



HM Prison &
Probation Service

Action Plan: HMP Exeter

Action Plan Submitted 9 October 2018

A Response to the HMIP Inspection of 14 – 24 May 2018

Report Published 9 October 2018

INTRODUCTION

HM Inspectorate of Prisons (HMIP) is an independent inspectorate which provide scrutiny of the conditions for and treatment of prisoners. They report their findings for prisons and Young Offender Institutions across England and Wales to Ministry of Justice (MOJ) and Her Majesty's Prison and Probation Service (HMPPS). In response to the report HMPPS / MOJ are required to draft a robust and timely action plan to address the recommendations. The action plan confirms whether recommendations are agreed, partly agreed or not agreed (see categorisations below). Where a recommendation is agreed or partly agreed, the action plans provides specific steps and actions to address these. Actions are clear, measurable, achievable and relevant with the owner and timescale of each step clearly identified. Action plans are sent to HMIP and published on the HMPPS web based Prison Finder. Progress against the implementation and delivery of the action plans will also be monitored and reported on.

Term	Definition	Additional comment
Agreed	All of the recommendation is agreed with, can be achieved and is affordable.	The response should clearly explain how the recommendation will be achieved along with timescales. Actions should be as SMART (Specific, Measurable, Achievable, Realistic and Time-bound) as possible. Actions should be specific enough to be tracked for progress.
Partly Agreed	Only part of the recommendation is agreed with, is achievable, affordable and will be implemented. This might be because we cannot implement the whole recommendation because of commissioning, policy, operational or affordability reasons.	The response must state clearly which part of the recommendation will be implemented along with SMART actions and tracked for progress. There must be an explanation of why we cannot fully agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.
Not Agreed	The recommendation is not agreed and will not be implemented. This might be because of commissioning, policy, operational or affordability reasons.	The response must clearly state the reasons why we have chosen this option. There must be an explanation of why we cannot agree the recommendation - this must state clearly whether this is due to commissioning, policy, operational or affordability reasons.



**ACTION PLAN: HMCIP REPORT
ESTABLISHMENT: HMP EXETER**

1. Rec No	2. Recommendation	3. Agreed/ Partly Agreed/ Not Agreed	4. Response Action Taken/Planned	5. Responsible Owner	6. Target Date
	Main recommendation to HMPPS and the governor				
5.1	<p>National and local managers should take concerted action to ensure that prisoners' living conditions are improved, and that cells falling below basic standards are not occupied.</p> <p>All prisoners should have supervised regular access to clean bedding and clothing.</p> <p>Staff should be proactive in their dealings with prisoners, including their response to cell call bells. (S39)</p>	Agreed	<p>HMP Exeter has introduced a cell standard policy and any accommodation falling below the standards required will be taken off line. Any damaged cell furniture will be replaced to a strict timetable. Enhanced assurance checks are now incorporated into daily landing officer's duties as well as supplementary weekly and monthly checks by the Senior Management Team (SMT) and Custodial Managers respectively.</p> <p>To improve access to clean clothing and bedding HMP Exeter will introduce a prisoner work party within the Clothing Exchange Store. This will be supervised by an Operational Support Grade staff (OSG). Furthermore, Government Facility Services Limited (GFSL) are recruiting an additional Store Person who will cover the current singleton post for periods of absence. Monthly minuted contract management meetings with the Deputy Governor, Service Delivery Manager and GFSL Site Manager will be established to provide assurance of service delivery.</p> <p>All residential staff will be supported to engage with prisoners through key worker training, this will include appropriate advice for the use of cell bells. The need to respond to cell bells promptly will be reinforced during daily operational briefings and will be written into all Prison Officers 2018/19 Staff Performance Development Report (SPDRs). Prison staff will assure that cell bells are working through Accommodation Fabric Checks (AFCs), and are responded to promptly by a weekly review of cell call bell response times, covert testing and weekly management checks.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>December 2018</p> <p>December 2018</p> <p>January 2019</p>
	Main recommendations to the Governor				
5.2	All aspects of the violence reduction strategy should be implemented.	Agreed	HMP Exeter has recently reviewed its violence reduction strategy to incorporate the 5P's (Strategic approach to Prison Safety) approach (People, Population, Partnerships, Procedural and Physical) in line with national good practice.	Governor	December 2018



	<p>Supervision by staff and by camera, should be effective in detecting and preventing bullying and violent behaviour.</p> <p>Engagement with prisoners to understand safety issues should be improved through consultation and targeted key work.</p> <p>There should be greater incentives for prisoners to behave well, and positive visible leadership should focus on creating a culture of optimism and encouragement. (S36)</p>		<p>Implementation will be overseen by a Project Manager who reports directly to the Governor and the monthly Violence Reduction Committee.</p> <p>The Senior Management Team (SMT) will undertake regular proactive reviews of intelligence, data and camera footage in relation to the detection and prevention of bullying and violent behaviour. Issues will be raised and discussed during daily operational meetings and at the monthly Violence Reduction Committee, to inform the tactical deployment of staff.</p> <p>A violence summit has been completed involving both staff and prisoners with an aim to understand and address both prisoner and staff concerns and further inform the prisons strategy. Staff engagement and supervision of prisoners will be continue to be supported by Five Minute Intervention training, Time wise and the implementation of Key Workers. Expectations will be set out within SPDRs and Key Worker supervision to promote good practice.</p> <p>A review of the Incentives and Earned Privileges (IEP) is currently underway to incentivise good behaviour and reduce punitive measures. The review will be incorporated into the Key Worker implementation, with an aim to improve engagement with prisoners and the consistency of application. Support will be provided by Organisational Development, The Evidence Based Practice Team and Business Development Group to provide targeted development for senior managers.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>December 2018</p> <p>April 2019</p> <p>March 2019</p> <p>January 2019</p>
5.3	<p>All records of the use of force and authorising the use of the special cell should be completed accurately and in full.</p> <p>Immediate measures should be taken to ensure that all cameras, fixed and body-worn, are used</p>	Agreed	<p>Governance for the completion of use of force paperwork has been reviewed with national support. A log of use of force incidents is maintained and a weekly management check of the log will be undertaken by the weekend duty governor to follow up where paperwork has not been completed. A random sample of use of force paperwork will be quality assured by the Assurance Custodial Manager, and a further 10% will be checked by the Use of Force Committee during the monthly meeting. Learning will be taken forward within the management line. The current Use of Force data base will be reviewed by the Use of Force Committee to ensure it is fit for purpose. Use of force will become a standing agenda item in the Prison Group Directors visit report.</p> <p>Authority for the use of special accommodation will only be given by the Duty Governor. The Head of Residence and Safety will be tasked to ensure that paperwork is completed and quality assured and escalated accordingly.</p> <p>Additional body-worn video cameras have been ordered and maintenance checks of CCTV equipment will be undertaken. A sample of footage will be reviewed at the monthly Use of Force committee and reported to the Violence</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>December 2018</p> <p>January 2019</p> <p>Completed</p>



	effectively. Documentation and camera footage should be subject to vigorous management checks to identify issues and trends. This should inform actions to address the issues and reduce the number of restraint incidents. (S37)		<p>Management committee. This will help to inform HMP Exeter's intelligence picture and understanding of incidents with a view to reducing the use of force.</p> <p>All planned use of force incidents are recorded using a hand held video camera and footage is reviewed by the Use of Force committee. Exceptionally in any incidents where the Duty Governor is not present, they will review footage at the earliest opportunity to ensure any issues, or identified learning is addressed in a timely manner.</p> <p>Use of force de-escalation has been promoted at annual refresher training and via full staff briefings, wing briefings, posters, and staff notices.</p>	<p>Governor</p> <p>Governor</p>	<p>Completed and ongoing</p> <p>Completed and ongoing</p>
5.4	<p>Prisoners who are effectively in unregulated segregation should have adequate safeguards and managerial oversight.</p> <p>All prisoners segregated should have an adequate regime that safeguards their mental well-being.</p> <p>The underlying causes of poor or vulnerable behaviour that led to the segregation should be investigated and addressed.</p> <p>Reintegration plans should be thorough and not rely solely on a transfer out of the establishment. (S38)</p>	Agreed	<p>C1 landing which was deemed as 'unregulated segregation' by HMIP has been decommissioned pending the re-role.</p> <p>A minimum standard of regime will be agreed for the Care and Separation Unit (A Segregated Unit) and each prisoner will have a decision log that takes into account their individual needs. Duty governors will be required to reassure themselves and record that they are content with the regime being delivered for all prisoners held within the Care and Separation Unit.</p> <p>Adjudicators now use the Procedural Justice approach to obtain more information and understanding into what caused the poor behaviours which lead to segregation. HMP Exeter will address poor behaviour and vulnerability via a multi-disciplinary approach, and include the prisoner's Key Worker.</p> <p>Formalised reintegration planning for prisoners in the Care and Separation Unit will be introduced as part of Segregation reviews.</p>	<p>Governor</p> <p>Governor</p> <p>Governor</p> <p>Governor</p>	<p>Completed</p> <p>November 2018</p> <p>Completed and Ongoing</p> <p>December 2018</p>
5.5	<p>Equality and diversity should be given higher priority.</p> <p>Procedures and work practices covering all aspects of equality and</p>	Agreed	<p>An Equalities Advisor will be recruited to promote a new focus on Equality and Diversity.</p> <p>In the interim an Equalities Action Plan has been put in place which captures the specific concerns of the Inspectorate including leadership, data analysis and protected characteristics representation. Implementation of the plan is currently</p>	<p>Governor</p> <p>Governor</p>	<p>February 2019</p> <p>Completed and ongoing</p>



	diversity should be improved to ensure that the needs of prisoners from each of the protected characteristics are understood and dealt with fairly. (S40)		being overseen by the Head of Business Assurance and at the Equalities Meeting chaired by the Deputy Governor.		
	Recommendations				
	Early days in custody				
5.6	Prisoners should spend less than two hours in reception. (1.9)	Not Agreed	This recommendation is not agreed as operational priorities may occasionally result in prisoners being held in reception for more than 2 hours.	Governor	
5.7	Prisoners should be able to shower on their first night in custody, and be located in clean, well-prepared cells. (1.10)	Partly agreed	<p>This recommendation is Partly Agreed as there are circumstances where very late receptions or operational incidents prevent access to showers on the night of reception. Showers are currently only available on wings as showers in reception have been decommissioned whilst awaiting refurbishment. Where a prisoner is unable to shower upon reception in the evening access will be given the following morning.</p> <p>All first night centre cells will be prepared prior to occupancy by the first night centre Orderly and checked by a member of staff to ensure that they are clean and well prepared, in line with the cell standard expectations included in the new Decency Policy. Weekly dip testing will be undertaken by the wing manager.</p>	Governor Governor	November 2018 December 2018
5.8	Induction should start the day after arrival and be completed by all prisoners. (1.11)	Not Agreed	<p>This recommendation is Not Agreed. There are some circumstances (for example due to serious health or detoxification needs) where it is not appropriate for prisoners to commence induction the day after arrival. Moreover, the establishment does not have sufficient resources to provide induction staff at weekends. Safety screening does however take place for all prisoners to deal with immediate issues on initial reception.</p> <p>To ensure that induction is available to all prisoners on weekdays, new receptions will be identified on NOMIS (an electronic Prisoner Database) and the induction officer will coordinate attendance at induction. A Custodial Manager check will be built in to ensure that all prisoners are captured. A review will also be undertaken to improve the timeliness of induction for vulnerable prisoners.</p>	Governor	
	Managing behaviour				



5.9	Prompt, adequate support should be provided for victims of intimidation and violence. (1.21, repeated recommendation 1.21)	Agreed	The Victim support plan will form part of the roll out of Challenge, Support and Intervention Plans (CSIP). Part of this process is to directly support victims of intimidation and violence through multi-disciplinary support and management.	Governor	February 2019
5.10	Targets for all prisoners on the basic level of the incentives and earned privileges (IEP) scheme should be individualised and should promote improvements in behaviour. (1.22, repeated recommendation 1.46)	Agreed	Wing managers will set individualised targets for basic prisoners during IEP reviews, in line with policy. Key Workers will engage in supporting prisoners in achieving targets. The use of strength based incentivisation and procedural justice will be central to the development of targets.	Governor	May 2019
5.11	There should be a creative focus on providing enhancements that prisoners aspire to achieve through good behaviour. (1.23)	Agreed	A revision of HMP Exeter's IEP policy is currently underway to incentivise positive behaviour. Access to private cash and updates to the facilities list have been recommended following recently held prisoner forum groups. An additional enhanced unit will be created to cater for those prisoners not suitable to reside on the risk assessed unit. IEP enhancements will additionally be considered when setting targets for improved behaviour.	Governor	May 2019
	Security				
5.12	There should be a prison-wide approach to exploring and understanding the wider factors linked to drug taking, such as living conditions, boredom and a lack of meaningful activity. The strategy should incorporate actions to address these wider issues. (1.43)	Agreed	A review of the Drug Supply & Reduction Strategy will take place. This strategy will ensure that every department contributes to the prevention of drug use. It will include the role of key work, incentivise targets, engagement in regime and promotion of drug services. Progress will be reviewed at the monthly Senior Management Meetings and Drug Strategy meetings.	Governor	March 2019
	Safeguarding				
5.13	Prisoners who require constant observation should not be located in special accommodation. (1.50)	Partly Agreed	This recommendation is Partly Agreed as, the use of the constant supervision cell within the Care and Separation Unit may be necessary in some specific circumstances. An additional constant supervision cell is currently being constructed. The constant supervision cell in the Care and Separation Unit will only be exceptionally considered for use if no constant supervision cell is	Governor	October 2018



			available on ordinary location. In that event, a case review will consider whether the interests of the prisoner, and the effective management of suicide risk, are best served by the use of that facility or by an urgent transfer to a different prison where constant supervision can be provided on ordinary location. In all circumstances where it used for this purpose the cell will be properly furnished and these procedures will be supported by appropriate governance.		
	Staff-prisoner relationships				
5.14	All prisoners should have good quality weekly meetings with their keyworker, and these should be fully recorded in electronic case notes. (2.4)	Agreed	A ten strand assurance framework has been agreed already and will be used to give assurance to all aspects of Key Worker delivery. The Governor and SMT will monitor assurance data monthly. The Head of OMU (Offender Management Unit) will be the manager responsible for the collection and recording of the assurance data, which will be reviewed at SMT.	Governor	March 2019
	Daily life				
5.15	Prisoners should not have to wait two weeks to receive their first shop order. (2.15, repeated recommendation 2.97)	Not Agreed	This recommendation is Not Agreed, due to the DHL (The commissioned provider of prisoner grocery items) contractual constraints which only provide for Emergency Canteen for new receptions.	Governor	
5.16	Prisoners should be consulted regularly about the routines and facilities of the prison. (2.20, repeated recommendation 2.12)	Agreed	A prison council will be implemented with bi-monthly meetings held and chaired by the Head of Residential and Services.	Governor	January 2019
5.17	The prison should ensure that applications are dealt with promptly and helpfully. (2.21)	Agreed	HMP Exeter has allocated a wing decency orderly who logs each application when submitted and returned. The log will be reviewed weekly by Residential Custodial Managers to ensure that applications are processed in a timely manner. Timeliness and quality assurance of application responses will checked through monthly dip testing by residential managers.	Governor Governor	April 2019 April 2019
5.18	Quality assurance procedures should be developed to improve investigation of and responses to complaints. (2.22)	Agreed	A Procedural Justice meeting has been held with the SMT and guidance has been issued to staff and managers to help them improve their responses to complaints. Management checks will be undertaken for a sample of 10% of complaints by the Governor and deputy Governor. Complaints will be checked to see that they	Governor Governor	Completed December 2018



			are answered in line with procedural justice guidelines with feedback to managers as appropriate.		
	Health, well-being and social care				
5.19	Adverse incidents should be promptly reported and investigated, and lessons learned shared with the full health team. (2.49)	Agreed	Care UK/Devon Partnership Trust will ensure that Mental Health (MH) service staff are trained and able to report onto DATIX (incident reporting system) and that MH managers are able to review within the expected timescales. Further training will also be provided to the Senior nursing team in investigating incidents.	NHS England	November 2019
			Lessons learned will be a standing item on fortnightly team meetings.	NHS England	October 2019
5.20	Information about health services and national health campaigns should be easily available in all required formats and languages. (2.54)	Agreed	Where national health campaigns are available in alternative formats these will be requested against local population need.	NHS England	January 2019
			Local leaflets regarding health care provision will be translated into the priority population need and this population need will be reviewed on a 6 monthly snapshot basis.	NHS England	January 2019
5.21	Prisoners should have easy and prompt access to the full range of smoking cessation support and barrier protection throughout their stay and on discharge, if required. (2.55)	Agreed	Psychosocial interventions will be developed in conjunction with Integrated Substance Misuse Service (ISMS) colleagues as per NHS England guidelines and offered to all those requiring cessation support.	NHS England	December 2018
			A local policy will be developed with head of Health and HMP Exeter SMT for the supply and distribution of CE marked condoms and lubricant for resident prisoners and added to the release planning process.	NHS England/Governor	January 2019
5.22	Prisoners on all wings who have substance misuse problems should have access to all psychosocial interventions. (2.81)	Partly Agreed	This recommendation is Partly Agreed because vulnerable prisoners on B wing do not have access to all psychosocial interventions as there is only one group room and one interview room available which is shared with Education. It is therefore not possible to offer access to all services. HMP Exeter will however be seeking to offer facilities to Psychosocial service providers who are able to operate during the evening duty and weekend periods for B wing prisoners.	Governor	January 2019
5.23	Prisoners in shared cells should have secure storage for their medicines. (2.87)	Agreed	Exeter cannot currently source suitable storage units due to the physical cell constraints (size, space and age of building). The Head of Residential and Head of Healthcare are taking this forward, and if suitable storage units can be sourced, roll-out will commence on the enhanced and social care units with a full roll-out scheduled to be completed by January 2019.	Governor/NHS England	January 2019



5.26	All prisoners should have access to at least one hour in the open air daily. (3.11, repeated recommendation, 3.5)	Not Agreed	PSI 75/2011 - Residential Services states that prisoners are afforded a minimum of 30 minutes in the open air daily, as defined in the Service Level Agreement/Contract. This provision is mandatory subject to weather conditions and the need to maintain good order and discipline. All prisoners at HMP Exeter have the opportunity to take 30 minutes exercise in the open air as per the fully implemented benchmark decency guidelines.	Governor	
5.27	The gym showers should provide decent facilities for prisoners. (3.12)	Agreed	Funding is in place for the refurbishment of the gym shower area with the aim to complete this work within this financial year.	Governor	March 2019
	Education, skills and work activities				
5.28	College managers should develop the provision further so that prisoners can improve their skills in using English, mathematics and the use of information and communication technology to enhance the likelihood of successful resettlement. (3.20)	Agreed	Plans are in place to embed English in all workshop areas. The Weston College functional skills maths team are gathering resources that can be adapted by other colleagues and contextualised for their own course. This will be reviewed monthly at the managers meeting. HMP Exeter are investigating the use of internet free tablet devices and resources to teach skills which are more relevant to personal and employability outcomes. The specification for the new Education contract includes an emphasis on functional skills and Information, Communication and Technology (ICT) according to the establishment needs analysis and in line with the funding proposed for HMP Exeter.	Governor Governor Governor Governor	April 2019 October 2018 November 2018 April 2019
5.29	Foreign national prisoners should have access to suitable provision to improve their spoken English. (3.21)	Agreed	HMP Exeter have created dedicated courses for non-English speakers across the prison. Workers can attend on a part-time basis to improve their spoken English.	Governor	Completed
5.30	Prison managers should improve the evaluation of the quality of training, learning and assessments in prison work, and ensure that the self-assessment report is accurate. (3.22)	Agreed	The Head of Learning Skills and Employment will review best practice Self-Assessment Report's (SARS) and adapt the prison report accordingly. Prison managers are reviewing best practice reports and will adapt the prison SAR when this training and review have been completed.	Governor	January 2019



5.31	All prison work should enable prisoners, including vulnerable prisoners, to develop useful vocational skills, improving their prospects of finding employment after release. (3.23)	Partly Agreed	<p>This recommendation is Partly Agreed as it is not possible to ensure that all work within the prison has a vocational training element. As a local prison, HMP Exeter caters for a wide range of prisoners with different sentence lengths, needs and skills and therefore seeks to offer work and activities at a range of levels.</p> <p>The prison will continue to seek to improve the range of activity on offer for all prisoners to ensure that vocational skills training is provided where possible. Vocational skills by vulnerable prisoners will be improved by providing access to the Learning Zone for regular periods.</p>	Governor Governor	April 2019
5.32	Advice and guidance about courses should be improved to increase prisoners' chances of gaining employment after release, including a better use of the virtual campus for finding jobs. (3.24)	Agreed	<p>HMP Exeter will bring in specific Information Advice & Guidance (IAG) services as part of the Education Review process from April 2019.</p> <p>In the meantime, Weston College are providing some aspects of IAG through the Education and Employment Induction process which every prisoner receives. The induction process outcomes not only identify education levels but also concentrates on aspirations, interests and employability opportunities.</p> <p>The Virtual Campus (VC) job searching process is inconsistent and there are concerns about its ability to produce good CV's and live job applications. HMP Exeter are working with VC partners to improve this process.</p>	Governor Governor Governor	April 2019 Completed and ongoing April 2019
5.33	Instructors should use information about prisoners' existing skills to set them appropriately demanding work and targets for their development. (3.31)	Agreed	To support the development of workshop instructors, Weston College have agreed to provide an Assessors Qualification, which will equip and empower them with the necessary skills to support prisoner's development and ensure that, where possible within the constraints of the working environment and course delivery, prisoners are set work targets at the appropriate level.	Governor/Weston College	April 2019
5.34	Tutors and instructors should promote the values of fair treatment and respecting differences in their teaching and training sessions. (3.32)	Agreed	Weston College have recognised that equality and diversity should be given greater focus and will plan an ongoing programme of events with further training provided to tutors and instructors.	Governor/Weston College	November 2018
5.35	Tutors and instructors should include tasks and activities in their teaching, training, and assessment that improve prisoners'	Agreed	HMP Exeter are continuing to embed English throughout the curriculum in the majority of courses. Plans are in place to embed English in all workshop areas. The embedding of maths requires more planning and preparation for the majority of courses. The Weston College functional skills maths team are gathering resources that can be adapted by other colleagues and contextualised for their own course.	Governor/Weston College	November 2018



	skills in English and mathematics. (3.33)				
5.36	Wing staff should encourage and motivate prisoners to improve their attendance and punctuality to lessons and prison work activities so that they can increase their chances of gaining employment after release. (3.38)	Agreed	Key Workers will encourage and motivate prisoners to engage in activity and have been given education and work awareness sessions which underpin the importance of how activity can improve employment opportunities for prisoners on release. Monitoring of activity attendance is completed weekly and is reported to the Head of Learning and Skills.	Governor	Completed
5.37	There should be effective measures to motivate prisoners to improve their English and mathematics skills. (3.39)	Agreed	HMP Exeter will ensure prisoners have a skills assessment prior to allocation to work or activity, if skills levels do not support the chosen course or job, a subsequent learner pathway will be identified. Prisoners will be encouraged to improve their English and Mathematics skills with support from their Key Worker. Additional marketing is being prepared that will support motivation. A further review of incentivisation will be explored including links to the local pay policy.	Governor	November 2018
5.38	Tutors and instructors should ensure that all prisoners always follow appropriate health and safety procedures. (3.40)	Agreed	HMP Exeter will however take all reasonable steps to equip, challenge, guide and train prisoners to follow health and safety arrangements. Tutors will ensure that classroom behavioural guidance, including health and safety, is made clear at the start of courses and is monitored and challenged. Health and safety signage is visible in Education areas and workshop Instructors will be tasked to provide evidence of systems and reporting.	Governor	December 2018
5.39	Prisoners in prison work should be able to gain qualifications, and instructors should recognise and record accurately the skills that prisoners develop. (3.44)	Agreed	Workshop Instructor training and development is currently being planned and a supporting qualification in Assessment has been offered by Weston College. This training will give instructors the skills to accurately record prisoner's development skills. Training for Instructors will include Training, Assessment and Quality Assurance and Accredited Education and Training qualifications.	Governor	April 2019
	Reducing risk, rehabilitation and progression				
5.40	The prison should develop a needs analysis drawing on information about risk and prisoner need, and use this to inform the	Agreed	A Needs Analysis will be produced that will inform a Reducing Reoffending action plan. An Education needs analysis has already been completed and a wider Reducing Reoffending Needs Analysis is scheduled for February 2019. The outcomes of	Governor	April 2019



	reducing reoffending action plan. (4.18)		both reviews will be implemented from April 2019 alongside the introduction of the new Education contractor.		
5.41	Procedures to implement offender management in custody should ensure that their sentences and what will happen to newly sentenced prisoners are explained to them, that key worker contact is reliable and consistent, and that there is good liaison between offender supervisors and keyworkers based on agreed targets for progression and resettlement. (4.19)	Agreed	<p>Once OMiC (Offender Management in Custody) case management is implemented, all NPS (National Probation Service) and CRC (Community Rehabilitation Company) allocated prisoners who are serving longer sentences (more than 10 months left to serve on day of sentence) will have their Offender Manager located in the prison. The prison offender manager will have time allocated for engagement prior to the sentence planning meeting which will include ensuring that the prisoner understands the sentence and its implications in relation to how they will be managed in prison and upon release. For prisoners serving shorter sentences (less than 10 months to serve on day of sentence) the responsibility for sentence planning will remain with the Community Offender Manager for prisoners allocated to both CRCs and NPS.</p> <p>Key work contact is expected to take place on a weekly basis with 45 minutes allocated per prisoner. This includes the session itself and any follow-up work such as contacting the Offender Supervisor. Where possible Key Workers will attend sentence planning sessions.</p> <p>A ten strand assurance framework has been agreed already and will be used to give assurance to all aspects of Key Worker delivery. The Governor and SMT will monitor assurance data monthly. The Head of OMU will be the manager responsible for the collection and recording of the assurance data, which will be reviewed at SMT.</p> <p>Until OMiC case management is implemented, HMP Exeter will ensure that the current offender management processes are consistently delivered. Under the current model, responsibility for sentence planning is complex, with the NPS offender manager located in the community responsible for the first sentence planning cycle for all life sentenced prisons and all sentence planning throughout the sentence for high and very high risk of serious harm cases. For CRC allocated offenders, the responsibility sits with the Offender Supervisor (excluding those serving sentences of less than 12 months). Part of the sentence planning process is to ensure that prisoners understand the sentence and its implications in relation to how they will be managed in prison and upon release.</p>	Governor / NPS	March 2019
5.42	The interdepartmental risk management team should consider all high-risk prisoners and those subject to multi-agency	Partly Agreed	This recommendation is Partly Agreed as not all high risk prisoners need to be managed through the interdepartmental risk management team (IRMT).The MAPPA (Multi Agency Public Protection Arrangement) Guidance 2012 issued by the Secretary of State under Criminal Justice Act 2003 - states "the IRMT has responsibility within the prison to monitor those offenders who present the	Governor	



	public protection arrangements on their arrival and in sufficient time before their release, identifying risk factors and targets for risk management. (4.20)		<p>highest risk of serious harm” (Chapter 15 - Custodial section - para 15). Whilst the IRMT is not required to all monitor all high risk offenders, the prison will have a process to screen their general and high risk prison population that may benefit from IRMT management.</p> <p>The OMU will screen all MAPPA level 2 and 3 levels on a weekly basis to ensure that all risk factors are identified and managed at IRMT. The community Offender Manager will attend to jointly agree risk management planning on release, and VISOR (A dangerous persons database) will be updated with outcomes from the meetings.</p>	Governor	March 2019
5.43	Reviews of prisoner categorisation should include the opportunity for prisoners to make representations about their risk level, and they should be informed of the decision and what they need to do to progress. (4.21)	Agreed	All prisoners due a categorisation review are issued with notification of the categorisation board and enabled to make representations about their risk level and asked if they would like to attend the review board. Prisoners will be informed of the outcome of the board by their prison offender manager or their key worker. The number of representations made will be reviewed at the Offender Management meeting to ensure that reasonable levels of prisoner engagement in this process are being achieved.	Governor	March 2019
5.44	Transfer of prisoners should be based on an OASys assessment of their risk and should support their progression. (4.22)	Not Agreed	<p>This recommendation is not agreed as the decision to transfer prisoners may be made for operational reasons separate from prisoner progression.</p> <p>HMPPS are reconfiguring the adult male estate to ensure men can be held in the right conditions to access the right support and regime for their needs. This underpins the Offender Management in Custody (OMiC) model and will ensure men can transfer as intended.</p> <p>The review of Offender Management in custody (OMiC) will address the issues which prisons currently face around completing OASys reports. The new model will move the resource for OASys report completion into the training / resettlement estate and away from local / reception prisons, where there is more time for engagement with the prisoner and for the action plan to be produced.</p> <p>In the interim, prioritisation criteria for the current OASys backlog remain in place to support the Prisons Estate to ensure the highest priority cases are completed in full, with a reduced assessment for lower risk cases, ensuring all cases have some form of risk assessment and sentence plan.</p>	Governor/HMPPS Prison Estate Transformation Program	
	Interventions				



5.45	Prisoners with finance, benefit and debt problems should have ready access to competent specialist support. (4.26, repeated recommendation 4.38)	Not Agreed	This recommendation is Not Agreed as HMP Exeter is currently not funded to deliver a specialist support service in this area. The prison is however actively seeking nil-cost independent financial support and advice provision.	Governor	March 2019
	Release planning				
5.46	Prisoners being released should not be required to change their clothes in view of staff. (4.31)	Agreed	Prisoners being released are no longer routinely required to change their clothes in view of staff as part of the search process. . Searching on discharge is now undertaken on a risk assessed basis or intelligence led as per the National Security Framework.	Governor	Completed
5.47	There should be adequate discharge clothing for prisoners who need it, and a bag for possessions provided if required. (4.32)	Agreed	The Reception Custodial Manager (CM) will review discharge clothing and put a system in place to ensure adequate clothing and a bag is available to those prisoners who need it. Adherence will be checked during discharge boards and will be overseen by the head of security and operations.	Governor	January 2019

Recommendations	
Agreed	35
Partly Agreed	6
Not Agreed	6
Total	47

