

# Improvement plan

**Service:** HIW - Local Review of Governance Arrangements at Swansea Bay University Health Board for the Provision of Healthcare services to Her Majesty's Prison Swansea

**Date of review:** 30 June 2022

The table below includes any other improvements identified during the review where we require the service to complete an improvement plan telling us about the actions they are taking to address these areas.

Recommendations	Action	Responsible officer	Timescale	Updates
1	The health board and prison partnership board must consider how they gain assurance, that any reports or recommendations relating to prison healthcare published by both Welsh Government and Senedd committees, are identified, received and disseminated to the appropriate individuals throughout the health board and prison. In addition, that action is taken to ensure appropriate membership and attendance of the Prison Health Oversight Group.	a)The Prison Partnership Board (PPB) have a Representative from Welsh Government on the Board whose role will be to bring new publications to the Board's attention. A standing agenda item will prompt updates on this.	30 <sup>th</sup> September 2022	Complete
	b) Any reports issued by Welsh Government to the health board are reviewed by the Corporate Governance team. Where there are recommendations relating to prison healthcare they will be shared with SBU Board members via secure portal, and forwarded to the Primary Community & Therapies (PCT) Service Group Directors for	SBU Director of Corporate Governance & PCT Deputy Group Nurse Director	In Place	Complete

		<p>distribution to Prison Partnership Board members.</p> <p>c) The PPB will determine an appropriate circulation list for dissemination after receipt.</p> <p>d) The health board will contact Welsh Government for an update on status of Prison Health Oversight Group and representation requirements. Representation will be provided as required.</p>	<p>PCT Deputy Group Nurse Director</p> <p>PCT Deputy Group Nurse Director</p>	<p>Membership Reviewed</p>	<p>Complete</p> <p>No update yet from WG</p>
2	The health board and prison partnership board must ensure that recommendations made in the report, Health and Social Care provision in the Adult Prison Estate in Wales, are reviewed and considered, and take action where necessary.	<p>a) The Prison Partnership Board have formally written to the Welsh Government seeking clarity on the status of the report.</p> <p>b) An exercise to map the recommendations across into this action plan will be undertaken. Action will be monitored through this plan.</p>	<p>a) Prison Governor</p> <p>b) PCT Assistant Director of Operations</p>	<p>b) 30<sup>th</sup> September 2022</p>	<p>a) Complete</p> <p>b) Complete Recommendations mapped Against HDP and will be monitored via the PPB</p>
3	The health board and PPB must ensure there are clear lines of reporting and escalation into the PPB terms of reference, to ensure robust governance	New Terms of Reference have been redrafted which set out the governance arrangements, including reporting and escalation process.	Prison Governor & PCT Deputy Group Nurse Director	30 <sup>th</sup> November 2022	ToR formally discussed and small changes required.

	arrangements are in place for the management of healthcare services at the prison.	These will be submitted for ratification at the next PPB in November 2022, and approved by respective partner organisations.			To be signed off in PPB in November 2022
4	The health board and PPB must promptly address the outstanding recommendations made in the Tamlyn Cairns Partnership health needs assessment report and implement any actions and monitor as appropriate.	An action plan which details the recommendations has been developed and distributed to key stakeholders. It will be ratified at the next meeting of the Partnership Board. The progress of this action plan will be monitored through the Prison Partnership Board also.	PCT Deputy Group Nurse Director	30 <sup>th</sup> September 2022	Proposal presented to PPB in September 2022 Plan to update PPB with progress at each PPB
5	The Health Board must ensure that it has a clear strategy and plan for the commissioning and delivery of healthcare services, and for the wellbeing and improvement of prisoner health.	A Health Care Delivery Plan which sets out the future strategy for delivering health and wellbeing services to the Prison population has been developed.  The plan has undergone consultation with key stakeholders and will be ratified at the PPB in November 2022 and approved by respective partners. Delivery against the plan will be monitored through the PPB.	PCT Assistant Director of Operations	30 <sup>th</sup> November 2022	HDP agreed at PPB mtg in September. Operational delivery programme to be drafted for review/approval by Board in November 2022
6	The Prison Partnership Agreement must be reviewed and updated promptly by the health board and HM Prison Service. This must reflect	This action has been completed in line with the recommendation and will be shared with partners and ratified at the PPB in November.	Prison Governor & PCT Deputy Group Nurse Director	30 <sup>th</sup> November 2022	PPA reviewed and discussed at PPB in September. The intention is to enable social

	current arrangements for commissioning and accountability for the delivery of healthcare services at HMP Swansea.				care to be listed as an equal partner in the body of the document. Legal approval is required from the Council and is due in October to be formally ratified at PPB in November
7	The health board must ensure quality and safety matters arising from HMP Swansea are defined, reported, and escalated appropriately through the governance framework. In doing so, it must: a. Ensure that the appropriate groups within the quality and safety governance framework scrutinise and monitor actions taken to address recommendations made in all external inspection reports.	<p>The Health Board is revising its Governance Framework currently.</p> <p>a. The Terms of Reference of the PCT Quality &amp; Safety Group will reflect those new requirements and the arrangements around scrutiny and monitoring of all quality &amp; safety matters including incidents / Inspections and DIC reports will feature as part of that process. Standard agendas will ensure key areas are covered. Escalation and reporting on quality &amp; safety matters from the PCT service group will align to the new SBU governance framework.</p>	PCT Deputy Group Nurse Director	31 <sup>st</sup> October 2022	Discussed at PPB in September 2022 Some amendments required To be formally ratified in PPB in November

	<p>b. Ensure that all outstanding recommendations made within the HMIP Scrutiny Visit reports, CHC report, and DIC report recommendations, are considered robustly, and any actions taken should have regular review to ensure appropriate and timely actions are implemented.</p>	<p>b. The PCT Deputy Group Nurse Director (DGND) chairs a monthly group where all open actions relating to the Prison are reviewed and updated. This includes all stakeholders.</p>	<p>PCT Deputy Group Nurse Director</p>	<p>30<sup>th</sup> September 2022</p> <p>In place</p>	<p>Monitored monthly</p>
8	<p>The health board must ensure adequate arrangements to identify, escalate, record, manage, and mitigate risks in relation to healthcare services at HMP Swansea.</p>	<p>a) Health Board related risks are managed through the established process whereby risks are recorded within the risk register held in the Datix system. Prison related risks have been refreshed since the review.</p> <p>Risks are reviewed in the PCT Quality and Safety Group Meetings and for risks assessed to score over 16 the DGND meets monthly with a member of the PCT Triumvirate to review progress.</p> <p>There is an escalation process for risks 16+ to Executive Director level either directly or via Risk Scrutiny Panel, and in performance reviews.</p>	<p>PCT Deputy Group Nurse Director</p>	<p>30<sup>th</sup> September 2022</p> <p>In place</p>	<p>Complete</p>

		b) Risks are also reported into the PPB, however, the reporting to PPB will be enhanced.	PCT Deputy Group Nurse Director	30 <sup>th</sup> November 2022	
9	The health board must improve visibility and oversight of clinical audit, and ensure this activity is reported to relevant governance groups for monitoring and scrutiny for prison healthcare services.	<p>The development of an audit plan has begun. This will be a joint approach between Secondary Mental Health and Primary Care.</p> <p>The plan will be presented for review to the PPB in November 2022. Progress and outcomes of audits will be reported to PCT Quality &amp; Safety Group (and the equivalent in MHL D service group) and the PPB subsequently.</p>	PCT Deputy Group Nurse Director & MHL D Head of Nursing	30 <sup>th</sup> November 2022 (Approval of plan)	
10	The health board and prison must consider how it can address the issue identified around staff safety, and the availability of 'panic alarms' within the healthcare environments at the prison.	<p>The rooms have been surveyed and the works will be completed by the prison estates dept by the end of September.</p> <p>Current control measures include officers being in the vicinity of the health care clinics to support in the event of any violent or aggressive incidents.</p>	Prison Governor	30 <sup>th</sup> September 2022	Complete
11	The health board and prison must review and update the memorandum of understanding to ensure that	This recommendation will be addressed via an update of the partnership agreement which will be	PCT Head of Health Care	30 <sup>th</sup> November 2022	Reviewed in PPB in September 2022

	there is clarity around responsibility and accountability for repair of premises and healthcare equipment.	ratified by the PPB in November 2022.			Will formally be signed off in PPB in November
12	The health board should review the clinical pathways used to deliver care to the prison population to ensure they are appropriate to the secure environment. Consideration should be given to the variety of patient needs, and to ensure appropriate and up to date guidance is available to both substantive and temporary healthcare staff.	Following development of the Prison Health Delivery Plan (see Recommendation 5), clinical pathways to delivery care to meet needs will be reviewed and guidance established for staff.	SBU Clinical Lead HMP Swansea & PCT Head of Healthcare	28 <sup>th</sup> February 2023	In progress
13	The health board and prison should consider commissioning a further health needs assessment to establish what clinical pathways should be in place at the prison.	A new healthcare needs assessment will be published as per requirement in 2023	PCT Deputy Group Nurse Director	31 <sup>st</sup> December 2023	
14	The health board must explore how individual health records can be accessed by GPs working within the	The GPs have access to WCP (Welsh Clinical Portal) and have remote access for System One.	SBU Clinical Lead HMP Swansea		Complete

	prison, to ensure timely and an up-to-date history of patients is available, and to also provide timely health care and prescribing for prison residents.				
15	The health board should take steps to consider and monitor the service provided by the dental provider 'Time for Teeth', to ensure its contractual obligations are meeting the needs of the prison residents.	<p>A new dental contract was awarded in July of 2022. This is a 3 year contract.</p> <p>There are regular monitoring reports received through the partnership board on waiting times and activity.</p> <p>As at August 2022 average waiting times for non-urgent dental treatment is approximately 3 weeks.</p> <p>There are no delays for urgent appointments. Care is based on a risk/needs basis and aligned with NHS services in primary care and WG Contract Reform Programme.</p>	PCT Head of Health Care		Complete
16	The health board must consider the impact on the prison population as a result of the prolonged period without access to eye care services, and how it can mitigate against the risk of this occurring in the future.	<p>A new optometry contract has been in place since January 2022. This is a 3 year contract.</p> <p>There are regular monitoring reports received through the partnership board on waiting times and activity.</p>	PCT Head of Health Care		Complete

		As at August 2022 there was no waiting list for the eye tests.			
17	The health board must take appropriate action to address any issues arising as part of the implementation of the new electronic pharmacy system, and to ensure all staff are adequately trained, and that appropriate support is always available to staff if required.	<p>All pharmacy staff have been trained to use the new pharmacy system. Additional training and support has been given by the Health Board pharmacy team to prison pharmacy staff to improve the use and understanding of the functionality.</p> <p>The Clinical Lead will continue to monitor any issues associated with the system.</p>	SBU Clinical Lead HMP Swansea	30th September 2022	Complete
18	The health board must ensure that the pharmacy team based at the prison are made aware of the latest HMIP report findings, and that any actions set by the health board as a result are shared with them to ensure improvement.	All reports will be shared where appropriate with the pharmacy team as part of recommendation 1 above.	SBU Clinical Lead HMP Swansea	30 <sup>th</sup> September 2022	Complete
19	The health board must undertake a prompt review of its governance arrangements to ensure it is compliant with all medication licensing requirements.	The Health Board have a home office licence and we are now compliant. This was granted after a robust assessment process and visit to the prison.	PCT Triumvirate Lead (for controlled drugs)	30 <sup>th</sup> September 2022	Complete

20	The health board must provide HIW with an update regarding the progress of the CD license application, and when it has been granted.	This recommendation has been met. A copy of the home office licence was sent to HIW for assurance on 20 <sup>th</sup> June 2022.	PCT Head of Health Care		Complete
21	The health board must review the current staffing establishment of MHIRT to ensure the resources available meet the demand of mental health services, in both HMP Swansea and HMP Parc.	<p>The responsibility for health care in HMP Parc will move to Cwm Taff Morgannwg University Health Board next year. This will allow designated staff from Mental Health to work in HMP Swansea. In addition, a separate bid has been successful for additional funding for the prison in-reach team. This will improve the current position.</p> <p>Recruitment timescales will be confirmed and an update on the transfer presented at the PPB in November 2022.</p> <p>Staffing requirements will be reviewed following the transfer of staff for adequacy and annually thereafter.</p>	Head of Nursing Mental Health	30 <sup>th</sup> November 2022	Reviewing accommodation for the new MHIRT from last PPB September 2022
22	The health board must consider how the performance of its MHIRT service is monitored, to ensure it is meeting the	The Prison Healthcare Delivery Plan will indicate service expectations of the MHIRT. The Plan will indicate performance requirements, and set out arrangements for gathering	Head of Nursing Mental Health	30 <sup>th</sup> September 2022 (MHIRT requirement and wills)	HDP formally agreed in PPB in September 2022 Implementation plan being

	needs of the HMP Swansea residents. In addition, it should consider how it can obtain regular patient feedback from the prison's residents in order to shape service provision.	feedback from prison residents. Subsequent monitoring of performance and feedback will be via Prison Partnership Board.	PCT Assistant Director of Operations	30 <sup>th</sup> November 2022 (Plan agreement PPB)	developed and will be ratified in PPB in November 2022
23	The health board must consider how a strengthened approach can be implemented for health promotion within the prison, with a view to promoting the health of prisoners and addressing health inequalities.	<p>The health promotion task and finish group will be re-established to identify a health promotion programme that is suitable for the prison.</p> <p>The first draft of the programme will be presented at the PPB in November.</p> <p>The progress of the group will be monitored through the PPB subsequently.</p>	Prison Governor & PCT Head of Health Care	30 <sup>th</sup> November 2022	Health Promotion plan developed Progress to be reported in PPB in Nov 2022
24	<p>The health board PPB must consider:</p> <p>a. The disparities between staff groups and prisoner perceptions of prison healthcare services and consider whether key information is appropriately transported through its quality framework.</p>	<p>A new healthcare operations group has been established to provide opportunities for the officers and health care staff to meet to share information on each area.</p> <p>An education / information package is being developed that will be given to the prisoners so they are aware of the healthcare service available to</p>	PCT Head of Health Care & Prison Governor	31 <sup>st</sup> March 2023	Opportunities for Prisoner engagement in development

	<p>b. How it can obtain and learn from regular prison staff (non-healthcare) and prisoner (patient) feedback, in relation to services available and that provided to HMP Swansea, and act accordingly on the feedback.</p>	<p>them whilst they are in HMP Swansea.</p> <p>Feedback from prison residents is currently captured by a number of routes:</p> <ul style="list-style-type: none"> <li>• The Governor leads a 50 plus group</li> <li>• The counsellor takes opportunities to gather feedback in his sessions</li> </ul> <p>A case for additional resources to support consistent and regular feedback from the prisoners has been submitted to the Health Board for consideration. It is intended that information will be received &amp; reviewed at the Prison Partnership Board, and reported into the health board via PCT Q&amp;S Group reporting.</p> <p>A survey of the officers will be undertaken to determine whether the gap in understanding has reduced.</p>			
25	<p>The health board must review the adequacy of the prison healthcare nursing establishment, to ensure it is sufficient to meet the current level of demand for</p>	<p>A review of the health care interventions has been undertaken and a request for additional resources has been developed and is being considered by the Health Board</p>	<p>PCT Deputy Group Nurse Director</p>	<p>30<sup>th</sup> September 2022</p>	<p>Action from PPB A formal joint letter from the Governor and the PCTG Director is to be sent to</p>

	health care services in HMP Swansea.	The capacity and demand in HMP Swansea will remain under continuous review.			Welsh Gov and Justice dept requesting support to meet the additional operating capacity
26	The health board must consider how it can obtain regular patient experience feedback from the prison residents at HMP Swansea, and to consider these findings in line with how this is considered regarding people within the health board's other communities.	As per Recommendation 24 a bid for additional resources has been made to undertake this function routinely and consistently.	PCT Deputy Group Nurse Director	31 <sup>st</sup> March 2023	Opportunities for Prisoner engagement in development
27	The health board must ensure that its prison healthcare staff are recording prisoner concerns as highlighted within the HMP Swansea Healthcare Complaints Pathway. In addition, that these are accurately reported to the PPB for monitoring and action planning as appropriate.	<p>a) The complaints process has been revised and complaints are now managed under Putting Things Right Policy.</p> <p>b) Themes and learning from complaints are shared at PPB</p>	<p>PCT Deputy Group Nurse Director</p> <p>PCT Deputy Group Nurse Director</p>	<p>30<sup>th</sup> September 2022</p> <p>In place</p>	Complete

28	The health board must ensure the prison residents have access to information relating to NHS Wales Putting Things Right process and are provided with information on how to raise a concern regarding healthcare.	<p>An information leaflet on Putting Things Right will be included in the Prisoner Induction pack.</p> <p>Posters are placed on the wings along with complaint forms</p> <p>Exploration is underway with the Prison as to whether this information can also be displayed on prison television system.</p> <p>An update will be given at the PPB in November.</p>	PCT Head of Health Care & Prison Governor	30 <sup>th</sup> November 2022	Complete
29	The health board must inform HIW how it will work with the Prison Governor to share the findings of our review with the prison residents. This must also consider how the report's recommendations will be responded to	<p>Reports from HIW and any associated Action Plans will be placed on the establishment's Shared Drive. In addition, the Governor will send out a Notice to Staff with the hyperlink to the location on the drive.</p> <p>For the Prisoners the report and Action Plan will be placed in the Prison Library.</p>	Prison Governor	30 <sup>th</sup> September 2022	Complete

The following section must be completed by a representative of the service who has overall responsibility and accountability for ensuring the improvement plan is actioned.

### Service representative

Name (print): Brian Owens

## **Job role: Service Group Director**

Date: 18/08/22