

**ACTION PLAN: HMCIP REPORT**

**ESTABLISHMENT: HMP BRIXTON**

<b>TIMETABLE</b>	<b>DATE</b>	<b>STATUS OF THIS RETURN</b>
Full Unannounced inspection	3-4 and 9 -13 January 2017	
Report published	15 June 2017	
Action Plan Submitted	15 September 2017	Attached

## ACTION PLAN - HMCIP REPORT

### ESTABLISHMENT: HMP BRIXTON

1. Rec. no	2 Recommendation	3. Accepted/ Rejected/ Partially Accepted / Accepted Subject to Resources	4. Response Action Taken/Planned	5. Function Responsible/ Policy Lead	6. Target Date
	<b>Main recommendations to the governor</b>				
5.1	The high levels of violence should be systematically addressed through a comprehensive violence reduction strategy informed by an up-to-date analysis of data and consultation with prisoners. All violent incidents should be investigated thoroughly, perpetrators should be managed consistently and victims supported. (S42)	Accepted	<p>Implementation of revised comprehensive violence reduction strategy to be informed by an up-to-date analysis of data and consultation with prisoners. All violent incidents will be thoroughly investigated and perpetrators managed through management plans and victims by support plans.</p> <p>Violence reduction strategy will take into account the themes and violence at HMP Brixton, and provide staff with tools to manage this through conducting quarterly safety surveys.</p> <p>HM Prison and Probation Service (HMPPS) has a zero tolerance approach to violence. New ways of working are being introduced in prisons to give staff more time to directly supervise offenders. This one-to-one support from a key worker as part of the new offender management in custody (OMiC) model is intended to deliver transformational benefits needed to improve regimes and staff-prisoner</p>	<p>Head of Residence and Safety /</p> <p>HM Prison and Probation Service (HMPPS)</p>	<p>September 2017</p> <p>Ongoing</p>

			relationships.		
<b>5.2</b>	Prisoners at risk of self-harm should be given consistent care, attention and supervision. Support should be in line with promptly completed and comprehensive assessment, care in custody and teamwork (ACCT) documentation and processes. (S43)	Accepted	<p>HMP Brixton will run a full training programme for safer custody staff, introduce revised quality-focused management checks; implement investigation forms to embed learning from every act of harm and a clear drive to push up standards.</p> <p>HMP Brixton are working towards delivering all six modules of the new Suicide and Self-Harm (SASH) training to 40% of the staff group by Summer 2018 and 100% by April 2019. The training will be monitored by the People Hub, quality checks completed by both Duty Governors and the Safety team. Feedback will be given to individuals and themes addressed in safer custody meetings.</p> <p>All prisoners who are identified as being at risk of suicide or self-harm will be supported through the use of the Assessment, Care in Custody and Teamwork (ACCT) procedures.</p> <p>HMPPS are rolling out new training across the estate to support staff identify risks and triggers of suicide and self-harm and understand what they can do to support prisoners at risk. This involves awareness training for prison staff on supporting prisoners with mental health issues.</p> <p>To support governors and prison staff across the estate, specialist roles have been put in place such as regional safer custody leads - in every region to provide advice to prisons and to spread good practice on identifying and supporting</p>	<p>Head of Residence and Safety /</p> <p>HMPPS</p>	April 2019

			prisoners at risk.		
<b>5.3</b>	There should be a whole prison strategy for managing substance misuse, informed by an up to-date needs assessment. The drug and alcohol strategy committee should meet regularly to generate and oversee implementation of strategic action plans to reduce drug supply and demand. Prisoners should have easy and timely access to psychosocial support. (S44)	Accepted	<p>The drug strategy meeting's Terms of Reference have been reviewed to include monthly meetings attended by key departments including the local drug services provider, Offender Management Unit (OMU), Residence, Healthcare, Security and Activities.</p> <p>An action plan focusing on both drug demand and supply has been developed and progress will be monitored via the above meeting. This will include prisoner access to support services such as Narcotics Anonymous, Alcoholics Anonymous. A needs analysis is taking place via NHS England (NHSE) commissioners and this will inform a further review of the Terms of Reference.</p> <p>Rehabilitation for Addicted Prisoners' Trust (RAPT) now see that all new receptions attend their units regularly. RAPT hold groups on all units at HMP Brixton including G wing. Prisoners have an access to a range of psychological and social services.</p>	Head of Security and Intelligence /  Head or Reducing Re-Offending (Manages Substance Misuse services)	Completed
<b>5.4</b>	Prisoners should not be held in overcrowded conditions. All cells should provide decent, hygienic and well maintained conditions, including effective toilet screening and sufficient furniture. (S45)	Partially Accepted	The occupancy of prison cells is determined by establishments and certified by the Director in accordance with PSI 17/2012, which provides clear guidelines for determining cell capacities. Cells will only be shared where a Director has assessed them to be of adequate size and condition for doing so. All accommodation is compliant with the certified cell certificate.	Director of London and Thames Valley prisons	Completed

			<p>Utilisation of operational capacity in relation to population management needs will be kept under review to enable consideration of potential opportunities to reduce the level of occupancy in the cells highlighted by this recommendation.</p> <p>Decency checks are now carried out on a monthly basis and recorded on a central database. All deficiencies are recorded and reported to the facilities provider (MITIE). All fabric items are ordered if reported missing following a decency checks. Cleaning officers control all cleaning products and orders are placed via Stores on a weekly basis. MITIE are working on the feasibility of having toilet screens, which will have a cost implication to the establishment.</p>	Head of Residence and Services	
<b>5.5</b>	Managers should systematically consult prisoners from minority groups, identify and meet support needs, address negative perceptions, and investigate and act on adverse monitoring data. (S46)	Accepted	<p>HMP Brixton will introduce prisoner forums based on Protected Characteristics and will conduct twice yearly prisoner surveys supported by information from the Equality Monitoring Tool to identify and robustly act upon issues identified.</p> <p>The findings and themes, including adverse monitoring data, will be addressed in the Diversity and Equality Action Team monthly meeting and progress will be monitored.</p>	Head of Residence and Safety	September 2017
<b>5.6</b>	Prisoners should be unlocked and able to attend appointments and engage in constructive activity during the working day. (S47)	Accepted	A consistent restricted regime is presently in place at HMP Brixton. However, this does impact on the establishment's ability to unlock greater numbers of prisoners for work and activities. Over the next six months HMP Brixton will be working towards a new core day which will provide a full regime when staffing levels are in place. Forecasting staffing levels indicate	Head of Residence and Services / Head of Reducing Reoffending	March 2018

			<p>early 2018 when the new core day will be in place.</p> <p>In the interim, the Head of Residence and Head of Reducing Reoffending are working together to maximise prisoners attendance at activities to increase time out of cell.</p> <p>Prisoner appointments are listed on the daily free flow list to ensure prisoners attend their appointments.</p>		
	<b>Recommendation To HMPPS</b>				
	<b>Offender management and planning</b>				
<b>5.7</b>	Resettlement frameworks should support and enable IPP prisoners to progress effectively towards release. (4.19)	Rejected	<p>HMP Brixton's criteria has recently changed; indeterminate sentence for public protection (IPP) and lifers no longer meet the establishment's criteria. The only IPP/Lifers at HMP Brixton will be there to access treatment in the personality disorder unit or the drug recovery unit and will have a return plan from their sending establishment following the completion of treatment.</p> <p>All IPP's that are currently on normal location will have progressive plans drawn up to transfer on to suitable establishments to meet their ongoing needs.</p>	Head of Offender Management Unit (OMU)	
	<b>Recommendations To the governor</b>				
	<b>Early days in custody</b>				
<b>5.8</b>	Reception staff should engage proactively with newly arrived prisoners, and both they and induction staff should effectively support and supervise prisoner peer workers. (1.7)	Accepted	HMP Brixton will identify a group of dedicated reception staff trained in Five Minute Intervention (FMI- an effective programme which prisoners engage with, and challenges both staff and prisoners to interact in a different way), cell share risk assessments and safer custody. The reception processes will be reviewed to ensure prisoners are moved through as quickly as possible with appropriate staff	Head of Operations	September 2017

			and engagement from peer workers. HMP Brixton will also review the possibility of having either a video or prison radio in holding cell areas. Peer workers work will be signed off and briefings will be held to support them and allow them to contribute to the induction action plan. Regular surveys about the reception experience will be carried out.		
<b>5.9</b>	Risk interviews in reception should be carried out in private and risk information should be routinely shared with induction staff. (1.8)	Accepted	<p>A new fire door has been installed and the waiting area chairs moved to ensure interviews take place in private. Signage(s) have been put up to ensure there are no interruptions.</p> <p>A new transfer interview format has been introduced with a strong focus on risk identification. This is in form of an induction action plan to ensure that key risk information is handed over to induction wing staff and that appropriate action is taken to address any risks/vulnerabilities. Listeners are assigned to prisoners for additional support who present themselves at being risk of self-harm.</p>	Head of Operations	Completed and ongoing
<b>5.10</b>	First night cells should be prepared in advance for newly arrived prisoners. (1.9)	Accepted	<p>The first night cells will be fully prepared with kit, furniture and up to the required standard. Induction Orderlies will be put in place to ensure cells are appropriately kitted and these will be spot checked by staff in advance of the prisoner's arrival.</p> <p>All prisoners now have access to a television. Orders are placed weekly and aerials are ordered. Manager of units to monitor this area.</p>	Head of Residence and Safety	September 2017

	<b>Self-harm and suicide</b>				
<b>5.11</b>	Death in custody action plans should be fully implemented and monitored over time. (1.20)	Accepted	<p>Death in Custody (DIC) action plan(s) will be discussed monthly at the safer custody meeting, actions will be implemented and progress strictly monitored. Learning will also be taken from actions by other establishments' action plans.</p> <p>All actions from DICs are monitored at the above meeting.</p>	Head of Residence and Safety	Completed and ongoing
<b>5.12</b>	The constant supervision cell for those at risk of self-harm should not be located in the segregation unit. (1.21, repeated recommendation 1.39)	Partially Accepted	<p>Additional gated cells have been put in discrete places within residential areas to limit the constant supervision cell being used.</p> <p>Only in exceptional circumstances, if a prisoner demonstrates such behaviour that can only be managed in segregation (in addition to a high risk of self-harm) it may be considered necessary to use the gated cell in the segregation unit. Where a decision is made to accommodate a prisoner in a gated observation cell and on constant supervision, this will be recorded in the ACCT plan and the prisoner to remain in the gated cell for the shortest time possible and this will be documented on the Care Map by the person authorising the constant supervision.</p>	Head of Residence and Safety	Completed
<b>5.13</b>	All prisoners, including those in reception and on the induction unit, should have easy access to a Listener. Listeners should attend safer custody meetings. (1.22)	Accepted	Listeners now attend the safer custody meeting and have easy access to key areas of the prison through implementation of a new rota allocation system in aid to improve access. Listeners are routinely in reception on reception days and are available on the induction unit.	Head of Residence and Safety	Completed



	<b>Safeguarding</b>				
<b>5.14</b>	The governor should re-establish contact with the local director of adult social services and the local safeguarding adult's board to develop safeguarding processes. (1.25)	Accepted	The Head of Safety will attend local Safeguarding Boards and will make attempts to develop safeguarding processes and forge links with the local authority around social care. This matter is currently been referred to the Commissioner to agree the level of service.	Head of Residence and Safety	December 2017
	<b>Security</b>				
<b>5.15</b>	Visits restrictions should only be imposed in response to visits-related activities. (1.32, repeated recommendation 1.51)	Rejected	<p>HMP Brixton is under a duty of care to keep prisoners safe and that duty naturally extends to visitors and prisoners during visits, therefore various security measures such as restrictions on visits may be appropriate to ensure this duty is upheld.</p> <p>Closed visits may be imposed in the absence of specific visits-related activity and as an administrative measure where necessary i.e. for reasons of securing good order or discipline or for the prevention of crime or in the interests of any persons. They should be applied where prisoners are proved or reasonably suspected of involvement in smuggling prohibited items through visits, or are considered to pose a reasonable risk of involvement, or when the application of closed visits is otherwise necessary for the grounds specified in the prison rules.</p>	Head of Security and Intelligence	
<b>5.16</b>	The strategic management of security risks should include stronger links with the police. (1.33)	Accepted	In line with a tripartite agreement between, the Police, Crown Prosecution Service and HMPPS, HMP Brixton will ensure appropriate criminal related offences are reported to the police. A monthly review of the cases referred to police will be requested to monitor progress. The Police Intelligence Sergeant has been invited to attend the monthly security meetings.	Head of Security and Intelligence	Completed and ongoing
	<b>Incentives and earned</b>				

	<b>privileges</b>				
5.17	The IEP scheme should encourage prisoners to improve their behaviour and not interfere with their ability to maintain basic hygiene and contact with families. (1.36)	Accepted	A new local incentives and earned privileges (IEP) policy will be written and published. Consultation with Prisoner Council and other prisoner groups will take place prior to publishing to ensure feedback is sought. Quality assurance checks to be conducted by managers will be written into the proposed policy.	Head of Residence and Services	November 2017
	<b>Discipline</b>				
5.18	Senior managers should quality assure adjudication hearings and outcomes to ensure fairness and consistency. (1.38)	Accepted	The Deputy Governor quality assures 10% of adjudication paperwork on a monthly basis to ensure fairness and consistency and intermittently is present at adjudication hearings.  Improvements have been made to better prepare cases, CCTV footage and reporting officers present at first hearings.	Deputy Governor	Completed
5.19	There should be effective management oversight of the use of force, including special accommodation, and any emerging trends should be identified through systematic data analysis. (1.41)	Accepted	The Deputy Governor and the Head of Safety now holds quarterly management check meetings concerning special accommodation, adjudications and use of force and any emerging trends are identified through systematic data analysis.	Head of Residence and Safety	Completed
5.20	Every use of special accommodation should be comprehensively documented to demonstrate that it is used legitimately and proportionately. It should not be used for anything other than serious refractory behaviour. (1.42)	Accepted	Every use of special accommodation is now comprehensively documented to justify the reasons and staff are fully aware that it should not be used for anything other than serious refractory behaviour.  Briefings have been given to Managers, Orderly Officers and Segregation staff and this will be strictly monitored to demonstrate that special accommodation	Head of Residence and Safety	Completed

			used legitimately and proportionately. Paperwork will be routinely reviewed by the Deputy Governor and discussed as part of the quarterly management meeting.		
<b>5.21</b>	The segregation unit should be maintained to a high standard and the cells should be clean, free of graffiti and well lit. Toilets, showers and windows should be in full working order. (1.46)	Accepted	<p>The bathroom has been refurbished and is checked regularly to ensure standards are maintained. Cell checks are carried out on a daily basis to ensure that these are maintained to an appropriate standard and any issues are dealt with immediately.</p> <p>A painting programme to remove graffiti is in place.</p> <p>A capital bid has been approved to make wider improvements to the segregation unit. An Architect is due to attend HMP Brixton in September 2017 and planning permission will be sought. It is hoped all work to be carried out by Autumn 2018.</p>	Head of Residence and Safety	<p>Completed</p> <p>August 2018</p>
<b>5.22</b>	Senior managers should monitor the use of the segregation unit to ensure it is used appropriately. (1.47)	Accepted	The Deputy Governor and Head of Safety closely monitor the use of the segregation unit through looking at the Segregation Monitoring and Review Group (SMARG) data which is discussed as part of both the safer custody and Equalities meetings. Segregation use is discussed and analysed as part of the quarterly management meeting. Segregation unit usage is reported to the	Head of Residence and Safety	Completed and ongoing

			Governor each week.		
	<b>Substance misuse</b>				
<b>5.23</b>	All prisoners with substance misuse concerns should have easy access to mutual aid groups and peer support. (1.55)	Accepted	A new Drug Strategy policy is now in place at HMP Brixton and includes a drug supply element which includes referrals and signposting to services for prisoners. Monthly meetings are held to discuss further actions. Whilst this is in its infancy stages. HMP Brixton will continue to take this forward. However, peer workers will be in place to support others.	Head of Reducing Re-offending	Completed and ongoing
	<b>Residential units</b>				
<b>5.24</b>	All showers should be clean, well maintained and screened to provide full privacy. (2.10)	Partially Accepted	Cleanliness checks are being carried out on a weekly basis.  A review of the feasibility and costing of shower privacy screening will be undertaken. If feasible this will be implemented.  A capital bid has been submitted to improve the damage to the shower units flooring and is currently awaiting approval.	Head of Residence and Services	December 2017
<b>5.25</b>	Emergency cell bells should be answered promptly at all times. (2.11)	Accepted	Reports are run by the control room throughout the course of the day to monitor cell bells and the Orderly Officer checks through the reports. If any bells are not answered promptly matters will be escalated to unit managers to carry out an investigation.	Head of Residence and Services	Completed
<b>5.26</b>	The prisoner information desks (PIDs) should be embedded on all units and PID workers should be supported and adequately supervised by staff. All applications should be effectively tracked. (2.12)	Accepted	A recruitment campaign is currently in place at HMP Brixton to ensure full staffing complement and work is also in place to address staff retention issues and support prisoners in carrying out these roles. The prisoner information desks (PIDS) process is being re-launched in September 2017. All units will have a PID worker with	Head of Residence and Services	October 2017

			their photograph displayed for visibility purposes. Managers will audit and check application responses on a monthly basis by dip testing. A new process will also be in place to ensure confidentiality by ensuring envelopes are provided with applications.		
	<b>Staff-prisoner relationships</b>				
5.27	Managers should ensure that there are sufficient staff and that they engage positively with prisoners and act as positive role models. (2.17)	Accepted	<p>A recruitment campaign is currently in place at HMP Brixton to ensure full staffing complement and work is also in place to address staff retention issues and support prisoners in carrying out these roles. All staff will be trained in FMI.</p> <p>HMP Brixton should reach near full staffing figures by January 2018 and aims to launch the OMiC model in April 2018 (which will require additional staff). An interim personal officer scheme will be introduced prior to the launch of the OMiC model.</p>	Head of Residence and Services	April 2018
	<b>Equality and diversity</b>				
5.28	Reports of discrimination should be thoroughly and promptly investigated. Timely quality control measures should be taken by a senior manager with external scrutiny in place. (2.21)	Accepted	<p>All discrimination incident reporting forms (DIRFs) are now effectively monitored to ensure timescales for completion are adhered to, thorough and issues are followed up and with external scrutiny. A process of quality assurance is in place to monitor the quality of responses and this is done by the Head of Residence and Safety. Any issues are addressed that are not carried out to an expected standard. DIRFs are discussed as part of the monthly Equalities meetings.</p> <p>Some Equality representatives are in place and these will be in place across the prison by end of September.</p>	Head of Residence and Safety	September 2017
	<b>Faith and religious activity</b>				

5.29	A full-time Anglican chaplain should be recruited without delay. (2.31)	Accepted	A new campaign is currently ongoing to recruit an Anglican chaplain. The vacant post is being covered by sessional resources on an interim basis.	Deputy Governor	November 2017
	<b>Health services</b>				
5.30	Designated leads should be introduced for older people and long-term conditions to support a systematic and evidence-based approach to care. (2.47)	Accepted	<p>HMP Brixton currently run both asthma and diabetes specific clinics. A community provider provides diabetic eye screening within the prison. Two designated leads will be identified, one for Long Term Conditions (LTC) and one for older prisoners and training will be provided in both these areas. Weekly nurse led clinics will commence for both LTC and older prisoners. The LTC register and older prisoner registers will be reviewed and maintained by each lead. These areas will also be overseen by the lead General Practitioner and will be reported on at the monthly quality meetings.</p> <p>Care UK has nurses dedicated to the management of LTCs. The nurses will complete their training in October 2017 and will manage patients in the LTC clinics. All cases are on an LTC register on System One and are case managed by the nurses. Where there may be presenting complexities with certain cases these will be managed through a weekly multi-disciplinary team meeting looking at complex case management.</p>	Head of Healthcare	November 2017
5.31	Prison staff should be trained in resuscitation skills to ensure they can respond appropriately to medical emergencies. (2.48)	Accepted	<p>Staff training will be discussed as an agenda item and healthcare will support the prison to identify appropriate training for staff. Reporting on the number of staff trained will take place via the Local Delivery Board (LDB).</p> <p>First Aid training for staff will form part of</p>	Head of Healthcare	March 2018

			training plans and delivered quarterly. It is also part of the prison officer entry level training (POELT) course. HMP Brixton have approximately 40% new officers.		
<b>5.32</b>	Wing treatment rooms should be cleaned regularly and fulfil national infection control requirements. (2.49)	Accepted	<p>A Band 6 charge nurse has currently been identified as an infection prevention control lead. An annual schedule of audits have been undertaken and outcomes are being discussed at the monthly quality assurance meetings. Daily cleaning schedules have been implemented and checked weekly by management. Deep cleans will be organised and conducted every six months. An areas identified as not meeting infection control standards will form part of an agenda item at the monthly LDB for action.</p> <p>MITIE the external contractor for the prison undertake a quarterly deep clean of all clinical areas and this will be audited through the Healthcare audit cycle.</p>	Head of Healthcare	Completed
<b>5.33</b>	Reception screening should include identification of key issues such as social care needs and learning disabilities. Nursing staff should be proactive in their communication with reception staff in relation to key health indicators. (2.57)	Accepted	<p>NHSE has invested in the health services in prison by asking providers to recruit a specific Learning Disability (LD) coordinator to ensure screening is undertaken; reasonable adjustments are made and staff are skilled in the management of health of prisoners with a learning disability.</p> <p>Prisoners arriving in to HMP Brixton may have had their social care needs assessed in the previous prison or healthcare will request a referral from the local social care services based on an initial assessment at reception or on a presentation once in the prison.</p> <p>An assessment screening tool for use at</p>	Head of Healthcare / National Health Service England (NHSE) and Governor	December 2017

			<p>reception will be identified to meet key issues-social care (SC) and learning disabilities (LD). All nursing staff will be trained on how to use the assessment tool effectively. Joint training with prison reception staff will be undertaken to ensure staff across both disciplines have the skills to meet the needs of these individuals. Specific read codes will be allocated for all LD and SC so that patients' details automatically appear on a register necessary for quick identification purposes. An LD and SC lead will be identified and they will provide specialist interventions and care for these patients.</p> <p>An audit has been produced of the implementation of the LD coordinator and any improvement plans will be delivered under the supervision of NHSE commissioners.</p> <p>Healthcare providers are not commissioned to deliver social care in HMP Brixton. Any resulting care plans / equipment needs/assistance will be managed between the social care provider and HMP Brixton.</p>		
<b>5.34</b>	Prisoner access to primary care, dental and hospital appointments should reflect community waiting times. (2.58)	Accepted	<p>A Data Performance Officer has been recruited who will be tasked to monitor and report via the monthly performance meeting waiting times for two weeks and 18 weeks appointments. These targets will be monitored and fed back at the quality meetings and findings taken to the LDB.</p> <p>Due to the high demand for dental services at HMP Brixton, additional funding has been sourced to increase the dental sessions from four per week to eight per week. This also supports the dual regime healthcare now operates (following the re-roll of G wing to a Sex Offender wing in</p>	Head of Healthcare	September 2017



			<p>February 2017).</p> <p>The sex offender population and the general population are managed on a separate prison regime (leading to healthcare running two sets of all clinics). Due to the change in population and the impact on waiting times, the healthcare provider, commissioners and prison agreed (a) to immediately reduce the waiting times through delivery of an additional four sessions (two days) per week for 12 weeks. Thereafter to (b) maintain the waiting time to the national standard after 12 weeks requiring an additional 2 sessions per week (one day) which would meet and maintain the national standard.</p>		
<b>5.35</b>	Medication administration should be consistently and adequately supervised by prison staff, to ensure privacy and compliance, and reduce the risk of bullying and diversion. (2.65)	Accepted	<p>Staff are supervising the medication administration on all wings. Medical hatches are supervised during administration of medications by prison staff and have been briefed to support medical staff and monitor, for medication diversion.</p> <p>To reduce the risk of diversion and to mitigate risk when supplying methadone to patients, 150mls of water has to be drunk in front of clinical staff. Suspected diversion is recorded in the patients' medical notes and also onto the prison computer system (P:NOMIS). No medication is dispensed unless a prisoner has an identification card. Clinical staff are advised to request the presence of an officer before commencing medication.</p>	Head of Healthcare	January 2018
<b>5.36</b>	Prisoners with significant mental health problems should be transferred to hospital without delay. (2.73)	Accepted	The current Department of Health Good Practice Procedure Guide, the transfer and remission of adult prisoners under s47 and s48 of the Mental Health Act, 2011, suggests that patients can be assessed	National Health Service England (NHSE) / Head of Health Care /	October 2017 and ongoing

			<p>and transferred to hospital within the period of 14 days.</p> <p>All patients requiring transfer under the Mental Health Act are assessed promptly, and every effort is made to expedite transfers. However, this is dependent on the availability of Mental Health hospital beds which is beyond the control of the prison's healthcare.</p> <p>The current Prison Transfer and Remission Guidance published by the Department of Health in 2011 is being reviewed. In particular, a focus of the work is about ensuring that the most appropriate timescales are developed and implemented in relation to prison transfers and remission, taking into account clinical urgency and need.</p> <p>It is anticipated that revised timescales for transfer from prison to hospital will be developed by autumn 2017 to enable the current guidance to be reviewed by the end of the year.</p> <p>HMPPS is working with NHSE to ensure assessments and transfers to hospital from prison take place within appropriate timescales. Where there are delays evident, work is underway to establish the reasons for this and work collaboratively to address the issues.</p> <p>Meanwhile, the Head of Healthcare will monitor and review with Barnet, Enfield and Haringey (BEH) NHS Trust to check timely transfers. To reduce risk to patients, they will be reviewed under the ACCT process and a joint decision with HMPPS, BEH and Care UK on the management and location of the patient will be agreed whilst</p>	HMPPS	
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			hospital transfer is pending.		
<b>5.37</b>	Prison officers should receive mental health awareness training to help them to recognise when a prisoner requires assistance from mental health practitioners. (2.74)	Accepted	NHSE are currently participating in a development and support programme into reducing deaths in custody. A bespoke training package is being developed for HMP Brixton and will be aimed at prison officers as well as healthcare staff to equip staff with the skills aimed to reduce the numbers of death in custody and self-harm occurrences. Initial meetings have taken place and awaiting for the delivery of the draft training plan. BEH have discussed delivering mental health awareness to operational and clinical staff. Healthcare will support BEH and safer custody team with this training initiative and will this form part of safer custody's item of agenda. A national training programme around suicide and self-harm (SASH) for all staff working with prisoners, which includes a module around identifying and supporting those with mental health issues. This is currently being rolled out and the full six modules will be completed by Autumn 2017.	Head of Healthcare /  Head of Residence and Safety	December 2017
	<b>Social care</b>				
<b>5.38</b>	There should be a formal agreement between the prison and the local authority which reflects a shared approach to the identification and referral of prisoners with social care needs. (2.76)	Accepted	A formal Safeguarding policy and an agreed social care referral system is in place. The Head of Residence and Safety attends the Local Safeguarding Board to raise HMP Brixton's profile and a meeting with the Commissioner is planned.	Head of Residence and Safety	October 2017
	<b>Catering</b>				
<b>5.39</b>	Wing serveries, hotplates and trolleys should meet required food hygiene standards and food should be served at the	Accepted	Regular cleanliness checks on serveries are in place and these are noted in the wing books, checked by the wing manager and the Head of Residence regularly. Spot	Head of Residence and Services	Completed

	required temperature. (2.83)		<p>checks by kitchen staff take place on an ad-hoc basis.</p> <p>A separate hotplate temperature and cleanliness log has been introduced for each wing. Management checks are in place to ensure full compliance and are audited by both wing management and kitchen staff.</p> <p>Food comments books is now available to prisoners to provide feedback on the service.</p> <p>Wing serveries have been refurbished, and hot trolleys used to transport food from the kitchen to the wings are being regularly cleaned. HMP Brixton recently received a 'Green' scoring in the Catering Foods Standard Audit.</p>		
<b>5.40</b>	Prisoners on the main wings should be able to eat out of their cells. (2.84)	Partially Accepted	<p>Costing and feasibility of having tables situated on landings is being considered. This will be implemented subject to financial resources being available and appropriate risk assessments being carried out.</p>	Head of Residence and Services	December 2017
	<b>Time out of cell</b>				
<b>5.41</b>	All prisoners should have the opportunity of evening association and at least one hour of exercise outside each day. (3.2)	Accepted	<p>A new full core day will be implemented once staffing levels increase to a sufficient level and new profiles and staff shift patterns are in place. This will allow for prisoners to have access to evening association and at least one hour of outdoor exercise daily.</p>	Head of Residence and Services	February 2018
	<b>Learning and skills and work activities</b>				

5.42	The allocations process should be equitable and not carried out by wing staff. (3.8)	Accepted	<p>Wing staff no longer carry out any form of activity allocations.</p> <p>All activity allocations currently takes place in the education induction room and sometimes in presence of a patrol officer (although no involvement). Prisoners who are wing workers must have a completed accredited City and Guilds in industrial cleaning and National Vocational Qualification (NVQ) in food safety. Staff do make suggestions on who to employ if involved in complex case / opened ACCT.</p>	Head of Reducing Re-offending	Completed
5.43	Education and vocational training programmes should provide relevant progression for prisoners to improve their chances of getting into jobs, further education and training. (3.9)	Accepted	<p>HMP Brixton will ensure that prisoners either have the correct basic, key and functional skills level to join courses (if they haven't for a specific reason such as a learning difficulty) and there is currently a provision in place for embedded English and Maths for individual prisoners who require extra support. Prisoners working in the Bakery or 'The Clink' restaurant are required to complete a food safety NVQ delivered by the education provider prior to their start date.</p> <p>All prisoners attend education induction and are screened for their English and Maths skills on entering the prison (or information from the last prison so long as valid within last six months) in order to assess the needs of the individual and to set the learner journey. Learners are directed to the most appropriate learning pathway across a selection of courses in Construction, Catering and Hospitality, Services including Barbering and Cleaning Services which reflect Labour Market requirements. Foundation courses in English, and Maths and IT Skills are offered to support skill levels below those required to succeed across vocational</p>	Head of Reducing Re-offending	November 2017

			<p>training courses.</p> <p>Clear progression routes are located across the provision. For example, in Catering and Hospitality from achievement of City and Guilds Food Hygiene certificate to NVQ Level 2 Food Preparation in the Kitchen and specialism at Level 2 in 'Bakery' Skills in the Bakery and The Clink restaurant. Level 3 units will be added to the curriculum from November 2017 in Barbering, Catering, Horticulture and Textiles.</p> <p>Vocational training supplemented with an Employability course to ensure learners are supported to complete an accurate and targeted Curriculum Vitae to promote opportunity for employment upon release from HMP Brixton.</p>		
<b>5.44</b>	A wider range of work should be provided and places should be filled according to prisoners' resettlement needs. (3.14)	Accepted	<p>HMP Brixton will establish past employment, qualifications and experience, and their expectations of the prison during a prisoner's induction.</p> <p>During the induction process the individual learning journey is set via involvement of both National Careers Service, Learning and Skills and the Education provider in order to meet the prisoner's resettlement needs as identified by him and demonstrated via his assessment including information taken from P:NOMIS relating to behaviour and security level. From this a long term plan will be drawn up to achieve certain goals, including employment, increasing security levels steps and sequencing their time in the prison to provide the best resettlement opportunities. Additional learning spaces are now in place to accommodate G Wing provision. Improved use of Education Co-ordinators,</p>	Head of Reducing Re-offending	September 2017

			notably G Wing, has improved the exchange of information to prisoners in relation to higher level learning with an increase in the application of learners to Higher Level Distance Learning courses. HMP Brixton will continue to monitor popular training places (such as scaffolding and construction programmes) and manage attendance in these areas, as well as plan for three new workshops. This will be managed through bi-monthly meetings with Deputy Governor.		
<b>5.45</b>	The standard of teaching and learning in education and vocational training should be raised, further learning sessions should start and finish on time and be effectively planned. (3.20)	Accepted	<p>Weekly meetings are in place to identify any issues with teaching and look to problem solve them in order to aid productivity. The Head of Learning and Skills is conducting learning walks to familiarise themselves with staff, establish if any systems / processes are not working effectively or a matters needs to be delivered to a high standard and act upon this. Monthly meetings also take place with the Governor.</p> <p>Thorough use of teaching observations to measure teaching standards across education and vocational training is in place.</p> <p>More robust quality measures are now in place including Learning Walks, some of which are themed, in order to focus improvement across delivery. Further training is in place for teachers on planning and differentiation as evidenced in training calendar and also demonstrated in learner profiles and lesson plans. Coaching from Advanced Practitioner is in place for all tutors with grade below 2. Evidenced in Tutor Development Plans.</p>	Head of Reducing Re-offending	Completed and ongoing
<b>5.46</b>	Tutors should ensure that, in	Accepted	Training on individual learning plans will be	Head of Reducing	September 2017

	setting targets in individual learning plans and in the assessment of prisoners' work, they refer to the specific skills and knowledge that prisoners need to develop. (3.21)		delivered by the Head of Learning and Skills to non-Novus (education provider) staff to ensure tutors set clear individual targets and make appropriate assessments referring to areas which need developing.	Re-offending	
5.47	The prison should increase support for prisoners with additional learning needs, particularly in English and mathematics to ensure that they achieve. (3.22)	Accepted	HMP Brixton have introduced additional provision of 'Outreach' to support learners outside of discrete provision in English and Maths. An increase of 4 sessions per week for Functional Skills outreach.  Improved delivery of Functional Skills in the context of vocational training and more of extensive use of learning support across teaching and learning for year ending 2016/2017 with average of 45 learners per month in receipt of a learning support plan.	Head of Reducing Re-offending	September 2017
5.48	All prisoners should be able to use the library at least once a week, including at weekends. (3.30)	Partially Accepted	Prisoners are now assigned allocated library slots. HMP Brixton currently does not have sufficient staff to facilitate a weekend or evening library service. However, this will be reviewed early 2018 when staffing levels have increased.	Head of Reducing Re-offending	March 2018
5.49	Managers should analyse data on non-library users and implement strategies to increase usage, including making the library available at weekends. (3.31)	Partially Accepted	Library usage and information is collated within the Activities Hub. Regular meetings with the prisoner council representatives are currently in place to obtain their suggestions on how the library service can be delivered differently. This action is being taken to increase usage.  As stated in Recommendation 5.48 above, HMP Brixton currently does not have sufficient staff to facilitate a weekend or evening library service. However, this will be reviewed early 2018 when staffing levels have increased.	Head of Reducing Re-offending	March 2018
	<b>Physical education and</b>				



	<b>healthy living</b>				
5.50	Prisoners should be able to undertake an appropriate range of accredited vocational PE training courses. (3.35)	Accepted	<p>HMP Brixton is currently staffed below the benchmark in terms of gym provision which has impacted on delivery of such courses.</p> <p>A campaign is ongoing to recruit more physical education instructors (PEIs) There are currently four PEI's in post against the seven funded posts. To date two potential PEI's are awaiting attendance at the Pre-Selection Course.</p> <p>The current staffing number has affected the number of vocational courses offered and this is currently limited the establishment to delivering Level 2 Gym Instructor courses during 2017-18. A pilot Level 1 Football Coaching Award (in conjunction with Fulham Football Club has been delivered. Following the assessment of this pilot, the establishment will consider running further Coaching Award courses in conjunction with the Gym Instructor course during the course of 2018.</p> <p>A review of vocational PE provision will take place as the number of PEI's increases.</p>	Head of Reducing Re-offending	April 2018 <i>(to be reviewed once number of PEIs have increased following candidates completion of the accredited PE course)</i>
5.51	The outside all-weather surface should be resurfaced to the latest standards, to ensure that continued use is made of the facility. (3.36)	Rejected	A capital bid for an outside all-weather surface has been unsuccessful. HMP Brixton will submit a further bid next year.	Head of Reducing Re-offending	April 2018
	<b>Strategic management of resettlement</b>				
5.52	There should be effective strategic integration between the reducing re-offending and offender management functions, which places offender management at the	Accepted	<p>Monthly meetings are in place with the Head of Reducing Reoffending and the Head of Offender Management Unit to review effectiveness of offender management functions.</p> <p>The OMiC model is currently being</p>	<p>Head of Reducing Re-offending /</p> <p>Head of Offender OMU /</p> <p>HMPPS</p>	Completed and ongoing

	centre of service delivery to prisoners. (4.3)		implemented with the key worker role providing dedicated time for all prisoners with a phased implementation across the prison estate. The next phase implementing the case management part of the model is due to start implementation from April 2018 with the overall implementation of the model due to be complete by April 2019. The OMiC model introduces changes to the OMU designed to improve the quality and effectiveness of offender management.		
	<b>Offender management and planning</b>				
<b>5.53</b>	All prisoners should have an up-to-date OASys assessment, sentence plan and an effective risk management plan. (4.10)	Accepted	<p>HMPPS continues to review the offender assessment system (OASys) backlog and the prioritisation criteria remains in force, which ensures the highest priority cases are completed in full, with a reduced assessment for those lower risk cases.</p> <p>Work is ongoing at HMP Brixton to address the OASys arrears and agency staff are being employed solely to complete OASys in addition to a local bonus scheme and overtime for existing prison and probation staff. Further offender supervisor resources are in place for the short term to assist in addressing this matter.</p> <p>HMP Brixton will continue to tackle the backlog until the new Offender Management model is rolled out at the establishment.</p> <p>Public Sector Prisons is currently pursuing a revised operating model, using the principles of the recent offender management review as its firm basis. This will ensure there is increased time for building effective relationships with</p>	Head of OMU / HMPPS	April 2018 and ongoing

			prisoners, and also a more robust approach to prioritising assessments in the future, including ensuring initial OASys are routinely completed.		
<b>5.54</b>	Offender supervisors should have regular planned contact with prisoners allocated to them. (4.11)	Accepted	<p>Further offender supervisor resources are in place for the short term to assist in addressing this matter – which it is hoped will result in all offender supervisors being able to plan monthly visits and record contact on P:NOMIS. However, current staffing levels continues to make this work challenging.</p> <p>In addition, wing surgeries will be held weekly for prisoners to gain an opportunity of seeing an OMU staff member to address any matters arising outside their planned meeting schedule.</p>	Head of OMU	November 2017
<b>5.55</b>	Resettlement frameworks should support and enable IPP prisoners to progress effectively towards release. (4.19)	Rejected	This is a repeated recommendation – see recommendation 5.7. HMP Brixton's criteria has recently changed; indeterminate sentence for public protection (IPP) and lifers no longer meet the establishment's criteria.	Head of OMU	
	<b>Reintegration planning</b>				
<b>5.56</b>	Basic custodial screenings and resettlement plans should be fully completed and use all relevant information, including OASys where it is available. (4.22)	Accepted	<p>A weekly review meeting will take place for all prisoners that are being released within 12 weeks from the date of the meeting. This meeting will be attended by representatives from various departments including the local drug services provider and OMU, who contribute to fully completed resettlement plans.</p> <p>There are circa 60 releases from HMP Brixton each month. Weekly review of releases will be undertaken with CRC partnership agencies. Outcomes recorded on the Management Information Through</p>	Head of Reducing Reoffending	31 December 2017 and ongoing

			<p>The Gate Log by London CRC (LCRC), in addition to the Resettlement Plan Review (BCST 3).</p> <p>HMP Brixton is part of the South West area trial of a 'Custody Cohort' model by LCRC. The Custody Cohort model will manage all of HMP Brixton's LCRC prisoners in one place, and by one distinct team. This team will have full access to all OASys / probation records pertaining to a particular prisoner.</p>	<p>Directorate of Community Interventions (Local Contract Management Team)</p>	
<b>5.57</b>	<p>The CRC and housing advice providers should establish why prisoners are being released without settled accommodation and take concerted action to address the problem. (4.25)</p>	<p>Accepted</p>	<p>The Head of Reducing Reoffending will review no fixed abode releases monthly, examining OASys entries to ensure that all reasonable action has been taken to secure accommodation.</p> <p>The Quality Improvement Group and Reducing Re-Offending meetings are now established. Subject to the ongoing provision of data, the conclusions of the analysis of this data will continue to be fed in to the Pathway Leads and provide assurance to the Governor that service provision adequately meets need and challenged if the data indicates it has not.</p> <p>Where issues are identified, these will be taken up with the CRC provider.</p> <p>All offenders are now entitled to targeted support before and when they leave prison to help them reintegrate into society. This includes working with local partners to help them find accommodation, which can be provided by the local authority and private landlords.</p> <p>The CRC has a robust knowledge of housing provision, effective working relationships and referral pathways with</p>	<p>Head of Reducing Re-offending</p> <p>Directorate of Community Interventions</p>	<p>Completed and ongoing</p>

			<p>providers. HMPPS Contract Management Team will monitor this service on a monthly basis to ensure service delivery occurs and to maintain continuous improvement.</p> <p>HMPPS expect CRCs to work closely with local partners to help offenders find accommodation and assist them to maintain their accommodation as part of a package of support tailored to meet their individual needs. HMPPS are working closely with other Government departments to ensure this happens.</p> <p>HMPPS have conducted an internal review of the probation system and have agreed changes to CRC contracts to reflect more accurately the fixed costs of delivering services to offenders, and this will enable providers to focus on the delivery of core operational services and doing further work to consider improvements to the probation services.</p> <p>HMPPS continues to closely monitor and robustly manage providers to make sure they fulfil their contractual commitments to maintain service delivery, reduce reoffending, protect the public and provide value for money to the taxpayer.</p>		
<b>5.58</b>	Validated data on education, training and employment places when prisoners are released should be collected and analysed to measure the effectiveness of the resettlement work. (4.27)	Accepted	<p>The Head of Reducing Reoffending are analysing and challenging CRC reference data collection and how they evidence that education / training and employment (ETE) outcomes are correct. Monthly meetings are taking place to discuss service delivery including ETE data collection.</p> <p>HMPPS are introducing enhanced measures of resettlement which include the recording of employment and accommodation at the start and end of the</p>	<p>Head of Reducing Re-offending</p> <p>Directorate of Community Interventions</p>	Completed and ongoing

			<p>sentence and at the end of the licence supervision period for offenders. HMPPS aims to include this in future publications, for both CRCs and the National Probation Service (NPS), once data collection has bedded in.</p> <p>HMPPS have conducted an internal review of the probation system and have agreed changes to CRC contracts to reflect more accurately the fixed costs of delivering services to offenders, and this will enable providers to focus on the delivery of core operational services and doing further work to consider improvements to the probation services.</p> <p>HMPPS continues to closely monitor and robustly manage providers to make sure they fulfil their contractual commitments to maintain service delivery, reduce reoffending, protect the public and provide value for money to the taxpayer.</p>		
<b>5.59</b>	All prisoners should be able to use the virtual campus to research employment opportunities. (4.28)	Accepted	Usage of virtual campus (VC) has increased. A review of VC will take place to ensure it is effective in supporting prisoners to search for employment prior to release and findings to be implemented.	Head of Reducing Re-offending	September 2017

5.60	Prisoners should be able to access training on overdose management, including the use of Naloxone, before release. (4.32)	Partially Accepted	RAPT conduct release management planning which includes risk of overdose and tolerance levels. Naloxone is not covered in this although advice is available to prisoners on release.	Head of Reducing Re-offending	Completed
5.61	Prisoners' financial needs should be assessed on arrival and there should be services which meet the needs of all prisoners. (4.34)	Partially Accepted	<p>Basic custodial screening would have been undertaken by the prisoner's previous establishment prior to his arrival to HMP Brixton. Therefore, immediate financial needs such as outstanding debt (court fines, credit cards, mobile phone contracts) would have been already addressed. This part of the recommendation is therefore rejected.</p> <p>There are Financial Literacy modules as part of the 'Getting it Right' programme that is about to be delivered at HMP Brixton. Across the London Contract Package Area, there is good practice being shown by providers in getting prisoner debt written off permanently. The method for achieving this is shared at the monthly tripartite meetings and will be adopted for the benefit of the prisoners at HMP Brixton.</p>	Directorate of Community Interventions (Local Contract Management Team)	Ongoing
5.62	Family days should be widely promoted on induction and on the wings. (4.40)	Accepted	Family day posters have been created and notice boards are regularly updated throughout the prison, including wings, the visitor centre and reception to ensure all family/visit events are widely promoted. A prison orderly (with support from the Operations Manager) ensures this	Head of Operations	Completed

			information is shared and is available on the wings and during induction. A booklet has been created outlining the different types of visits offered. This is regularly monitored by the Head of Operations in line with compliance controls.		
<b>5.63</b>	Social visits should start on time. (4.41)	Accepted	<p>Visits start and finish times are reported by the orderly officer to ensure more accountability for timeliness. This is action taken forward by Head of Operations reporting date on start times at the morning operational meeting.</p> <p>This is now reported and taken forward at the monthly senior management team (SMT). Improvements have been made to starting times.</p> <p>A new profile will be introduced in Autumn / Winter 2017 to ensure visits times match the wider prison profile.</p>	Head of Operations	December 2017
<b>5.64</b>	The visitors' centre should be expanded to meet the needs of the population. (4.42)	Accepted Subject to Resources	<p>Major changes to the visitors' centre is subject to capital funding due to the significant amount of structural work. A bid will be submitted and work will be carried out subject to acceptance at the end of the financial year. In the interim, the visitors centre will be redecorated and new lockers for visitors to store personal belongings have been ordered.</p> <p>A vending machine has now been installed and there is a Café in the visits hall.</p>	Head of Operations	May 2018
<b>5.65</b>	A detailed needs analysis of the population should be undertaken to inform the provision of offending behaviour programmes which meet the needs of prisoners.	Accepted	A detailed analysis of prisoner offending behaviour programmes will take place to assess the needs of the population. The information gathered will inform part of HMP Brixton's offending behaviour programmes during this financial year. The methodology used will be detailed to	Head of Reducing Reoffending	October 2017



	(4.45)		include questionnaires to prisoners and data analysed by the programmed team and reported to the SMT.		
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<i>Recommendations</i>	
Accepted	52
Accepted Subject to Resources /Partially Accepted	9
Rejected	4
<b>Total</b>	<b>65</b>