



Ministry
of Justice

Victoria Atkins MP
Minister of State for Justice and
Minister for Afghan resettlement

Chair, Independent Monitoring Board
HMP Bristol
19 Cambridge Road
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MoJ ref: SUB 093426

10 January 2022

Dear Chair,

**HMP BRISTOL: INDEPENDENT MONITORING BOARD ANNUAL REPORT
FOR 1 AUGUST 2020 – 31 JULY 2021**

Thank you for your Board's report for the year ending 31 July 2021. I am grateful to you and your colleagues for your hard work in capturing these helpful observations, as I note you were short of Board members. I was saddened to hear there was a death in custody during the reporting year; my officials take recommendations from the Prisons and Probation Ombudsman very seriously.

I acknowledge the Board's comments about improving outcomes for people with neurodivergent needs and that you feel at HMP Bristol they have not always been supported by practical strategies. I hope to reassure the Board that my officials are committed to meeting and protecting the needs of vulnerable people in prison. The Governor has advised that although many themes have emerged from multi-disciplinary panel meetings, use of force methods has not been identified as an issue against this cohort. However, the Governor will continue to monitor this matter. A Neurodivergent Specialist has been recruited who is working closely with the Safety Team and Mental Health Team to improve staff understanding of the needs of this cohort and the provision of appropriate services.

More broadly, as the Board are aware the published Call for Evidence (CfE) report on Neurodiversity, provides an overview of the current national provision to support adults with neurodivergent conditions in the Criminal Justice System. Alongside this work, HM Prison and Probation Service (HMPPS) is working closely with the Ministry of Justice (MoJ) to examine current provision including encompassing the commitments made in the National Disability Strategy and the National Autism Strategy both published in July 2021. MoJ officials are preparing an Action Plan in response to the recommendations of the CfE report which will be published in due course. As outlined in the 'A Smarter Approach to Sentencing' White Paper, a national Neurodiversity Toolkit will be delivered by 2022. This will aim to improve staff awareness and understanding of neurodivergent needs and enable them to feel confident to make appropriate referrals to health services.

All policies reviewed and developed will have an equality analysis to ensure consideration of neurodivergent people. HMPPS is currently reviewing the safer custody training and the searching policy in terms of awareness and interaction with neurodivergent individuals. The future prison build programme will be informed by available evidence (including the CfE) on design principles and specifications. HMPPS is also scoping the current prison screening process and data collection storage procedures with a view of standardising this across the prison estate. As part of the new Custody and Detention Apprenticeship launched in June 2021 an autism-specific session has been incorporated. The aim is to

upskill the learner as to how to respond appropriately to someone who may have autism in a custodial environment. Additionally, all HMPPS employees have access to an online e-learning platform which offers a Neurodiversity-Autism / Attention Deficit Hyperactivity Disorder module and provides clarity, together with an understanding about the associated behaviours that may be displayed and support strategies. Avon and Wiltshire Mental Health Partnership (AWP) provides neurodiversity training (which has continued throughout the pandemic) and this training is available to prison staff.

Turning to the Board's comments about alternatives to prison for elderly and vulnerable people who could be better managed in non-custodial environments. The Government is developing an Older Offenders Strategy for publication in early 2022, which will set out how we will ensure that this cohort is held in the most appropriate environments, can access a purposeful and rehabilitative regime, can access health and care services equivalent to those within the community, and are prepared for their release and resettled effectively. In situations where a prisoner has arrived at HMP Bristol AWP has helped in making these men safe until a social care referral has been made and a care package agreed.

Prisons play a vital role in cutting crime, but we are clear that delivering public protection is not just about better use of custody. The Sentencing White Paper also sets out our ambition to make community sentences more robust and effective, so that they offer both an appropriate level of punishment and a flexible and tailored approach to address the underlying drivers of offending. The Police, Crime, Sentencing and Courts Bill delivers on many of the reforms in the White Paper and non-legislative work is also underway, such as the scaling up the community sentence treatment programme to tackle vulnerable people with mental health issues, drug and alcohol addictions linked to offending. Furthermore, a pre-sentence report pilot to evaluate a new approach to producing higher quality and more timely reports, for instance, targeting cohorts understood to have more complex needs.

I note the Board's comments about the Covid-19 vaccination programme. As the Board will appreciate, since the beginning of the pandemic HMPPS has worked very closely with the NHS and the Department of Health and Social Care and has followed the advice of the independent Joint Committee on Vaccination and Immunisation. In line with the community, the vaccine roll out was prioritised based primarily on age, given this is the predominant risk factor for severe outcomes linked to mortality and morbidity. It remains the case, that no occupational group will be prioritised, because the evidence still shows that an age-based approach remains the most effective way of reducing deaths and hospitalisation from Covid-19. HMP Bristol has vaccinated a higher percentage of its population compared to other comparator prisons.

Turning to some positives captured in your report, it was encouraging to hear there were only two small outbreaks of Covid-19 infection during the reporting year, with no resulting serious illnesses or deaths. I acknowledge the hard work of the prison team who also successfully managed to be taken out of the Urgent Notification measures in September 2021. I welcome the ongoing Diversity and Inclusion work activity taking place which the Regional Equality Advisor is supporting. I note you have raised some local issues of concern in your report which the Governor will continue to keep you aware of as work continues. HMPPS comments in response to other issues raised in your report are set out in the attached annex.

The Justice Secretary and I appreciate the valuable role played by members of Independent Monitoring Boards throughout the estate and we are very grateful for your continued hard work on behalf of HMP Bristol.

Yours ever,



VICTORIA ATKINS MP

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HMPPS comments on matters raised in the report

Key Work

At HMP Bristol key work has been reintroduced as part of the Covid-19 recovery measures and delivery has steadily increased during the reporting period. Earlier implementation was not possible due to the staged recovery process which was dependant on the level of the virus within the establishment, the local community as well as the staff resource required to deliver this work.

The delivery of key work and the wider Offender Management in Custody (OMiC) model is monitored at the monthly Senior Leadership Forums chaired by the Prison Group Director and Regional Probation Director. There are several national guidance documents designed to support keyworkers and those managing keywork including an interactive recovery toolkit for key workers and online keywork refresher training.

OMiC resources are currently being reviewed. HMPPS hopes to publish the outcome of the review at the end of 2021-22 calendar year, with any changes implemented to take place from April 2022 (this date however, maybe subject to changes).

Operational Capacity

The reduction in the operational capacity was a temporary measure and was always intended to increase at some point. These discussions are underway but have yet to be finalised. However, any move back to HMP Bristol's pre-UN operational capacity will be carefully controlled, balancing operational risk with the move back to business as usual.

Engaging with the IMB

We recognise the importance of the work that the IMB complete. HMP Bristol offer the option for external parties to meet with the local Board.

Prisoners' Property

Following a pause in the development of the new Prisoners' Property Policy Framework due to Covid-19, a meeting with IMB representatives took place in August 2020. The feedback received from those members was considered alongside the comments received from other stakeholders, and comments from subsequent operational engagement. HMPPS has circulated the draft Framework with internal and external stakeholders, including the IMB Secretariat and the IMB representatives previously consulted. In addition, further operational engagement was necessary following that consultation. The large number of comments received are being considered and the Framework is expected to be published early in 2022.

The Framework aims to ensure that property is handled with efficiency, care and respect and that staff and prisoners are clear on the arrangements in place. It provides clear requirements and strengthens guidance on known problem areas. This includes providing stronger guidance to ensure volumetric control limits are respected, so that prisoners do not build up excessive amounts of property.

Property handling at HMP Bristol is recognised as an area for improvement required. The Head of Operations reviewed the processes and identified several weaknesses. Following this, an improvement

plan was implemented towards the end of the reporting year to irradiate these issues which included a six-month review period. The damage drains have been repaired in the property store.