relation to effective consultation, analysis of monitoring data and prompt response to diversity complaints. (S56)	Agreed	<p>The Equality Strategy has been reviewed and updated. It covers actions to include consultation, analysis and monitoring of data, along with an analysis of complaints themes and responses. An action plan has been published within it which includes all protected groups. The action plan is reviewed monthly at equality meetings.</p> <p>Monthly equality meetings have been scheduled to take place, chaired by the Governor. The data to be reviewed at this meeting will be agreed and introduced. This will then inform actions to reduce disproportionality.</p> <p>The Zahid Mubarak Trust will provide independent scrutiny, and support activity around identified disproportionality. They will start by holding focus groups with young Muslim men.</p>	Governor	Completed
				Governor	September 2019
				Governor	September 2019
5.11	The prison health care local delivery board should ensure that assertive action is taken to enable access to health care, safe storage of in-	Partly agreed	This is partly agreed as there are currently no funds available to purchase and install safes for in cell medication. However, a bid will be submitted for funding. Until safes can be provided, the prescribing of in-possession medication will remain limited to ensure safe practice.	Governor	September 2019



	possession medicines, and a prison-wide strategy for health and well-being. (S57)		<p>With the implementation of new profiles, officer resources have been included to collect prisoners and escort them to medical appointments which should increase attendance. The attendance rate is monitored at the healthcare partnership board.</p> <p>The healthcare provider will work alongside prison staff to ensure a clear and focussed health and well-being strategy is in place for both staff and patients to allow for greater awareness and access to key health promotion material.</p>	Governor	Completed
				Governor & Care UK Head of Healthcare	January 2020
5.12	Managers should ensure that all prisoners have the opportunity to participate in a full and purposeful regime and are encouraged to attend activities. (S58)	Partly agreed	<p>This recommendation is partly agreed as there are insufficient activity spaces available for all prisoners to participate in a full regime. However, a range of actions will be taken forward to ensure the use of existing activities is maximised and that available funding is used to introduce further regime opportunities.</p> <p>A regime monitoring system will be implemented so that the prison can better understand any curtailment of the regime in relation to fluctuating staffing levels and allocation of key workers.</p> <p>The sequencing and allocation system of allocating appointments will be reviewed with an aim to minimise regime clashes and increasing attendance at purposeful activity.</p> <p>The local Incentives and Earned Privileges and pay policy will be reviewed to encourage attendance at activity and engagement in the regime.</p> <p>The Heads of Residence will work pro-actively with the Head of Reducing Re-Offending to ensure that all prisoners identified for activities are able and encouraged to attend.</p>	Governor	September 2019
				Governor	December 2019
				Governor	October 2019
				Governor	October 2019



			<p>The information made available to prisoners on induction and during sentence will be reviewed to ensure that it is effective in communicating regime and activity opportunities.</p> <p>The prison will utilise the Dynamic Purchasing System funds to introduce additional activity spaces.</p> <p>A wider range of Education opportunities will be introduced on F wing for vulnerable prisoners</p> <p>Attendance and attainment data will be reviewed at the monthly reducing reoffending committee meeting. This will be chaired by the Head of Reducing Reoffending. This committee will also oversee a review of the physical education schedule.</p> <p>The Head of Reducing Reoffending will review the current physical education schedule to identify any possibilities for further outdoor activities. A range of data including the number of activity spaces allocated and the number of men attending will be reviewed at the monthly reducing reoffending meeting. This meeting will be chaired by the Head of Reducing Reoffending and residential managers will be mandated to attend.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>December 2019</p> <p>December 2019</p> <p>January 2019</p> <p>October 2019</p> <p>October 2019</p>
5.13	<p>Prison-wide quality assurance processes should be developed to ensure an effective approach by prison managers to self-evaluation and planning for improvement across all education, skills and work. (S59)</p>	<p>Agreed</p>	<p>A selection of local managers will be trained to enable them to complete lesson observations and quality assure them using a standardised template. The results of these observations will be shared with individual teachers and any trends will be discussed at the Quality Improvement Group meetings. The prison will ensure all partner agencies such as CRCs and St Mungos have an input into the monthly progress reports to better monitor impact.</p> <p>A joint Novus and Prison Learning Walks of Education provision will be introduced to all non-Prison Education Framework (PEF) Education areas to identify good practice and areas for improvement. PEF contract meetings will be chaired by the Governor or Deputy Governor</p>	<p>Governor/ Local Novus Head of Education</p> <p>Governor/ Local Novus Head of Education</p>	<p>October 2019</p> <p>October 2019</p>



			The prison will interrogate a range data such as attendance and attainment data at the local Quality Improvement Group (QIG) The terms of reference will be reviewed to ensure it is effective in identifying data to be analysed and desired outcomes.	Governor/ Local Novus Head of Education	October 2019
5.14	All relevant departments and agencies should play a full part in strategic and risk management work, including relevant meetings. (S60)	Agreed	The Interdepartmental Risk Management Team (IRMT) meeting will be re-launched, with a new Terms of Reference. Attendance at this meeting will be reviewed to ensure all key staff are involved in decision making.  The prison will monitor expected outcomes and action plans developed to ensure that risk are identified and communicated to staff and other agencies as required.	Governor and Senior Probation Officer  Governor and Senior Probation Officer	November 2019  November 2019
5.15	All prisoners should have an up-to-date OASys assessment. (S61)	Partly agreed	This recommendation is partly agreed as following the review of the Offender Management in Custody (OMiC) model the resource for OASys report completion will move into the training/resettlement estate. As part of the OMiC model implementation prisons are being asked to develop and implement a plan to reduce their OASys backlogs for those assessments they are responsible for. HMPPS are currently working through the roll out schedule for the case management element of the model and the transition period with a target date to commence in October 2019. The move to a dedicated resource to complete this work should have a positive impact on outcomes.  As part of the OMiC model implementation prisons are being asked to develop and implement plans to reduce their OASys backlogs for those assessments they are responsible for. This continues to be an issue at HMP Pentonville due to the attrition rate of the prisoner population making it difficult to achieve this in the allocated timeframes, with the resources available.  HMPPS are currently working through the roll out schedule for the case management element of the model. This element of the model and the	Governor	December 2019



			transition period is being managed by Divisional Implementation Boards, with a target to start the full model implemented by October 2019. The move to a dedicated resource to complete this work with less chance of cross deployment should have a positive impact on outcomes.		
5.16	The CRC should ensure that all eligible prisoners receive an initial resettlement plan which is reviewed before their release. (S62)	Agreed	New opportunities for increasing provision with more prescribed support to the mandated services, are now available through the enhanced Through the Gate (TTG) Specification. This service was mobilised in May 2019. As a result, prisoners' needs are now assessed based on a tier system. Those within 12 weeks of release will also receive one to one support.	Director of Community Interventions, CRC	Completed
	<b>Recommendation to HMPPS</b>				
5.17	Prisoners with disabilities should not be held in Pentonville if they are unable to access readily outdoor exercise areas and key provision, such as work and education. (2.35)	Partly agreed	<p>As prisoners are received directly from court, the prison cannot control the arrival of prisoners with disabilities. Transfer to another prison will however be considered if Pentonville is deemed completely unsuitable for an individual and adjustments cannot be made.</p> <p>The prison will endeavour to provide prisoners with disabilities access to outdoor exercise areas and other key provisions, by making reasonable adjustments. Adjustments are considered once a prisoner is received into the prison and on a case by case basis.</p> <p>HMPPS will continue to provide establishments with guidance on managing prisoners with disabilities and making reasonable adjustments, as part of the refresh of PSI 32/2011 'Ensuring Equality', due to be published later this year.</p>	<p>Governor</p> <p>Governor and Equalities &amp; Diversity Group</p>	<p>November 2019</p> <p>November 2019</p>



	<b>Recommendations to the Governor</b>				
	<b>Early days in custody</b>				
5.18	First night cells should be clean and well equipped. (1.10)	Agreed	<p>An expected standard for first night accommodation will be developed and implemented. The standard will define the expected conditions into which new receptions must be located and the minimum provision of kit and other essentials they will be issued with on arrival.</p> <p>Performance will be measured using a first night cell checklist and all cells will be checked for compliance with the published standards with a QA process also in place, managed by the Head of First Night and the Head of Decency.</p> <p>The relative performance against the standard will be discussed at the Respect and Decency meetings ensuring that progress is made, any issues are tackled and updates provided.</p>	Governor	September 2019
				Governor	October 2019
				Governor	October 2019
	<b>Managing behaviour</b>				
5.19	There should be clear structures and mechanisms to identify, manage and support the reintegration of prisoners who choose to self-isolate. (1.21)	Agreed	<p>The prison has updated and will publish the local policy regarding the identification and care of those who are self-isolating. This will be kept under regular review.</p> <p>Those prisoners choosing to self-isolate will be reviewed during weekly segregation review boards including those not located in the Care and Separation Unit (CSU). These reviews will consider how best to support these individuals.</p>	Governor	October 2019
				Governor	October 2019
5.20	Adjudications should be completed thoroughly, fairly and with no unnecessary delay. (1.25)	Agreed	A review of the systems and processes for managing adjudications has commenced. This will also address the backlog of adjudications as well as including a new system for scheduling those that are remanded.	Governor	October 2019



			Adjudication quality will be assured by the Governor and Deputy Governor who will provide feedback to the relevant manager as well as disseminate good practice and learning.	Governor	October 2019
5.21	Segregation review boards should always be multidisciplinary and should focus on care and reintegration planning. (1.38)	Agreed	<p>All segregation review boards to consider the segregation of prisoners beyond the initial 72 hours will be multi-disciplinary in nature. As a minimum healthcare, chaplaincy and probation will be involved. This will be re-enforced with duty governors and a sample will be quality assured by a delegated senior manager.</p> <p>All segregation review boards will consider and record what consideration has been given to the care of the individual and the options for reintegrating them back onto normal location. The paperwork used locally has been amended to offer prompts.</p> <p>10% of segregation reviews will be considered at the monthly adjudication standardisation reviews. Where this scrutiny identifies areas of learning in the application of segregation processes, this will be fed back to operational managers and any necessary changes to segregation procedures will be made.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>September 2019</p> <p>October 2019</p> <p>September 2019</p>
<b>Security</b>					
5.22	Security intelligence should be acted on promptly. (1.50)	Partly agreed	<p>The recommendation is partly agreed as due to resource limitations and significant fluctuations in intelligence volumes, the prison appropriately prioritises actions arising from security intelligence.</p> <p>Weekly meetings have been established, which involve analysis and discussion of recent intelligence with residential and security staff to share information and agree necessary follow up actions. A list of 'prisoners of interest / concern' is also now agreed and published to all staff. This is designed to encourage intelligence to be submitted for those considered the highest risk. It will either assist with directing actions or suggest that they should not be considered as such.</p>	Governor	Completed



			<p>There will be a monthly review of intelligence flow, effectiveness and timeliness of required actions. This will be analysed in the monthly Security &amp; Stability Committee which is chaired by the Head of Security.</p> <p>The prison has introduced a daily triage meeting, which involves the Head of Security, Security Custodial Manager, Security Analyst and Security Collator to discuss high risk intelligence and any actions required as a result.</p>	Governor	September 2019
				Governor	Completed
	<b>Daily life</b>				
5.23	Showers should be clean and hygienic. (2.10)	Agreed	<p>The local Respect &amp; Decency lead has completed an audit of the showers to establish which are in most need of improvement, national guidance provided by the clean and Decent project will be used to improve standards of cleanliness.</p> <p>Additional funding has been allocated to refurbish 3 showers across A and G wing.</p> <p>A deep cleaning programme of showers based on need will also be implemented alongside a weekly jet washing schedule.</p> <p>Requests will be made to the FM provider for deep cleaning of the showers as and when required. These will be communicated via the monthly tripartite meeting.</p>	Governor	Completed
				Regional Estates Manager	March 2020
				Governor	October 2019
				Governor	Completed
5.24	Cell bells should be answered within five minutes. (2.11)	Agreed	<p>A monthly data capture of local cell bell data will take place. This data will be captured using covert testing. This will be analysed at the monthly safer custody meeting with any trends being shared with residential managers.</p> <p>The prison will work with prisoner forums including User Voice to understand the reasons for the volume and trends of cells bells and</p>	Governor	October 2019
				Governor	September 2019





			<p>work to put systems in place to reduce those activated for routine or non-emergency reasons.</p> <p>Staff will be reminded of the importance of responding to cell bells within 5 minutes at wing briefings.</p>	Governor	September 2019
5.25	<p>Breakfast should be served on the morning it is eaten, lunch not before noon and the evening meal not before 5pm. (2.14)</p>	Not agreed	<p>This recommendation is not agreed as the contents of breakfast packs are suitable to be stored in prisoner accommodation overnight. The serving of breakfast packs the evening before is a well-established practice across the prison estate and one which contributes to a swifter start to the morning regime, including start time for work and other activities.</p> <p>Whilst the lunch meal is often served before noon due to regime purposes, this is a cold meal. Prisoners are encouraged to eat it in the afternoon in order to allow a large number of prisoners to be able to have access to purposeful activity; the time taken to serve the meals; and funded staffing.</p> <p>Serving of the evening meal needs to start at 4.30pm to enable this to be completed and the roll collated by 6pm.</p>		
5.26	<p>Prisoners who need it should have access to bail information and support. (2.20)</p>	Agreed	<p>In accordance with paragraph 3.8 PSI 7/2/15 Early Days in Custody, the prison will implement systems to ensure prisoners are provided with information in reception and in the first night centre on making a bail application.</p>	Governor	September 2019
	<b>Health, well-being and social care</b>				
5.27	<p>Governance procedures should be strengthened significantly to ensure safe and appropriate</p>	Agreed	<p>The prison has engaged in discussions with the local council for the commissioning of improved and appropriate social care provision. A suitable framework with the relevant providers and structures will be implemented.</p>	Governor	December 2019



	social care provision. (2.65)				
5.28	Patients requiring care in external mental health services should be transferred expeditiously. (2.74)	Partly agreed	<p>This recommendation is partly agreed due to operational reasons outside of the prison's control relating to the availability of PICU and secure mental health beds in the community and the outcome of clinical assessments by external services.</p> <p>HMP Pentonville promote timely mental health transfers to hospital, however, when excessive waiting times are encountered, the prison make submissions to health commissioners and HMPPS to enable swift transfer.</p> <p>NHS England – London Region has set up a monthly Mental Health Transfer management meeting where all London Mental Health providers of prison and Immigration removal centres mental health in-reach services, Healthcare Lead Providers and secure mental health services are represented along with Health &amp; Justice Commissioners and Specialised Commissioning from NHS England. The meeting will identify blockers and points of delay in the mental health transfer pathway. All current cases of patients awaiting transfer are reviewed at this meeting.</p>	NHSE & CARE UK	Completed
5.29	Maximum and minimum temperatures should be recorded daily for refrigerators where medicines are stored and documented corrective action should be taken when temperatures fall outside the 2-8 degrees centigrade range. (2.89)	Agreed	<p>The healthcare provider has developed an action plan to ensure that all staff who work in treatment hatches are aware of the systems in place to report and manage fridge temperatures.</p> <p>This includes reissuing the local policy and flowchart to all staff, provision of weekly training, and weekly senior management assurance of the fridge temperature checks. This will be shared and discussed in the medicines management and Quality Assurance meeting to allow for full oversight and control.</p> <p>If possible, refrigerators will be repaired or replaced if required.</p>	NHSE / CARE UK	November 2019



	Education, skills and work activities				
5.30	Vulnerable prisoners should have access to a wide range of education, skills and meaningful work. (3.19)	Partly agreed	<p>This is partly agreed as there is limited further capacity to provide further education and work places for vulnerable prisoners, however opportunities for regime engagement will be maximised where possible.</p> <p>A needs analysis of the vulnerable prisoner population will be completed to identify further appropriate and available activity opportunities.</p> <p>A classroom pod will be introduced on the vulnerable prisoner wing to enable more education activities to be carried out on the unit.</p> <p>The provision of in cell work for prisoners will be reviewed to enable a introduce more creative and meaningful range of opportunities</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>December 2019</p> <p>October 2019</p> <p>November 2019</p>
5.31	Managers should provide structured support for prisoners with specific additional learning support needs. (3.25)	Agreed	<p>Reception and First Night Centre processes will be reviewed to identify those who may have additional learning support needs so that they can be referred to the relevant service for support. Any specific learning support needs will be further discussed during the initial education assessment.</p> <p>Novus are currently recruiting for a number of additional support teachers and have recruited a Special Educational Needs Coordinator (SENCo) to work with teams locally, in particular with Peer Mentors to support learning needs of men in custody.</p> <p>The establishment will raise awareness of learning disability during Equalities week in October 2019 and Basic skills assessments which highlight additional learning support needs will be sent to the Equalities</p>	<p>Governor/ Local Novus Head of Education</p> <p>Governor/ Local Novus Head of Educations</p> <p>Governor/ Local Novus Head of Education</p>	<p>December 2019</p> <p>October 2019</p> <p>October 2019</p>



			Officer for further review and action as required. They will work in conjunction with education to provide a full service.		
5.32	All prisoners should receive good quality teaching in functional skills English and mathematics, leading to successful achievement of qualifications. (3.26)	Agreed	<p>Novus have completed an initial set of teaching observations. Of those where concerns were highlighted, this is being addressed through development feedback, individual targets and learning plans. Novus will provide updates on improvements at the local governance meetings.</p> <p>Quality of teaching is reviewed at the group contract governance meeting chaired by the Prison Group Director and any concerns are highlighted with the Regional Director of Novus with robust actions agreed and monitored.</p>	<p>Governor/ Local Novus Head of Education</p> <p>Prison Group Director</p>	<p>Completed</p> <p>September 2019</p>
5.33	Managers should collect and analyse data on prisoners' life after release to ensure that the activities offered meet their needs. (3.31)	Agreed	<p>At the CRC contract management meeting, management information on education, training and employment as well as housing outcomes at point of release is shared.</p> <p>London CRC has introduced a 'One Referral' form which is discussed with a Service User and they are linked in with activities that meet their needs.</p> <p>As part of the CRC contractual requirements, they submit data on Housing Education Training Education outcomes (ETE)). The London Contract Management will continue to work with London CRC on improving their recording rates.</p>	<p>Governor, London CRC and Director of Community Interventions London CRC</p> <p>London CRC and Director of Community Interventions</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p>



	<b>Children and families and contact with the outside world</b>				
5.34	Visits procedures and facilities should provide a positive experience of efficient, welcoming and rehabilitative culture in the prison. (4.5)	Agreed	The prison will carry out a review of visits procedures and facilities in conjunction with the Prison Advice and Care Trust (PACT). Once this is completed, an action plan will be developed and incorporated into the family strategy to improve the experience of those visiting family and friends at the prison. This will include improvements to the visits hall and visitors centre environment, staff engagement with prisoners, timeliness of sessions and the provision of refreshments.	Governor	December 2019
	<b>Reducing risk, rehabilitation and progression</b>				
5.35	The prison should investigate the reason for the low home detention curfew approval rate and make any necessary changes. (4.13)	Agreed	A review of low approval rates will be completed to identify any themes or trends. Any appropriate actions will then be put in place to address these.	Governor	January 2020
	<b>Categorisation and transfers</b>				
5.36	The prison should keep comprehensive transfer data so that it can monitor performance and demonstrate any systematic problems that it is experiencing with the national prison estate. (4.19)	Not agreed	The Offender Management Unit attempted to maintain a local data set relating to prison transfers, but this proved unsustainable due to the resources required to complete this work.		



5.37	Prisoners should be able to make written representations for re-categorisation reviews. (4.20)	Agreed	A system will be introduced to invite prisoners to make written representations for re-categorisation reviews. The system will include a database of upcoming reviews and a letter being sent to the prisoner to invite them to make a written representation. Key workers will also be informed so it can be included in their ongoing work.	Governor	September 2019
	<b>Interventions</b>				
5.38	Staffing levels and referral procedures should ensure that all prisoners can access suitable interventions. (4.26)	Partly agreed	<p>This is partly agreed as access to suitable accredited programmes is depend on availability of spaces at prisons which offer them. There are no plans to increase staffing at Pentonville to provide further interventions. However, the prison will review sequencing and allocation processes to ensure that prisoner need is identified and appropriate transfer requests are actioned.</p> <p>The 'Getting it Right programme' has re-commenced since June 2019. London CRC Supply chain have put in contingencies to support continuation of the delivery of Getting it Right. London CRC CMT continue to work closely with the CRC to ensure delivery of interventions at the prison as well as ensuring sufficient levels of staff to deliver these. Under Enhanced TTG where Pentonville was signed off for delivery in May 2019' the Supply chain model accounts for specialist workers. Under Enhanced TTG the CRC have supported in the delivery of job fairs that have led to positive outcomes of employment and interviews for release. There are initiatives developing for other mandated pathways</p>	Governor  Director of Community Interventions	December 2019  Completed and Ongoing
5.39	The needs of care leavers should be fully understood and appropriate interventions and support made available. (4.27)	Partly Agreed	<p>This recommendation is only partly agreed as whilst support can be provided for care leavers through key work, there are no suitable interventions currently available.</p> <p>An assessment of the current numbers of care leavers within HMP Pentonville will be completed and key workers will be used to identify the needs of each individual through an interview process.</p>	Governor	October 2019



		<p>Once the needs are known, the establishment will work with the London Group lead for care leavers to identify any interventions or support that is affordable and available in the London area. If appropriate, the social worker for each individual will be contacted and asked to continue supporting individuals in custody, in conjunction with the CRC and Novus.</p> <p>The reducing reoffending meeting terms of reference and agenda will be updated to include an agenda item for Care Leavers, this meeting will be used to assess the continued suitability of the support and interventions in place.</p>	<p>Governor</p> <p>Governor, Novus and CRC</p>	<p>October 2019</p> <p>October 2019</p>
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Recommendations	
Agreed	26
Partly Agreed	11
Not Agreed	2
<b>Total</b>	<b>39</b>

