

## IMB summary response to the Prisons Strategy White Paper

February 2022

### About Independent Monitoring Boards (IMBs)

Appointed by Ministers under the Prison Act 1952, IMBs are an important part of the independent oversight of prisons. IMB members are a regular presence, visiting the establishment, monitoring the treatment and conditions of prisoners, reporting what they find to those running the prison, and dealing with queries and concerns from individual prisoners. They are unpaid but have statutory powers, granting them unrestricted access. Their findings are captured in their published annual reports.

### Comments

This document sets out the key issues the IMB identified in response to the Prisons Strategy White Paper. It was drafted following input from prison Boards.

The strategy sets out a vision for better and safer prisons that can reduce reoffending. There is a welcome focus on rehabilitation, as well as safety, and the paper sets out a range of initiatives towards the stated aim (paragraph 151) of '[creating] a prison system that properly rehabilitates prisoners and prepares them for life on the outside'. The paper recognises the salience of mental health, substance use and neurodiversity as drivers of offending and reoffending, both in prisons and community settings, and the importance of education, work and skills training.

However, unlike the proposal to create 20,000 more prison places, there are no clear costings, programme or timing for many of the positive proposals to support rehabilitation; they are often expressed as part of a '10-year' or 'long-term' vision. There is a proposed investment of £200m a year in rehabilitative work in and after prison by 2024-5, which is welcome, but no indication of the actual projected figures for 2022-4. There is a real risk that the focus will be on prison building, and that some of the innovative proposals, particularly those that extend beyond the next two years, are aspirations rather than strategic and funded aims, so that there will be more, rather than better, prisons. There are also some important areas that are under-developed or omitted.

### Key issues

- *Regimes.* It is good to see a move away from some of the Covid assumptions that prisons are better and safer places if prisoners spend more time in cell. However, it is not yet clear what 'time well spent' will mean in practice. More time in cell could be the consequence of some of the proposed regime developments, unless there are adequate staffing ratios and the opportunity to engage in positive and purposeful activity. Opportunities for socialisation and soft skills are important.
- *IT.* We welcome the design features for new prisons – security measures, access to rehabilitative activities and inclusivity – as well as the proposals for technological innovation and improvement. <sup>1</sup>However, it would be good to see a more ambitious

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<sup>1</sup> [www.gov.uk](http://www.gov.uk)

timescale, supported by funding, both for in-cell digitalisation and for the much-needed prisoner management tool to provide a holistic and sequenced approach to interventions and support.

- *Drugs and debt.* The paper rightly recognises the impact of illicit substances and debt on both safety and rehabilitation. It proposes more ‘enhanced gate security’ to prevent the entry of drugs; this could be extended further than the 42 prisons where it is currently planned. There is a proposal for further research on the linkage between debt and violence. However, these links are well-known and we believe that the priority should be on practical steps to recognise and deal with this: for example, awareness of certain triggers for and indications of drug debt, including the role of gangs, and further development of the CSIP process to manage this.
- *Self-harm.* The focus on multidisciplinary approaches being taken to support vulnerable prisoners is welcome, as is the reference to treatment and support – although, as elsewhere, more detailed costings and commitment to funding is needed. There is reference to physical measures to prevent self-harm (such as digital monitors, ligature-free cells, alternatives to razors and vapes) which are important, but not a substitute for the personal interactions and activities that can deal with the underlying causes of self-harm. Staff training is key, as is ensuring there are sufficient specialist staff available.
- *Deaths in custody.* We welcome the mention of an ‘innovation taskforce’ as a preventative measure, to identify best practice in relation to the drivers of violence and self-harm, a multi-disciplinary support service for local prisons, and continued funding for Samaritans’ support to prisoners and staff following a death in custody. However, the strategy should also include the need for clear lines of accountability in relation to learning lessons from such deaths, drawing together PPO, inquest and other recommendations and embedding them in training and general, as well as local, practice.
- *Education and work.* It is welcome that this is central to the strategy, including setting up a central Prisoner Education Service (there was such a central service, OLASS, which was scrapped five years ago). There are a number of positive initiatives proposed to improve prisoners’ chances of employment, though the paper does not reference some that we know of, such as the vanguard and accelerator projects and the work and strategy of the New Futures Network. The challenge will be to create an integrated and sustainable programme, rather than a series of initiatives, that can ensure continuity for prisoners transferring between prisons as well as those being released.
- *Resettlement and short-sentenced prisoners.* It is welcome that more pre-release support is being put in place for short-sentenced prisoners, and that there is a belated recognition of the need for support, particularly housing support, for remand prisoners. However, short sentences and remands are by definition disruptive, and arguably more investment in community alternatives, rather than prison, would be more effective. Research shows that sentencers will use alternatives such as community sentence treatment requirements (CSTRs) if they are available, which could reduce the number of short-sentenced prisoners.

- *Young adults.* Young adults present both a challenge and an opportunity in the prison system. It is disappointing that there is only one reference to them, in relation to the transition unit at HMP Deerbolt, and no reference to the need to mitigate the impact of early childhood trauma. The prison service has long lacked a clear strategy for the effective management of this challenging population, in spite of many reports and previous pilots. This has become even more crucial, given the large number of young people and young adults (estimated at over 2,000) who are now serving extremely long sentences. We understand that a young adult strategy has in fact recently been agreed, with initiatives being piloted across the estate, and it is surprising that this is not an integral part of the overall prisons strategy.
- *Women.* The reference to 'trauma-informed' work is welcome (and should be extended to young adults: see above). However, it is extremely disappointing that, 14 years after the Corston report, the creation of small units for women closer to home is still a 'long-term ambition', whereas 500 new prison places are an immediate and funded objective. There is no reference to community alternatives, such as women's centres. Sufficient and effective alternatives to custody are particularly relevant to the large number of women serving short sentences, which disrupt not only their lives but those of their families.
- *Neurodiversity.* The focus on neurodiversity throughout the paper is welcome, but again will require significant investment, as well as essential staff training. It is also not clear how far prisons will be able to ensure effective engagement and support for prisoners with challenging neurodivergent conditions, given the built environment and necessary limitations within prisons.
- *Race and ethnicity.* Four years after the Lammy report, and given that there are still well-known disproportionalities of outcomes for prisoners from minority ethnic groups, it is extremely concerning that there is no reference to the need to tackle these aspects of equality and diversity, either in provision within prisons or in staff training. Where protected characteristics in general are referred to in chapters 4 and 6, this is phrased as a question, rather than a developed part of the strategy.
- *Staffing.* Throughout, the paper refers to the importance of sufficient and properly trained and supported staff, and there are ambitious and welcome proposals for continuous professional development, not just of leaders but also middle and first-line managers. However, this has considerable cost implications, unless regimes are compromised, and there appear to be no costings for this. In addition, the considerable problems with staff recruitment and retention are unlikely to be solved while remuneration lags behind other public and private sector offers.
- *KPIs & targets.* There is a focus on KPIs, targets and league tables, which have proved problematic in the past. Binary assessments are not always helpful in measuring outcomes rather than outputs, or the qualitative measures, such as positive relationships, that are key to successful rehabilitation. There also seems to be a potential conflict with the proposed 'earned autonomy' for Governors, which is dependent on meeting KPIs. This autonomy is expressed only as allowing deviation from prison service instructions and policy frameworks, which carries some risks, rather than access to additional resources. Governors may want to avoid some of the more challenging prisons, or prisoners with the most complex needs, to maximise their promotion opportunities.

- *Cross-agency working.* Though this is presented as a prisons strategy, it also includes reference to the work of the probation service both in and outside prisons. However, there often appear to be parallel initiatives and roles across prisons and probation, rather than an integrated approach, for example in relation to short-sentenced prisoners or employment advice. There will need to be clear lines of accountability, setting out who is responsible for specific objectives and outcomes. There is still the sense of an agency-driven, rather than a person-centred, approach, except in Wales, where there appears to be a more integrated approach.
- *Cross-governmental working.* The drivers of both offending and reoffending are often outside the scope of prisons or criminal justice: early years support, mental health and substance use, housing and employment. The introduction to the paper therefore recognises the need for a 'cross-governmental approach'. The proposed 'resettlement passport' is a positive initiative, but its success will critically depend on the services available and actually provided by other agencies in the community. There is reference to joint work with health partners (though the proposed health and justice coordinators will not be in place for two to three years), to employment advisers from the Department of Work and Pensions, and to the need to build local partnerships, but that is not developed further. This suggests that there should be a cross-government (rather than just a prisons) strategy, tying in and resourcing the relevant agencies in both local and central government.