

Action Plan: HMP/YOI Portland

Action Plan Submitted: 23 November 2022

A Response to the HMIP Inspection: 25 July and 1–5 August 2022

Report Published: 04 November 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 priority and key concerns. Action plans provide specific steps and actions to address the priority and key concerns, that are clear, outcome focussed, 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.

ACTION PLAN: HMIP REPORT

ESTABLISHMENT: HMP/YOI PORTLAND

1. Rec No	2. Concerns	3. Response Action Taken/Planned	4. Responsible Owner	5. Target Date
	Priority concerns			
1	The level of assaults on other prisoners was too high. Although lower than in 2019, it was increasing, and leaders did not sufficiently understand what was driving violence.	 To identify the drivers behind violence, and reduce the levels of violence at HMP/YOI Portland the Head of Safety will: The daily support staff can provide to prisoners on Challenge, Support, and Intervention Plans (CSIPs), by making systems/files easier to access. Introduction of an improved Debt Management Strategy in partnership with the substance misuse team. Increased engagement and use of Safety Peer Support workers. The monthly Safer Prisons Meeting will review how safety data is analysed, identifying drivers for violence, and agreeing actions to address the risks associated with these drivers. Actions will address both trends of violence and the needs of the individuals. The effectiveness of how data is analysed, and subsequent actions will be monitored closely at the meeting to ensure that levels of violence continue to reduce. Guidance drawing on advice from the National Safety Team will be used to identify areas of best practice that can be shared and incorporated into the prison's own way of working. Data analysis has already identified that a large percentage of violence is committed by Young Adults (YAs), many of whom have neurodiverse conditions and mental health issues. To address this: 	Governor	March 2023 March 2023 March 2023 May 2023

	 The prison has assigned a dedicated Custodial Manager (CM) to support and work with Young Adults who commit acts of violence. As part of the review of how data is analysed, the prison will develop a greater understanding of the drivers behind violence and self-harm amongst YAs, to reduce violence and self-harm by 10% within this cohort of prisoners. 	Completed May 2023
Rates of self-harm whigh and increasing were among the high compared with simil prisons. The reason been investigated surnor was there a data-action plan to reduce harm.	year-on-year reduction) by: year-on-year reduction) by: • All near misses (incidents of severe self-harm) will be investigated to ensure appropriate support is provided to the individual, gain an understanding of the drivers behind the self-harming, and to provide learning for staff and Case	November 2022 February 2023 March 2023 March 2023

		 Improving the way in which the safety team uses/analyses data in order to understand the drivers behind self-harm, and by utilising available data from the last 12 months to help identify trends and assign appropriate actions, including data for YA adults as mentioned in priority concern 1. Information regarding best practice will also be sought from the National Safety Team. Current processes will then be reviewed and changed to incorporate improved ways of working. The Safer Prisons Meeting will monitor and track the effectiveness of the actions in reducing levels of self-harm. The prison will work closely with the new health provider to ensure they provide effective mental health provision as identified from previous Prison and Probation Ombudsman (PPO) recommendations. PPO recommendations are reviewed and tracked for progress at the monthly safety prisons meeting. Specific local training around the quality-of-care plans will be delivered to case managers, ensuring targets are comprehensive, meaningful, and shared with the person being supported by the ACCT. 		May 2023 May 2023
3	Not enough was being done to meet the needs of younger prisoners. The young adult's strategy was not based on a thorough needs analysis and there was no clear plan of action.	 The Heads of Reducing Reoffending and the Offender Management Unit will increase the provision of support available to YAs by: A dedicated CM will support and work with YAs to drive improvements in this area and provide updates to the weekly Safety Intervention Meeting (SIM) and monthly Safer Prisons Meeting. Delivering Duke of Edinburgh qualifications to YAs. The Safer Prisons Meeting will have a standing agenda item to discuss YAs, where all actions will be monitored and tracked through a consolidated safety action plan. A Quality Delivery Plan needs analysis will be purchased through the Dynamic Purchasing System (DPS) to identify the specific needs of YAs. The activities and equalities team will work together to improve YAs engagement and inclusion within all activities. 	Governor	Complete Complete December 2022 March 2023 March 2023

		 Continuing to use Sport to incentivise YA participation in education and work, delivering bespoke Rugby Academies in partnership with 100 and First Foundation (funded companies to deliver sport). The academies will be designed to enhance life skills, improve well-being, and give direct access to mentoring and work placements on release. Upon completion of the need's analysis, the prison will work with the National Young Adults team to develop a local strategy which links to the best practice highlighted within the national Model for Operational Delivery. The strategy will be reviewed annually to ensure it still meets the requirements of the prison. The strategy will have a clear plan of action to address the identified needs of YAs. Delivering Choices and Changes (for young adults with low psychosocial maturity) training to all staff, to increase delivery of this intervention by keyworkers and Prison Offender Managers (POM's). 		March 2023 May 2023 June 2023
4	Mental health services were seriously understaffed and overstretched. Support was largely confined to providing acute and urgent care and there were no specialist psychological interventions.	 To address the shortfalls of health care staff to provide appropriate mental health provision and psychological interventions at HMP/YOI Portland, the Health Provider will: A dedicated recruitment campaign has commenced for all the new contracts. An open day was undertaken on 17th October for HMP/YOI Portland and will be repeated as necessary. The Health Provider expect to see improvements in staffing levels by April 2023. The Mental Health (MH) support team have commenced providing group work for low level issues such as sleep hygiene and anxiety. NHS England (NHSE) have appraised Oxleas NHS Trust of the current situation and urgency around recruitment. Oxleas have been awarded the health care contract for the prison with effect from December 2022. Oxleas have agreed a policy of mutual aid with the induction of up to 6 staff to commence prior to contract start date who will remain at the prison for 3 months, until services can be stabilised. 	Governor/ Health Provider	Complete Complete December 2022 December 2022

•	Long term agency staff currently employed will continue to support health provision whilst posts are filled. NHSE are carrying out additional Quality Assurance visits to monitor staffing levels. The team are prioritising ACCT reviews and urgent referrals, as well as monitoring patients on the Care	April 2023
	Programme Approach (CPA) caseload, and those on anti-psychotic medication.	
•	Oxleas will be introducing a stepped Care MH model to ensure no exclusions to accessing MH, as dealing with anxiety and depression can often prevent a later crisis or self-harm, which is very important. The prison will also have a Learning Disability lead as part of the staff structure to support these prisoners.	April 2023
•	Where a patient presents with multiple comorbidities (simultaneous presence of two or more diseases or medical conditions) across MH, primary care, and / or substance misuse, the patient will be allocated a care coordinator who is responsible for liaising with the wider healthcare team on their behalf to minimise the need for multiple appointments, thus reducing the burden on the individual.	April 2023
•	Have a multidisciplinary mental health team responsible for strategic development of the service and delivery of clinical pathways. The clinical pathways will distinguish the management of complex cases, enduring mental illness, specialisms such as Learning Disability (LD)/Autism Spectrum Disorder (ASD), personality disorder and older adults.	April 2023
an pe ch	conitoring and compliance against the contract including mental health provision, and resources and waiting times, will be discussed at the monthly contract enformance meeting chaired by NHS England and also the prison governor aired Local Delivery Quality Board (LDQB). Updates and escalation will go to be quarterly Prison Health Partnership Board attended by the Prison Group rector (PGD) and Head of Health and Justice Commissioning South West.	April 2023

5	Leaders did not make sure that there was sufficient resource to support the	The Education Provider and the Head of Reducing Reoffending will ensure there is sufficient resource to support the English and Mathematics needs of prisoners by:	Governor/ Education Provider	
	English and mathematics needs of prisoners. Too few spaces were available or outreach support for those with the lowest levels. There was no ESOL provision.	 The Education Provider has completed a needs analysis and strategy to evaluate the skill levels of the population, allowing the Annual Delivery Plan (ADP) to be reviewed to ensure it meets the requirements of the prison. The English and Maths curriculum will be reviewed as part of the ADP review, and delivery will be increased, if required, as identified by the need's analysis. 		November 2022 March 2023
	no EGGE provision.	 Providing bespoke English for speakers of other languages (ESOL) as required for those identified as needing it, reviewed at the monthly Quality Improvement Group (QIG) meeting to assess the level of need. 		March 2023
		Outreach provision will be reviewed via the ADP for the next business year (2023-24), and provision increased if identified through the annual needs' analysis.		March 2023
		 Developing a Functional Skills (FS) strategy to incorporate progression through FS, completed by priority order from Information, Advice and Guidance (IAG) plans and applications. 		March 2023
		 Producing monthly data on the number of learners beyond their planned end date in order to monitor effectiveness of delivery, and challenge target end dates at the monthly EPM and Teacher Quality Management Plan (TQMP) meetings. 		March 2023
		The Education Provider will recruit in line with the ADP to ensure there are sufficient staff to deliver the contract, utilising directly or non-directly employed tutors.		March 2023
		• In order to ensure the Education Provider provides a service for prisoners, any continued non provision of staff will result in the ADP being adjusted to deliver alternative courses of a similar subject area, as identified in the needs analysis report.		March 2023
		Improvements and progress, including recruitment, allocation, and attendance, will be monitored, and tracked at the monthly QIG, Education		March 2023

		Performance Meeting (EPM) and Reducing Reoffending Meeting, and quarterly through the Prison Education Framework (PEF) meeting.		
6	Leaders and staff did not prepare prisoners effectively for employment on release. Almost all work was part-time, prisoners could not access essential safety qualifications and too few could access ROTL.	 The Education Provider and the Heads of Reducing Reoffending and Offender Management will prepare prisoners for employment on release, and refresh the current Release on Temporary Licence (ROTL) provision by: Reviewing all activity places to increase the number of full-time activity spaces available, where possible. Ensuring all prisoners within the last 12 weeks of their sentence can access the services provided by the Weston Employment Team, Prison Employment Lead and Information, Advice and Guidance (IAG) services, to provide them with information about employment opportunities prior to being released. Installing the Virtual Campus (prisoner access to community education, training, and employment opportunities via the internet) throughout the prison on completion of the upgrades to the cabling, to assist prisoners with job searches and applications. The Catering Manager will implement Level 1 food hygiene for all kitchen and servery workers, and offer prisoners working with food the opportunity to achieve a Level 2 qualification. The Education Provider will commission and deliver additional safety qualifications as part of the 2023 – 2024 ADP, including British Institute of Cleaning Science (BICS), Painting and Decorating, and Construction Skills Certification Scheme (CSCS). The portfolio of ROTL opportunities will be refreshed and circulated to prisoners working towards progression. ROTL opportunities will be marketed to prisoners during their Offender Management Unit (OMU) induction. ROTL will be advertised by a regular notice to Prisoners and advertised in key areas throughout the prison. 	Governor/ Education Provider	March 2023

		 POM's will ensure that ROTL is discussed during sentence planning and progression one to one sessions, which will be recorded on CNOMIS. The increase in ROTL will be monitored in the monthly OMU returns. Improvements and progress, including monitoring prisoner's employment on release, will be monitored, and tracked at the monthly QIG, EPM and Reducing Reoffending Meetings, and quarterly through the PEF meeting. Additionally, by September 2023 installing the Virtual Campus (prisoner access to community education, training, and employment opportunities via the internet) throughout the prison on completion of the upgrades to the cabling, to assist prisoners with job searches and applications. 		September 2023
	Key concerns			
7	Key work was not sufficient and still operating only on a priority basis.	To improve the delivery and quality of key work to support prisoners in progressing through their sentence, the Heads of Offender Management Delivery and Services will:	Governor	March 2023
		 Continue to deliver keywork to a risk assessed priority group of prisoners due to current resourcing pressures, with the aim to gradually ramp up to full key work delivery in line with the Offender Management in Custody (OMiC) model as soon as HMP/YOI Portland resourcing pressures improve. Introduce a Monthly Key Worker newsletter distributed to all key workers that will include best practice, key messages, and ideas. Reprofiling of the staff by March 2023 to increase key worker provision and delivery. Roll out a revised Key Worker Strategy and action plan, including a new keyworker allocation process, that will include the upskilling and development of staff groups involved in Offender Management in Custody (OMiC) and Keyworker strategies. The quality and delivery of keyworker, including frequency, purposeful and rehabilitative conversations will be monitored by the 		

		Offender Management Unit CM, weekly performance meeting and PGD data return. Identifying Key worker champions, residential officers additionally trained in the delivery of the Choices and Changes Maturity Toolkit, who will support and mentor their colleagues to improve delivery and standards. Improvements will be monitored weekly through the Digital Prison System and weekly performance meeting Introduce monthly meetings with Residential managers, Heads of Residence and OMU Managers on keyworker progress, ensuring constructive relationships are being developed fostering positive behaviours. Supported by a 10% monthly Quality Assurance (QA) check of key worker notes by Residential CMs, and the Heads of Offender Management Services and Delivery checking 10% of the CM's checks.		
8	Prisoners found the cost of basic items from the shop too high. Low incomes, rising shop prices and poor food left many prisoners frustrated. Many told us this made issues around debt worse.	 The Heads of Residential Services and Business Assurance will address the low incomes, costs of basic items from the shop and poor food quality by: Uplifting prison unemployment pay from £2.50 to £4 per week and implementing pay progression scales to incentivise attendance at activities. Additionally, the prison will review current pay scales in line with the current prisoner pay budget allocation. Awarding bonuses to prisoners who achieve a qualification in functional skills. Conducting a review of the price of items available on the prison canteen list that can be purchased in the community, with the findings being discussed by the Head of Business Assurance (HoBA) at the quarterly contract reviews with DHL (contract provider of canteen items), and where necessary escalated to the Head of Prison Sector Prison Industries (PSPI). Continuing to have canteen as a standing agenda item at monthly prison council meetings for prisoners to allow them to raise any concerns, with DHL invited to attend these meetings periodically. 	Governor	March 2023

		 The prisons Lifting the Lid (debt management scheme) will provide support for prisoners identified with debt issues. The quality and quantity of the food will be monitored daily by the Duty Governor, with wing CM's and Supervising Officers (SOs) monitoring the serveries to ensure each prisoner receives the correct amount of food ordered. Kitchen staff will carry out 6 monthly surveys and food forums, in addition to food comment books being available on each servery to allow prisoners to comment on the standard of the food, so they can monitor and address any issues around the menu, quality, and quantity of the food. The Head of Residential Services will hold monthly meetings with the catering manager to monitor the food provision. 		
9	The needs of foreign national prisoners were not identified or met. The strategy for foreign national prisoners was mainly limited to immigration detainees.	 The Head of Offender Management Services (HoOMS) will improve the support provided to Foreign National (FN) prisoners by: The FN Strategy will be reviewed annually in line with the National Policy Framework for FNs, to ensure the needs of FNs are being met. Inviting all FNs to a bi-monthly forum chaired by the local FN lead, to allow FNs to raise any issues concerns around their detention. Home Office (HO) case workers will increase the provision for the prison by providing a FN surgery every fortnight. The case workers will have a predetermined list of which FNs they need to see on each visit, additionally, HO officials have agreed to see additional FNs at the surgeries who have submitted an application to see a case worker once they have seen everyone on their list. The prison will ensure that all immigration detainees have equal access to legal assistance and the same pay as those held in immigration centres. A Notice to Staff will be issued to ensure all staff are aware of the translation services available to support FN Prisoners. The provision will be monitored by the HoBA. 	Governor	February 2023

		Ensuring FNs are a standing agenda item at the monthly Diversity and Inclusion meeting, to monitor the overall provision available to FNs.		
10	Provision for neurodivergent prisoners was limited.	 To improve the provision for prisoners with neurodivergent conditions, the Health Provider will: Work to deliver against the Neurodiversity action plan which has been produced by NHSE that is included in the new contract requirements. As part of the new Health Providers contract, from December 2022 Oxleas NHS Trust will: Work on the philosophy that neurodivergence will be accepted, understood, and destigmatised. The underpinning principles of the practice will be to align the delivery of services in line with the Equalities Act 2010, ensuring fair access to services and reasonable adjustments. Ensure provision for the needs of patients with neurodiversity, co-ordinated by a senior specialist LD/ASD) nurse who will undertake assessments, provide advice and consultation, offer specialist interventions, and deliver training to other staff. Training will be offered to all staff to equip them with the clinical skills for recognition, communication techniques and necessary adaptations for working with neurodiversity. Contract monitoring by NHSE includes consideration for neurodiversity and OXLEAS will be expected to provide relevant data as part of their monthly data return. Monitoring and compliance against the contract including mental health provision, and resources and waiting times, will be discussed at the monthly contract performance meeting chaired by NHS England and also the prison governor chaired Local Delivery Quality Board (LDQB). Updates and escalation will go to 	Governor/ Health Provider	April 2023

		the quarterly Prison Health Partnership Board attended by the Prison Group Director (PGD) and Head of Health and Justice Commissioning South West.		
11	Many prisoners spent too little time unlocked – about five hours a day – which was	HMP/YOI Portland will aim to increase the amount of time prisoners can spend unlocked through the following measures: The Head of Reducing Reoffending will endeavour to increase activity attendance.	Governor	March 2022
	inadequate for a training prison.	 The Head of Reducing Reoffending will endeavour to increase activity attendance and monitor improvements by: Ensuring all eligible prisoners are assigned to an activity place. Allocating prisoners who are self-isolating to the available workspaces allocated to this cohort, to support their progression, interaction with others and increase the time spent in purposeful activity. Discussing activity spaces and attendance at the morning operational briefing to determine any barriers to attendance, and by monitoring weekly attendance figures (locally and nationally) using the regimes dashboard to ensure there is an accurate data capture of attendance figures. Endeavouring to regularly have at least 80% of the eligible population allocated to an activity, with a minimum expected attendance rate of 85% of those allocated. Strategic monitoring of attendance will be discussed at the quarterly Reducing Reoffending meeting to monitor improvements and raise actions to identify any barriers to attendance, such as shortages of teachers and instructors. 		March 2023
		 The Head of Residence will aim to improve the residential function offer by: Reviewing the current residential regime to explore ways to increase the amount of time that all prisoners can spend out of their cells, with a particular focus on increasing the offer available to prisoners who engage with the regime and activities. 		June 2023

		 Ensuring Residential Officers adhere to the published core day timings, including a continued focus on activity attendance. Activity attendance figures will be monitored at the weekly performance meeting. Increasing the availability for intervention and support groups to take place on the residential units. The serving of all meals at the residential serveries. 		
		The HoBA will review the Regime Management Plan to explore ways of expanding the regime utilising the current staff resources that are available, to ensure that it is suitable to delivering the most effective core day for a Category C training and resettlement prison.		June 2023
		The PGD will engage national support to develop prison activities on offer in order to maintain employment for all, but with increased full-time options. This will support readiness for employment on release and will dovetail with the work of the Regional New Futures Network lead and the Prison Employment Lead.		June 2023
12	Leaders did not ensure that prisoners could access activities or education promptly enough. Too many qualifications and courses were not running owing to staff vacancies. Waiting lists for vocational training were too long.	 The Education Provider and the Head of Reducing Reoffending will improve the availability of qualifications, courses, and waiting times by: Ensuring that teaching and instructor vacancies are advertised in a timely manner to allow the prison to deliver the required courses and qualifications. The Education Provider will continue to advertise any vacancies and utilise agency staff to cover vacancies whilst campaigns are ongoing to minimise the amount of time prisoners have to wait to commence their chosen vocation. The activities hub will ensure prisoners are assigned to their chosen vocation at the earliest opportunity, following assessment and completion of their Learning Development Plans. If a prisoners chosen vocation is fully prescribed, the activities hub will maintain weekly waiting lists for each qualification, course, and activity so they can offer the next available place in priority order from the list. The list will be shared with Tutors, Instructors and Managers. 	Governor	March 2023

		Producing monthly data on the number of learners waiting to commence their chosen vocation, and those beyond their planned end date in order to monitor improvements, progress, and effectiveness of delivery, and appropriately challenge start and target end dates at the monthly QIG, EPM, TQMP and Reducing Reoffending Meeting, and quarterly through the PEF meeting.		
13	Instructors did not use progress trackers effectively to support prisoners in gaining transferable employment-related skills or personal development. Prisoners were not aware of the progress they had made in these areas.	 The Education Provider and the Head of Reducing Reoffending will ensure Instructors utilise progress trackers effectively by: The Industries manager will develop a training plan to ensure continuous personal development (CPD) for all instructors, to provide them with the necessary skills to evidence a prisoner's progression through their Individual Learning Plans (ILP's), that are linked to transferable employment related skills. The Industries Manager and the Learning and Skills manager will conduct regular walkthroughs to provide assurance that progress trackers (ILP's) are being used effectively to recognise both strengths and development requirements, whilst also evidencing progression. The Education Provider will deliver training/guidance for all staff on residential units and satellite work areas/parties on how to update ILPs, so every prisoners' progress/skills can be recorded no matter where they work. Recording and monitoring progress of all skills on the CURIOUS management information system database. Improvements and progress utilising data from CURIOUS will be monitored, and tracked at the monthly QIG, EPM and Reducing Reoffending Meeting, and quarterly through the PEF meeting. 	Governor	March 2023

14	Sentence planning and offending behaviour work	The Heads of Offender Management Delivery and Services will improve the delivery and quality of sentence planning and offending behaviour work to support	Governor	June 2023
	did not sufficiently support prisoners to make progress	prisoners through their sentence by:		
		 Keyworker champions will be trained to help support progression and sentence planning, particularly to the younger population. They will assist POM's by delivering interventions that assist with a prisoner's sentence progression, namely victim awareness and choices and changes (A resource pack to use in one-to-one sessions with young adults who have been identified as having low psychosocial maturity). Working collaboratively with the Education Provider so prisoners, upon arrival at the prison, are allocated to the appropriate course to develop their functional skills, to assist them in progressing with their OASys (Offender Assessment System) sentence planning targets. The Head of Offender Management Delivery will review POM's ways of working, including better use of technology, to increase the amount of time allocated to complete OASys and Sentence Plans. The HoMD will monitor the quality and frequency of offender manager sessions by POM's, identifying priorities to help drive sentence plans and prisoner's progression, and to provide the POM with support and training as required. Face to face sessions will be delivered in accordance with national standards in the first three months of arrival and over a three-month period prior to release. Face to face appointments will also be delivered at key points in the prisoner journey such as parole and Category D reviews. The Offending Behaviour Programmes (OBP) treatment manager will complete a quarterly needs analysis to determine the OBP need of the 		
		population. The analysis will be reviewed at the quarterly Reducing Reoffending (RR) meeting to determine if the current provision adequately supports prisoner progression.		
		Where the current provision does not support a prisoner's progression, a progressive transfer request will be raised with the appropriate prison		

		delivering the necessary OBP. Transfer requests will be discussed and monitored at the RR meeting, with any identified issues or concerns being escalated to the monthly National Reconfiguration meeting. • The RR meeting will monitor and track progress for all sentence planning offending behaviour related work to ensure the prison is providing the necessary support to allow all prisoners progress with their sentences.		
15	Resettlement planning arrangements were inconsistent and too many prisoners did not receive sufficient support for their upcoming release.	 The Heads of Reducing Reoffending, Offender Management Unit and the Education Provider will improve resettlement arrangements by: Implementing a weekly multi-disciplinary pre-release board to identify and track the resettlement needs of all prisoners during their last 12 weeks of their sentence, attended by representatives from the Offender Management Unit, Substance Misuse Services, Healthcare, pre-release team, activities, IAG, Job Centre Plus and the prison employment lead. The Education Provider and IAG team will offer Curriculum Vitae (CV) and Interview Skills support for those identified as needing or requesting it. Developing a multi-disciplinary key stakeholder pre-release course for all prisoners 12 weeks prior to release, co-ordinated by the Prison Employment Lead and IAG services, to address any identified outstanding resettlement requirements. The Senior Probation Officer (SPO) will oversee all POM to Community Offender Manager (COM) handovers, to ensure resettlement requirements are being addressed by the COM in advance of the transition from custody to the community. If the POM identifies issues/delays in addressing actions, or a lack of response from COMs, the SPO will escalate their concerns to the Head of the Probation Delivery Unit concerned. 	Governor	January 2023 January 2023 March 2023