



HM Prison &
Probation Service

Action Plan: HMP Hewell

Action Plan Submitted: 5 November 2019

A Response to the HMIP Inspection: 3-14 June 2019

Report Published: 25 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.

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 must be an explanation of why we cannot fully agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.
Not Agreed	The recommendation is not agreed and will not be implemented. This might be because of commissioning, policy, operational or affordability reasons.	The response must clearly state the reasons why we have chosen this option. There must be an explanation of why we cannot agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.



ACTION PLAN: HMCIP REPORT

ESTABLISHMENT: HMP HEWELL

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	Key concerns and recommendations				
	Directed to: Governor				
S47	<p>Concern: First night risk assessments on both sites were not always completed, putting prisoners at risk during their early days in custody. The delivery of the induction programmes was often delayed and weak, and management oversight of the process was poor. Although most prisoners attended an induction, it was often delivered late and did not provide adequate or up-to-date information to new arrivals.</p> <p>Recommendation: Arrangements for the arrival of new prisoners should ensure they are kept safe and properly supported.</p>	Agreed	<p>A review of the induction process on the open site has been completed which has led to the development of a new induction programme to address the concerns highlighted. The review is completed and the new induction process will be in place and operational by the end of October 2019.</p> <p>A local first night lead has been assigned and a review of the first night and early days procedures on the closed site has been formally commissioned through the 2019/2020 establishment business plan. The review stage has been completed. Recommendations within the report have been developed into an early days action plan to address the concern and create a more positive experience for men arriving at the establishment.</p> <p>The review will inform the development of the local early days policy. The early days policy will be revised and re-published in October 2019.</p> <p>First night processes have been updated to strengthen assurance and the level of management oversight. This has included the introduction of first night pre-occupancy checks. First night risk assessments now take place in the first night centre and are subject to the induction Custodial Manager (CM) oversight. The locations of men on first night are documented in CM handovers to ensure that the night duty officer is aware of the locations of all men on their first night in the establishment.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>November 2019</p> <p>Completed</p> <p>October 2019</p> <p>Completed and ongoing</p>



			<p>The Early Days in Custody (EDiC) passport has been developed and is scheduled for implementation in October 2019. This sets out and sequences the progression of men through each stage of the early days process through to completion of a three day induction programme. Each stage of the process is subject to a management check and sign off prior to progression. All final completions of induction will be subject to review through the multi-disciplinary 'induction procedure completion board'. The induction programme has been reviewed and the induction booklet has been updated to support the implementation of the EDiC passport and ensure appropriate information is available to men on arrival into the establishment.</p>	Governor	October 2019
S48	<p>Concern: Low-level rule breaking went unchallenged by staff and there was no consistency in how prisoners were challenged. Prisoners complained that most incidents went unpunished. The local incentives and earned privileges (IEP) scheme was not used systematically at either site. Record keeping was poor with no system to identify prisoners who received two IEP warnings within 28 days, which should have led to a downgrading of their IEP level.</p> <p>Recommendation: The prison should have a strategy and</p>	Agreed	<p>A review of the processes and the development of a strategy to manage challenging behaviour has been commissioned through the local business plan. This includes the management of challenging behaviour across the residential units. The local process, protocol and tools in place to manage behaviour at the appropriate level will be set out in a strategy and communicated to staff as instruction and guidance.</p> <p>A review of the local Incentives and Earned Privileges (IEP) framework in accordance to the updated national requirements will be completed. The application and recording of IEP will be included in the strategy for managing behaviour.</p> <p>Residential Supervising Officers (SOs) will be responsible for tracking and conducting IEP reviews and implementing standards of record keeping. This will be a subject of formal review at monthly bi-lateral meetings with the head of function.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>November 2019</p> <p>November 2019</p> <p>November 2019</p>



	deliver practical arrangements that promote and ensure good behaviour and full engagement with the prison's regime.		<p>The Custodial Manager (CM) group is to be re-profiled to provide a distinct orderly officer group and allow residential CM's to focus their time to working in function. This will provide consistent management oversight and improve the level of staff supervision on the residential units.</p> <p>The standards coaching team will be deployed at the establishment to build the knowhow, capability and confidence of the officer group in managing the men and challenging inappropriate behaviour. The commencement of a 12 week deployment began in August 2019.</p> <p>An officer swap scheme has been developed within the West Midlands Prison Group to support Hewell with the provision of experienced officers from within the group through detached duty deployments. This builds the level of experience at the establishment whilst providing development opportunities for less experienced officers through deployment at more settled prisons within the prison group.</p>	Governor	October 2019
				Governor	November 2019
				Governor	October 2019
S49	<p>Concern: The use of drugs contributed to high levels of violence and bullying, and there were too few responses to security intelligence supplied, which allowed prisoners to take part in illegal activities without being detected. The prison lacked sophisticated drug-detection equipment, especially in key risk areas such as reception, which increased the risk of contraband entering the prison.</p> <p>Recommendation: The prison should introduce a robust strategy and action plan that reduces the availability and use of illegal drugs.</p>	Agreed	<p>The review of the local drug strategy has been formally commissioned through the 2019/20 local business plan. The review will include the development of data around current drug use; review of the clinical provision and support services; MDT and testing arrangements and the use of intelligence and security. The review will inform the development and application of a robust reduction strategy and action plan aligned to the specific local need.</p> <p>The review has been informed by the drug diagnostic report that was published in July 2019. The drug strategy will include an action plan that addresses the recommendations contained within the drug diagnostic report.</p> <p>A gate resilience project has been commissioned to strengthen security and address existing vulnerabilities. Recommendations are to be submitted in October 2019.</p> <p>Drug detection has been improved through the locating of a body-scanner in the visits hall and a mail scanner is in operation to scan incoming mail.</p>	Governor	November 2019
				Governor	November 2019
				Governor	October 2019
				Governor	Completed



			<p>A procedure to photocopy prisoner mail on a risk led basis will be introduced.</p> <p>Security has been strengthened with the application of an active dog test for all rule 39 mail and newspapers prior to distribution.</p> <p>The officer profile has been updated to enable the provision of a local pro-active search team. This is a dedicated group of search officers that will enable a consistent, specialist and more pro-active response to the security and intelligence picture at the establishment and reduce the prevalence of contraband. The new profile is scheduled for implementation in November 2019.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>October 2019</p> <p>Completed</p> <p>November 2019</p>
S50	<p>Concern: Living conditions on the closed site, including house blocks, the segregation unit and the inpatient unit, were unnecessarily poor. Wing staff did not effectively monitor the condition of the cells: much of the furniture was damaged; prisoners had blocked observation panels and made unacceptable modifications; and there was considerable graffiti and some offensive images displayed. The standard of cleaning was inadequate, prisoners said they had insufficient access to cleaning equipment, and clean bedding was not issued weekly.</p> <p>Recommendation: Prison cells, showers and communal areas on the closed site should provide clean, hygienic and well-maintained conditions for</p>	Agreed	<p>Improvements to the fabric and infrastructure remain ongoing through upgrade projects being undertaken at the establishment. This includes the full refurbishment of showers and windows across the residential areas and the installation of in-cell telephony. Full completion is scheduled for March 2021.</p> <p>A revised decency strategy has been drafted and is due to be implemented in November 2019. This sets out the minimum provision for men and the access to cleaning materials and laundry services. The strategy will include the introduction of new cleaning schedules and associated support documents from the national clean and decent project available on the intranet. The local decency plan will include actions to enhance the environment for men, including art-work and information boards.</p> <p>The assurance framework will be revised to include a residential Custodial Manager's (CMs) Decency Assurance Checklist which will be completed monthly and subject to scrutiny at bilateral meetings with heads of function.</p> <p>Further organisational support will be provided through inclusion of the establishment in the Clean & Decent Project. This is a 12 month project due to commence in January 2020 attracting additional management oversight and expertise to develop the decency agenda and long term improvements at the establishment.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>March 2021</p> <p>November 2019</p> <p>November 2019</p> <p>January 2021</p>



	prisoners, including those in the segregation and inpatient units.				
S51	<p>Concern: The main building on the open site did not provide an acceptable residential environment. The dormitories had makeshift partitions in ill-adapted rooms, showed many signs of wear and tear, and were not fit for purpose. The toilets and washing facilities were even worse, with leaking and blocked sanitary fittings not uncommon. Some refurbishment had begun but no improvements had yet been completed.</p> <p>Recommendation: Sleeping accommodation, showers, toilets and communal areas on the open site should meet modern standards of decency, providing clean, hygienic and well-maintained living conditions for prisoners.</p>	Agreed	<p>The open unit at HMP Hewell will close following a deterioration in the standard and condition of the accommodation. A review of the 209 place unit concluded that it does not provide decent living conditions for the men in its current state and the scale of upgrade required does not present long term viability. The open site will therefore be permanently closed by the end of the financial year.</p> <p>Plan are now in place to decommission the site over the remainder of the year and maintain standards to minimum levels within the limitations of the current building. A senior project manager has been assigned to manage this process to the best effect and maintain a senior level oversight over the conditions and outcomes for men until the point of closure.</p>	<p>Governor</p> <p>Governor</p>	<p>March 2020</p> <p>April 2020</p>
S52	<p>Concern: There were several areas where the prison's inability to allow prisoners to access health provision directly affected patient care. There was a lack of clinical space for clinics to take place, in particular for secondary health screening of new arrivals. Prisoners had poor access to appointments, which in some cases created a health relapse. Officer presence in the inpatient</p>	Partly agreed	<p>This recommendation is partly agreed as the conversion of office space to clinical assessment and interview rooms to meet clinical activity and patient demand is subject to approval of a business case. The Governor is reviewing potential options of alternative office space.</p> <p>Prison and health management are progressing a new first night/induction centre on House Block Two with the intention to relocate Reception staff and include interview space for screening to take place.</p> <p>The Governor has allocated a project manager to work with Healthcare management to improve the process of enabling patients to attend the Healthcare centre to access appointments.</p>	<p>Governor</p> <p>Governor</p>	<p>November 2019</p> <p>Completed and ongoing</p>



	<p>unit remained inconsistent, which left nursing staff without keys monitoring patients identified at risk to themselves. Continuing late arrivals into reception created gaps in prescribing medicines, and the clinical rooms there were not confidential and not kept clean. The prison still did not provide secure lockable cabinets for in-possession medication.</p> <p>Recommendation: The prison's co-commissioning agreements with its health partners should jointly assess and monitor prisoner health needs and progress against agreed actions to ensure the best health outcomes for prisoners.</p>		<p>The Governor has committed to improving officer presence and staffing on the inpatients unit which now has appropriate officer numbers.</p> <p>NHS England has funded an additional reception nurse for 12 months to accommodate the increased demand on reception screening, in particular later in the evening which enables patients to be seen by the prescriber sooner. This will be reviewed again in July 2020.</p> <p>Healthcare rooms are to be included in the cleaning schedule for the Prison Orderly's paid to work in reception. This will be implemented alongside the cleaning schedules contained within the revised decency strategy.</p>	<p>Governor</p> <p>NHS England</p> <p>Governor</p>	<p>Completed and ongoing</p> <p>July 2020</p> <p>January 2020</p>
S53	<p>Concern: Time out of cell at the closed site was very poor for any prisoner not engaged in off-wing work, with many spending almost 22 hours a day locked up. Only prisoners on the enhanced level of the IEP scheme had the opportunity for association on weekdays, and even this was often cut short. The regime was frequently curtailed, often due to problems reconciling the roll count, which limited the time available for out of cell activities. Prisoners had only a 45-minute exercise period in the morning, leaving little or no time to exercise and complete</p>	Agreed	<p>The portfolio and number of activity spaces has been reviewed and there is adequate provision of spaces for the level of the population. Opportunity for time out of cell is therefore sufficient and outcomes are subject to men engaging with the regime.</p> <p>A review of the reducing reoffending outcomes and portfolio of activity spaces has been commissioned through the local business plan. Outcomes will include the publishing of a clear and descriptive range of activities that provide purposeful activity in line with the core day; the publishing of expectations that incentivise and challenge men to work and the support provided to staff to challenge poor attendance.</p> <p>An allocations board has been re-established and includes the better use of sequencing and pathway plans. The prisoner pay policy has been revised to reward and incentivise meaningful engagement in activities.</p> <p>The revised core day has been implemented and provides designated time out of cell for exercise and domestics in the week-day mornings.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>November 2019</p> <p>Completed and ongoing</p> <p>Complete and ongoing</p>



	<p>other regime activities, such as collecting medication.</p> <p>Recommendation: The prison should ensure a regular and predictable regime for all prisoners that maximises purposeful time out of cell, association and exercise each day.</p>		<p>The Regime Management Plan has been updated and is now used in accordance to policy to better plan the regime and ensure a regular and predictable approach.</p> <p>Adherence to the regime and core day will be supported and managed with the introduction of a new profile for Custodial Managers (CMs). The introduction of a designated duty officer group will protect time in function for Residential CMs and enable improved management oversight in residential areas.</p> <p>The Senior Officer profile will be updated to provide Senior Officer coverage on each residential unit throughout the core day. This will improve regularity and supervision of evening association.</p>	<p>Governor</p> <p>Governor</p>	<p>October 2019</p> <p>November 2019</p>
S54	<p>Concern: The prison's leadership and management of the education, skills and work provision was disjointed, stretched and insufficiently knowledgeable. Leaders and managers had failed to use information to plan provision to meet the needs of all groups of learners, and had no effective oversight of the performance of education, skills and work.</p> <p>Recommendation: Prison leaders should equip the education, skills and work management team with the appropriate resources and knowledge to support the effective management of the provision.</p> <p>Managers should use this data to inform their decisions, and evaluate the performance of the</p>	Agreed	<p>A review of the Learning & Skills leadership and management will be undertaken to propose a new structure that will make the provision cohesive and properly resourced in line with other complex sites.</p> <p>A knowledge assessment will be completed with the support of regional and national colleagues from Learning & Skills and Human Resources in order to identify gaps. Individual development plans will be put in place for those staff identified as requiring development.</p> <p>HMPPS will work with Novus to ensure this is reflected by them and they are held to account on contractual delivery via the Teaching Quality Management Plan, which covers these areas.</p> <p>A local data set will be designed to capture all performance of Education, Skills and work and this will be used alongside Curious to ensure contractual delivery, inform and drive continuous improvement and priorities and inform the curriculum and delivery in the new academic year. A quarterly meeting will be introduced to review and analyse this data.</p>	<p>Governor/Novus</p> <p>Governor/Novus</p> <p>Governor/Novus</p> <p>Governor/Novus</p>	<p>December 2019</p> <p>December 2019</p> <p>December 2019</p> <p>December 2019</p>



	provision and their improvement priorities accurately.				
S55	<p>Concern: Prisoners were not supported well to develop their employability and personal skills, in particular in English and mathematics. The learning resources used did not help learners to progress as well as they could, and some prison staff were not sufficiently knowledgeable to deliver training and learning.</p> <p>Recommendation: Prison leaders and managers should ensure that all teachers, trainers and instructors are able to deliver teaching, training and assessment activities that enable prisoners to learn and develop essential employability and personal skills, including English and mathematics, and record prisoners' acquisition of new skills.</p>	Agreed	<p>Teachers, trainers and instructors will be observed by means of learning walks and development plans agreed for those whose delivery does not meet the required standard. Both unitised delivery and functional skills are in the delivery plan and will be delivered in both education and work place settings. There will be a focus within the development of the delivery plan on embedding Maths and English into as many learning environments as possible.</p> <p>Novus will deliver functional skills in line with the new course delivery and this will include new resources as well as a review of all other resources used.</p> <p>The Data set that will be designed to capture all accredited and none accredited learning will record prisoners learning and progression alongside curious and the course progress tracker introduced by Novus.</p> <p>The management structure and capability of the management team will be reviewed and training needs will be identified. This will inform the development of a training plan to address the ongoing training and development needs of the management team and ensure prison staff are sufficiently knowledgeable to deliver training and learning.</p> <p>The learning and skills delivery plan will be reviewed and updated. This will include the recommending of changes through the change process to improve the delivery plan and ensure that it is meaningful and includes adequate provision of functional skills for maths and English. This will be monitored through the development of an assurance process as outlined in the objective.</p>	<p>Governor/Novus</p> <p>Governor/Novus</p> <p>Governor/Novus</p> <p>Governor/Novus</p> <p>Governor/Novus</p>	<p>December 2019</p> <p>December 2019</p> <p>December 2019</p> <p>December 2019</p> <p>December 2019</p>
S56	<p>Concern: Prisoner attendance at activities was poor and too many had missed their induction to activities and were not receiving careers information, advice and</p>	Agreed	<p>A new process has been put in place to allow men three opportunities to attend induction. A new weekly Labour Board means that men that have not attended induction will not be allocated to work areas but will be given the chance to attend induction again.</p>	Governor	Completed and ongoing



	<p>guidance. Prisoners overall were not developing a good work ethic.</p> <p>Recommendation: Leaders and managers should improve prisoner attendance at education, skills and work, and ensure they access an induction that provides them with the necessary careers information, advice and support to develop a good work ethic.</p>		<p>The re-profiling of the Custodial Manager (CM) group will provide for greater management oversight and leadership on the residential units to drive engagement in the regime and improve the level of attendance at activities. The development of an orderly officer group will ensure that residential CMs are based on their units on a more regular and consistent basis and will be available at key times, including the key morning sessions. The use of a new prisoner database and its associated management information will support this with activity lists being available to staff immediately and seven day schedules being available to the men. New CM profiles are due to be introduced in October 2019.</p> <p>Whilst attendance will be encouraged, non-attendance at activities will be more robustly challenged using new NOMIS and IEP warnings will be issued appropriately. Three non-attendance at sessions will result in a no-pay status, resulting in an immediate basic review and a discussion at the weekly Labour Board.</p> <p>An Information, Advice and Guidance (IAG) contract in is the process of being awarded for the West Midlands region and this includes both sites at HMP Hewell. The provider (Prospects) has now been informed that they have been successful. The implementation of the new contract will ensure men receive careers information, advice and guidance in addition to that already available from Citizens Advice Bureau and Job Centre Plus. The IAG provider will also attend the prisoner induction.</p>	<p>Governor</p> <p>Governor</p> <p>Governor/Prospects</p>	<p>October 2019</p> <p>Completed and ongoing</p> <p>Completed and ongoing</p>
S57	<p>Concern: Prisoner outcomes in education, skills and work were poor, and outcomes for the few following non-accredited courses were not recorded. There was a gap in achievement between learners with learning disabilities and their peers, and prisoners did not develop their English and mathematics skills well.</p>	Agreed	<p>A local data set will be designed to capture non- accredited learning alongside curious and other management information systems. This information will be reviewed quarterly to monitor achieved outcomes.</p> <p>The course Progress Tracker introduced by Novus will ensure that outcomes can be tracked and that wherever possible improvement in levels are achieved.</p> <p>Men will be screened on induction for learning disabilities based on self-disclosure and referrals from staff and peer supporters and a paper assessment will be completed. A further assessment will take place if</p>	<p>Novus/Governor</p> <p>Novus/Governor</p> <p>Novus/Governor</p>	<p>March 2020</p> <p>Completed and ongoing</p> <p>March 2020</p>



	Recommendation: Accredited and non-accredited outcomes for learners should be tracked and monitored to ensure that all achieve as well as they can, with a clear focus on improving the acquisition of English and mathematics skills.		<p>allocated to education and their personal needs will be met in the learning environment. This will drive improvement in the levels of achievement for this group and narrow any identified gap. More cohesive links will be established between induction and the equalities team to ensure self-disclosure is not missed.</p> <p>The introduction of the new Functional Skills Course will result in an increased development in English and mathematical skills.</p>	Novus/Governor	Completed and ongoing
S58	<p>Concern: Shortages in the case administration team on the closed site meant that some rehabilitation and resettlement processes were not completed promptly. At the time of our inspection, new arrivals had not been allocated to offender supervisors for four weeks, there had been delays in providing sentence calculations, and there was a backlog in the verification of telephone numbers for prisoners subject to public protection measures. The team lacked skills for sentence calculations and its work was further distracted by the large number of recalls and short-sentenced prisoners and high prisoner turnover. These factors had a far-reaching impact, including for the CRC and pre-release service, for a significant group of prisoners.</p> <p>Recommendation: The case administration team should complete rehabilitation and resettlement processes for prisoners without delays.</p>	Agreed	<p>An administration review and rotation exercise has been completed to manage the level of vacancies in the administrative staff group and address backlogs within the case allocation and public protection checks.</p> <p>A training plan will be developed to identify training needs and skill requirements across the group. This will include the provision of sentence calculation training for new staff and a long term plan to manage the need for advance calculation trained staff and provide consistency with the skill set in the hub.</p>	<p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>October 2019</p>



S59	<p>Concern: Significant cross-deployment of uniformed offender supervisors at both sites led to a variable service for prisoners. Contact levels with prisoners varied from good in some cases to others that had no contact with their offender supervisor. Prison offender supervisors had been cross-deployed on average 75% of the time over the previous two months on the open site and 50% of the time on the closed site.</p> <p>Recommendation: Offender supervisors' contact with prisoners on their caseload should be regular and meaningful, particularly in high risk of harm cases.</p>	Agreed	<p>The profile and deployment of Offender Supervisors will be reviewed through the development of the new (OMiC) staff profile. The introduction of non-operational Prison Offender Managers at the closed site has provided more consistency and predictability for men to have access to their offender manager.</p> <p>Vacancies at Supervising Officer (SO) level will be filled when recruiting to the new profile. This will alleviate the need for cross deployment from the Offender Supervisor group. Profiles will be implemented in November 2019 and supported with the revision of the Regime Management Plan (RMP). The RMP will be re-established and used to implement a pro-active approach to the delivery of the regime that includes planned deployment of the SO group. This will enable a planned approach based on business need and avoid the repeated depletion of the Offender Supervisors group.</p> <p>There is an improved position with the management of high risk cases as the OMiC staffing levels for probation officers is achieved. This has improved consistency, reduced the individual case-loads across the group and enabled Probation Officers to access their men on a regular basis. All high risk cases are managed by Probation Officers so an improved picture will be achieved on completion of the recruitment process.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>November 2019</p> <p>November 2019</p> <p>Completed and ongoing</p>
S60	<p>Concern: The open site was not achieving its full purpose of helping prisoners resettle into the community. Prisoners had too few opportunities for purposeful release on temporary licence (ROTL), and some assessments were delayed.</p> <p>Recommendation: Prisoners should have prompt access to good quality and purposeful ROTLs to aid their rehabilitation and resettlement.</p>	Agreed	<p>A revised ROTL framework has now been introduced. This provides swifter access and a streamlined allocation process to those who are considered eligible for ROTL. Individuals are allocated to their offender supervisors according to their risk. Men are risk assessed generally within the eight week time window with the more complex cases being boarded within 12 weeks. The number of men accessing work and training over a 4 month period has been increased, with nearly 50% of the population of the open site accessing some form of paid/unpaid work or training.</p> <p>Closer working relationships are now taking place with resettlement to work officers, which includes the community engagement manager. More links with community employers is now evident and the employment broker is generating viable options, which often lead to job opportunities.</p>	<p>Governor</p> <p>Governor</p>	<p>Completed and ongoing</p> <p>Completed and ongoing</p>



			All family ties ROTL are approved by the individual Offender Supervisors and must link into the sentence and release plan. There is a stepped approach to these ROTL's and men who are fully engaged and are accessing work or training are able to apply and access more Release Day Release (RDR) at different stages of their progress. Release Overnight Release (ROR) is available to men with 12 months remaining on their sentence if all release planning targets have been met and there is a clear pathway to employment on release. This new policy is now fully embedded at the open site.	Governor	Completed
S61	<p>Concern: On the closed site, management oversight of prisoner risk of harm before release was inadequate. MAPPA management levels were not always discussed as part of the release plan. Attendance at the inter-departmental risk management team was not good enough.</p> <p>The inter-departmental risk management team on the closed site should ensure that the release plan for all high-risk prisoners and those subject to MAPPA meets and supports the protection of the public when individuals are released into the community.</p>	Agreed	<p>The inter-departmental risk management team (IRMT) will be reviewed with the aim to merge the IRMT for both the open and closed sites whereby a discussion regarding Multi Agency Public Protection Arrangements (MAPPA) releases (Level 2 and 3) will take place on a regular basis. This will be supported through the filling of vacancies and development of the training plan in the Offender Management hub. The launch of the new IRMT will take place in January 2020.</p> <p>Some of the concerns identified (and associated risks) will be mitigated against following the roll out of OMiC as this brings clear expectations of release planning and handover to the community with high risk MAPPA nominals in scope for early assignment.</p>	<p>Governor</p> <p>Governor</p>	<p>January 2020</p> <p>November 2019</p>
S62	Concern: On the open site, management oversight of prisoners' risk of harm before release was inadequate. Prisoners were granted ROTL without their MAPPA management level being known, and MAPPA management	Agreed	<p>A combined interdepartmental risk management team will be introduced in January 2020. This will support the risk board process by providing a mechanism for multi-agency discussion of those men considered to pose the most significant risk.</p> <p>A training plan will be developed to address the training need identified amongst administrative staff at the open site in respect of Public</p>	<p>Governor</p> <p>Governor</p>	<p>January 2020</p> <p>October 2019</p>



	<p>levels were not always discussed as part of the final release plan. There was no oversight of release planning for public protection cases through an IDRMT, which was a concerning gap. There were no data on how many prisoners potentially posed a risk to children. Procedures on the open site to identify prisoners' ongoing risks to others, including children, were weak overall.</p> <p>Recommendation: An inter-departmental risk management team should be set up on the open site to provide management oversight of relevant public protection cases and ensure risk of harm is managed actively.</p>		<p>Protection and MAPPA. Experienced staff at the closed site will train open staff in the screening of public protection cases, monitoring of communication processes and identification of MAPPA nominals.</p> <p>As part of routine risk board discussions at the open site there is inter-departmental oversight of potential risk, public protection, victim and MAPPA issues. HMP Hewell have introduced the open prison suitability assessment for any prisoners identified on transfer as Public Protection or MAPPA cases. In certain cases, there is also additional oversight through the Enhanced Behaviour Monitoring process.</p>	Governor	Completed
	General recommendations				
	To Governor				
1.10	All first night cells should be clean and adequately prepared for new arrivals.	Agreed	<p>Pre-occupancy checks have been introduced for cells on the first night unit to ensure that they are adequately prepared for new arrivals prior to location.</p> <p>A caretaker role has been developed to ensure all cells are cleaned and adequately stocked on a daily basis. Senior Officers are responsible for completing daily management checks. This is monitored by the Custodial Managers through inclusion in the Decency Assurance checklist that is subject to review in management bilateral meetings.</p>	Governor Governor	Completed and ongoing Completed and ongoing



1.22	All incidents of violence should be investigated, with support provided for victims when required.	Agreed	<p>There is a commitment to investigating all acts of violence. Data is reviewed daily and a register of violence investigations is reported through the daily management meetings to ensure that there is management team oversight over the position with incident and investigations. There is further oversight with the review of violent incidents through Challenge Support and Intervention Plan (CSIP). This will be updated to include provision for victims where appropriate.</p> <p>A plan will be developed with the group safety lead to expand the use of CSIP, build local awareness and increase the number of referrals to appropriate levels.</p> <p>A review of the safety structure and deployment of the safety funding envelope has been commissioned through the local business plan. The re-structure will include the provision of safety officers to carry out violence investigations as their primary role. This will improve the quality and timeliness of these investigations and include coaching and quality assurance responsibilities for investigations completed by Residential staff. The new profiles are scheduled for introduction in November 2019. With this increased capability it is expected to see higher quality investigation leading to proactive measures being taken to identify the causes of violence, appropriately support the victims and prevent further violence from the perpetrators.</p>	Governor Governor Governor	November 2019 November 2019 November 2019
1.31	The prison should ensure there is a comprehensive review and management oversight of use of force.	Agreed	<p>A review of the establishment's Use of Force has been commissioned to comprehensively evaluate the effectiveness of the processes in place and propose amendments or additions.</p> <p>Outcomes from the review will include a revised quality assurance process with appropriate senior management oversight, a commitment to view all planned Use of Force footage and the completion of associated documentation being a key part of the appraisal process for all staff. The aim is to ensure that Use of Force is used only when necessary and that non-physical strategies are employed first and foremost. It also aims to foster a culture of strong governance around Use of Force and to prevent litigation claims and reputational damage.</p>	Governor Governor	November 2019 November 2019



			The Use of Force meeting will have amendments made to the terms of reference to include the Governing Governor as chair of the meeting and to increase the number of those required to attend across the establishment. This will ensure that the salient points are discussed with the appropriate audience and key messages are spread more widely.	Governor	November 2019
1.51	Assessment, care in custody and teamwork (ACCT) documentation should be completed with sufficient detail to provide appropriate and meaningful support to prisoners who are in crisis and most at risk.	Agreed	<p>Staff awareness and understanding is to be strengthened through the ongoing schedule of 'Safety Summits' delivered by the local Safer Custody Team. These have been supported by the Prison Group and National teams. The Safety Summits are local training events intended to build understanding through the inclusion of Assessment, Care in Custody and Teamwork (ACCT) risks and triggers, CSIP and presentations on safety trends within HMP Hewell.</p> <p>The establishment will work with and obtain support from other establishments within the Prison Group. This will include the support of experienced ACCT Case Managers coaching and mentoring local Case Managers as well as sharing good practice from their home establishments. This coaching will include some focus on low level training for staff on engaging with those on ACCT, the quality of observations and creating and updating effective and comprehensive Caremaps.</p> <p>A Multi Agency Safeguarding and Support (MASS) meeting has been introduced with the first meeting already held in September 2019. This is being introduced as good practice following its success at HMPYOI Brinsford. The MASS will be a multi-disciplinary review of ACCT cases with the Case Manager present. This will be a mechanism for coaching and supporting case managers as well as ensuring that quality care is given to individuals in crisis.</p>	Governor Governor Governor	Completed and ongoing November 2019 Completed and ongoing
2.12	Staff should respond to cell call bells within five minutes. (Repeated recommendation 2.10)	Agreed	<p>HMP Hewell will endeavour to respond to cell call bells within five minutes.</p> <p>A cell call system is being installed through the MOJ refurbishment programme and will enable the monitoring of cell call bell response</p>	Governor	March 2021



			<p>times. Expectations are to be re-published to staff and the protocol for monitoring response times and taking responsive action is to be included in the safety strategy.</p> <p>Upon completion, the new call system will enable the production reports to show which areas are answering cell calls promptly and which are not. Reports will be reviewed by the safety and residential managers to identify and address deficiencies when highlighted. The system has been installed on house block 1. Final completion of the staged installation is scheduled for March 2021.</p> <p>Prior to the completion of the installation of the cell call system, a management check will be introduced and reviewed through the CM assurance process. This will include a process of testing and observation that will be reported monthly through the CM assurance bi-lateral meetings.</p>	<p>Governor</p> <p>Governor</p>	<p>March 2021</p> <p>November 2019</p>
2.27	There should be effective tracking, monitoring and quality assurance of the applications process.	Agreed	The existing scheme provides sufficient process for logging and tracking applications. Applications are logged and tracked through the prisoner information desk (PID) workers and records should be available for management checks. To ensure this is used effectively residential functional heads will re-launch the existing scheme and establish assurance through daily SO checks and a monthly assurance of responses to be carried out by the CMs.	Governor	December 2019
2.33	The strategic management of equality and diversity work should be prioritised and sufficient resources allocated across the prison to identify any discrimination, which should be tackled effectively if found.	Agreed	<p>The development of an equalities agenda in accordance to the prison group commitments and recommendations from the Lammy review has been commissioned through the local business plan. This will set out the strategic management through: the development/re-vision of the local policy; the development of the equalities committee to ensure that it is appropriately informed by proportionality data; the development and progression of a delivery plan that is aligned to the Lammy review and local need.</p> <p>A dedicated non-operational equalities lead has been allocated through the revised safety structure and is due to commence post in October 2019. This will provide consistency with the management and application of the equalities agenda.</p>	<p>Governor</p> <p>Governor</p>	<p>December 2019</p> <p>October 2019</p>



			<p>The re-allocation of protected characteristic leads will be completed in October 2019. Responsibilities will be updated to ensure the facilitation of focus groups and provision of reports to the equalities committee.</p> <p>The Equalities teams will continue to highlight the use of discrimination incident reporting forms (DIRFs) for both staff and prisoners by meet and greets, awareness sessions and training for all staff. The Equalities team will work closely with the Safety function to identify incidents whereby the individuals may have been discriminated against or targeted due to their characteristic, a DIRF will then be raised as part of the investigation process. All DIRF responses will continue to be quality assured by the Deputy Governor and an independent equalities lead alongside the West Midlands police.</p> <p>The equalities team will continue to hold prisoner lead focus groups ensuring we cover all protective characteristics and take forward any more pro-active ways of working from these. The committee will be reviewed to include prisoner peer representation.</p> <p>The equalities team will develop staff awareness through meet and greet events, awareness sessions, poster and note card campaigns and inclusion on the induction programme for new starters. The equalities team will identify an equalities champion in each hub to further raise awareness and help drive the equalities agenda.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>October 2019</p> <p>Completed and ongoing</p> <p>Completed and ongoing</p> <p>December 2019</p>
2.40	The prison should identify the needs of prisoners from minority groups on both sites and ensure their basic needs are met.	Agreed	<p>The Head of Equalities will review the local policy and agenda to ensure that it is in-line with the recommendations from the Lammy review. The terms of reference and agenda of the committee will be reviewed to ensure that all protected characteristics are discussed and strategic support taken to support these individuals.</p> <p>The protected characteristic lead for sexual orientation will hold focus groups with the individuals identified as gay/bisexual with the support of the Equalities team and the Equalities peer supporters to discuss the issues they face and any action that the establishment can take to support them. This will also be completed for the staffing group.</p>	<p>Governor</p> <p>Governor</p>	<p>October 2019</p> <p>October 2019</p>



			<p>The Head of Equalities will arrange for the LGBT+ national lead to attend the establishment to offer support and guidance on what more could be done to support the LGBT+ community</p> <p>The Equalities team have purchased Basic aids to assist individuals with limited mobility. Requests for aid can also be made to the Worcester Social Care team and this will form part of their assessment on relevant individuals.</p> <p>Awareness sessions will take place with staff on social care referrals ensuring that all men requiring an assessment is referred and any recommendations are actioned. The Head of Equalities will submit a business case for all shower rooms to be fitted with handrails and folding seats as per the requirements.</p>	Governor	October 2019
				Governor	October 2019
				Governor	October 2019
2.52	There should be a joint local operating procedure to optimise emergency response, including automated external defibrillation accessible for each house block and working area.	Agreed	<p>The Governor and Head of Healthcare will agree arrangements for ensuring the appropriate number of Automated External Defibrillators are available across the prison and accessible by all staff. Locations will be published in key areas to identify the nearest unit.</p> <p>A joint Local Operating Procedure will be written to define roles and responsibilities along with expectations during an emergency response in line Care UK Policy and Prison Service Instructions.</p>	Governor/ Head of Healthcare	November 2019
				Governor/ Care UK	November 2019
2.53	Clinical supervision should be provided and recorded for all clinical staff, and mandatory training requirements should be fulfilled.	Agreed	<p>Clinical Supervision Training will be delivered to healthcare management and a supervision schedule published. All healthcare staff will be given protected time to engage with clinical supervision which will be discussed during management supervision. An attendance log of clinical supervision and training will be retained for audit.</p> <p>Mandatory training will be completed in line with compliance requirements and timescales. Care UK mandatory training compliance will be recorded through Learning Management System. In addition Midlands Partnership Foundation Trust mandatory training compliance is to be provided at contract review meetings monthly. This process is currently in place and subject to ongoing implementation.</p>	Governor/Head of Healthcare	October 2019
				Governor/Head of Healthcare	Completed and ongoing



2.65	Social care arrangements should meet the needs of all prisoners and the requirements of the Health and Social Care Act 2014.	Agreed	<p>Key relationships have been fostered between the Worcestershire County Council Social Care Team and the HMP Safer Custody Team. A representative from HMP Hewell has been in attendance at the latest Council Social Care Team meeting and been able to discuss the referral procedures and the support available.</p> <p>The initial focus will be on the promotion of the availability of Social Care Support throughout the establishment. Promotional materials have been provided by the council to assist with the campaign. There will be guidance provided to staff to assist them with making their decision to refer.</p> <p>The social care policy will be developed with the Safety Hub Manager. The Equalities Officer will act as Gatekeepers for all referrals to ensure that these are appropriate and contain the correct detail required. They will then pass them on to the Council Social Care team to arrange assessment and further follow up action. The Equalities team will be overseeing this initiative as part of the Safeguarding and Social Care process.</p> <p>A formal buddy scheme will be launched initially on the house block with the greatest need (house block 5). When this has been embedded then it will be rolled out across the establishment.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>December 2019</p> <p>December 2019</p> <p>December 2019</p>
2.73	Transfers under the Mental Health Act should occur expeditiously and within the current Department of Health transfer time guidelines. (Repeated recommendation 2.94)	Partly agreed	<p>This recommendation is partly agreed as action is taken locally to expedite mental health transfers, however waiting times are subject to availability of spaces in appropriate facilities. NHS England continues to work with partners across the criminal justice system to improve services for offenders with mental health difficulties and has reviewed and consulted on the current Prison Transfer and Remission Guidance published by the Department for Health in 2011. A focus of this work has been to ensure that the most appropriate timescales are implemented in relation to prison transfers and remission, considering clinical urgency and need. Consultation closed at the end of July 2019 with the final guidance anticipated as being published late 2019.</p> <p>Action will be taken locally to ensure that transfers are monitored appropriately and work is undertaken to transfer within the department of</p>	<p>NHS England</p> <p>Governor</p>	<p>Completed and ongoing</p>



			health guidelines. Guidelines have been obtained, shared with managers and added to the Terms of Reference and agenda of the Safety Intervention Meeting.		
2.80	Prisoners with substance use needs should receive substitution treatment in line with national guidance, and monitoring should ensure that their care is safe.	Agreed	<p>A process has been implemented to ensure that patients are able to receive their medication once prescribed, prior to relocating to the residential unit. On occasions when this is not enabled, healthcare staff will escalate to Prison Management for the patient to be brought to the inpatient unit to be administered their prescribed medication. This will be audited in three months to assure compliance.</p> <p>A new process has been implemented to ensure that patients with substance misuse needs are monitored daily to ensure their safety and wellbeing. Healthcare Management will review whether observation cells have been vacated daily to ensure that they are made available for patients who arrive that day. On occasions when cells are not available for patients requiring clinical observations, healthcare staff will check on the patients' welfare, request access to the patient during the night and if not enabled, request officers on the relevant unit monitor the patient. A Datix incident report will be submitted and the issue escalated to the Prison management team at the Operational meeting the following morning. This will be audited in three months to assure compliance..</p>	Governor/Care UK Governor/Care UK	December 2019 December 2019
2.87	New arrivals should receive their prescribed medicines promptly.	Agreed	<p>A process has been implemented to ensure that patients are able to receive their medication once prescribed, prior to relocating to the residential unit.</p> <p>The inpatients unit will be staffed with Prison Officers at all times enabling healthcare staff to ensure that patients have medicines administered as required. This will be audited in three months to assure compliance.</p>	Governor/Care UK Governor/Care UK	Completed December 2019
2.88	The governance of medicines optimisation should ensure the competency of staff, and the monitoring and auditing of the	Agreed	Medicine Management forms part of the Quality Assurance and Improvements meeting agenda. Independent Medicine Management meetings have been reintroduced monthly and are chaired by a Pharmacist to ensure monitoring and auditing of the effectiveness and use of medicines. The Pharmacist will also attend the Regional	Governor/Care UK	December 2019



	effectiveness of the use of medicines.		Medicines Management meeting to ensure local practice is in line with National policy. This will be audited in 3 months to assure compliance.		
3.16	Leaders and managers should use the pay policy to incentivise prisoner attendance at education.	Agreed	Attendance at Education was incentivised in the last Pay Policy review with education now being paid more than other roles. A further review of the pay policy is being undertaken and this will look to introduce a qualified and none qualified rate of pay for certain roles. This will therefore reduce the rate of pay for some roles and incentivise attendance at education in order to achieve qualifications and access the higher pay rate.	Governor	October 2019
	Directed to HMPPS				
4.32	Prisoners should be transferred to appropriate prisons within reasonable timescales.	Partly agreed	This recommendation is partly agreed as currently there are too many local prison places and too few training and resettlement places. Reconfiguration will rebalance the estate to match the type of available places with the needs of the prison population. This will simplify the functions a prison will carry out into reception, training and resettlement and introduce new offender flows to support how men move through the prison estate. Reconfiguration will increase the number of Category B training places, which will support prisons like HMP Hewell to progress prisoners onwards. This will result in 1,000+ additional category B training places. These changes will allow HMP Hewell to focus on its functions of serving the courts and resettling men to the local area, closer to home. Progressive transfers of prisoners are, however, subject to space in the appropriate part of the prison estate becoming available.	Change, Strategy and Planning Directorate	March 2023
4.40	The prison should monitor accommodation outcomes after release to assess the effectiveness of the services provided and establish the extent of the homeless problem.	Partly agreed	This recommendation is partly agreed as from April 2019, prisons have become subject to a new accommodation upon release performance measure, which will operate in parallel to the existing Probation one. As part of the longer term policy development, consideration is being given to making Probation subject to an intermediate performance measure. This would assess the accommodation status of individuals at three months after release/commencement of community sentence and will demonstrate effectiveness of any interventions. Long-term implementation will accordingly be subject to future development of the	Prisons Policy Directorate	Ongoing



			next Target Operating Model for Probation Providers and as such at this stage it is not possible to accept the recommendation in full.		
4.47	All prisoners should have their resettlement plan reviewed at least 12 weeks before their release, and the prison should take all the action necessary to promote their successful rehabilitation.	Agreed	HMPPS has been implementing an enhanced 'Through The Gate' service for prisoners. This new specification includes the requirement that CRCs complete specific, tailored, tasks to help prisoners to secure and maintain settled accommodation, gain employment and manage debt and their financial affairs. The new specification has been fully operational in Hewell since April this year with the Enhanced TTG service provided by Warwickshire West Mercia CRC (Lead Host) and Staffordshire West Midlands CRC (Host).	HMPPS Through the Gate Project	Completed and ongoing

Recommendations	
Agreed	31
Partly Agreed	4
Not Agreed	0
Total	35

