



HM Prison & Probation Service

Action Plan: HMP Lewes

Action Plan Submitted: 31st August 2022

A Response to the HMIP Inspection: 3-4 and 9-13 May 2022

Report Published: 23rd August 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: HMCIP REPORT

ESTABLISHMENT: HMP LEWES

1. Rec No	2. Concerns	3. Response Action Taken/Planned	4. Responsible Owner	5. Target Date
	Priority concerns			
1.1	Staff shortfalls in many areas had slowed progress in achieving better outcomes for prisoners. The difficulties in recruiting and retaining staff at all levels were having an impact on the delivery of services throughout the prison.	<p>Recruitment</p> <p>The Regional Human Resource Team are developing a package and detailed action plan to improve recruitment at HMP Lewes, which has continued to benefit from the application of a market supplement and has received an element of marketing support and candidate acquisition activity including job boards; search engine advertising; social media campaigns and inclusion in the Advance into Justice campaign for former military service personnel. The Prison Pay award has been announced and will improve the position of HMPPS in the labour market.</p> <p>The MOJ Resourcing Team have made adaptations to the recruitment process for Operational Support Grades (OSG) at HMP Lewes from August 2022. The improvements will lead to an increase in the number of applications reaching the interview stage and aims to improve the overall success rate of the campaign and have a positive impact on vacancy levels. The Kent Surrey Sussex (KSS) Human Resources (HR) Team will undertake a review in December 2022 to measure the outcome.</p>	<p>MoJ Resourcing / KSS HR Team</p> <p>MOJ Resourcing / KSS HR Team</p>	<p>December 2022</p> <p>December 2022</p>



		The KSS HR team held a further Outreach event in Brighton in August 2022 to target local people to apply to work at HMP Lewes.	KSS HR Team	Complete
		Practice Plus Group (PPG) have recognised that the salary scales for HMPPS positions may not be commensurate with the cost of living and have adjusted the salaries offered accordingly. To progress recruitment further PPG will be taking part in the Brighton and Hove Royal College of Nursing recruitment fayre in September 2022 and will hold an open day at HMP Lewes. A review of the bank rates for existing staff will be reviewed to encourage retention and recruitment.	Practice Plus Group (PPG)	October 2022
		CXK, providing the National Careers Service Contract, have appointed a team leader to support staff on site and have subcontracted the 'Work Ready' initiative to Genius Within with a scheduled start date of August 2022.	CXK, Careers Provider	Complete
		The education provider, Weston College, have recruited 0.8 Administrative staff and an additional English tutor.	Weston College	Complete
		Government Facility Services Limited (GFSL) staffing shortfalls in the cleaning department are impacting on performance and vacancies are currently being backfilled with contractors which has improved performance in the short-term. A recruitment drive is in place to address long term staffing shortfalls.	GFSL	Complete
		GFSL are reviewing pay structures to address recruitment and retention, whilst the allowance has been extended to new recruits to offer competitive conditions.	GFSL	December 2023



		<p>Retention</p> <p>HMP Lewes held a series of events to launch 'Our People Strategy'. Monthly meetings chaired by the Head of Business Assurance and attended by representation from a wide cross-section of staff will champion the strategy and encourage staff involvement and participation.</p> <p>The KSS HR Team will continue to conduct exit interviews and provide monthly analysis of the retention data to the Senior Leadership Team (SLT). HMP Lewes will use the data at the monthly 'Our People' meeting to inform future staff support and retention initiatives.</p> <p>The KSS HR Team will deliver Success Profile training for all managers and staff who conduct interviews to improve consistency.</p> <p>HMP Lewes commenced the recruitment into the role of 'New Colleague Mentor' as part of a new initiative called Supporting Each Other Framework in which all Prisons will have an assigned 'New Colleague Mentor' to improve the experiences of new staff. Locally this will be overseen by the Head of Business Assurance.</p> <p>HMP Lewes commenced engagement in a HMPPS 'Culture' pilot, led by the Deputy Governor. This involves completing a 'Culture Hack' which will inform an action plan to support the promotion of a positive culture within HMP Lewes to aid the</p>	<p>Governor / KSS HR Team</p> <p>KSS HR Team</p> <p>KSS HR</p> <p>Governor</p> <p>Governor</p>	<p>Complete</p> <p>Complete</p> <p>September 2022</p> <p>December 2022</p> <p>December 2022</p>
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		<p>retention of staff at all levels and positively influence staff/prisoner relationships.</p> <p>HMP Lewes will conduct a re-profile of staffing exercise to make better use of the current staffing resource.</p>	Governor	October 2022
1.2	<p>The most vulnerable prisoners were not sufficiently well cared for. The quality of ACCT documentation was poor, including weaknesses in the case management of prisoners on constant supervision. Serious incidents of self-harm were not investigated routinely to understand the causes.</p>	<p>HMP Lewes will identify staff to attend workshops for trainers for Module 1 – Introduction to Mental Health; Module 3 – Suicide and Self-Harm; and Module 8 – Investigating Concerns, of the Safety Training Programme.</p> <p>Once staff have attended the relevant workshops, HMP Lewes will deliver the packages to staff locally.</p> <p>HMP Lewes will work with the regional Learning and Development team to ensure all untrained Senior Officer and Custodial Managers attend Module 9 – Case Review Team Training.</p> <p>HMP Lewes will identify staff to attend Module 8 – Investigating Concerns and ACCT (assessment, care in custody and teamwork) Assessor bolt-on training and then work with the Regional Safety Team to ensure this training is delivered locally.</p> <p>HMP Lewes will work with the Regional Safety Team to deliver Module 8 – Investigating Concern training to all Custodial Manager and Senior Officer groups.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor, KSS Regional Safety Team</p> <p>Governor, KSS Regional Safety Team</p>	<p>November 2022</p> <p>March 2023</p> <p>October 2022</p> <p>November 2022</p> <p>November 2022</p>



	HMP Lewes will order a supply of ACCT Pocket Guides and ensure these are distributed to staff.	Governor	December 2022
	The manager with responsibility for SASH (Suicide and Self Harm) will provide weekly assurance that the required ACCT quality assurance checks are taking place as per national guidelines. Any trends and actions identified will be shared at the monthly Safer Prisons meeting.	Governor	January 2023
	The HMP Lewes Safer Custody Team will provide a monthly analysis of trends and triggers for self-harm, which will be discussed at the monthly Safer Custody meeting, where emerging trends will be identified, and actions to address them will be recorded and tracked via the Safety Action Plan.	Governor	October 2022
	A re-profiling exercise that updates the blueprint of the prison regime will ensure staffing is sufficient to provide regular and consistent support to prisoners at risk of self-harm and reduce the regular cross-deployment of staff (including Safer Custody staff).	Governor	October 2022
	A new process will be introduced regarding investigations and learning following incidents of serious assault or self-harm in line with PSI 15/2014 (Prison Service Instruction). These incidents will be identified and investigated by the Safer Custody Team and any learning disseminated out to the wider staffing group via the Safety Intervention meeting (SIM) and Notice to Staff (NTS). A Safety Booklet is in draft and will be published to staff in October 2022 detailing learning points. Each month the Safer Custody Team will publish a bulletin on	Governor	March 2023



		<p>specific topics around self-harm and suicide to increase staff awareness.</p> <p>HMP Lewes will increase the number of ACCT Assessors to a minimum of twelve and include this role as a profiled task in the Autumn 2022 re-profiling exercise.</p> <p>Some prisoners supported through ACCT may have particularly challenging needs, with their circumstances representing a significant level of risk and / or complexity. These prisoners will be referred to the SIM which will be chaired by a member of the Senior Management Team. The SIM will provide support and further multi-disciplinary guidance to Case Coordinators and case review teams, including reviewing and recommending actions to reduce risk and discussing alternative interventions within this senior multi-disciplinary forum. If identified as a need, the SIM will arrange for more senior staff to participate in individual ACCT Case Reviews.</p>	<p>Governor</p> <p>Governor</p>	<p>March 2023</p> <p>October 2022</p>
1.3	<p>Areas of the prison were unacceptably dirty. Cleaning standards and routines were inconsistent across the prison. Some communal areas were grubby. Many cells contained graffiti and toilets were filthy.</p>	<p>An Industrial Cleaning Instructor has been recruited and is now in post. They will deliver Industrial Cleaning by the end of September 2022. Adequate training including “on the job” for prisoners employed as wing cleaners and cleaning orderlies, will be delivered. Each industrial cleaning course is accredited under CIWM (Chartered Institute of Wastes Management).</p> <p>Pre-occupancy cell checks will be undertaken whenever prisoners vacate a cell. This will address graffiti, deficiencies in cleanliness and fabric of the cell prior to occupancy.</p>	<p>Governor</p> <p>Governor</p>	<p>September 2022</p> <p>October 2022</p>



		<p>Assurance will be through the Custodial Manager Quality Assurance Logs across all wings.</p> <p>Accommodation Fabric Checks (AFCs) will continue to be quality assured by Residential and Security Custodial Managers who document and give feedback on the standard of AFCs. Each quality assurance will be descriptive in terms of what has been viewed with appropriate feedback (positive and negative) shared accordingly. Confirmation that both departments are completing this on a regular basis will be assured by Head of Residential and Head of Security respectively.</p> <p>HMP Lewes will explore the options of undertaking deep cleaning of cell toilets.</p> <p>The list of damages via Adjudications has been reviewed to include damage to cells including graffiti, utilising the Damage Recovery Process. This was communicated to Staff and Prisoners via Notice to Community (NTC) and NTS in August 2022.</p> <p>The funding for C wing showers on level 2 & 3 is now approved with installation scheduled for October 2022. The shower refurbishment for C4, Healthcare and G Wing are at the design stage with installation scheduled for January 2023.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>October 2022</p> <p>January 2023</p> <p>Complete</p> <p>January 2023</p>
1.4	<p>Patient care was deficient because of ineffective partnership arrangements. Services to patients were being negatively affected by poor communication with prisoners,</p>	<p>Healthcare Senior Leadership Team will review current induction. Once complete, the new position of Induction Lead will be identified and will ensure all inductions are robust,</p>	<p>Head of Healthcare PPG</p>	<p>November 2022</p>



<p>reduced nurse staffing levels and inconsistent prisoner escort arrangements. Health care environments had not improved.</p>	<p>complete and in line with the plan for Practice Plus Group staff at HMP Lewes which is in development.</p>		
	<p>Prisoner escort arrangements will be subject to on-going review and comparable data will be provided week on week at the Wednesday Operational Meeting and monthly Local Delivery Board. Split clinics with reduced numbers of appointments is currently being trialled and the review of the data will allow further changes to the clinic structure as required.</p>	<p>Head of Healthcare PPG</p>	<p>November 2022</p>
	<p>A twelve-month milestone plan is now in place with the initial three months focused on "back to basics" and to include: complaints and feedback training for staff, 1 -2 - 1s for all Healthcare staff with Line Managers where expectations around communications with patients is set out as a standard goal.</p>	<p>Head of Healthcare PPG</p>	<p>July 2023</p>
	<p>Fortnightly, operational meetings between the Head of Healthcare (Practice Plus Group) and Head of Healthcare (HMP Lewes) have commenced. Shared priorities and appropriate actions are agreed to improve patient services and communication between stakeholders. The recent appointment of a Patient Engagement Lead will improve this further through patient forums, improved two-way communication between managers and patients.</p>	<p>Head of Healthcare PPG / Governor</p>	<p>Complete</p>
	<p>A Better Life (ABL) have been commissioned by NHS England to provide prisoner engagement services in Sussex, this will include involving patients in the formation of services as part of</p>	<p>Head of Healthcare PPG / NHS England</p>	<p>November 2022</p>



		<p>the partnership and will commence in November 2022 at HMP Lewes.</p> <p>An NHS England- led plan to refurbish a number of patient areas from a therapeutic perspective is in its infancy. This is NHS England led with support from Healthcare and HMP Lewes Senior Leadership Team with the agreement that all investments will be below the capital bid capacity and not requiring a business case.</p>	Head of Healthcare PPG / NHS England	July 2024
1.5	<p>Time out of cell for prisoners was inadequate. Although COVID-19 restrictions were lifted during the inspection, there were no plans to increase time out of cell for the many unemployed prisoners. Access to the open air remained too limited, at only 45 minutes a day, and the weekend routine was poor.</p>	<p>All new reception prisoners will have a Maths and English Assessment and Personal Learning Plan (PLP). To reduce the number of unemployed prisoners, the activities board will allocate positions before leaving the new induction wing. The move to part time working has increased the opportunity for every prisoner to be employed, including the remand population.</p> <p>Once in an activity, prisoners will be encouraged to maintain employment through the Local Operating Procedure, Incentives Framework and through key working. HMP Lewes will improve our understanding of the barriers to activity attendance through prisoner consultation.</p> <p>HMP Lewes will increase the duration of the activity sessions from 2.25 hours to 2.5 hours. By engaging in activity, the time out of cell for prisoners will increase to an average of five hours per day per prisoner. This will be monitored by the SLT at the daily operational briefing. In line with the re-profile of the establishment HMP Lewes will look at how this will impact on the ability to offer a more generous regime on weekends.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>October 2022</p> <p>October 2022</p> <p>December 2022</p>



1.6	Allocation to activity was inefficient, and leaders did not use classroom and workshop places well enough. Prisoners were allocated to wing roles that they did not have the skills or qualifications for. There were also long waiting lists for most subjects, although there were spaces available in classes. As a result, approximately half of the prison population was unemployed, and too few prisoners successfully completed accredited qualifications.	The new induction wing and reception process will require all prisoners to have Maths and English Assessments, a PLP and to be allocated to an activity before leaving the induction wing (<i>see Priority Concern 1.5</i>). This will reduce the number of unemployed prisoners.	Governor	October 2022
		The recruitment of the Industrial Cleaning Instructor will allow HMP Lewes to deliver accredited qualifications for wing cleaners (<i>see Priority Concern 1.3</i>). Accreditation will be tracked through the monthly Reducing Reoffending meetings.	Governor	Complete
		An Accredited Food Hygiene course is now delivered by the education provider for all servery and kitchen workers and now forms part of the initial training for the role. Accreditation is tracked and discussed through the Reducing Reoffending meeting.	Governor	Complete
		The activities allocation process has been reviewed and the frequency increased from weekly to daily following a 0.5 uplift in staff within the Activities Hub.	Governor	Complete
	Key concerns			
1.7	The prison had a limited understanding of the current drivers of violence and how to respond to them. The strategy and action plan for dealing with violence were not informed by thorough analysis of available data, or of available intelligence.	HMP Lewes will develop and embed the role of the recently appointed Safety Analyst. Each month the Safety Analyst will provide data analysis, for both self-harm and violence, to the Safety Committee which will be interrogated and used to identify appropriate actions to reduce self-harm and violence.	Governor	January 2023
		The data analysis provided by the Safety Analyst will inform the review of violence at HMP Lewes and feed into the	Governor	February 2023



		<p>development and implementation of a Violence Reduction Action Plan. The Safety Committee meeting will discuss trends and themes and plans will then be developed to reduce violence with actions being appropriately allocated and monitored through the meeting.</p> <p>The SIM will develop a catalogue of available and appropriate meaningful targets which investigating managers can use to support the development of an intervention plan.</p> <p>Adjudications now start at 08:00 to allow more time for enquiry to take place. The is now need for procedural justice to be evidenced in the Record of Adjudication Hearing reflecting that a full investigation of the charge has been undertaken, the prisoners' voice has been heard and any decisions are fully explained. This will be discussed at the Adjudication Standardisation meeting with a presentation on how to do so emailed to all hearing authorities. Ensuring adjudications are procedurally just has been added to the Deputy Governor's monthly assurance check of adjudications.</p>	<p>Governor</p> <p>Governor</p>	<p>October 2022</p> <p>Complete</p>
1.8	<p>Insufficient attention was paid to risks for new arrivals. Some prisoners had been moved to the first night centre before having their safety risks fully assessed, failing to identify if they were suitable for sharing a cell.</p>	<p>The new Induction Unit and the implementation of a five-day induction schedule will ensure there is sufficient capacity to provide a quality induction to all newly arrived prisoners.</p> <p>A new Supervising Officer's assurance check and proforma has been introduced in Reception to ensure all parts of reception/induction processes are completed/delivered, including safety risks, before a prisoner is located on the First Night Centre. A process has been introduced to ensure the</p>	<p>Governor</p> <p>Governor</p>	<p>October 2022</p> <p>Complete</p>



		Duty Governor is contacted about High Risk assessments before individuals leave Reception.		
1.9	Prisoners had insufficient clothing and bedding. They were not given enough kit on arrival and subsequent arrangements to make sure that they had enough clothing and bedding were poor.	<p>A full review of bedding and kit exchange will be conducted by the Head of Residence to ensure that a prison issue bedding and clothing exchange occurs weekly. Assurance processes will be implemented to ensure compliance moving forward.</p> <p>Improved laundry facilities will be introduced. This will include completing the remedial work in wing laundries to enable the installation of semi-commercial washers and dryers and the delivery of the outstanding dryers for the use of prisoners with their own clothing. HMP Lewes will contact Prison Service Production Industries (PSPI) to secure an external laundry service for prison issue kit following the decommissioning of HMP Ford's laundry provision.</p> <p>HMP Lewes will work with Senior Finance Business Partners to consider options for a laundrette service at HMP Lewes for personal prisoner clothing.</p> <p>HMP Lewes will review the process for personal prisoner clothing and prisoner kit as part of our Recovery Plan to improve access to kit and bedding. We will work with PSPI to produce a Business Case to secure funding for a full kit provision. Twice monthly kit purges will continue to ensure kit is accounted for and stocks maintained.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>September 2022</p> <p>September 2022</p> <p>December 2022</p> <p>December 2022</p>
1.10	Primary care lacked effective clinical leadership and was too dependent on agency staff, leading to gaps in patient care.	A Primary Care Clinical Lead, Public Health Lead and two Senior Primary Care Nurses have been recruited on a permanent basis and are now in post. The Head of Healthcare	Head of Healthcare PPG	October 2022



	<p>Prisoners expressed frustration with health care services as clinics were cancelled routinely and communication was poor. Long-term condition management was fragmented and services were largely reactive.</p>	<p>and Deputy Head of Healthcare positions have been recruited and will be in post by October 2022. Clinic attendance is improving with this increased presence of senior clinicians who can make assessments of priority. A restructured clinic timetable is also improving attendance. The new in post Primary Care Lead will oversee patients unable to attend clinics and being seen on their wings.</p> <p>The long-term condition management role is currently being recruited with interim cover provided by a long -term condition nurse who carries out weekly clinics. Once in post the Long-term Condition Manager will hold responsibility for all associated clinic schedules.</p> <p>A skills matrix is to be completed for all clinical and non-clinical staff inclusive of agency staff to ensure that the clinical skill set of the team are suitable and work towards providing appropriate and evidence-based care, minimising the risk of unnecessary external escorts.</p>	<p>Head of Healthcare PPG</p> <p>Head of Healthcare PPG</p>	<p>November 2022</p> <p>November 2022</p>
1.11	<p>Prisoners with serious mental health problems waited too long before being transferred to hospital. Transfers under the Mental Health Act did not always occur within the national guidelines. This meant that access to urgent care and treatment for acutely unwell prisoners was delayed.</p>	<p>All patients fitting this criteria will be discussed at the SIM and escalated to the NHS England commissioning team. This will be written into a local process for HMP Lewes.</p> <p>The Senior Commissioning Manager will review the current partnership board arrangements in terms of stakeholder membership, attendance, action plans and risk register. In instances where stakeholders from NHS England are unable to attend the meeting, they will submit a report or provide an</p>	<p>Head of Healthcare PPG / NHSE Commissioners</p> <p>Head of Healthcare PPG</p>	<p>November 2022</p> <p>November 2022</p>



		update for their specific area of responsibility for discussion at the meeting, concerns will be escalated to the NHS England Senior Management Team.		
1.12	Leaders had not made progress with improving education, skills and work since the previous inspection. Although leaders and managers held regular meetings where they discussed education, skills and work, they did not place enough focus on improving the quality of the curriculum. The actions that leaders set focused too closely on the completion of processes, rather than on measuring the impact of their actions.	<p>The Learning and Skills Manager will undertake a needs analysis and review the current curriculum in line with the needs analysis findings.</p> <p>The Learning and Skills Manager will complete an audit of the current curriculum focusing on appropriate allocation to ensure that prisoners are challenged through learning and the course level reflects capability to progress.</p> <p>The Learning and Skills Manager now holds weekly meetings with the education provider to better understand outcomes and intent of delivery which is scrutinised by the Regional Educational Lead and the Head of Reducing Reoffending.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>December 2022</p> <p>October 2022</p> <p>Complete</p>
1.13	Prisoners in several work areas had not completed basic training or qualifications that were important for their roles. For example, those working in the kitchen or on the serveries did not routinely complete basic training or qualifications to provide them with knowledge of how to handle food safely. Those prisoners that took food safety qualifications did not pass in high enough numbers.	<p>The Activities Custodial Manager will undertake a review of work placements and what basic training and/or qualifications are needed for each position.</p> <p>The Head of Reducing Reoffending will conduct a 5% monthly dip test of employment positions to assure that prisoners allocated to work have the appropriate skills to undertake the roles</p>	<p>Governor</p> <p>Governor</p>	<p>December 2022</p> <p>January 2023</p>
1.14	The provision of careers information, advice and guidance (CIAG) was too limited. Too many prisoners had not received any CIAG for	There have been significant (66%) CIAG (careers information, advice and guidance) vacancies at Lewes that have affected the ability to ensure all prisoners receive (IAG) Information and	Governor	January 2023



	<p>their next steps or future career goals. Leaders had not developed sufficient links with external employers who could support prisoners both in prison and after release.</p>	<p>Guidance as part of their induction. All CIAG vacancies have now been appointed (subject to vetting). This situation is closely monitored by the Learning and Skills Manager through contract meetings.</p> <p>The CIAG provision has been improved by reviewing the process for completion of PLPs and co-locating the provider with the pre-release team to improve consistency and efficiency.</p> <p>The new Prison Employment Lead now undertakes liaison between Employment Brokers (New Futures Network) and local employers to understand the skills gap in the community.</p> <p>HMP Lewes will look to an external employer, such as a construction company, to support the delivery of skills and qualifications within the prison, which are in demand in the community.</p> <p>HMP Lewes will continue the regular delivery of Constructions Skills Certificate Scheme (CSCS) card and employment fayres to engage local construction companies, achieving 40 completions per year.</p>	<p>CXK, Careers Advisor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Complete</p> <p>Complete</p> <p>February 2023</p> <p>March 2023</p>
1.15	<p>Monitoring arrangements for those with public protection concerns were not fully effective. Prisoners' telephone calls were not listened to when they should have been; arrangements for too many rolled on without appropriate authorisation, and those who were</p>	<p>Prisoners subject to Low-Risk Monitoring will be reviewed and tracked at the monthly Interdepartmental Risk Management Meeting (IRMM). The backlog will be completely reviewed by the IRMM in November 2022.</p> <p>All three-monthly reviews and authorisations will be completed via the monthly IRMM from December 2022. Any prisoner with</p>	<p>Governor</p> <p>Governor</p>	<p>November 2022</p> <p>December 2022</p>



	<p>having their mail monitored might not have needed this for so long.</p>	<p>no security intelligence or breaches of restrictions in the previous three months will be removed from monitoring.</p> <p>The reduction in the numbers of those subject to Low-Risk Monitoring will relieve the pressure on the monitoring staff and assist them to complete the required High-Risk Monitoring. The Heads of Security and Offender Management Delivery will continue to have oversight of the monitoring log and will review it monthly to ensure compliance with requirements.</p>	Governor	December 2022
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