



Chair, Independent Monitoring Board  
HMP/YOI Drake Hall  
Eccleshall  
Staffordshire  
ST21 6LQ

**MoJ ref:** SUB96208

3 May 2022

Dear Chair,

**HMP/YOI DRAKE HALL: INDEPENDENT MONITORING BOARD ANNUAL REPORT  
FOR 1 NOVEMBER 2020 – 31 OCTOBER 2021**

Thank you for your Board's report for the year ending 31 October 2021. I am grateful to you and your colleagues for your hard work in capturing these helpful observations, especially as 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 understand that my predecessor, Alex Chalk QC, MP, met the Governor and staff during his visit to the prison on 8 June 2021 and I trust this proved useful.

I am sympathetic to the needs at HMP/YOI Drake Hall, and elsewhere across the estate, and share your views that the living conditions on Richmond and Plymouth are unacceptable. HM Prison and Probation Service (HMPPS) is determined to address the conditions of the World War II prefabricated buildings. Some remediation works are being carried out and reduce ongoing degradation to the fabric and systems of the buildings. Further details of the work to be carried out during this financial year is outlined in the attached annex.

Concerns about the ageing buildings have been raised with the Ministry of Justice Property Asset Management Team responsible for overseeing high value capital works and they have been involved in plans around accelerating the program to replace the buildings as part of the ongoing upgrade project to accommodation within the female estate. Project re-scoping visits have taken place to review the works and ensure what is provided as a replacement will be fit for purpose going forward. Prioritising potential projects against a huge programme of work and developing the capital maintenance programme is a very challenging task for those responsible. However, whilst decisions are being made, Facilities Management in the interim will carry out repairs and planned maintenance work to manage risk and decency issues.

Pest control has been an ongoing problem at HMP/YOI Drake Hall and site visits have been increased to eradicate the problem. Since late Autumn 2021 a trapping programme has been used as poison causes the rats to die within the fabric of the building (which can create a health hazard as their bodies decompose). Other areas that act as a sanctuary for rodents have been poisoned and the Governor has begun to see noticeable improvements with far less reports of rodents seen on site.

Despite the Board's concerns, it was reassuring to read that HMP/YOI Drake Hall provides a safe and secure environment. It was especially pleasing to note the low levels of violence and self-harm rates lower than in other closed women prisons. I was pleased to hear that the women's healthcare needs were generally met, and Covid-19 outbreaks were excellently managed. I share the Board's feedback on in-cell telephony, a very useful initiative to support family ties, and the Chaplaincy service for supporting and changing women's lives through pastoral care and religious values. Lastly, I would like to thank the staff at HMP/YOI Drake Hall for their hard work and commitment during a challenging year.

HMPPS comments in response to issues raised in your report marked for their attention is also included. 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.

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/YOI Drake Hall.

Yours ever,

A handwritten signature in blue ink that reads "Victoria Atkins". The signature is written in a cursive style with a large 'V' and a long, sweeping 'A'.

**VICTORIA ATKINS MP**

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**HMPPS comments on matters raised in the report**

**Plymouth and Richmond Unit Work**

Funding for the following works has been approved, for delivery this financial year:

- Replacing external render and waterproof membrane to external elevations and removing existing covering on both elevations.
- Fitting breathable barrier covering.
- Fitting new exterior Plywood to existing frame, ensuring 150 millimetres above ground level and applying a stabilising solution.
- Fitting Stop Bead around the windows, doors and along the bottom of the cladding.
- Apply a High Build decorative textured coating finish.

**Prisoners' Property**

Further to our April 2021 response, the feedback received on the new Prisoners' Property Policy Framework was considered and, where appropriate, adjustments have been made. The framework is expected to be published this Summer. The new framework will seek 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.

While digital improvements to property processes are being explored, the nature of that work means that any digital changes are likely to be longer-term and will not be part of the framework at this stage. However, the planned introduction of digitally recorded Person Escort Record including property tags will enable better tracking of property in transit with Prisoner Escort and Custody Service (PECS) suppliers and will assist with investigations into the few complaints PECS receives about lost property. PECS continue to monitor all aspects of the contractors' performance and on occasions where it fails to meet the agreed levels will be raised with the contractor for improvement.

As recognised by the Board, at HMP/YOI Drake Hall there is a good system in place for handling property overseen by Reception staff. There have, however, been some delays owing to staff shortages during the pandemic.

**Suitable Rooms**

The bid for the new Healthcare office and private interview room space was unsuccessful, but it has been perfected in readiness for resubmission this financial year. The Governor will keep you informed of any further updates.

**Specialist Provision for Eating Disorders**

At HMP/YOI Drake Hall there is designated prison officer who can provide information to women with an eating disorder. As in the community, people in custody do have access to support and guidance from specialist eating disorder services, accessed by a referral from the prison healthcare team. Adult Eating Disorder Inpatient service are commissioned and provided by the West Midlands Adult Eating Disorder Provider Collaborative. For more details and latest updates please see [mpft.nhs.uk](https://mpft.nhs.uk).

### **Prisoner Transfers**

The issue identified by the Board is a problem that has been exacerbated by the closure of accommodation at HMP/YOI Foston Hall and the pandemic putting pressure on the whole female estate. This has resulted in some establishments having to transfer women due to the need to create space for those directed from the courts whilst dealing with outbreaks of Covid-19 thus reducing capacity.

There is a bespoke resettlement approach agreed for women; one that offers a trauma responsive design and approach. The model is being implemented in all Probation regions over the course of 2022 as part of the Unified Probation Service Target Operating Model. Pre-Release teams will ensure womens' needs in prison are at the centre of the work being done around them and provide continuity of support from within the community, into custody, and back into the community on release. The Framework encourages building a relationship of trust with the Community Probation Practitioner; supporting women to feel safe, engage with the services on offer and develop hope in their capacity to make changes.

### **Banking Programme**

Thank you for the feedback provided. Prisoners know that in order to gain Release on Temporary Licence (ROTL) employment whilst in open conditions they need a bank account as stipulated in policy. There is not a prison rule that prevents a prisoner from having a bank account. However, it is recognised that the current banking programme arrangements are not suited to those who gain employment more than six months prior to release where the intention is to use the account whilst still serving their sentence in custody. We accept that there is a need to build greater confidence with the banking sector through this first phase to extend the criteria (although does not prevent prisoners from opening and using bank accounts with more than six months left to serve), there are no plans at the moment to make such changes.

From a Cashier/ Prison-NOMIS perspective, obtaining cash from a HMPPS account will generally be restricted to those who have only have just begun domestic ROTL and without a personal bank account or requiring access domestic ROTL with no intention of opening one. As ROTL for domestic purposes is generally restricted to two Resettlement Day Releases and one Resettlement Overnight Release each month (there may be additional ROTL at Drake Hall in terms of women accessing Childcare Resettlement Licence), you would not normally expect someone to get more than one ROTL period per week and therefore would only be planning financially, for this one event rather than every day expenses if they were employed in the community. Prisoners do need to try and plan for this to ensure they have sufficient cash and if they do not, a written request must be submitted to the Finance Team as per policy guidance (the Prison Banking Lead can provide support here).

The Governor will keep the Board informed of any future changes to the current arrangements.