



# **Annual Report of the Independent Monitoring Board at HMP/YOI Drake Hall**

**For reporting year  
1 November 2020 – 31 October 2021**

**Published April 2022**



# Content

<b>Introductory sections 1 – 3</b>	<b>Page</b>
1. Statutory role of the IMB	3
2. Description of establishment	4
3. Executive summary	5
<b>Evidence sections 4 – 7</b>	
4. Safety	12
5. Fair and humane treatment	15
6. Health and wellbeing	22
7. Progression and resettlement	26
<b>The work of the IMB</b>	
Board support	32
Applications to the IMB	33
Glossary	34

All IMB annual reports are published on [www.imb.org.uk](http://www.imb.org.uk)

## Introductory sections 1 – 3

### 1. Statutory role of the IMB

The Prison Act 1952 requires every prison to be monitored by an independent board appointed by the Secretary of State from members of the community in which the prison is situated.

Under the National Monitoring Framework agreed with ministers, the Board is required to:

- satisfy itself as to the humane and just treatment of those held in custody within its prison and the range and adequacy of the programmes preparing them for release
- inform promptly the Secretary of State, or any official to whom authority has been delegated as it judges appropriate, any concern it has
- report annually to the Secretary of State on how well the prison has met the standards and requirements placed on it and what impact these have on those in its custody.

To enable the Board to carry out these duties effectively, its members have right of access to every prisoner and every part of the prison and to the prison's records.

The Optional Protocol to the Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT) is an international human rights treaty designed to strengthen protection for people deprived of their liberty. The protocol recognises that such people are particularly vulnerable and aims to prevent their ill-treatment through establishing a system of visits or inspections to all places of detention. OPCAT requires that states designate a National Preventive Mechanism to carry out visits to places of detention, to monitor the treatment of and conditions for detainees and to make recommendations for the prevention of ill-treatment. The IMB is part of the United Kingdom's National Preventive Mechanism.

## 2. Description of the establishment

Drake Hall is situated in rural Staffordshire, about a mile from Eccleshall and 10 miles from Stafford. The prison is a training and resettlement prison and does not take remand prisoners.

Although designated as a closed prison, the layout provides significant freedom of movement for prisoners within the perimeter fence. In this sense, the environment is unique within the women's closed estate, and comparisons with other prisons must account for these differences.

The prison takes both adult women and young adults

The prison has a capacity of 340. The prisoners are accommodated in 15 individual houses, each with around 20 rooms. Most are single rooms, with a small number of doubles. The closed element of the prison has a capacity of 315.

An additional house lies beyond the perimeter fence of the prison. This open unit provides additional capacity for 25 prisoners and the unit aims to prepare the prisoners for a productive life after release.

The prison also has a care and support unit (CSU), which contains six cells and is used in situations where a prisoner must be segregated from the main population for disciplinary or safety reasons.

During the pandemic, the prison introduced an additional facility: Truro is a temporary facility that consists of 10 spaces for prisoners shielding because of the Covid-19 virus.

Prisoners at the establishment come from a wide geographical area across England and Wales to serve a variety of sentences, ranging in length from a few months to life. Their ages range from 18 to 70 years.

The prison population averaged just over 75% capacity (257) in this reporting year, a reduction from over 82% (280) in 2019/20 and 97% (330) in 2018/19 prior to the pandemic.

Many of the women have complex needs associated with their mental or physical health, substance misuse, history of trauma or abuse, or experience of the care system.

The prison is accredited as an enabling environment by the Royal College of Psychiatrists.<sup>1</sup>

---

<sup>1</sup> The College describes this as a place that focuses on creating a positive and effective social environment where healthy relationships are seen as the key to success.

### **3. Executive summary**

The Board believes that HMP Drake Hall provides a safe and secure environment for prisoners and that they are treated decently and with humanity. The prison offers sufficient structure and control to ensure the environment is safe but provides a level of empowerment expected in an enabling environment.

The Board remains concerned about some of the prisoner accommodation: two units, Plymouth and Richmond, both constructed during World War 2, are not of an acceptable standard. The Board has raised this issue in every report for nearly 20 years. Her Majesty's Inspectorate of Prisons (HMIP) takes a similar view, suggesting that they should be demolished and replaced.

The Board does not criticise the local prison managers, as they have worked consistently to improve these units. Unfortunately, fundamental structural difficulties remain and the units should be replaced. An infestation of rats illustrates this point. This is unacceptable and the women should not be expected to live in a damp, cold and rat-infested environment. The prison should not have to work constantly to try and mitigate the issues these problems cause. The Board again draws this matter to the minister's attention and hopes that this year its view will not fall on deaf ears.

The Board continues to be concerned about the transfer of property. Prisoners can arrive at the prison without all their belongings and there are often delays in rectifying the situation. Some of the property lost can be replaced but some is irreplaceable, often of sentimental value. This is a national issue that urgently needs resolution. Despite regular assurances that a solution is pending, this remains an important and ongoing problem.

The pandemic affected, and continues to affect, Drake Hall. It has impacted the everyday running of the prison and has altered work, learning and exercise. A restricted regime has now been in operation since March 2020 and it has affected the prison's rehabilitation ethos and the preparation of the prisoners for release.

The overriding objective during the pandemic has been to keep prisoners and staff safe. This objective has been achieved. This is in no small measure due to the hard work and commitment of the prison staff, and they must be commended. Throughout the pandemic the prison staff and management have displayed considerable flexibility, innovation and compassion in ensuring that the needs of the women are met and that a humane, secure and effective regime is maintained.

The role of the prisoners must also be mentioned: without their cooperation and support, the measures put in place by the prison would have been far less effective. They have adapted to a continually changing environment with good grace and understanding. This deserves recognition.

#### **3.1 Background to the report**

The pandemic has been ever-present during the reporting period. Prisons are prone to outbreaks with higher rates of infection, hospitalisation and mortality than in the wider community. Intensive control measures are necessary to reduce infection and these measures must be robust. There is a constant balance to be struck between the implementation of restrictions to minimise the risk to life and health and the harm that such control measures can cause due to prolonged isolation.<sup>2</sup>

The environment and the approach taken have meant the prison is far more restricted than pre-Covid-19 but less restrictive than many other closed women's prisons. The process has been managed well, although this has inevitably been at the expense of some of the rehabilitation ethos of the prison. Table 1 below outlines the timescales and the implications of the different regimes in operation during the reporting period.

**Table 1: Regimes in place during the reporting period**

<b>Date</b>	<b>Stage</b>	<b>Impact at Drake Hall</b>
<b>November 2020</b>	<b>Stage 3 (restricted regime)</b> Compartmentalisation in place with testing and monitoring ongoing. Social distance applied and PPE in use.	<ul style="list-style-type: none"> <li>• house bubbles in place</li> <li>• social distancing in line with community guidance</li> <li>• inter-prison transfers allowed</li> <li>• reintroduction of some classroom-based teaching</li> <li>• increase in work available</li> <li>• limited gym activity</li> </ul>
<b>January 2021</b>	<b>Stage 4 (lockdown)</b> Minimum required regime in place to ensure safety and decency.	<ul style="list-style-type: none"> <li>• essential work only</li> <li>• house bubbles</li> <li>• basic pay</li> <li>• fresh air x three hours per day</li> <li>• PIN phone credit</li> <li>• TV and distraction packs</li> <li>• access to clothing and showers</li> <li>• reduced family contact</li> </ul>
<b>April 2021</b>	<b>Stage 3 (restricted regime)</b> – see above	See above

<sup>2</sup> SAGE EMG Transmission Group, '[Covid-19 transmission in prison settings](#)' (March 2021),

<b>July 2021</b>	<b>Stage 2 (reduced regime)</b> Compartmentalisation remains in place. Testing and monitoring ongoing. Minimal social distancing in line with community guidelines.	<ul style="list-style-type: none"> <li>• prison split into two cohorts</li> <li>• morning and afternoon sessions for work, education, and association</li> <li>• some evening activity</li> <li>• all women offered 50% activity</li> <li>• move towards a re-establishment of the rehabilitative ethos of the prison</li> <li>• increased social visits</li> <li>• communal worship with restrictions based on cohorts</li> </ul>
<b>November 2021</b> - as the reporting period came to an end, the prison was due to move to Stage 1a, meaning that it was aiming to deliver a meaningful, decent, and fuller regime. However, this process reversed with the advent of the Omicron variant.	<b>Stage 1a (prepare)</b> compartmentalisation no longer required, but ongoing screening, testing and monitoring continues to rapidly detect any new infections.	<ul style="list-style-type: none"> <li>• return to a more normal regime</li> <li>• full-time work</li> <li>• all activity areas used to a maximum</li> <li>• evening gym sessions</li> <li>• increased family contact and return of family days</li> <li>• reintroduction of peer working</li> <li>• ROTL from the closed site</li> </ul>

### 3.2 Main judgements

#### How safe is the prison?

Drake Hall provides a safe environment. However, we accept that there will always be some prisoners who do not feel safe and others who may be vulnerable and subject to bullying. Nevertheless, levels of violence against staff and between the prisoners remain low, and rates of self-injury are lower than in other closed prisons in the women's estate. The Board commends the proactive approach to the reduction of self-harm for women at risk which has been in evidence during the reporting period.

#### How fairly and humanely are prisoners treated?

Prisoners are treated fairly and humanely. This approach has continued despite the restrictions associated with the pandemic. These restrictions have always been approved through the relevant command structures and followed the guidance provided by Public Health England. Any limits imposed have been both proportionate and necessary.

### **How well are prisoners' health and wellbeing needs met?**

The healthcare needs of the prisoners are generally well met. Systems for accessing health appointments and receiving treatment mirror arrangements outside the prison. The management of the Covid 19 outbreaks has been excellent.

### **How well are prisoners progressed towards successful resettlement?**

The pandemic has affected this element of the prison's work. Many activities have had to be curtailed for long periods, while opportunities for employment and educational activities have been reduced. This has had an impact on the prison's ability to maintain its resettlement ethos. Significant policy changes in the delivery of probation services are also a concern. The outcome of these changes is yet to become apparent.

## **3.3 Main areas for development**

### ***TO THE MINISTER***

The Board again draws attention to the condition of Richmond and Plymouth houses. They are not fit for purpose. Allowing prisoners to live in sub-standard accommodation is detrimental to their physical and mental wellbeing. The provision of new accommodation is long overdue. The problems associated with an infestation of rats during the reporting period provide more evidence, if needed, that this remains an ongoing problem. The Board is increasingly frustrated that these concerns have been ignored. It is appreciated that there are worse environments in the prison system. However, this does not provide any justification for failing to address this issue. Allowing women to live in this way cannot be defended (See section 5.1).

### ***TO THE PRISON SERVICE***

In our last report, the Board drew the attention of the prison service to four main issues. Unfortunately, three of these remain problematic. In addition, we raise two additional matters.

Delayed or lost property on transfer to Drake Hall remains a significant problem and causes unnecessary distress to prisoners. It is a systemic issue that requires action across the Prison Service (see section 5.8).

The number of mental healthcare staff has increased. With the potential to increase the range of therapeutic interventions available. However, there is a lack of private



and confidential interview space available to allow the team to work effectively and for women to engage in therapeutic work (see section 6.3).

Additionally, during the year the prison had to deal with a prisoner experiencing difficulties associated with an eating disorder. However, no facility existed that could provide specialist services for this individual. As a result, the prison was forced to manage the situation without specialist support. This constitutes a service deficit (see section 6.3).

Due to operational pressure, increasing numbers of prisoners are transferred shortly before their release date. This has the potential to harm their successful transition from prison (see section 7.3).

Prison Service guidance means that the prisoner banking programme is only available for prisoners who are within six months of release and who do not have an existing bank account. This can impact on the rehabilitative experience in the open unit (see section 7.3).

### ***TO THE GOVERNOR***

Drug ingress into the prison appears to have been low during the pandemic. It is hoped that these improvements can be maintained (see section 4.5).

The showers on the open unit are covered in mould and damp. The cause is structural. A long-term solution is required to resolve this problem (see section 5.1).

The Board participated in an equality and diversity survey undertaken across the women's estate. It is hoped that addressing the findings will lead to improvements in the experience of some ethnic minority women (see section 5.4).

The Board looks forward to seeing an increase the number of social visits, pandemic permitting (see section 7.4).

### 3.4 Progress since the last report

Area of concern	Addressed to	Concern in last year's report	Current assessment
Accommodation – Richmond and Plymouth houses.	Minister	The condition of Richmond and Plymouth houses.	These remain unfit for purpose.
Property	Prison Service	Prisoners' personal property was frequently delayed or lost on transfer to Drake Hall.	Prisoner property continues to pose problems.
Mental healthcare – accommodation	Prison Service	The number of mental healthcare staff had increased, but there was limited space available for increased therapeutic work.	The service is fully staffed but the limited accommodation reduces the level of therapeutic interventions possible.
Prison transfers	Prison Service	Prisoners transferred shortly before their release date.	This remains a problem.
Offender Management in Custody (OMiC)	Prison Service	There had been a delay in introducing OMiC across the women's estate.	The OMiC system was introduced in April 2021.
Visits	Governor	The use of Purple Visits to ensure that family contact is optimised during the pandemic.	The availability of Purple Visits at more family-friendly times is now the norm. Evening and weekend visits are regularly facilitated.
Impact of long-term shielding in the Truro unit	Governor	The impact of shielding on wellbeing and	Efforts by both discipline and healthcare staff

		rehabilitation prospects of prisoners in the Truro unit.	have served to mitigate the risks identified and the unit is due to be closed, with women supported in normal location.
Impact of the pandemic on women's mental health	Governor	Mitigating the impact of the pandemic on some prisoners' mental health.	The risks cannot be eradicated but steps to promote wellbeing have been taken.
Drug ingress into the prison	Governor	Continued reduction of drug ingress into the prison during the pandemic.	Levels of ingress have been low and efforts to minimise opportunities for drugs to enter the prison have been successful.

## **Evidence sections 4 – 7**

### **4. Safety**

#### **4.1 Reception and induction**

After the first Covid-19 lockdown, transfers to Drake Hall operated every two weeks to allow sufficient time for Covid-19 checks and isolation periods. After the national lockdown earlier this year, weekly admissions continued despite regime restrictions. Reverse cohorting arrangements continue to operate effectively.

Prisoners arriving in reception are dealt with in a Covid-19 secure area and then located in Keele, the induction unit. They remain there for 10 days whilst they complete the induction process.

All newcomers are given a health check on the first day. During these initial screenings, the prisoners are tested for Covid-19 and offered vaccinations whenever appropriate.

Before leaving the induction unit, each woman meets with the activity board to confirm an appropriate work placement. The board comprises representatives from many departments, including healthcare and education.

#### **4.2 Suicide and self-harm, deaths in custody**

There has been one death in custody due to natural causes. The outcome of the Coroner and Prisons and Probation Ombudsman (PPO) investigations are awaited.

The levels of self-harm in women's prisons are high and during the pandemic this has been a particular issue.<sup>3</sup> The prevalence at Drake Hall is lower than at similar establishments.

An average of 10 prisoners per month were involved in acts of self-harm, with a mean of 23 incidents per month. The range was between 46 in June 2021 and 11 in September 2021. The total number of incidents was 278 and this compared with 226 in 2019/20 and 337 in 2018/2019.

There was an increase in incidents during January and February 2021 and April, June and July 2021. However, at the time the report was produced, the number of incidents has seen a noticeable reduction.

---

<sup>3</sup> See [IMB national annual report \(prisons\) 2020-21](#), p.10.

The assessment, care in custody and teamwork (ACCT) process is a fundamental part of supporting prisoners who self-harm. There were 263 ACCTs opened in 2018/19 and 156 in 2019/20. During 2020/21, 107 ACCTs were opened.

The number of ACCTs opened reduced when compared with previous years. Where levels of self-harm have increased, it has been due to a small number of women with complex needs.

This year has seen a small number of women who have spent long periods on an ACCT and have exhibited high levels of self-harm. The work undertaken to support these women has been excellent.

The continuous observation suite is used to support prisoners at significant risk of self-harm. It has been used sparingly except for a short period around April 2021 when a higher number of women were on continuous observation. At one point, the CSU was required as four women required constant observation simultaneously. As a result, the women needed to be accommodated in the CSU under rule 45 (see section 5.2).

The professional and proactive approach to intervention by safer custody staff must be commended.

### **4.3 Violence and violence reduction, self-isolation**

Drake Hall exhibits low levels of violence and few serious incidents. Effective staff/prisoner relationships underpin safety (see section 5.3). During the reporting year, the total number of recorded incidents has been 28 assaults by prisoners on other prisoners and three assaults on staff.

The management of prisoners using challenge, support and intervention plans (CSIPs) is at a low level. Over the reporting period, seven CSIPs were raised, compared with eight in the previous reporting period and 25 in 2018/19.

### **4.4 Use of force**

The number of use of force incidents has fallen this year, possibly because of lockdown and other measures which have limited the free flow and association of prisoners within the grounds. There have been 16 use of force incidents. This compares with 41 in 2019/20 and 74 in 2018/19.

As part of the Board's monitoring function in normal times, a member regularly attends the use of force review meetings. The Governor or deputy governor attends these monthly meetings and as many of the heads of function as are available. Every incident is scrutinised in detail, including viewing recordings from body-worn cameras. The minutes are then distributed and the Board receives a copy.

However, because of Covid-19 restrictions, prison meetings have been drastically reduced and less use of force meetings have taken place. Attendance by the IMB has sometimes been difficult. Therefore, scrutiny has necessarily been by examining the minutes of the use of force review meetings and scrutiny of the use of force log rather than through the actual presence of a member of the Board.

All the information held by the prison can be accessed by the Board as and when required.

The Board is content that the use of force is kept to a minimum, consistent with maintaining the regime. The use of 'guiding holds' appears to be the more frequently employed option with very little use of full restraint.

#### **4.5 Substance misuse**

During the reporting period, drug and alcohol finds have been low. There have only been 1.33 drug finds per month on average; the figure for alcohol finds is similar.

In contrast, drugs have been detected in prisoners' incoming post on average 16.3 times per month. Items of post that are contaminated in this way are photocopied with the copy being sent on to the addressee. The original item is then destroyed.

From the above, it can be concluded that whilst drugs may occasionally leak into the prison, this is by no means a frequent event, as the checks undertaken in the post room are very effective.

A further indicator that drugs are not readily available to prisoners is the number of attempts to brew alcohol (hooch). The recorded finds do not give the quantities involved. A widely-held view in the prison is that the women would not take the trouble, nor the risk, of fermenting 'hooch' if drugs were readily available to them.

The backdrop to this almost drug-free environment at Drake Hall is the restricted regime introduced last year to control the spread of Covid-19. As there has been less movement by prisoners in and out of the prison, there has been little opportunity for prisoners to bring in concealed drugs – this opportunity is highly likely to increase when ROTL is reintroduced within the closed establishment.<sup>4</sup>

A used X-ray machine was scheduled for transfer to Drake Hall during the last financial year but, unfortunately, it missed the April deadline. It is hoped that this equipment will become available before the end of this financial year. It will be vital in ensuring the reduced ingress of drugs into the prison.

---

<sup>4</sup> As the report was being produced, ROTLs were again suspended from the closed part of the prison due to the Omicron variant.

## **5. Fair and humane treatment**

### **5.1 Accommodation, clothing, food**

The Board believes that the prison provides reasonable accommodation except for Richmond and Plymouth houses. These two houses continue to fall well below the required standard and are considered unfit for purpose.

The continued decline of these two buildings has now meant further issues have developed, including a heavy rat infestation within their cavity walls. The prison has been working on a solution to eradicate the rats, but this is proving very difficult so far.

The women describe hearing these vermin throughout the night. There have been occasions, albeit rare, when they have entered the actual living accommodation. The prison has received numerous complaints and the IMB has responded to many applications. This is unacceptable. No one should be expected to live in such conditions.

The Board does not criticise the local prison managers: they have worked consistently to improve these units and have had some success in doing so. Unfortunately, fundamental structural difficulties remain and the units need to be replaced.

Despite the approval of a significant reconfiguration of the prison estate at Drake Hall, these premises will remain. This is a decision that cannot be justified.

In-cell telephony has been installed in all rooms. It is proving very popular with the women, as indicated by the increased use of the system. This has been an excellent initiative with a clear impact on the quality of life for the women.

All residential houses have now had new kitchenettes with refrigerators installed to allow the women to enjoy more cooking. In addition, graze boxes have been introduced to provide a weekly supply of fruit, vegetables and certain essential products such as rice. Issues such as the lack of sharp knives to deal with vegetables has meant that choices have had to be altered. However, the women are enjoying cooking some food for themselves.

Covid-19 meant that communal dining in the main hall was no longer an option but, after the last Christmas meal was arranged in each block, in-house dining was developed and has proved very popular with many women.

Work on decorating each of the houses was started before the Covid-19 pandemic. This has now been restarted, and so far, three houses have been completed.

Two houses, Ipswich and Folkestone, were used, when necessary, to isolate symptomatic women and those with positive test results.<sup>5</sup> The ten Bunkabins (Truro) set up last year to house those prisoners who were clinically vulnerable and required

---

<sup>5</sup> This situation has now changed following advice from Public Health England.

shielding have continued to provide accommodation for some of the clinically vulnerable, but these are due to be decommissioned although no date has yet been given.

The open unit situated outside the main prison gates can house up to 25 prisoners ready to move to the next phase of their sentence. This provides good accommodation except for the shower block, which has suffered from a severe mould problem. Estates have now carried out work to clear the signs of mould and damp and then decorated with anti-mould paint. The Board will continue to monitor this since it is an ongoing problem.

The charity shop that operates within the prison had to be closed in the earlier stages of the pandemic but is now running again using an appointment system. This service provides the women with the opportunity to buy good quality clothes at reasonable prices whilst raising money for a local charity.

The kitchen has had to operate with reduced staff due to Covid-19. However, they have still managed to provide a full service, with the women still being escorted to collect their meals. Drake Hall was one of the first prisons to return to a full five choice menu. In addition, they have continued to provide themed days, which the women enjoy.

Like others throughout the country, the kitchen team has suffered some supply issues but have accepted that these are being dealt with nationally. In the meantime, they address this locally, whenever necessary, by adjusting the menus daily.

The core menu reflects all religious needs. As a standard, there is always a halal meat option and vegetarian meals suitable for halal diets. It was noted that a few Muslim women had recently mentioned that they were unable to obtain their choice of halal meat. The kitchen staff discovered that some of the other women were selecting the halal meat despite not having pre-ordered it. Staff now try to ensure the correct people get the halal meat, but they also order extra supplies.

## **5.2 Segregation**

During the reporting period, the number of adjudications has dropped while the number of days spent in the CSU has increased. Some of these changes can be explained due to the use of the CSU as a reverse cohorting unit and on a small number of occasions for continuous observation.

Adjudications this year have fallen to an average of 44 per month, which represents a reduction of 25% from last year.<sup>6</sup> The average number of prisoners segregated each month was 12 (10 last year). The average number

---

<sup>6</sup> The average monthly figures for the last three years were 138, 59 and 44 respectively, the total yearly numbers were 1,650, 708 and 529.



of days spent in total on the CSU has remained similar – 65 (64 last year).<sup>7</sup>

However, these segregation figures are distorted because the CSU has been used to house women for Covid-19 related isolation purposes and for constant observation when the constant observation suite has been occupied. A total of 19 women have been housed in this way for 90 days in the year (see section 4.2). The increased use of constant observation was for a short period during the reporting period and has not been repeated. However, the Board will keep this under review.

Despite the restrictions on direct monitoring visits imposed by the pandemic, the Board monitored almost all 72-hour segregation reviews, either by means of a conference call, where the member concerned was able to participate remotely during the actual review, or through actual attendance if a member was on site. On the rare occasions when a member was unable to participate in either way, all the appropriate paperwork and decisions were reviewed retrospectively.

There have been 24 occasions where prisoners on an ACCT have been placed in the CSU during this reporting year. All paperwork to justify the decision making has been completed, and the welfare of these individuals has been closely monitored during their stay.

Overall, the Board has no concerns about the operation of the CSU and commends the CSU staff for their professional approach to their work and the care provided in trying to return prisoners to their normal location as soon as appropriate.

### **5.3 Staff-prisoner relationships, key workers**

The Board's observations of staff-prisoner interaction suggest an environment characterised by respect for the women and a desire to develop positive working relationships. The Board notes a high level of professionalism among the staff, who are supportive and helpful, sometimes exceptionally so. They demonstrate a high level of understanding when helping the women to address the problems they face. Prisoners are dealt with consistently and in a non-confrontational way, as illustrated by the low figures for use of force (see section 4.4).

In May 2021, the prison completed a safety survey which indicated that the relationship between prisoners and staff had been good. On a Likert scale, 83% of the women who responded agreed or strongly agreed on this issue.

Set against this, we must note that around 12% of complaints are about the staff (see section 5.7). However, the Board is confident that these are investigated. Moreover, it is important to note a small but persistent number of applications from women who feel they have been treated unfairly. These relate to adjudications, the

---

<sup>7</sup> In 2018/19, 2019/20 and 2020/21 the number of women segregated were 163, 118 and 150.

approval of ROTLs, sentence-related decision making and the allocation of jobs. These matters are raised with the prison management as part of the process of reviewing the application.

The Board is pleased to report the implementation of the OMiC system, which has meant that all women at Drake Hall are allocated a key worker. This is a prison officer who guides and supports the prisoner through their sentence (see section 7.3).

As the introduction of OMiC was delayed in the woman's estate, it is too early to comment on the outcomes for the women.

## **5.4 Equality and diversity**

Over the past year, all equalities committee work, and its activities across the prison (including sub-groups), must be viewed in the context of the restrictive regime in place due to the pandemic.

In 2021 the IMB participated in a survey of equality and diversity issues across the women's estate. At Drake Hall 24 returns were received out of 54 surveys sent out. This revealed that a minority of ethnic minority prisoners consider that they are treated less well than other prisoners. For the survey, the prisoners completed a questionnaire in which they rated a variety of activities. How the survey results compare to the rest of the women's estate is not known at this time.

Unfortunately, due to the Covid19 restrictions, the various channels through which prisoners are normally able to complain informally and consult about various issues, were not available within the prison. Whilst many issues may be concerning to the individual, they may not be of sufficient importance to justify submission of a discrimination incident reporting form (DIRF). However, some of the issues would appear to justify a DIRF, and it is not clear why so few DIRFs have been submitted in the past 12 months.

In the past year, only 14 DIRFs were received. Out of these, eight were investigated. The remainder were dealt with using alternative procedures judged to be more appropriate. Four were upheld, three not upheld, and one is still ongoing. The survey suggests that these numbers do not reflect the level of concern within the ethnic minority community.

Also, it is not clear when the independent scrutiny panel that has an overview of the DIRFs will meet. There is a lack of members, and this is disappointing. Through its work of overseeing the fairness of DIRFs, this panel is one of the cornerstones of the equalities structure at Drake Hall.

Despite the above, the equalities team at Drake Hall has done its best to publicise the protected characteristics (PC) forum's work and replace those forum members who have left the prison. The last PC forum took place in February 2020. Throughout

the pandemic, the team has continued to communicate with the women, putting posters in each house advising them that they can apply to the equalities team regarding any queries they may have.

Additionally, a range of planned events and celebrations has taken place, all within the confines of the restricted regime in place at the time.

When the PC forums can restart and prisoner representatives once again attend the monthly equalities meetings, it is hoped that the DIRF process will be revitalised and that as a result the frustrations of some of the ethnic minority prisoners will be alleviated.

## **5.5 Faith and pastoral support**

The pastoral role undertaken by the chaplaincy is highly valued in the prison, particularly during the pandemic. The chaplaincy has a strong and regular presence in all areas of the prison and a critical role in supporting women who are vulnerable and/or may have experienced significant loss.

Religious festivals are all recognised and celebrated during the year. In addition, the kitchens work hard to ensure that appropriate food is always available.

Following the introduction of stage 2, religious services were reintroduced and allowed women to attend the chapel, albeit limited based on the cohort structure in place.

The absence of a Muslim chaplain has been a source of concern for Muslim women. The equality and diversity survey (see section 5.4 above) identified the problems that this caused in providing the proper spiritual support. A Muslim chaplain has been recruited and will commence her duties shortly.

There is no doubt that, given the pandemic, the pressure on the chaplaincy services has been significant and it is to their credit that such a high quality of service has been maintained.

## **5.6 Incentives schemes**

The IEP system is a means of rewarding good behaviour and disincentivising poor behaviour.<sup>8</sup> There are three categories: basic, standard, and enhanced. Prisoners are assigned to one of these categories, depending on their behaviour. At Drake Hall there are very few basic status prisoners, and during the pandemic there have been none, as the basic IEP level is on hold nationally during the pandemic. At the time of reporting, there were 85 standard and 180 enhanced prisoners.

---

<sup>8</sup> Ministry of Justice and Her Majesty's Prison and Probation Service, '[Incentives Policy Framework](#)', July 2020.

The Lammy Review<sup>9</sup> recommended that the IEP process be reviewed to apply it equitably. Quarterly forums and a scrutiny panel involving staff and prisoners scrutinise the process to review its effectiveness and equitable use. Unfortunately, it has not been possible for the forums to take place regularly during the pandemic; only one has occurred during the reporting year.

## **5.7 Complaints**

The complaints system is the main route for prisoners to raise concerns if they believe they are being treated unfairly or that prison rules have not been followed.

The complaints policy gives guidance on timeframes for responses and access to the Prisons and Probation Ombudsman (PPO). Prisoners also have direct access to the Governor or the chair of the IMB for confidential complaints. In most cases, this guidance is complied with, and the system appears to work effectively in most cases.

Despite this, when investigating applications made to the IMB, it has been noted that some of the replies appear quite rudimentary and lack the level of detail required. In addition, responses are sometimes delayed. Moreover, some women claim that they have submitted complaints that appear not to have been received. However, we have no objective evidence that this is the case.

During the reporting period, there were 432 complaints, an average of 36 complaints per month, with a range of between 59 in September 2021 and 20 in February and March 2021. The number of complaints received increased between May and September 2021.

The nature of the complaints varied but included issues such as staff, accommodation, property, employment, sentence management, transfers and location.

Many complaints are received regarding matters relating to other establishments (over 11%). Nearly a third (32%) of complaints are upheld, and 10% of replies are audited by the prison management monthly.

## **5.8 Property**

Property is a systemic issue across the prison service. Unfortunately, Drake Hall is no exception to this rule. Applications to the Board are regularly received regarding property and many of the prisoners' complaints – over 10% – concern this issue. Often, these relate to transfers between prisons and can be challenging to resolve.

---

<sup>9</sup> An independent review into the treatment of, and outcomes for, Black, Asian and minority ethnic individuals in the criminal justice system.

During the reporting period, the Board identified some problems with the issue of parcels as there was a backlog held in reception. This caused some frustrations with the women affected. Interventions by the relevant governor and his team resolved this issue.

The prison adopted a stricter approach to stored property and volumetric control during the reporting period. This was implemented at the end of July 2021.

## 6. Health and wellbeing

### 6.1 Healthcare general

Primary healthcare, including substance abuse, continues to be provided by the Practice Plus Group. The Midlands Partnership NHS Foundation Trust provides mental health services. The prison has no inpatient facility.

Since July 2021, all medications have been supplied by the Practice Plus Group instead of the Lloyds Group.

### 6.2 Physical healthcare

The pandemic has continued to impact the provision of healthcare at Drake Hall. The prison suffered two outbreaks earlier this year. Between 15 January 2021 and 23 February 2021, 77 women were affected. There was a further outbreak in August 2021 involving nine women; this also included the open unit.

However, the prison dealt with these successfully using the process used during previous outbreaks. There was a specific house for all symptomatic women and a second house for women who tested positive. The houses where affected women lived were also placed in lockdown. The advice of Public Health England (PHE) was obtained and complied with. PHE has praised the way the outbreaks were managed.

Covid-19 vaccination uptake rates among prisoners are also high when compared with other establishments. Rates are shown in Table 2.

**Table 2 – Covid-19 vaccination rates**

1 <sup>st</sup> vaccination	80%
2 <sup>nd</sup> vaccination	73%
Booster vaccinations	44%

Healthcare staff have worked hard to ensure the impact of the pandemic has been reduced as much as possible despite the limited room availability being exacerbated by social distancing rules.

Currently the department is fully staffed, which has allowed routine breast, cervical and bowel screening to continue in the past year and ensures staff are available for all routine health checks and ACCT reviews. Counselling and life coaching sessions have been restarted as well as peer support provided by the healthcare champion based in the department. Healthcare has also been participating in a social prescribing pilot since July, and this is proving popular.

Connection to the in-cell telephony system has been very successful because it has allowed staff to improve communications with the women; for example, they can provide test results without waiting for an appointment.

Clinically vulnerable women were housed in Truro but are no longer shielded. Some concerns were raised about excessive weight gain for these women due to a lack of exercise, but they are now part of the current regime which means they have access to far more exercise. In addition, healthcare staff run healthy heart clinics, plus the healthcare champion again provides peer support.

The women are still escorted to all clinical appointments, which has helped reduce the 'did not attend' rates to below 10%. The department has also been piloting pharmacist-led clinical record reviews. This ensures all women who arrive at the prison have their notes reviewed within 14 days.

### **6.3 Mental health**

Mental health services have continued to be operational during the past year despite significant problems with accommodation. This issue was raised in last year's report.

Appropriate therapeutic space has continued to be a problem, particularly during Covid-19 restrictions. There is a team of 15 staff but only one room suitable for therapeutic sessions. They cannot use their other two rooms because they have no ventilation or are too small to ensure social distancing. Even their office is only risk assessed for five people, which means staff have had to go home to access team meetings online. They have some access to shared space in the prison but this is not ideal. Some women were seen in their houses, but this is not trauma-informed, and confidentiality is always a concern.

However, despite these difficulties, they have ensured that all urgent referrals have been seen within 48 hours and non-urgent within five working days. Referrals have averaged 30-40 per month in the past year. The only waiting list is for consultant psychiatric appointments. The team has also managed to start some group work.

Access to a psychiatrist is limited to a half-day session once per week, which only allows three appointments. This means that routine appointments must be postponed when there are urgent referrals. In November, the team will lose their psychologist and the psychology assistant. Other than that, they have a full mental health team which appears to be coping and is well supported in their monthly supervisions.

One woman was transferred to a secure placement under the Mental Health Act. The process took longer than the 14-day limit. However, one referral for a secure bed for a prisoner suffering from a severe eating disorder was refused because, apparently, there was no secure bed allocated for eating disorders. As a result, the team had to seek appropriate support and manage the patient within the prison.

Despite the publication of a national brain injury policy last year, little progress seems to have been made to ensure prisons have an appropriate staff member within the team. When a referral is made, the team must arrange for the psychiatrist to confirm the diagnosis and then seek appropriate assistance from a specialist.

## **6.4 Social care**

There is an agreed memorandum of understanding between Staffordshire County Council and the prison. In situations where a prisoner requires social care support, an assessment is completed by the local authority under the Care Act 2014. This results in the development of a plan of care to support the individual concerned. The number of women requiring social care interventions has increased during the last year.

## **6.5 Exercise, regime**

Before the pandemic, Drake Hall operated a very open regime, where prisoners were off their houses for most of the day and expected to work or undertake an educational activity. As noted earlier in the report, this has been much reduced during the pandemic.

The prisoners have had constant access to showers, an association room, a small kitchen, and the house telephone throughout the pandemic. In addition, the prisoners located on Truro have en-suite facilities.

The women have also enjoyed at least three hours of fresh air and outdoor exercise each day because every house has a fenced off grassed area around it. An outdoor multi-use games area has also been installed near the gym, which has allowed a greater choice of games and exercise to be offered. However, access to this has been limited during the pandemic.

In addition to the above, prisoners were escorted to collect their meals. They also left their houses to collect medication, attend healthcare appointments or collect their canteen. This compares favourably with the conditions experienced in many closed prisons.

It is a credit to the prisoners that their compliance with the regimes required by the pandemic has been good. Despite the duration of the restrictions, problems with compliance have been minimal. Furthermore, the women coped very well throughout the winter and with the inclement weather. This reduced opportunities for fresh air and exercise. Prison staff worked hard to manage this situation.

Before the pandemic, prisoners had access to well-equipped indoor and outdoor gym equipment. Additional staff had been recruited to facilitate improved access to classes and support an increased programme of activity. As the regime has become less restrictive, access to the gym has increased.

## **6.6 Drug and alcohol rehabilitation**



Drake Hall has an excellent clinical substance misuse service. They provide the full range of prescribing options available in the community. These are tailored to a prison environment and patient-centred. They offer pre-release prescribing, which includes using both Naltrexone and Acamprosate to help women avoid returning to opiate or alcohol use upon leaving prison. For those that need the support of ongoing opiate substitute prescribing, the doses are adjusted to give adequate protection when returning to the community. This also encourages engagement with prescribing drug services upon release. Take-home Naloxone is also offered.

The biggest challenge is the short time that some women have left to serve upon transfer from another prison and the lack of available room space to enable one to one clinical consultation for all women when required. This lack of space affects both clinical and recovery parts of the service.

The psycho-social and recovery workers are particularly restricted in what they can offer due to the lack of available room space to run groups or offer one-on-one counselling. They are also an integrated part of the overall mental health team and sometimes the demands of the wider prison population must take priority.

## **6.7 Soft skills**

Soft skills relate to how individuals work together, particularly in activities that require some form of teamwork. There are several examples of efforts made to make the prison environment more interesting and provide opportunities for developing people, communication and creative skills, as well as facilitating engagement with families, charities and the public. These include the following: a twinning project with Port Vale Football Club, a charity bike ride, a 100-word story competition, an All Nations Day games competition (non-stop cricket and captain ball), knitting competitions, an Easter bonnet and bake a cake initiative, Euros and Christmas house decoration competitions, a masterchef challenge and a butterfly project.

Fish tanks have been installed in each house and bird feeders fitted outside the windows of each association room. These have been very well received by the prisoners.

## **7. Progression and resettlement**

### **7.1 Education, library**

The service is provided through People Plus and has been affected by the restrictions associated with the pandemic. This has led to the reduction of the offer in comparison with the pre-pandemic period.

Despite this, efforts have been made to support the women to complete a variety of courses, facilitated by the tutors undertaking one-to-one work, small teaching groups on individual houses and the use of course work. As the year progressed, more use of the education centre was possible as restrictions eased.

On entry to Drake Hall, the educational attainments of all the women are checked or assessed unless this has been completed at previous establishments. Checks are also made regarding previous courses attended, and consideration is given to the needs of all the women who enter the prison.

Educational opportunities range from functional skills to degrees<sup>10</sup> and over 50% of the offer is vocational (see section 7.2). The curriculum runs over 12 months. The rehabilitation ethos supports each woman developing her potential through education and/or work to develop skills and/or to follow a vocational pathway where appropriate.

The transfer of women to Drake Hall in the three-month period before release reduces the potential value of the opportunities available. In such cases, prison staff face the challenge of addressing a prisoner's skill and educational levels in a very short time.

This trend has continued, with several prisoners transferred to the establishment when due for release a week later. On one occasion, a woman was transferred to Drake Hall with one week to serve and, for entirely justifiable reasons, this was spent in the CSU. The value of this transfer for rehabilitative purposes was effectively nil.

Refurbishment work was completed on the library and this is now operational. It is sad to note the discontinuation of the work undertaken by the Shannon Trust. The volunteer left the establishment during the pandemic.

### **7.2 Vocational training, work**

Before the pandemic all women able to work were offered vocational training or work after assessment. In addition, the prison provided a range of opportunities in gardening, waste management, beauty, laundry, call centre, kitchens, hairdressing, Remade with Hope, Halfords, Greggs and DHL. These opportunities were linked with vocational training programmes and associated qualifications.

---

<sup>10</sup> Six women are undertaking degree-level courses.

The wide range of opportunities and the links with external employers such as Halfords and DHL meant that the women were provided with skills, knowledge, experience and qualifications that increased their chances of employment following release, so reducing the chance of reoffending. Attendance was generally high.

Unfortunately the pandemic has resulted in a reduction in available work placements. For long periods most of the women were unable to work. Sadly, the call centre and Remade with Hope are no longer available. On a more positive note, many of the women living in the open unit are still attending work and a number of these women are recognised as key workers in the community.

### **7.3 Offender management, progression**

The offender management unit (OMU) works to progress prisoners through the prison system. Each prisoner requires an individual plan. Most prisoners arrive with complex issues associated with offending behaviour, such as drug misuse, homelessness and mental health problems. These need to be addressed to reduce their chances of reoffending.

In April 2021, the OMiC system was introduced in the women's estate. This framework ensures that rehabilitation is at the centre of custodial and post-release work to reduce reoffending and promote reintegration into the community. A bespoke model is in place in the women's estate due to challenges presented by women who have complex psychological needs. Those with complex needs receive an enhanced service.

Each prisoner is allocated a key worker (see section 5.3) to guide her through her sentence. The key worker and prison offender managers (employed by the probation service) work together. The latter produce assessments, sentence plans and interventions that support the women's move from Drake Hall to the community probation services (see section 7.5). Minimum standards are in place regarding input and these standards are monitored.

The Board has commented favourably on the work of the OMU in previous reports, particularly on the effective use of ROTL and access to the open unit, which gives up to 25 prisoners the opportunity to live independently before release while also being employed in the local community.

The use of ROTL helps to support resettlement and to promote good family ties.<sup>11</sup> Unfortunately, the number of ROTL events has been reduced considerably because of Covid-19. ROTL was stopped at the onset of the pandemic and then restarted only on the open unit.

---

<sup>11</sup> Prisoners who are eligible for ROTL can take up employment in the community as well as overnight leave to spend time with their families.

The open unit allows prisoners to progress towards release, with many employed in the local community. A new protocol to move prisoners into the open unit was necessary to ensure that ROTL occurred during the pandemic.<sup>12</sup> However, the rehabilitative ethos of the prison is affected by the allocation of bank accounts.

Formal guidance is in place showing how prisons can assist prisoners with opening personal bank accounts.<sup>13</sup> These accounts assist rehabilitation and resettlement.<sup>14</sup> Prison Service guidance means that the prisoner banking programme is only available for prisoners within six months of release from custody who do not have an existing bank account.

When applied to prisoners in open conditions, these prison rules<sup>15</sup> can be problematic: if they do not have an existing bank account and have more than six months to serve before their release, they are prevented from opening one. This is because the rules do not differentiate between those in open conditions and those in closed conditions. In effect, the rules penalise prisoners in open units with more than six months to serve by not trusting them with a bank account.

A prisoner denied a bank account must submit a weekly application to the prison cashier for cash that they estimate will cover their needs for the ensuing seven days. Any additional requests, for example to cover ROTL, must be justified. This money is deducted from her NOMIS account. As a result, many prisoners in open conditions do not consider themselves empowered despite being encouraged to reintegrate into society and rebuild their lives.

---

<sup>12</sup> This was described in last year's report.

<sup>13</sup> This follows a successful pilot by the Royal Bank of Scotland Group (RBSG) in 2013.

<sup>14</sup> HMPPS also supports this position. Their guidance document, 'Prisoner banking programme guidance for prison banking leads', echoes the benefits described by the RBS Group. For example, it states that 'Having a bank account is essential for rehabilitation'.

<sup>15</sup> In the case of Drake Hall, a prisoner who resides in 'open' conditions lives outside the main prison and works in various occupations and organisations. Due to her status, she is trusted to engage with the wider community. While in paid employment, she pays National Insurance and income tax where appropriate.

## 7.4 Family contact

Regular contact with family and friends is a significant factor in maintaining the women's well-being and self-esteem.<sup>16</sup>

Contact with families and friends at HMP Drake Hall may be conducted in several ways – via physical visits to the prison, by secure video calls known as Purple Visits and in-cell telephone calls.

The number of physical visits to prisoners at HMP Drake Hall has increased over the past year, from around 17/18 visits per month in 2020 to an average of 24 per month. It should be borne in mind that, from January to March 2021, there were no visits at all. These figures should be compared to the pre-pandemic figure of approximately 230 visits per month by family and friends. Note that during the last year, the number of physical visit cancellations and 'no shows' averaged 23, indicating a reluctance amongst some relatives to visit Drake Hall during the pandemic, even though they had the opportunity to do so.

The number of Purple Visits conducted by secure video calls has increased over the year, with the monthly average increasing from around 55 to 94. Undoubtedly, this increase in Purple Visits has been helped by the availability of evening and weekend slots that are better timed, as they coincide with the times when family and friends are more likely to be at home.

In March 2021, in-cell telephones were introduced to allow women to call their families from their rooms. This facility of in-cell phones has proved to be very popular, although in some cases very costly, since women must pay for their calls. However, the figures for both physical and video visits must be viewed in the context of the prison now providing better access to telephones and giving women the opportunity to call their families from their rooms.

So, although the overall amount of contact between women and their families has increased over the past year, it is not back to pre-Covid-19 levels. Unfortunately, physical visits are still down on previous years. There is no substitute for a physical visit. It is, therefore, to be welcomed that family days are being reintroduced, when families with young children can visit the prison and interact with their loved ones.<sup>17</sup>

Anything that encourages a higher take-up of physical visits to the prison by making them more attractive for family members and friends is welcomed. Face-to-face contact goes a long way towards improving a woman's self-esteem and reducing feelings of isolation.

---

<sup>16</sup> The importance of this was described in detail in the Farmer report, '[Importance of strengthening female offenders' family and other relationships to prevent reoffending and reduce intergenerational crime](#)', Lord Farmer, Ministry of Justice, 2019.

<sup>17</sup> Unfortunately, as this report is being produced, these initiatives have been put on hold due to the Omicron variant.

## 7.5 Resettlement planning

Drake Hall aims to provide a rehabilitative environment where prisoners are supported to achieve their potential. The Board has always considered this an area of strength, and resettlement pathways were well developed. The reducing reoffending strategy outlined the approach to working with prisoners to ensure they were prepared for release.<sup>18</sup>

In normal times, Drake Hall provides a high standard of support to women preparing for life after release. The challenging circumstances over the last twelve months mean these standards were inevitably compromised. However, it must be emphasised that overall, the prison has done its best to provide support over this challenging period and with some success.

The pandemic has affected the usual support available to facilitate each prisoner's planned progression through the various programmes associated with their sentence plan and subsequent release. For example, prisoners released have not had the opportunity to participate in courses such as employability, job clubs and the release course.

Employment and employability advice is crucial for women's 'through the gate' support. So that some support could still be provided for the women due to be released, a self-assessment action plan was implemented whereby employability advice was offered on a one-to-one basis. This advice was delivered either by post or (from April) by talking to women individually during exercise. It is expected that the employability course that ceased at the outset of the pandemic will be reinstated soon.

Jobcentre Plus has not attended Drake Hall since the lockdown commenced in March 2020. However, from November 2021, a representative from the Department for Work and Pensions will attend regularly. This should have a positive impact on preparation for release, employment, and benefits advice.

All prisoners receive pre-release packs, including information about licence conditions, benefits, disclosure, debt, domestic violence, drugs and alcohol, probation and community support. Although information packs have been available, it is not clear how effective these can be without opportunities for face-to-face briefings and discussion. Discussions with a small number of women leaving the prison indicate this may be a problem.

---

<sup>18</sup> The strategy has nine pathways, with associated work programmes, to ensure that it is implemented effectively. The pathways are: accommodation; education; health; drugs and alcohol; children and families; finance, benefit and debt; attitudes, thinking and behaviour; domestic violence; and working with sex workers.

In addition to the pressures imposed by the pandemic, from June 2021, new probation arrangements were put in place. This followed the ending of the community rehabilitation companies (CRC) contracts.

This new approach to resettlement developed as part of the implementation of the OMiC model. Prison offender managers in the prison and community offender managers in the community support prisoners in the 10 months before their release.

The aim of the new model is to reduce the disconnect between interventions based in the prison and those in the community. Unfortunately, the model appears to lack clarity, and it is unclear how it will impact on practice. For example, very few prisoners have been released from Drake Hall without accommodation. This position is in stark contrast to the situation in the women's estate more generally.<sup>19</sup> The Board is concerned that this situation may change and be detrimental to the women.

---

<sup>19</sup>In a survey by IMBs of women being released from prison, 41% said they had accommodation to go to, and 45% said they had nowhere to go. Some of these women believed they would be homeless on leaving prison.

## The work of the IMB

The pandemic has also had a significant impact on the Board's ability to gather information and discuss the contents of this annual report. The Board has therefore tried to cover as much ground as it can in these difficult circumstances, but inevitably there is less detail and supporting evidence than usual. Ministers are aware of these constraints.

Between January 2021 and April 2021, the Board could not visit the prison due to a national lockdown. Therefore, for much of the reporting period, monitoring was based on a blended approach whereby some members visited in person, and others operated remotely based on their health situation. All Board meetings took place using MS teams.

The Board also works with fewer members than it did, which has impacted the level of monitoring the Board has achieved. Three new members have commenced their induction period with the Board during the year. However, one has since had to go on sabbatical due to work commitments. The functional capacity of the Board is six members.

### Board statistics

Recommended complement of Board members	12
Number of Board members at the start of the reporting period	10
Number of Board members at the end of the reporting period	8
Total number of visits to the establishment	86
Total number of shifts on the 0800-telephone line	0
Total number of segregation reviews attended	13



### Applications to the IMB (including via the 0800 telephone line)

Code	Subject	Previous reporting year	Current reporting year
A	Accommodation, including laundry, clothing, ablutions	3	10
B	Discipline, including adjudications, IEP, sanctions	5	7
C	Equality	3	0
D	Purposeful activity, including education, work, training, library, regime, time out of cell	4	4
E1	Letters, visits, telephones, public protection restrictions	10	9
E2	Finance, including pay, private monies, spends	3	2
F	Food and kitchens	0	1
G	Health, including physical, mental, social care	15	7
H1	Property within this establishment	0	8
H2	Property during transfer or in another establishment or location	4	11
H3	Canteen, facility list, catalogue(s)	0	0
I	Sentence management, including HDC, release on temporary licence, parole, release dates, recategorisation	16	10
J	Staff/prisoner concerns, including bullying	3	8
K	Transfers	1	3
L	Miscellaneous, including complaints system	3	7
	Total number of applications	70	87

## **9. Glossary of prison-related abbreviations used**

**ACCT** - Assessment, care in custody and teamwork

**CRC** - Community rehabilitation company

**CSIP** - Challenge, support and intervention plan (formerly the anti-bullying programme)

**CSU** - Care and support unit

**DIRF** - Discrimination incident report form

**DNA** - Did not attend

**HMIP** – Her Majesty’s Inspectorate of Prisons

**HMPPS** – Her Majesty’s Prison and Probation Service

**IEP** - Incentives and earned privileges; prisoners can be on basic, standard or enhanced levels

**IMB** - Independent Monitoring Board

**OMIC** - Offender management in custody

**OMU** - Offender management unit

**Prison and Probation Ombudsman (PPO)** – The PPO carries out independent investigations into complaints and deaths in custody.

**Protected Characteristics** – Nine characteristics are protected by the Equality Act 2010. They are: age; disability; gender reassignment; marriage or civil partnership (in employment only); pregnancy and maternity; race; religion or belief; sex.

**Public Health England** – An executive arm of the Department of Health and Social Care that provides evidence-based expertise and support.

**Purple Visits** – A secure video calling platform designed specifically for the criminal justice system. It allows prisoners to talk to their families.

**P-NOMIS** - Prison National Offender Management information system. This is the operational database used in prisons for the management of prisoners. It contains

the prisoner's personal details and a range of information regarding their offence and progress in custody.

**Reverse cohorting** - Part of the prison service's capacity management approach. All new arrivals at the prison are quarantined for 14 days.

**ROTL** - Release on temporary licence (for example for work, town visits, home leave)



This publication is licensed under the terms of the Open Government License v3.0 except where otherwise stated. To view this licence, visit [nationalarchives.gov.uk/doc/open-government-licence/version/3](https://nationalarchives.gov.uk/doc/open-government-licence/version/3)

Where we have identified any third-party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at <https://www.gov.uk/government/publications>

Any enquiries regarding this publication should be sent to us at [imb@justice.gov.uk](mailto:imb@justice.gov.uk).