



HM Prison &  
Probation Service

Action Plan: HMP Forest Bank

Action Plan Submitted: 20 September 2019

A Response to the HMIP Inspection: 13, 14, 20 – 24 May 2019

Report Published: 4 September 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.

### ACTION PLAN: HMCIP REPORT

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.



## ESTABLISHMENT: HMP FOREST BANK

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	<b>Key concerns and recommendations</b>				
S38 (1)	Self-harm should be reduced. Managers should devise a strategy and action plan to achieve that aim.	Agreed	<p>Consultation with staff and residents took place in June 2019 and a Safety Improvement strategy is now in place. Progress is reviewed at the monthly Safer Prisons meeting and is chaired by the Director or Deputy Director at HMP Forest Bank.</p> <p>HMP Forest Bank will develop and re-launch the Rehabilitative Culture Strategy in October 2019. An independent needs analysis is also being completed by an external agency to inform the Safety Strategy and interventions to reduce self-harm.</p> <p>Improvements to the Assessment Care and Custody Teamwork (ACCT) quality assurance process has commenced and due for completion by December 2019 to drive continual improvements in ACCT management.</p> <p>Staff identified as requiring training will be trained in trauma and risk management across functions to support Management of residents in crisis. This will include training on Mental Health First Aid, Trauma, and Conflict resolution by February 2020.</p>	<p>Director of HMP Forest Bank</p> <p>Director of HMP Forest Bank</p> <p>Director of HMP Forest Bank</p> <p>Director of HMP Forest Bank and Director of Sodexo Healthcare</p>	<p>Completed</p> <p>March 2020</p> <p>December 2019</p> <p>February 2020</p>
S39 (2)	Violence in the prison should be reduced. Strategies to achieve this requirement should include measures that incentive good behaviour whilst ensuring those who offend are held properly to account.	Agreed	<p>A revised Incentives and Earned Privileges (IEP) policy is under review and due to be fully implemented by November 2019 with staff and residents fully informed before implementation. The revised policy will concentrate on rewarding and recognising good behaviour, and be based on rehabilitative principles and a facilities list will be provided that differentiates between incentive levels and encourages good behaviour.</p> <p>HMP Forest Bank will partner with KSA Training and Consultancy to improve and expand Restorative Justice approaches and reduce conflict and misunderstandings. The recommendations will be implemented by December 2019 and the effectiveness reviewed in January 2020.</p>	<p>Director of HMP Forest Bank</p> <p>Director of HMP Forest Bank</p>	<p>November 2019</p> <p>January 2020</p>



			STEM (Support Through Enhanced Management) is a dedicated unit set up to address lower level bullying for residents that are unsuitable for the Challenge Support Intervention Plan (CSIP) process. A dedicated programmes team will deliver safety interventions, support for debt management, conflict resolution and the accredited Thinking Skills Programme (TSP) programme will be delivered by January 2020. Work is currently underway developing a debt management framework to help address the causes of lower level bullying.	Director of HMP Forest Bank	January 2020
S40 (3)	Vulnerable prisoners should be kept safe and protected from victimisation. Those seeking protection should be subject to effective risk assessment and risk management.	Agreed	<p>The Risk Assessment proforma and process for allocations to the Vulnerable Prisoner Unit will be reviewed and a Notice to Staff will be issued to remind staff to fully complete the assessment and provide adequate depth in assessments. The Head of Residence will complete an assurance audit once a month on 20% of completed assessments to ensure adherence.</p> <p>To help vulnerable residents feel safer, they are now encouraged to participate in the User Voice Council where their concerns and perceptions of safety are addressed.</p> <p>To further reduce the feelings of vulnerability and provide a safer environment there will be an integrated healthcare facility developed on the Vulnerable Prisoners (VP) unit.</p> <p>Vulnerable Prisoners visits sessions will be introduced by November 2019 as separate sessions will facilitate and increase feelings of safety.</p>	<p>Director of HMP Forest Bank</p> <p>Director of HMP Forest Bank</p> <p>Director of HMP Forest Bank</p> <p>Director of HMP Forest Bank</p>	<p>December 2019</p> <p>Completed</p> <p>October 2019</p> <p>November 2019</p>
S41 (4)	Strategies should be put in place that provide staff with meaningful support and give them the confidence to exercise effective and impartial authority and control when supervising prisoners.	Agreed	<p>Full Key Worker scheme roll out is due at HMP Forest Bank by October 2019. Robust quality assurance checks will be conducted by Managers on a weekly basis on 10% of Key Worker contacts. Further monitoring will be completed by the on-site HMPPS Controllers. Any feedback received from the User Voice Councils will also be considered by the Head of Residence.</p> <p>HMP Forest Bank has established 30 Prison Custody Officer mentors and will allocate them to a graduate member of the Initial Training Course (ITC) for a period of two weeks post-graduation to facilitate skills and meaningful engagement. This process will be subject to regular review.</p> <p>Job Descriptions for managers will be amended to mandate increased management visibility at key times on the wings to empower staff to exercise</p>	<p>Director of HMP Forest Bank</p> <p>Director of HMP Forest Bank</p> <p>Director of HMP Forest Bank</p>	<p>October 2019</p> <p>Completed and ongoing</p> <p>October 2019</p>



			proper authority and control. Managers will be held accountable via the appraisal process.		
S42 (5)	Cells should provide a decent environment which is in a good state of repair and fit for purpose.	Partly agreed	<p>This recommendation is partly agreed as double-cell occupancy is required due to population pressures across the prison estate and toilet specifications are subject to HMPPS conditions. Occupancy of prison cells is determined by establishments and certified by the Prison Group Director (PGD) in accordance with Prison Service Instruction (PSI) 17/2012, which provides clear guidelines for determining cell capacities. Cells will only be shared where a PGD has assessed them to be of adequate size and condition for doing so. All accommodation is compliant with the certified cell certificate.</p> <p>Wing Managers will conduct recorded weekly cell inspections to ensure in-cell equipment is in good order and stocks will be maintained to ensure there are no shortages.</p> <p>The introduction of CHECKIT, a tablet-based system to record and immediately alert managers of issues/defects following cell fabric checks, will be audited monthly by the Head of Residence to ensure the remedial action taken is within a reasonable timeframe.</p> <p>A maintenance plan to replace all broken cell windows is currently being actioned and due for completion by February 2020.</p> <p>The establishment is also in the process of sourcing and trialling in-cell lockers. Initial designs were found to be unsatisfactory (August 2019). Further designs and trials are currently being progressed and if successful, in cell lockers will be in all cells by April 2020.</p>	<p>Director of HMP Forest Bank</p> <p>Director of HMP Forest Bank</p> <p>Director of HMP Forest Bank</p> <p>Director of HMP Forest Bank</p>	<p>October 2019</p> <p>February 2020</p> <p>February 2020</p> <p>April 2020</p>
S43 (6)	Consistent clinical leadership should ensure that the admission criteria, environment and regime for inpatients provide therapeutic value and encourage recovery.	Partly agreed	<p>This recommendation is partly agreed as the inpatient unit requires additional resources for overall improvements to facilitate a therapeutic environment and regime, and this is dependent on acceptance of a business case submitted to HMPPS.</p> <p>A Clinical Head of Healthcare has been in post since June 2019 to build clinical quality. The admission criteria will be revised, redrafted, and published by October 2019.</p> <p>Time out of cell is determined by patient condition, risk and safety, however staff are encouraged to facilitate this where possible using the Single Point of Referral process completed on a weekly basis.</p>	<p>Director of Sodexo Healthcare Services</p> <p>Director of Sodexo Healthcare Services</p>	<p>October 2019</p> <p>Completed</p>



			A sensory garden is being created as a therapeutic external environment for patients and scheduled for completion by February 2020.	Director of HMP Forest Bank	February 2020
S44 (7)	Time out of cell for prisoners who do not work full time should be increased to enable them to take part in other purposeful activity such as gym, library or supervised association.	Partly agreed	<p>This recommendation is partly agreed due to space and resource constraints limiting HMP Forest Bank to 69% of residents in full time activity or 88% in combined full or part time activity. When the establishment increased the Operational Capacity by 264 spaces additional activity provision was not factored.</p> <p>HMP Forest Bank appointed a senior leader to the newly created Head of Regimes post on 1 June 2019 to actively drive the regime and ensure all employment spaces are maximised. The Head of Regimes is to work collaboratively with the allocations department to over-allocate, ensuring increased participation in the event of withdrawals. Attendance will be monitored weekly and will engage a wider range of residents who will be encouraged to attend activities via regime meetings, induction and the User Voice Council.</p> <p>A library administrator has been recruited to actively monitor wing attendance and encourage attendance where it is low. Library facilities will be promoted via the induction Programme, kiosk system and User Voice Council.</p> <p>A working group has been formed to review time out of cell for retired and disabled residents as they are most at risk of remaining in cells during the core day. Results of the working group consultation will be fed into the User Voice meetings and any changes to processes will be monitored by the resettlement meeting.</p>	<p>Director of HMP Forest Bank</p> <p>Director of HMP Forest Bank</p> <p>Director of HMP Forest Bank</p>	<p>November 2019</p> <p>November 2019</p> <p>October 2019</p>
S45 (8)	Sentenced prisoners should be given progressive moves to another establishment or provided with appropriate interventions and opportunities for progression at Forest Bank.	Partly agreed	<p>This recommendation is partly agreed as progressive transfers to Category B establishments is dependent on HMPPS population management allocating sufficient spaces.</p> <p>HMP Forest Bank will maximise progressive allocations to support progression when allocated into prison transfers by the Population Management Unit (PMU).</p> <p>Current population data indicates that there are insufficient training places within the estate. The Reconfiguration project is adapting the way that men move through the prison estate. By the end of 2023 the closed adult male estate will be simplified into three main functions: reception, training, and</p>	<p>Director of HMP Forest Bank</p> <p>Director of HMPPS Estate Transformation Programme</p>	<p>Completed and Ongoing</p> <p>December 2022</p>



			<p>resettlement. Reconfiguration of the estate coupled with the building of new prisons, will create much-needed training and resettlement places.</p> <p>The offender flows and a national allocation protocol developed by the Reconfiguration Project, will be adopted by prisons in five geographical lots between 2020 and 2023. HMP Forest Bank will apply the new offender flows by 2022/23. As part of its reconfiguration to a Reception Prison, HMP Forest Bank will also provide a resettlement function for Category C men.</p>	<p>Director of HMPPS Estate Transformation Programme and Director of HMP Forest Bank</p>	<p>December 2023</p>
	<b>General recommendations</b>				
1.11 (9)	Prisoners should not be unnecessarily delayed in reception before moving to the first night centre.	Agreed	<p>Reconfiguration of HMP Forest Bank will allow for swift transfers from Reception to the First Night Centre. Reconfiguration is due to commence in October 2019 and completed by December 2019. The Reception pathway will be developed to incorporate healthcare and operational processes to minimise waiting times in Reception for those moving to the First Night Centre.</p> <p>Head of Healthcare will review the Healthcare provision in Reception as an interim measure prior to reconfiguration which will include a GP and healthcare staff resident in reception when residents need to be seen.</p>	<p>Director of HMP Forest Bank</p> <p>Director of Sodexo Healthcare</p>	<p>October 2019</p> <p>December 2019</p>
1.12 (10)	Induction information should be available in a variety of languages. (Repeated recommendation 1.17)	Agreed	<p>HMP Forest Bank currently provide induction information in five languages. The population trend will be re-examined following reconfiguration in December 2019 and language provision reviewed accordingly.</p> <p>Monitoring of this will take place every quarter commencing April 2020.</p>	<p>Director of HMP Forest Bank</p> <p>Director of HMP Forest Bank</p>	<p>December 2019</p> <p>April 2020</p>
1.13 (11)	First night cells should be clean, fit for purpose and should contain basic amenities.	Agreed	<p>Pre-occupation checks are now in place to ensure cells are suitable for occupation. Stocks of bedding, clothing, cell equipment and toiletries are checked weekly by the First Night Centre Manager. A review of the new process will be conducted in September 2019.</p>	<p>Director of HMP Forest Bank</p>	<p>September 2019</p>
1.30 (12)	Adjudications should be concluded swiftly to ensure that the system acts as a deterrent to violence and drug misuse.	Agreed	<p>The Segregation Monitoring and Review Group (SMARG) meeting will focus on adjudication processes and concluding adjudications in a timely manner. A dedicated group of adjudicators will be in place to ensure timeliness.</p>	<p>Director of HMP Forest Bank</p>	<p>December 2019</p>



1.36 (13)	Records of the use of force and planned interventions should be scrutinised, including viewing CCTV and body-worn video camera footage, to ensure that the force used is necessary, justified and proportionate.	Agreed	<p>The Use of Force meeting will scrutinise both CCTV and a good sample of body-worn video camera footage to ensure any incidents of use of force is justified, necessary, and proportionate.</p> <p>New body worn video cameras will be purchased by January 2020 and issued with improved control measures together with increased reminders on good practice every quarter by the Use of Force committee.</p>	<p>Director of HMP Forest Bank</p> <p>Director of HMP Forest Bank</p>	<p>December 2019</p> <p>January 2020</p>
1.44 (14)	The care and reintegration planning for prisoners segregated on an ACCT, or those with complex needs, should include clear evidence of measures to reintegrate them to the main population as soon as practically possible.	Agreed	<p>Progress on care plans will be recorded on the prison service electronic database case notes (NOMIS) and will include evidence of measures to reintegrate this population. Monthly assurance checks will be completed by the Head of Residence on a random sample of 10% of cases. A recent HMPPS Headquarters audit in July 2019 confirmed an improvement in this area.</p>	<p>Director of HMP Forest Bank</p>	<p>December 2019</p>
2.13 (15)	Meals should be served at the correct temperature.	Agreed	<p>Procedures regarding the use of temperature probes and monitoring food temperatures will be reviewed. The Head of Safety &amp; Risk and the Catering Manager will conduct random weekly quality assurance checks to ensure compliance with the new procedures.</p> <p>New servery heated storage cabinets on residential units are currently being sourced and will be reviewed and evaluated. This will be commissioned by March 2020.</p> <p>A 'comments book' at the servery areas is now in place to seek residents' views and provides a further level of scrutiny.</p>	<p>Director of HMP Forest Bank</p> <p>Director of HMP Forest Bank</p> <p>Director of HMP Forest Bank</p>	<p>October 2019</p> <p>March 2020</p> <p>Completed</p>
2.21 (16)	Answers to complaints should fully address all the issues raised.	Agreed	<p>The new HMPPS complaints framework will be adopted following publication in August 2019. The new complaints form encourages investigation, problem solving, and conversations between the responder and complainants.</p> <p>A 10% monthly quality check will be conducted by the Deputy Director in addition to weekly quality checks conducted by the Senior Leaders Team. These quality checks will ensure that the investigation has been conducted appropriately, that the complaint has been addressed at the appropriate level, consultation has taken place with the resident, and the reply addresses the complaint. Checks will also cover legibility, language, and authors details.</p>	<p>Director of HMP Forest Bank</p> <p>Director of HMP Forest Bank</p>	<p>October 2019</p> <p>October 2019</p>





			Any User Voice Council feedback will be considered and will add a further level of scrutiny to the Senior Leaders Team quality check.	Director of HMP Forest Bank	October 2019
2.40 (17)	The personal emergency evacuation plan system should be applied consistently and provide assurance that the safety of all identified prisoners is assured in an emergency. (Repeated recommendation 2.28)	Agreed	Personal Emergency Evacuation Plan (PEEP) processes are to be discussed at weekly briefings and staff understanding is to be monitored via timed Fire Evacuation exercises and Night Duty Manager inspections.	Director of HMP Forest Bank	November 2019
2.72 (18)	Appointment slips for health appointments should be distributed in a way that preserves the patient's confidential medical status.	Agreed	All appointment slips will be put in fully sealed envelopes for distribution by the night Health Care Assistant.	Director of Sodexo Healthcare	October 2019
2.73 (19)	All prisoners should be released or transferred with their required medication, and this process should be recorded accurately and regularly monitored.	Agreed	HMP Forest Bank have introduced the FP10 prescription system to ensure those residents requiring controlled drugs are transferred with a FP10 prescription. This also ensures accurate recording.  A process is in place where all residents are able to order non-controlled medication for discharge. This is recorded in reception by the nurse using the national template. This is then sent with the resident to the ongoing establishment.	Director of Sodexo Healthcare  Director of Sodexo Healthcare	Completed  Completed
<b>Error ! Reference source not found.</b> (20)	Patients requiring mental health inpatient care should be transferred within the national guidance timeframe.	Partly agreed	This recommendation is partly agreed as HMP Forest Bank cannot commit to transfers within Department of Health guidelines ('The Prison Transfer and Remission Guidance' published by the Department of Health in 2011), which in any event is not agreed by NHS England. Transfers are dependent on a number of factors such as the completion of appropriate assessments, administrative processes within the NHS, and the availability of accommodation in mental health hospitals and other related issues and beyond the control of the establishment.  NHS England guidance, published in March 2018, sets out timescales that take into account clinical urgency and need. The health care provider and NHS England Health and Justice, and NHS England Specialised Commissioning, continue to robustly manage this challenging pathway.	Director of Sodexo Healthcare	Completed and ongoing



3.19 (21)	Managers should ensure that all allocations to work and training are fair and that all eligible prisoners have an opportunity to apply for all jobs.	Agreed	<p>The central allocation team now have overall control of all allocations into work and training ensuring fairness. All eligible residents have the opportunity to apply for all jobs.</p> <p>Work allocation will be monitored by the Equalities Monitoring Tool via the Diversity and Action Team Meeting and Senior Lead briefing bi-monthly. Any actions arising from the User Voice Council will be fed back to Senior Leaders.</p>	<p>Director of HMP Forest Bank</p> <p>Director of HMP Forest Bank</p>	<p>Completed</p> <p>October 2019</p>
3.20 (22)	Managers should provide enough activity places to enable most prisoners to be occupied for the full working day. These should include more demanding and interesting work.	Partly agreed	<p>This recommendation is partly agreed due to space and resource constraints limiting HMP Forest Bank to 69% of residents in full time activity or 88% in combined full or part time activity. When the establishment increased the Operational Capacity by 264 spaces additional activity provision was not factored for.</p> <p>Activity spaces are continually being reviewed at HMP Forest Bank to maximise the number of residents in activity. HMP Forest Bank appointed a senior leader to the newly created Head of Regimes post on 1 June 2019 to actively drive the regime and ensure all employment spaces are maximised. The quality of activity is under review which will be further reviewed post-reconfiguration in December 2019.</p>	<p>Director of HMP Forest Bank</p>	<p>January 2020</p>
3.21 (23)	Managers should provide prisoners with relevant careers guidance, particularly during induction, so that they can develop realistic and challenging plans for their future.	Partly agreed	<p>This recommendation is partly agreed as the provision of careers guidance is dependent on the approval of a business case which has been submitted to the HMPPS for extra resource from Prison Education Framework (PEF).</p> <p>The Community Rehabilitation Company (CRC) provider will ask residents about their employment and aspirations during the Basic Custody Screening Tool 2, a process completed during induction. There is also a group work facilitator in post who will offer workshops and advice about employability and disclosure. CRC partners will give ongoing support post release.</p>	<p>Director of HMP Forest Bank</p> <p>Director of HMP Forest Bank</p>	<p>February 2020</p> <p>February 2020</p>
3.28 (24)	Managers should ensure that all teachers and trainers support prisoners to improve their written English skills.	Agreed	<p>There will be extra written English skills integrated in workshops for the residents. Instructors delivering vocational qualifications will have their feedback on written work checked and quality assured at quarterly standardisation meetings. Instructors comments on learning plans will also be quality assured by the Education Manager on a monthly basis to ensure continuous improvement.</p>	<p>Director of HMP Forest Bank</p>	<p>December 2019</p>



3.34 (25)	Leaders and managers should ensure an even higher rate of attendance and punctuality at education classes to maximise prisoners' learning.	Agreed	Attendance and punctuality is continuously monitored and quality assurance of attendance is provided daily by the Head of Regimes. There is also weekly regime monitoring, and further monthly assurance by Senior Leaders and quarterly assurance at the Quality Improvement Group (QIG). If unauthorised non-attendance is repeated, the IEP scheme will be used to support and encourage the residents. A review of the new measures will take place in December 2019 to assess how well they have been embedded.  Managers will be held accountable for timely movements to activities to ensure punctuality and this will be monitored via the staff appraisal process.	Director of HMP Forest Bank  Director of HMP Forest Bank	December 2019  October 2019
3.35 (26)	Managers should provide prisoners with a comprehensive induction to help them make informed decisions about their career aims and interests.	Agreed	Increased literature on the pathways available for residents will be produced and be available at induction. The information advice and guidance team will attend Quality Improvement Group (QIG) quarterly meetings to ensure that the quality of induction improves.	Director of HMP Forest Bank	February 2020
3.38 (27)	Managers should provide prisoners with formal recognition of the skills they develop.	Agreed	HMP Forest Bank is in the process of seeking approval from WAMITAB (the authority that certifies those working in waste management, recycling, and cleaning) to deliver nationally recognised cleaning qualifications. Kitchen workers will have their achievements in work recognised by an internal HMP Forest Bank award. They will also undertake food hygiene qualifications that are Sodexo approved.	Director of HMP Forest Bank	February 2020
4.17 (28)	Probation staff should be systematically involved in quality assurance, training and countersigning of individual prisoner assessments, to ensure that risk issues are understood and properly identified by all involved in offender management.	Partly agreed	This recommendation is partly agreed as this is dependent on the increase of Probation Officers, and HMPPS are responsible for this recruitment.  The Offender Management in Custody (OMiC) case management model, which allows for an increase of Probation Officers, will enable oversight of high risk and very high risk residents.  HMP Forest Bank are currently in discussions with the National Probation Service for an interim measure.	Director of HMP Forest Bank  Director of HMP Forest Bank	February 2020  February 2020



<b>Recommendations</b>	
Agreed	20
Partly Agreed	8
Not Agreed	0
<b>Total</b>	<b>28</b>

