



HM Prison &  
Probation Service

Action Plan: HMP Bedford

Action Plan Submitted: 6<sup>th</sup> July 2022

A Response to the HMIP Inspection: 10<sup>th</sup> January & 21<sup>st</sup> - 24<sup>th</sup> February 2022

Report Published: 8<sup>th</sup> June 2022

## 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, 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 provide 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 GOV.UK website. 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, Measurable, 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: HMIP REPORT

### ESTABLISHMENT: HMP BEDFORD

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>				
7.1	<p>Key concern (1.38): The incidence of violence was still too high. Incidents were not routinely investigated, which meant that leaders were unable to understand fully the drivers of violence. Challenge, support, and intervention plans (CSIPs, see Glossary) were not used widely or effectively enough to manage perpetrators and victims of antisocial behaviour.</p> <p><b>Key recommendation: All violent incidents should be investigated, and findings should inform the strategy to reduce violence. CSIPs should be used to address violence and antisocial</b></p>	Agreed	<p>All incidents of violence against staff or prisoners will be subject to a fact-finding investigation. For governance purposes, all investigations will be reviewed by the Head of Safety who will ensure recommendations are addressed. Learning outcomes will be discussed at the monthly safety committee meeting and will inform the prison's violence reduction strategy on a monthly basis.</p> <p>CSIP plans will be individualised using a multi-disciplinary approach and prisoners will be involved and aware of their plans. Staff understanding of the purpose and application of CSIPs to address violence, anti-social behaviour and to support victims will be improved as part of the prison's Compliance Project, which will set and enforce clear expectations about what is needed. The Compliance Project, which is bespoke to HMP &amp; YOI Bedford, sets, and enforces clear expectations via a series of Governor's Orders to support officers to understand their roles in respect of systems and processes</p> <p>10% of all opened CSIPs will be quality assured by the Safety Team on a monthly basis. The purpose of this is to evaluate and analyse their effectiveness and the findings will be discussed at the monthly Safety Committee meeting.</p> <p>Progress and outcomes against this key concern and recommendation will be considered by the Senior Management Team as part of the Self-Assessment Report Quarterly review and further actions will be identified as necessary.</p>	Governor	December 2022



	<b>behaviour, and to support victims. (To the governor)</b>				
7.2	<p>Key concern (1.39): Use of force documentation was not always fully completed and, although body-worn video cameras were readily available, many staff failed to activate them during an incident to provide evidence and support de-escalation.</p> <p><b>Key recommendation: Body-worn cameras should be routinely switched-on during incidents, and both footage and written records should demonstrate the use of de-escalation before and during use of force. (To the governor)</b></p>	Agreed	<p>As part of the prison's Compliance Project, a Governor's Order will be published that requires staff to routinely switch on Body Worn Video Cameras (BWVC) during incidents. The prison's Use of Force Coordinator will check compliance with this as part of their regular Compliance Project assurance checks and, where staff do not switch on their BWVCs, action will be taken to address this.</p> <p>The prison's Use of Force Coordinator will review the footage of all incidents and ensure that this and written use of force documentation evidence the use of de-escalation before and during use of force. The Use of Force Coordinator will also ensure that staff refresher training focuses on the importance of de-escalation before and during use of force and the need for BWVC footage and written records to demonstrate this. The Use of Force Coordinator will highlight any significant concerns to the Deputy Governor who will review, and action as needed.</p> <p>Following the review of any Use of Force footage, the Use of Force Co-ordinator will complete a debrief form which will assess the level of de-escalation used in each incident. Any trends or learning points will be discussed in the monthly use of force meetings</p> <p>The Deputy Governor will scrutinise all planned incidents at the fortnightly use of force committee meeting and learning outcomes will be discussed with individual staff members where needed.</p> <p>Progress and outcomes against this key concern and recommendation will be considered by the SMT as part of the Self-Assessment Report Quarterly review and further actions will be identified as necessary.</p>	Governor	October 2022
7.3	<p>Key concern (1.40): The environment in the segregation unit rendered it unfit for purpose. The unit was dark and</p>	Agreed	<p>Work to move the segregation unit to a refurbished area of the prison started on 3 May 2022. The new unit is scheduled to be completed in November 2022. This will ensure segregated prisoners are held in decent conditions. The progress of these works is discussed during a monthly Projects Meeting.</p>	Governor	December 2022



	<p>confined, and many cells had damaged furniture.</p> <p><b>Key recommendation:</b> <b>Prisoners on the segregation unit should be held in decent conditions. (To the governor)</b></p>		<p>Progress and outcomes against this key concern and recommendation will be considered by the SMT as part of the Self-Assessment Report Quarterly review and further actions will be identified as necessary.</p>		
7.4	<p>Key concern (1.41): While staff-prisoner relationships had improved, some officers remained dismissive and lacked focus on prisoner care. In our survey, many staff reported poor morale and some said they did not feel they had the time or skills to perform their roles effectively.</p> <p><b>Key recommendation:</b> <b>Managers should investigate the causes of poor morale and the lack of focus on prisoner care among some staff and should ensure that staff development initiatives address these concerns. (To the governor)</b></p>	Agreed	<p>A 6-monthly staff survey will be introduced to investigate the causes of poor morale, and this will inform initiatives to address this key concern and recommendation, which forms part of the Senior Management Team monthly meeting agenda.</p> <p>A Learning &amp; Capability Manager has been introduced and a Wellbeing Manager will be introduced to support the learning and capability of staff and their well-being. Staff development is also being supported through the introduction of a Compliance Project, which sets and enforces clear expectations via a series of Governor's Orders to support officers to understand their roles in respect of systems and processes. This is further supported by a prisoner 'Frequently Asked Questions' guide and information for staff about what good staff-prisoner relationships look like.</p> <p>Since April 2022 the Head of Business Assurance (HoBA) has chaired a training committee meeting, the committee is made up of senior managers and representatives from all departments. A staff training plan is now in place, this identifies the training needs of the establishment by department. An action plan is also in place to address the concerns highlighted by Bedford staff in the 2021 People Survey</p> <p>To improve staff well-being, staff reflection sessions will be delivered by PAM Assist (Employee Assistance Programme) Practitioners to Custodial Managers and Supervising Officers from May 2022. This will enable wing managers to provide appropriate support to their staff, including signposting them to mental health services.</p> <p>Progress and outcomes against this key concern and recommendation will be considered by the SMT as part of the Self-Assessment Report Quarterly review</p>	Governor	December 2022



			and further actions will be identified as necessary.		
7.5	<p>Key concern (1.42): Many of the cells on A and C wings were not fit for occupation. Conditions were particularly poor in cells designed for one prisoner, which were holding two. There was not enough space for two people, the screening of toilets was inadequate and bunk beds were too small and in poor condition. Many cells had continuing problems with cockroaches.</p> <p><b>Key recommendation: Managers should implement a programme of renovation to improve the quality and decency of cells designed for single occupancy and these cells should be used to accommodate one prisoner only. (To the governor and HMPPS)</b></p>	Partly agreed	<p>This key recommendation is partly agreed. Holding two men in a cell designed for one is never desirable but continues to be necessary across the estate in order to accommodate all those committed to custody by the courts. Recent population falls have allowed HMPPS to reduce crowding levels, and annually published figures show that crowding reduced from 22.5% to 20.2% between 2018/19 and 2020/21, equivalent to c.4,000 fewer prisoners held in crowded conditions.</p> <p>HMPPS are investing £3.8 billion over the next three years to deliver 20,000 new, uncrowded prison places. There may be options in future to reduce crowding levels in the estate, for example if population growth is slower than projected and there is sufficient headroom in the estate, it will enable targeted reductions of the least suitable prison places (including crowded places), but it is not possible to commit to this based on the latest projected population. Furthermore, it is also difficult to predict how these national trends will play out at a local level and the proportion of prisoners held in crowded accommodation at HMP Bedford will ultimately depend on regional population levels and demand.</p> <p>HMPPS have recently published a revised framework for the certification of prisoner accommodation, from which the useable operational capacity of the estate is derived. While most single cells in the prison system could physically hold two people, the determination of the maximum crowded capacity of a particular establishment is a matter of operational judgement, taking into account risks to safety and stability. In times of severe population pressure, it is clear that establishments will be expected to hold as many prisoners as they can safely accommodate, but equally clear that that number should be determined by the operational managers responsible for managing the prison, not by a central process or by wider supply and demand issues.</p> <p>All accommodation is compliant with the certified cell certificates and is compliant with the Certified Prisoner Accommodation policy (Prison Service Instruction 17/2012).</p> <p>In the interim HMP Bedford have / will take the following action:</p> <ul style="list-style-type: none"> <li>The Head of Residential 1 completed a condition and inventory survey of A &amp; C wing cells in April 2022 and, as an outcome, the prison's Facilities Management provider (GFSL) has installed new toilet screens</li> </ul>	Governor and HMPPS	March 2023



			<p>and standard HMPPS bunk beds in the cells where these are needed. GFSL, will work with the Heads of Residential and Head of Reducing Re-offending to introduce a joint workforce between facilities management department and trusted prisoners who will lead on a 'self-help' initiative to ensure cells are renovated to a decent standard. This will enable prisoners to gain essential trade skills which subsequently will promote their pride in the establishment and build rapport between staff and prisoners</p> <ul style="list-style-type: none"> <li>• Visits by pest control have been increased to twice weekly in an attempt to reduce the cockroach problem. Pest control is a standing agenda item on the facilities management meeting. Pest control services are contracted in proportionately to concerns that may occur, such as seasonal changes.</li> <li>• A capital bid business case will be submitted to fully renovate the Victorian designed cells in A, B &amp; C Wings, which is subject to approval of the bid.</li> </ul> <p>Progress and outcomes against this key concern and recommendation will be considered by the SMT as part of the Self-Assessment Report Quarterly review and further actions will be identified as necessary.</p>		
7.6	<p>Key concern (1.43): Despite good monitoring information, about a third of emergency cell bell calls were not answered within the target time. Many prisoners told us that cell bells could ring for very long periods before they were answered.</p> <p><b>Key recommendation: Managers should investigate the reasons for the failure to respond to emergency cell bells and implement measures to make sure that they</b></p>	Agreed	<p>A compliance project is now in place that includes a Governor's Order which outlines what staff are required to do when a cell bell is activated.</p> <p>The Head of Safety now provides monitoring information to the Heads of Residential, and this is used to address any concerns with staff.</p> <p>The Heads of Residential also carry out assurance checks to ensure their staff answer cell bell calls within the target time of 5 minutes.</p> <p>Progress and outcomes against this key concern and recommendation will be considered by the SMT as part of the Self-Assessment Report Quarterly review and further actions will be identified as necessary.</p>	Governor	July 2022



	<b>are answered within the target time. (To the governor)</b>				
7.7	<p>Key concern (1.44): Despite some good work on equality, not all protected characteristics had been given priority during the previous 12 months. Notably, the basic needs of prisoners with physical disabilities were not being met and the management of personal emergency evacuation plans was poor. Professional interpreting was underused and staff and prisoners were used to interpret for confidential matters. The specific needs of prisoners of all sexual orientations were not being met.</p> <p><b>Key recommendation: Leaders should ensure that prisoners with protected characteristics are systematically identified and given consistent and good quality support. (To the governor)</b></p>	Agreed	<p>The prison's Equality Action Plan will ensure prisoners' protected characteristics are identified and that consistent and good quality support is given by the relevant Protected Characteristic (PC) leads. This will be monitored at the monthly Diversity &amp; Inclusion (D&amp;I) Committee meeting, which is chaired by the Governor.</p> <p>Prisoners with physical disabilities will be identified on arrival by Reception staff and the Diversity &amp; Inclusion Lead and PC Lead for Disabilities will ensure good quality and consistent support is given. This will include a Personal Emergency Evacuation Plan (PEEP) being completed as part of the prisoner's induction process which will be communicated to residential staff to ensure they understand the support needed. Regular assurance checks will be completed by the D&amp;I Manager and will be reported at the monthly D&amp;I meeting.</p> <p>Other hidden and learning difficulties, can also be identified through their Education Induction process.</p> <p>Although good use of translated documents is in place, HMP Bedford will review monthly usage of the language line and measure it against the number of Foreign National prisoners. Information will be communicated by the Foreign National PC Lead to increase the awareness and accessibility of the language line.</p> <p>Understanding of sexual orientation will improve with support from Q-Alliance using awareness events, including Let's Talk events with prisoners and LGBTQ Allies, and champions will be introduced. Prisoners will also be supported to lead wing-based forums. We will survey prisoners to get their views about how declaration rates could be improved and respond accordingly. The prison Reception area will include awareness raising posters and information. Awareness raising forums, events and other initiatives will also cover the other Protected Characteristics. Understanding of sexual orientation will improve with support from Q-Alliance using awareness events, including Let's Talk events with prisoners and LGBTQ Allies, and champions will be introduced. Prisoners will also be supported to lead wing-based forums. We will survey prisoners to get their views about how declaration rates could be improved and respond accordingly. The prison Reception area will include awareness raising posters and information. Awareness raising forums, events and other initiatives will also</p>	Governor	March 2023





			<p>cover the other Protected Characteristics.</p> <p>Progress and outcomes against this key concern and recommendation will be considered by the SMT as part of the Self-Assessment Report Quarterly review and further actions will be identified as necessary.</p>		
7.8	<p>Key concern (1.45): Too many prisoners were locked in their cells for nearly 22 hours a day with little to keep them occupied, and there was evidence that this was having a detrimental effect on their well-being. The ability to expand the regime was limited, partly by staff shortages, and it was unclear when a fuller regime could be delivered.</p> <p><b>Key recommendation: Leaders should ensure that during the working day all prisoners are able to spend a substantial period out of their cells and in purposeful activity. (To the governor)</b></p>	Agreed	<p>HMP Bedford have secured funding to create up to 40 new workshops spaces for prisoners to work in by December 2022.</p> <p>In the interim, HMP Bedford will maximise attendance at purposeful activities by communicating and explaining the benefits to prisoners of attending purposeful activity opportunities and encouraging them to participate. Attendance at activities will be one of the key elements in a new incentives policy, which will be introduced by October 2022.</p> <p>Progress and outcomes against this key concern and recommendation will be considered by the SMT as part of the Self-Assessment Report Quarterly review and further actions will be identified as necessary.</p>	Governor	March 2023
7.9	<p>Key concern (1.46): Many prisoners were waiting too long to attend education where they could gain valuable skills and qualifications to help them progress into further education, skills and work</p>	Agreed	<p>A revised curriculum will be introduced for academic year 2022/23. Additional education provision will be put in place to ensure that work-based qualifications are available in all work areas.</p> <p>The Offending Management Unit and Reducing Re-offending teams will introduce a sequencing spreadsheet that will record prisoners' needs. The information regarding needs will be taken from the BCST process, Basic Skills assessment data and an initial Information Advice Guidance (IAG) interview. All</p>	Governor and People Plus	October 2022



	<p>in another prison or in the community.</p> <p><b>Key recommendation: Leaders should make sure that more prisoners can access the education they need promptly and that waiting lists are reduced significantly. (To the governor)</b></p>		<p>prisoners will have a learning plan which will be informed by the sequencing spreadsheet. The change from a demand led to a 'needs' based approach will ensure resources are maximised and waiting times are reduced, which in turn will enable prisoners are able access the education they need promptly.</p> <p>Partnership working with construction companies, agencies and external charities is happening and enables prisoners to participate in mock interviews in order to prepare for job interviews on release.</p> <p>A weekly sequencing meeting attended by Education, OMU, and IAG ensures that waiting lists are kept to a minimum.</p> <p>Progress and outcomes against this key concern and recommendation will be considered by the SMT as part of the Self-Assessment Report Quarterly review and further actions will be identified as necessary.</p>		
7.10	<p>Key concern (1.47): In-cell telephones had inevitably led to greater need for monitoring of calls where public protection risks had been identified. Even among prisoners who had been prioritised, no monitoring had taken place for several months. No translation had been carried out of calls in different languages, even though this included a prisoner on the priority list.</p> <p><b>Key recommendation: Monitoring of telephone calls for public protection purposes should be carried out regularly, with</b></p>	Agreed	<p>The Head of Offender Management Services will work with the Head of Operations to ensure monitoring of telephone calls for public protection purposes is completed. This will be measured as part of the Inter-departmental Risk Management Team (IRMT) meeting where those subject to monitoring are discussed on a monthly basis.</p> <p>Assurance will be given through a 10% Monitoring Quality check by the Head of Offender Management Services and Head of Security. The Head of Offender Management Services will ensure that where calls are not in English that translation services are provided through the contracted provider, 'The Language Line'. Quality assurance will be delivered through the data provided by the contracted provider.</p> <p>Progress and outcomes against this key concern and recommendation will be considered by the SMT as part of the Self-Assessment Report Quarterly review and further actions will be identified as necessary.</p>	Governor	November 2022



	translation where the call is not in English. (To the governor)				
7.11	<p>Key concern (1.48): Accommodation was the most pressing issue for prisoners approaching release. Only 57% had gone to sustainable accommodation during 2021 and the housing outcomes for many prisoners were not known. The support available had reduced sharply with the changes to resettlement services in mid-2021.</p> <p><b>Key recommendation: Managers should design and implement a comprehensive system of practical support to make sure that all prisoners go to the most suitable accommodation possible on release, with clear measures of success or failure. (To HMPPS and the governor)</b></p>	Agreed	<p>HMP Bedford will engage with the local authorities Bedford's prisoners are released to in order to improve accommodation outcomes on release.</p> <p>Prisoner's accommodation needs will be identified 12-weeks prior to release, using the BCST2 process. At this stage, where accommodation is needed, a referral will be made to the accommodation provider partners, Intervention Alliance and Oak Housing. This will ensure that the initial paperwork and accommodation application process will have started prior to prisoners going to court or being granted bail at court and will reduce the numbers being released homeless.</p> <p>Short sentence and remand prisoners' need for accommodation will be identified using the BCST1 process and the Offender Management Unit team will engage with accommodation providers to secure accommodation.</p> <p>Progress and outcomes against this key concern and recommendation will be considered by the SMT as part of the Self-Assessment Report Quarterly review and further actions will be identified as necessary.</p> <p>HMPPS Commissioned Rehabilitative Services (CRS) went live in June 2021. In the pre-release phase, CRS providers deliver resettlement interventions to support sentence management activities completed by the Probation Practitioner and pre-release staff in the prison. The contracts are designed to support sentenced prisoners and those subject to Probation supervision in the community, address the needs linked to their offending, and to achieve the stability they need to do so. Those services which are delivered pre-release, such as Accommodation, will continue post-release. This continuity of support is a key element of the CRS provision. All eligible cases receive support prior to release and for accommodation this will be delivered by suppliers based in the areas to which they will return. CRS providers attend HMP Bedford as required. HMPPS are currently working on extending the CRS contracts for Accommodation and Women's services to unsentenced people in prison (including HMP Bedford) and expect to commence delivery in Summer 2022.</p>	<p>Governor</p> <p>HMPPS Resettlement Contract Management</p> <p>HMPPS Accommodation Services</p>	<p>December 2022</p> <p><b>Ongoing</b> (For CRC provision)</p>



			<p>Under the new resettlement approach all resettlement prisons including locals, will have an embedded resettlement provision, managed by or otherwise linked to a Probation Delivery Unit (PDU). The embedded pre-release teams will provide immediate resettlement needs and pre-release support for all people in prison including the unconvicted and people out of area. The minimum will be to assess under the Basic Custody Screening Tool, undertake specialist immediate needs and support services to the people in prison. The pre-release teams will liaise with the Community Offender Manager or Short Sentence Function as allocated and support pre-release planning activity throughout the sentence. This includes progressing referrals that have been made to CRS suppliers and providing a point of contact for CRS suppliers seeking to engage with the individual. Probation is subject to performance metrics for Accommodation outcomes on release and 13 weeks after release from prison.</p> <p>The MoJ will also invest an extra £200m each year by 2024/25 to transform the approach to rehabilitation. This includes expanding the transitional accommodation service, initially launched in five probation regions in July 2021, across England and Wales. The service will support those under supervision from probation who are released from prison at risk of homelessness with up to 12-weeks accommodation.</p> <p>Homeless Prevention Teams (HPTs), operating across England and Wales, continue to strengthen relationships with local authorities and other strategic partners in order to embed and expand housing options for prison leavers. In addition, Housing Specialists are currently in post in 20 prisons and will be expanded to 48 posts across prison regions from late 2022. They support regional prison and probation leads to be more strategic in their response to reducing homelessness, including with wider partners.</p>		<p><b>End 2022</b> for transitional service in England</p>
	<b>Recommendations</b>				
7.12	<p>Recommendation (3.12): Staff on the induction wing should demonstrate that they are supporting prisoners through their first days in custody through properly completed Early Days in Custody</p>	Agreed	<p>The Induction Unit at HMP Bedford will be relocated to D Wing by end-June 2022. The Induction programme has been reviewed to ensure prisoners are provided with the information they need and will be jointly led by staff and prisoners. The Early Days in Custody (EDIC) support booklet has also been reviewed and induction unit staff will ensure new prisoners are always given appropriate support by staff.</p> <p>The Induction Custodial Manager will provide assurance for this process by</p>	Governor	August 2022



	documents. (To the governor)		reviewing induction led sessions once a week. An assurance log and tracker will be used to monitor delivery and to record all sessions that staff lead.		
7.13	Recommendation (3.13): Prisoners' PIN phone numbers should be added to their accounts within 24 hours of arrival, to enable them to contact their families. (To the governor)	Agreed	<p>Following HMIP inspection, the Business Hub Manager now completes a daily assurance check to ensure that delays with adding PIN phone numbers are minimised as much as possible.</p> <p>A new process is now in place for new arrivals that ensures PIN phone requests are confirmed with families by first night centre staff and communicated to the business hub. This ensures PIN phone numbers are added to the prisoner's account within 24 hours. Over weekends and Bank holidays, PIN numbers will not be processed; instead, new prisoners are given the opportunity to make a telephone call upon arrival.</p>	Governor	September 2022
7.14	Recommendation (3.17): Formal support should be provided for victims of antisocial behaviour or violence. (To the governor)	Agreed	<p>Every victim of anti-social behaviour will be interviewed by a Safety Supervising Officer and if required, support will be provided via a CSIP support plan. Support will be unique to the individual's needs and may include family engagement, mediation, debt management plans and welfare checks.</p> <p>For those who are not managed by the CSIP process, a Safety Supervising Officer will ensure they are provided with support avenues that are available to them and act as their point of contact on the residential unit.</p>	Governor	December 2022
7.15	Recommendation (3.22): Leaders should investigate why so many prisoners refused to attend their adjudications. (To the governor)	Agreed	The Head of Residential 1 will undertake an investigation into the reasons why prisoners refuse to attend adjudications by end-July 2022. The findings will be reported to the Governor along with any recommendation(s), which will be actioned and monitored for progress by the Quarterly Segregation Monitoring and Review Group (SMARG), which is chaired by the Governing Governor. This analysis will continue on a quarterly basis.	Governor	September 2022
7.16	Recommendation (3.30): Every use of batons and PAVA spray should be fully investigated and reviewed by a senior prison manager. (To the governor)	Agreed	Every use of baton and PAVA spray will be fully investigated by the Use of Force Coordinator. All investigations will be reviewed by the Head of Safety who will ensure that concerns are swiftly addressed and discussed at the Use of Force Committee meeting.	Governor	October 2022



7.17	Recommendation (3.31): Special accommodation should be used in the most exceptional circumstances and should not be used as a punishment. Thorough records should be kept of its use. (To the governor)	Agreed	<p>Special Accommodation will only be used when approved by the Governor or Deputy Governor and, in their absence, the Duty Governor will contact the Governor or Deputy Governor to explain why special accommodation as an exceptional circumstance is needed.</p> <p>The Head of Residential 1 will ensure all special accommodation use is fully documented.</p>	Governor	July 2022
7.18	Recommendation (3.32): All planned incidents should be recorded and footage retained. (To the governor)	Agreed	All planned incidents will be recorded. Footage will be retained in compliance with the PSI 04/2018 records, information management and retention policy and the Data Protection Act. Footage will be reviewed by the Use of Force Coordinator who will raise any concerns to the Deputy Governor	Governor	August 2022
7.19	Recommendation (3.42): Reintegration plans should be developed for prisoners held on the segregation unit with individual action plans and targets to help them move back into the general population. (To the governor)	Agreed	<p>Reintegration plans will be individualised using a multi-disciplinary approach and prisoners will be involved and aware of their plans. Reintegration plans will be accessible by staff on the shared drive. This is to ensure that staff have easy access to the purpose and application of plans that address violence, anti-social behaviour and to support victims.</p> <p>Reintegration plans will be quality assured by the Care and Separation Management Team on a monthly basis. The purpose of this is to evaluate and analyse their effectiveness and the findings will be discussed at the monthly SMARG meeting.</p>	Governor	October 2022
7.20	Recommendation (3.49): Intelligence reports should be analysed and processed quickly. (To the governor)	Agreed	<p>All Intelligence Reports will be processed within 48 hours. A daily triage will take place between the Head of Security, Security Custodial Manager and the Security Analyst. Trends will be identified, and actions will be completed within 7 days. Further analysis and required actions will be addressed and discussed at the monthly Security Meeting.</p> <p>The Head of Security will ensure that all Custodial Managers and Duty Governors are able to access the Mercury system in order to be able to triage Intelligence Reports at weekends and bank holidays.</p>	Governor	December 2022



7.21	Recommendation (3.59): Leaders should make sure that there are consistent and detailed records of the number of prisoners who have been subject to constant watch and anti-ligature clothing, and for how long. (To the governor)	Agreed	HMP Bedford have developed and implemented a consistent and detailed record. Constant watches and the length of the constant watch are now recorded in an ACCT log by the Safer Custody administration officer and the prison's Care and Separation Unit (CSU) staff maintain a record of all uses of anti-ligature clothing.	Governor	July 2022
7.22	Recommendation (3.60): Wing staff should routinely engage in meaningful conversations with prisoners on ACCTs, and these should be recorded on ACCT documents and electronic records. (To the governor)	Agreed	The prison's compliance project includes a Governor's Order that requires staff to routinely engage in meaningful conversations with prisoners on ACCTs and to record these in ACCT documents and on the National Offender Management Information System. Compliance project management checks will provide the assurance this is happening. In addition to this the Safety Team conduct quality assurance in line with the mandated ACCT Version 6 assurance process.	Governor	October 2022
7.23	Recommendation (3.61): Data analysis should be developed to support the identification and delivery of strategic priorities for the reduction of self-harm. (To the governor)	Agreed	<p>A trained Safety Analyst has been appointed. Each month the Safety Analyst will complete a data analysis report for both Self Harm and Violence and this data analysis will be used to task appropriate actions to reduce self-harm and violence. This will be communicated to staff via the Safer Custody monthly meeting where the findings will be discussed.</p> <p>In addition, the Safety Analyst and Security Analyst will work together to develop a monthly Safety and Security leaflet. The data will continue to be discussed daily at the morning meeting and weekly at the SIM meeting</p>	Governor	October 2022
7.24	Recommendation (4.50): All staff should complete clinical incident reports on Datix, the on-line clinical incident system, so that	Agreed	The Head of Healthcare can demonstrate that as part of both their NHFT and local induction processes there is an acknowledgment tick box for managers to complete and sign off with each new member of staff regarding incident reporting and the completion of Datix forms.	Northamptonshire Healthcare NHS Foundation Trust (NHFT)	July 2022



	incidents can be fully investigated and trends can be monitored and addressed. (To the governor)		<p>Incidents and lessons learned is a standing item on the full staff meeting agenda and incidents relating to medications issues are also discussed at the medicines management meeting.</p> <p>Additionally all NHFT staff complete information governance training annually which covers incident reporting, compliance is monitored locally by the Head of Healthcare and centrally by NHFT.</p> <p>The Head of Healthcare has also recently consulted with all staff around the “no-blame” culture and reinforced the need to complete an incident form. Acknowledgement and agreement from staff are tracked via a spread sheet which is also monitored by the Head of Healthcare.</p>		
7.25	Recommendation (4.62): Custody escort arrangements should be strengthened to meet the health care needs of all prisoners. (To the governor)	Agreed	During the pandemic, the prison did cancel a higher than usual number of escorts because of significant staffing shortfalls. Healthcare escorts take priority and will only be cancelled in exceptional circumstances. Any hospital escort that needs to be cancelled must now be jointly authorised by the Head of Healthcare and the Duty Governor. The Head of Business Assurance (HOBA) reviews the staff detail before it is published to ensure key activities, such as escorts, are fully staffed.	Governor	July 2022
7.26	Recommendation (4.76): Patients requiring treatment in hospital under the Mental Health Act should be transferred within the current guidelines. (To the governor and the healthcare provider)	Agreed	<p>Health &amp; Justice Commissioners have responded to the actions that will be taken to address this recommendation, as follows:</p> <p>HMPPS and NHS England and Improvement are fully committed to the 28-day timeframe, working together to improve the transfer and remission process, ensure delays are reduced and avoid prison being used inappropriately.</p> <p>In the White Paper ‘Reforming the Mental Health Act’, the Government committed to introducing a new statutory time limit of 28 days for transfers from prison to mental health hospitals following the NHS England and Improvement Transfer and Remission Guidance published in June 2021, being properly embedded.</p> <p>Upon publication of the Guidance, <a href="#">NHS England » Guidance for the transfer and remission of adult prisoners and immigration removal centre detainees under the Mental Health Act 1983</a> NHS England and Improvement commenced an implementation programme including webinars and bespoke regional and provider focussed visits to ensure staff understand the changes made, key dates</p>	Head of Health and Justice for Bedfordshire, Hertfordshire and Essex and Governor	Complete





			<p>being monitored and escalation routes.</p> <p>NHS England and Improvement have also developed a new process for collecting and monitoring data on transfers. A data input portal has been running from April 2021, which enables providers to submit transfer and remission data. This is analysed to identify trends and areas where further improvement is needed to meet the 28-day timeframe set out in the guidance. Monitoring of the monthly data is ongoing and if timeframes are breached, targeted work will be carried out with local and regional teams and NHS funded providers. This data is not published as it is not possible to do so without potentially identifying individual patients/prisoners due to the small numbers in each establishment. Access to relevant data is available to commissioners and providers.</p> <p>The NHS Long Term Plan describes policy for mental health services which includes investment into community mental health services and alternatives to admission, to try and reduce the need for mental health inpatient care. The aim is to improve throughput across the whole pathway and consequently ensure appropriate access to mental health inpatient services when required. Additional investment in mental health services, £1bn per year by 2023/24, supports the ambition within the Long-Term Plan.</p> <p>There is an adequate supply of adult secure beds. The focus is on improving efficiency across the whole pathway, i.e., ensuring appropriate lengths of stay, reducing transitions, and thereby improving throughput. This will make better use of existing capacity across the whole system, including the pathway to and from prison.</p> <p>For adult medium and low secure beds, the 15 Adult Secure NHS-led Provider Collaboratives play a lead role in managing the patient pathway and addressing the needs of their local population whilst also being involved in strategic national commissioning and preserving the integrity of the overall secure estate.</p>		
7.27	Recommendation (4.92): Supervision by prison officers of medicine administration should enable compliance, promote confidentiality and minimise the risk of diversion. (To the governor)	Agreed	<p>The Heads of Residence will ensure that supervision of medicine administration in their residential units will minimise the risk of diversion through the deployment of officers to supervise this work.</p> <p>Residential Custodial Managers will monitor staff attendance daily at the medication hatch and ensure those staff identified are present for supervision.</p> <p>Regular Healthcare and residential meetings will take place regarding medication supervision. This will be jointly led by Wing Custodial Managers and the healthcare dispensing department.</p>	Governor	August 2022



7.28	Recommendation (5.13): Exercise periods should be provided consistently and for 60 minutes' duration. (To the governor)	Partly Agreed	This recommendation is partly agreed. The HMPPS Prison Service Order that governs the provision of exercise, Prison Service Instruction 75/2011 Residential Services, states that prisoners should have 30 minutes per day in the open air. While exercise periods will be provided consistently, and the prison will strive to achieve 60 minutes duration, the prison only has one large exercise yard and 3 small dedicated exercises yards that cannot be used for the general population.	Governor	December 2022
7.29	Recommendation (5.14): The gym should be open consistently and should provide a full range of activities, including the delivery of accredited courses. (To the governor)	Agreed	<p>As is the case in many prisons currently, workforce recruitment and retention is a significant challenge. The prison has struggled for several years to recruit and retain Physical Education (PE) Officers. The COVID-19 pandemic made matters worse by significantly reducing the availability of PE Officer selection and training courses, which has prevented local candidates from being trained. The prison is working with the Head of PE Training to prioritise selection and training courses for Bedford to fill current PE Officer vacancies and recruitment campaigns are regularly used to encourage trained PE Officers to apply.</p> <p>A review of the PE provision will be undertaken to ensure that PE activities are able to meet the needs of all prisoners when our PE staffing shortfalls have been resolved, including</p> <ul style="list-style-type: none"> <li>• New arrivals</li> <li>• Integrated Drugs Treatment System (IDTS)</li> <li>• Over 50's</li> <li>• Young Adults</li> <li>• Health Care Inpatients</li> <li>• Vulnerable prisoners</li> </ul> <p>One of the main aims of the new PE Programme will be to introduce courses that meet the needs of the men being prepared for work in line Ministerial Priorities, including:</p> <ul style="list-style-type: none"> <li>• Emergency First Aid</li> <li>• Manual Handling</li> <li>• Healthy Living</li> </ul>	Governor	March 2023
7.30	Recommendation (5.36): Leaders should ensure that	Agreed	A problem analysis has been undertaken to identify the issues affecting attendance and punctuality. The following actions will be completed to address	Governor	August 2022



	prisoners have consistently high attendance and punctuality at education, skills and work activities. (To the governor)		<p>this recommendation:</p> <ul style="list-style-type: none"> <li>• The Regime Management Plan will place high priority on delivery of Education &amp; Work.</li> <li>• A second medication dispensing hatch will be opened on A wing to speed up dispensing times.</li> <li>• A Governor's Operational Order has been issued outlining the revised process of supporting prisoner movement to work.</li> <li>• Numeracy and Literacy assessments will be conducted as part of the Induction process.</li> <li>• An attendance at work protocol will be introduced, outlining the incentivised behaviour rewards for good attendance and the sanctions for non-attendance.</li> </ul> <p>Attendance figures for Work and Education are reported to the Governor in the morning briefing and are monitored twice daily. This alerts the Governor to any reduction in attendance in Educational and Work areas. The Learning &amp; Skills manager and the Industries manager will address trends in non-attendance</p>		
7.31	Recommendation (5.37): Leaders should ensure that vulnerable prisoners have access to the full education, skills and work programme equivalent to their peers. (To the governor)	Agreed	<p>A review of the prison's activities facilities has been undertaken. A series of new workshops will be created (see recommendation 7.8), by relocating the prison's facilities management provider office and work spaces to a different area of the prison. A dedicated workshop and classroom will be opened that will allow for those most at risk to have access to education, skills, and work. There will be workshop areas dedicated to vulnerable prisoners.</p> <p>A new range of in-cell learning courses will also be available to all prisoners by September 2022.</p>	Governor	March 2023
7.32	Recommendation (5.38): Leaders should ensure that prisoners are able to achieve relevant vocational qualifications that meet their interests and aspirations. (To the governor)	Agreed	<p>The OMU and Reducing Re-offending teams will introduce a sequencing spreadsheet that will record prisoners' needs. The information regarding needs will be taken from the BCST process, Basic Skills assessment data and an initial interview with IAG, (Information Advice Guidance are an organisation that interview prisoners on induction, then highlight and signpost men to Work, Skills and Education). All prisoners will have a learning plan that meets their needs and aspirations. This is monitored using a sequencing tool.</p>	Governor	October 2022
7.33	Recommendation (5.39):	Agreed	<p>Progress Trackers have been introduced into each work area. This will enable</p>	Governor	October 2022



	Leaders should ensure that, in line with their own expectations, the recording and recognising of employability skills should be maintained in all workshops, training and work areas. (To the governor)		<p>prisoners to have their Work evaluated by the instructor.</p> <p>The level of updates in the Progress Tracker is set in line with the prisoners' development within the workshops. This records prisoners skills and staff will be able to evidence the acquisition and demonstration of their new skills.</p> <p>The Progress Tracker is initially completed by the prisoner prior to having a meeting with the instructor. Targets are set and agreed with the prisoner at the meeting. A 10% monthly assurance check is completed by the industries manager.</p>		
7.34	Recommendation (5.40): Leaders should ensure that prisoners have sufficient opportunities to take on roles of responsibility so that they can contribute effectively to the prison community. (To the governor)	Agreed	All prisoners are subject to a risk assessment and will be able to access responsible roles so they can contribute effectively to our prison community as part of the prison's active citizens initiative. Where opportunities exist to engage in community activities, such as wing prisoner councils' representatives and Listeners, these will be advertised to prisoners. The range of community and environmental opportunities will be reviewed and communicated to prisoners as part of the prison's Structured on-Wing Activity agenda.	Governor	October 2022
7.35	Recommendation (5.41): Leaders should ensure that all staff in education, skills and work consistently challenge instances of poor behaviour and use of derogatory language by prisoners. (To the governor)	Agreed	<p>A new incentive behaviour strategy will be introduced across the prison.</p> <p>People Plus will deliver training to education staff to give them the confidence to manage prisoners who display poor behaviour.</p> <p>Education and workshop patrols officers will be allocated from the residential units that are attending education. These staff will know their prisoners and will be able to encourage better behaviour and offer support to education staff.</p>	Governor	October 2022
7.36	Recommendation (5.42): Leaders should ensure that all vocational training and work environments are fit for purpose and fully equipped and meet industry standards. (To the	Agreed	A security and Health & Safety risk assessment will be completed for all vocational training and work areas to ensure they are fit for purpose. Furthermore, these areas will conform to the standards set out in the HMPPS National Standards for Cleanliness and Decency (June 2019). HMP Bedford will ensure there is sufficient equipment to meet the needs of those engaged in activities.	Governor	August 2022



