



Annual Report of the Independent Monitoring Board at HMP Risley

**For reporting year
1 April 2020 – 31 March 2021**

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Contents

| Introductory sections 1 – 3 | Page |
|-------------------------------------|-------------|
| 1. Statutory role of the IMB | 3 |
| 2. Description of the establishment | 4 |
| 3. Executive summary | 5 |
| Evidence sections 4 – 7 | |
| 4. Safety | 8 |
| 5. Fair and humane treatment | 17 |
| 6. Health and wellbeing | 22 |
| 7. Progression and resettlement | 24 |
| The work of the IMB | 29 |
| Applications to the IMB | 30 |

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 also 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 Independent Monitoring Board (IMB) is part of the United Kingdom's National Preventive Mechanism.

2. Description of the establishment

HMP Risley is one of the largest category C training prisons in the UK, housing an average of 1,100+ male prisoners.

The prison continues to be a hub for foreign national prisoners in the North West and Home Office Immigration Enforcement (formerly UK Border Agency) staff are permanently based in the prison. The population profile showed that, at the end of this reporting year, there were 100+ foreign nationals, 187 prisoners who have committed sexual offences, 50 prisoners serving indeterminate sentences for public protection (IPP) and 70 lifers.

The Risley site consists of seven residential wings, two of which house vulnerable prisoners. There is also a care and separation unit with its own outside exercise area. The training facilities within the establishment provide 12 workshops and 14 education classrooms, together with a library. There is also a health centre with full-time doctors and nursing staff. In addition, dental, podiatry and physiotherapy services are provided. Other facilities include a sports hall and two gyms. To cater for the various faith groups of the prison, there is a multi-faith centre, which is supported by several ministers from the various faiths.

3. Executive summary

3.1 Background to the report

The Board has covered as much ground as it could in these difficult circumstances, as the ongoing Covid-19 pandemic has continued to have an impact on the Board's ability to gather information and discuss the contents of this annual report. Ministers are aware of these constraints. The outbreak was confirmed in March 2020 and new systems and ways of working were devised and introduced. Prisoners were kept informed of developments and accepted and understood circumstances. This report presents the findings of the Board at HMP Risley for the period 1 April 2020 to 31 March 2021 and therefore there is less detail and supporting evidence within this report. Board evidence comes from observations made on visits, scrutiny of records and of data, informal contact with prisoners and staff, surveys, and prisoner applications.

3.2 Main judgements

How safe is the prison?

It is the opinion of the Board that the overall safety of the prison meets a high standard throughout. As the following report will demonstrate, the prison's reception processing unit works closely with the transport contractor, with consideration being given to the risks posed by Covid-19.

Prisoners are generally positive about their treatment in the reception area. Initial health screenings for new arrivals are undertaken promptly by a registered nurse. Immediate health care needs are identified, including mental health and substance misuse, as well as completion of assessment, care in custody and teamwork (ACCT) documents if deemed necessary. Initial cell-sharing risk assessments are also carried out.

This year due to Covid 19 ACCTs provide evidence that due to limited contact between prisoners there has been a reduction in violence in respect of prisoner on prisoner.

How fairly and humanely are prisoners treated?

It is the opinion of the Board that, overall, prisoners are treated fairly. Replacement of the roof to the laundry and workshops 1, 2 and 3 have all been completed.

The prisoners on average during the pandemic have an hour out of their cell.

The prison's ongoing focus on decent and humane treatment is demonstrated through the decency agenda introduced by the safer living department, including a 'room ready' programme and ensuring that all new prisoners receive an induction pack.

How well are prisoners' health and wellbeing needs met?

It is the opinion of the Board that the prisoners' health and wellbeing needs are, in the main, being addressed by the health centre staff, which includes full-time doctors

and nursing staff, dental, podiatry and physiotherapy services, plus a full mental health team.

On arrival at reception, procedures are adequately focused on the risks posed by Covid-19, with all new arrivals monitored for the virus, followed by prompt health screenings by a registered nurse.

Prisoners use the appointment system which is available to them. During this reporting year, improvements to attendance at healthcare appointments have been made, taking into account social distancing and Covid-19 testing.

How well are prisoners progressed towards successful resettlement?

Prisoners are encouraged to develop skills through a good educational provision and training in a range of workshops. All agencies are aware of prisoners' imminent release. Ofsted was part of the HM Inspectorate of Prisons (HMIP) scrutiny visit in November, followed by guided planning for the future, and plans are in place for the department to move forward. The prison is in the process of setting up an employment hub, which should operate on the lines of a job centre.

At the start of the year, there were still problems for families wishing to book visits. This has since dramatically improved; with the introduction of the online booking system and allocated visit times, it is a vast improvement on the previous system.

3.3 Main areas for development

TO THE MINISTER

3.3.1 With reference to items 4.2.10 and 5.4.16 in the body of the report, what discussions are you having with colleague ministers in order to help improve the long repatriation/deportation timeframes for foreign national prisoners?

TO THE PRISON SERVICE

3.3.2 There are frequent instances of prisoners being transferred to establishments that cannot facilitate the courses needed for their identified requirements with regard to sentence management and rehabilitation. Why are prisoners transferred to prisons which cannot ensure completion of sentence management requirements, and might the Prison Service consider a more efficient way of eradicating these problems, going forward?

3.3.3 The Board continues to receive a large number of applications regarding loss of prisoners' property. What plans does the Prison Service have to introduce a more streamlined system of handling prisoners' property when being transferred between prisons? This would avoid unnecessary distress for prisoners being transferred and also minimise the number of compensation claims.

TO THE GOVERNOR

3.3.4 There have been instances where the Board has not been called to serious incidents, particularly out of hours. What are your plans, going forward, to ensure that Board members may monitor and observe serious incidents, while maintaining all appropriate safety and security protocols?

3.3.5 The Board still has concerns about the efficient provision of prisoners' property. What plans does the prison have regarding developing a more efficient, consistent and streamlined approach to handling and allocating prisoners' property, on arrival, departure and movement within the prison?

3.4 Progress since the last report

3.4.1 A prisoner engagement session has been introduced as part of the staff induction process. Food and catering has much improved since the last report, with prisoner 'Food forums/food focus meetings' being implemented, as well as healthy options introduced on the evening menus on Saturdays and Sundays to promote healthy living.

Evidence sections 4 – 7

4. Safety

4.1 Reception and induction

4.1.1 Reception is the processing unit for all prisoners entering or leaving HMP Risley, and it works closely with the transport contractor, GeoAmey. The prison experiences a significant throughput of prisoners, averaging 35 new arrivals each week, many with complex personal needs. During this reporting period, transport arrangements to the prison were suitably focused on the management of the risks posed by Covid-19, with escort vans being cleaned and sanitised between uses.

4.1.2 Due consideration is given to the mix of the population processed through the establishment, with mainstream prisoners and those convicted of sexual offences arriving on different days.

4.1.3 Conditions in the reception area are adequate, with the need for Covid-19-related social distancing being carefully managed. Prisoners are served hot food and drinks, and all new arrivals have the opportunity to contact family and friends. In general, prisoners are positive about their treatment there.

4.1.4 There is access to decent toilet and hygiene facilities, as well as a television in the holding room. However, the Board notes that the observation regarding the absence of any provision of books and/or magazines made in our last report is still a valid one.

4.1.5 Arrival and reception procedures adequately focus on the risks posed by Covid-19, with new arrivals monitored for the virus via the reception screening processes, followed by health screenings undertaken promptly by a registered nurse. Immediate healthcare needs are identified, including mental health and substance misuse needs, as well as the completion of ACCT documents if deemed necessary. Initial cell-sharing risk assessments and private safety reviews are also carried out prior to the newly arrived prisoners being moved into their first night accommodation as a cohort, where they remain for at least 14 days. Few prisoners stayed in reception for more than two hours, and prisoner feedback indicates that they fully appreciated the reasons for being isolated for 14 days. All prisoners had access to daily exercise in the open air for a 60-minute period.

4.1.6 On arrival, all prisoners' immediate basic needs are catered for, including appropriate toiletries for at least the first 24 hours; one-to-one interactive support, demonstrating/advising of immediate complex needs, clean, reasonably fitting clothing, and items suitable for particular ethnicities if appropriate.

4.1.7 All prisoners who were isolating in their first 14 days received enhanced wellbeing monitoring, with healthcare staff providing vitamin D supplements to those who needed them during the restricted Covid-related regime.

4.1.8 A complement to the established reception searching processes and procedures is the recently introduced X-ray body scanner. This is now fully operational within the reception area, with full training having been rolled out to staff pertaining to the

processes, procedures and regulations surrounding its use. The Board was given a comprehensive verbal description of how it works and was also told of its successful use in making finds when new admissions arrive, including mobile phone concealment and small ingested parcels located in the stomach.

4.1.9 While the location and retrieval of prisoner property continues to be an issue and has, this year, accounted for 22% of Board applications, the Board must note that some improvements have been introduced since the last reporting period, most notably the updated process initiated by reception staff to ensure that all property in the property store that is designated as reasonable for prisoners to have is issued to them in a prompt and timely manner.

4.1.10 The needs of prisoners arriving, through reception to induction, are assessed by interactive peer-led induction representatives in the two specially designated areas, on a one-to-one basis, and in separate booths. The induction rooms are clean and bright, with adequate information posters clearly visible around the room. In general, prisoners were very complimentary about the induction process and felt that the pace and delivery of the sessions enabled them to fully understand all relayed information. However, the Board must note that the complaints processes are not always consistently handled and/or explained verbally in any depth, which has caused some confusion, especially for first-time prisoners. In addition, sessions are not always consistent in the delivery of information – for example, sometimes not mentioning the role of the Board, the Samaritans, Listeners or the Prisons and Probation Ombudsman service. Emergency evacuation procedures are not covered as part of the induction session.

4.1.11 A comprehensive induction pack is now sent to all new receptions, which may be translated into one of 11 different languages on request, and free reception letters are provided.

4.2 Suicide and self-harm, deaths in custody

4.2.1 The Board is pleased to report that there is a good level of support for prisoners at risk of suicide or self-harm at Risley, which is well supported by the ACCT case management process.

4.2.2 During this reporting year, there has been a steady decline in incidents of self-harm, with the exception of a small spike in cases during the August to October period. The total number of self-harm incidents reported was 386, compared to 674 in the previous year – a reduction of 57%. Improvements in monitoring and a proactive stance taken with regard to introducing new initiatives, such as incorporating more families in the ACCT process where appropriate, has contributed greatly to this downward trend.

4.2.3 The top three methods of self-harm used during this reporting year were ligatures, ingestion and cutting, with cutting accounting for 74% of the total number of self-harm incidents, compared to 66% in the previous year.

4.2.4 Safer custody meetings have continued throughout the pandemic, and the Board has attended these on a regular basis. They are well structured and well managed, not only discussing current incidents and trends, but also providing a forum to discuss proactive implementation of new safeguarding support measures where possible.

4.2.5 The number of ACCTs opened increased during the first half of the year; however, since December we have seen a decrease to pre-pandemic figures. The increase was predominantly due to the challenges in continuing individual case management due to lockdown restrictions; however, in the upcoming year, things are set to improve in this regard, along with the introduction of a new version of the ACCT document, which will focus more on care maps and family interaction where appropriate. The Board has attended a number of ACCT reviews throughout the year and feels that these are well conducted, although not always multidisciplinary. The Board would welcome regular attendance by all teams at these reviews, going forward.

4.2.6 Quality assurance checks are conducted on ACCT documents each week, with any recommendations (for example, holding more meaningful and quality conversations) being incorporated into safer custody meeting action points.

4.2.7 Safety champions have been introduced on the wings and they will receive training from the specialist nurse practitioner team to help them identify mental health needs more easily and more quickly.

4.2.8 Although the Samaritans stopped visiting at the beginning of the pandemic, they continued to provide supervision support sessions via Zoom. All wings have Samaritans telephones, which are available 24 hours a day.

4.2.9 The Listener scheme has continued throughout this reporting year, although requests from prisoners have declined compared to the previous year, due primarily to the risks of Covid-19. However, now that restrictions are gradually easing, the prison has implemented a recruitment drive for increasing the number of Listeners on the wings. The initial response has been good, with the take-up increasing the number of Listeners from 15 to 27 in total, so they can cover both the wings and reception, thereby promoting support as soon as prisoners arrive.

4.2.10 The Board must note the increase, in recent months, of self-harm by foreign national prisoners, who feel that their deportation to their home countries is taking too long and they do not understand the reason for the long delay.

4.2.11 There have been three apparently self-inflicted deaths during this reporting year and two deaths resulting from Covid-19. Only one of the prisoners was subject to any additional monitoring at the time of his death. The Board is yet to receive any initial learning points from the Prisons and Probation Ombudsman's reviews.

4.2.12 The Board was not regularly notified by the prison of deaths in custody and serious incidents on a real-time basis. To resolve this issue the board agreed that members would inform the IMB clerk when they were on the premises, the board member would contact control to check whether there had been any reportable incidents over the preceding 24/48 hours, and subsequently act on the feedback. This

has been formally raised with the Governor and steps have been taken to ensure that more robust communication is in place, going forward.

| | | 2020/21 | 2019/20 |
|------------------------|---------------------------|---------|---------|
| Incidents of self-harm | Total number of incidents | 386 | 674 |
| | Number of individuals | 130 | 191 |
| | First-time harmers | 33 | 57 |

4.3 Violence and violence reduction, self-isolation

4.3.1 Overall, this reporting year has seen a steady decline in violence when compared to the previous period, with the exception of a small spike in assaults on staff across three specific months – namely, April, August and November 2020 – and a spike in prisoner-on-prisoner assaults in November 2020. This reduction has been the result of improved prison safety, as well as the effort invested in reducing trends of violence.

| | | 2020/21 | 2019/20 |
|---|----------------------|---------|---------|
| Number of assaults | Total | 212 | 407 |
| | On staff | 67 | 85 |
| | Prisoner on prisoner | 145 | 322 |
| Number of disorder and damage incidents | Incidents of damage | 307 | 506 |
| | Incidents at height | 42 | 75 |
| | Barricade incidents | 53 | 75 |
| | Hostage | 3 | 0 |
| | Fires | 10 | 26 |

4.3.2 The safer custody team integrates itself well into the fabric of the prison, and links robustly into other key functions, teams and departments. Both the weekly safety intervention meeting (SIM) and the monthly safety custody meeting continued throughout the pandemic, focusing on managing and supporting perpetrators and

victims of violence alike, with a wide range of data being regularly analysed to identify emerging trends and triggers, and to highlight any hotspots. In addition, consideration and discussion opportunities are held at these meetings, with a view to introducing new initiatives that will contribute to and address the ongoing management of violence at the establishment, recognising that punishment alone will not reduce levels of violence. Examples have included, but are not limited to:

- upskilling and training staff on the importance of conducting thorough cell-sharing risk assessments
- regular promotion of the importance of wearing body-worn video (BWV) cameras as a de-escalation measure and the introduction of turning these on at mealtimes, when some assaults have taken place out of the view of closed-circuit television (CCTV) (for example, behind serveries)
- targeted searching sessions by the North West Area Search Team, involving whole wings at a time, resulting in a number of notable finds, particularly hooch
- the introduction of safer custody champions, who actively link into challenge, support and intervention plans (CSIPs) and attend prisoner council forums and safer custody meetings, in order to assist in establishing and highlighting any issue that might trigger violence. Over the coming year, Risley will be working on documenting and recording these triggers electronically and in a place that can be easily accessed by all staff
- enhanced measures to address the notable increase in prisoners spitting at staff or squirting substances through cell doors. To address prisoners' perception that spitting will have the most significant effect on staff while attracting the least amount of punishment, every incident of spitting is now being fully investigated and addressed accordingly.

4.3.3 All acts of violence and antisocial behaviour are appropriately challenged and, where necessary, the incentives policy (formerly known as IEP), CSIP, and/or adjudication processes are employed to challenge and address this behaviour, encouraging prisoners to contribute to life at HMP Risley in a positive manner.

4.3.4 The CSIP process is used well at Risley to manage and monitor the more complex and problematic prisoners who present a disproportionately damaging effect on individuals, staff or the establishment as a whole, so that they may understand the reasons behind their violent behaviour and receive insight and guidance into managing that behaviour in a more positive way that does not include violence. These plans also work with the victim in each case, identifying what support they might need and implementing this support at the earliest opportunity.

4.3.5 Netting and grilles have been introduced on both A and C wings, which have gone a long way to preventing the ingress of drugs into the prison, resulting in a drop in the number of prisoners under the influence of illicit substances and, consequently, a reduction in violent incidents.

| | | 2020/21 | 2019/20 |
|-----------------|-----------------------|---------|---------|
| Number of finds | Total number of finds | 743 | 843 |
| | Drugs | 220 | 229 |
| | Phones(Only) | 227 | 208 |
| | Weapons | 94 | 157 |
| | Alcohol | 202 | 249 |

4.3.6 What at first may seem like a drastic reduction in self-isolating prisoners during this reporting period is not necessarily the case, and is due mainly to the fact that many self-isolators who found living on the main wings problematic have been moved to F wing in order to provide them with a safe haven. These prisoners had previously isolated themselves in their cells for fear of victimisation or violence, often as a result of debt issues or issues external to the prison. While this change has been useful, the support and reintegration processes could have been improved to ensure that the unit more fully supported the prisoners' return to normal location. The Board is pleased to report that active steps have recently been taken in this regard, with pilot schemes under way to help prisoners to begin re-engaging with the regime, gain confidence and work towards a progression plan to end their isolation. In addition, all self-isolating prisoners are put on CSIPs and are able to engage with support partnerships, including their key workers, who try to actively assist in getting them back into the normal regime as soon as possible, linking in with the offender management unit (OMU).

4.4 Vulnerable prisoners, safeguarding

4.4.1 Case management of vulnerable prisoners, including self-isolators, is good. The safer custody team takes proactive responsibility in monitoring each case, ensuring that documents are generally completed to a good standard, evidencing the effective interactions between staff and prisoners in each case. Regular SIM forums are held, in which the needs of prisoners are considered, and support measures across a range of safeguarding issues implemented.

4.4.2 The Listener scheme has continued throughout this reporting period, although the number of callouts was lower when compared to previous year's, due to prisoners being afraid of calling for a Listener due to the risk of Covid-19.

4.4.3 Vulnerable prisoners continue to be managed safely on a separate residential wing, which provides a safe haven when they find living on the main wings problematic.

4.5 Use of force

4.5.1 There have been far fewer use of force incidents during this reporting period compared to the previous year – 334 compared to 409, a reduction of approximately 18%. Of the 334 incidents this reporting year, 252 were classified as low-level interventions (75%), such as guiding holds and application of rigid bar handcuffs (RBH), 50 as medium-level interventions (15%) and 33 classified as high-level interventions (10%). The introduction of RBH, issued to all officer bands 3–5 through training, has also impacted on the level of force used, as RBH de-escalate incidents and positively impact the level of force used within these incidents. It also speeds up gaining full control of prisoners and reducing injuries both to them and to staff.

4.5.2 Following HMP Risley's pilot participation in the use of PAVA project, the Board is pleased to report that the number of incidents involving the use of PAVA spray has reduced significantly in this reporting period, with the number of instances standing at 10, a reduction of 30 instances on the previous year (approximately 33%).

4.5.3 The number of incidents involving the use of batons in exceptional circumstances has also reduced significantly in this reporting period, with the number of instances standing at two, a reduction of three instances on the previous year (approx. 40 %).

4.5.4 There was no use of mechanical restraints (that is, body belt or metal cuffs) during this reporting period.

4.5.5 Managerial oversight of use of force is to be commended. All incidents are reviewed on a weekly basis, identifying best practice as well as issues of concern, and the monthly meeting analyses incidents in greater depth via written reports as well as BWV and CCTV footage. These monthly meetings also scrutinise data looking for any possible trends in the use of force, and to determine that incidents were reasonable, justified and proportionate, as well as non-discriminatory across age, ethnicity and religion, using the meetings as a vehicle for promptly addressing any issues if and when they are identified. Extensive analysis has found that the majority of incidents correspond to the end of periods of unlock, where prisoners refuse to go back behind their doors, and pertain mainly to the frustration of having telephone calls cut short. It is hoped that the in-cell telephony due to be installed shortly will have a positive effect in reducing these types of low-level interventions.

4.5.6 Use of force documentation is of a high standard and is completed on a timely basis; however, the Board must comment on the number of F213 reports (injury to prisoners) stated at senior management meetings as being submitted late during this reporting period. However, the trend on a month-by-month basis is continuing to improve.

4.5.7 The Board must note that members of the healthcare team have not always attended every incident where control and restraint has been used; however, this has been identified via the monthly strategic use of force meetings, and robust steps have been taken to address this issue, going forward.

4.5.8 Prisoners who display challenging behaviour or have physical or learning disabilities or personality disorders have care/management plans put in place,

highlighting risk factors and setting out alternative management protocols which seek to reduce the likelihood of restraint techniques becoming necessary. The care/management plans are emailed to the use of force coordinator. After attending the use of force meetings, the prisoner equality representative, as appointed wellbeing mentor, aims to work with those prisoners identified.

4.5.9 Any documented actions arising from the monthly meetings are now incorporated into the control and restraint training sessions, along with the relevant BWV/CCTV evidence.

4.5.10 The use of force training target's are generally met, with completion of basic training standing at 84%, PAVA training at 91% and RBH training at 75%.

4.5.11 Prisoner representatives regularly conduct structured quality assurance checks on a sample of records of use of force, with anonymisation in each case. This exercise has been highly successful in building and increasing trust across the establishment.

4.6 Substance misuse

4.6.1 The comprehensive three-part substance misuse strategy employed at HMP Risley concentrates not only on reducing the supply and demand of illicit substances, but also on building effective prisoner recovery through peer support services, accessible training and awareness, continuity of care and medicines management. In addition to the peer worker-led therapeutic groups, which provide valuable support in continuing to deliver substance misuse programmes, prisoners are able to receive additional support via groups such as Narcotics Anonymous.

4.6.2 The prison has reacted well to the challenge of reducing the ingress of drugs into the establishment, with electronic detection equipment being used to good effect, especially the recent introduction of an X-ray body scanner, which has proved particularly successful in the identification, retrieval and confiscation of illicit substances (see also paragraph 4.1.8).

4.6.3 HMP Risley continues to react well to the changes in drug supply routes, and in particular to the increase in attempts to send letters and documents impregnated with drugs into the establishment. A catalogue of official stationery from legal advisers, which has been verified with the sender, has assisted in detecting bogus Rule 39 (legal and confidential) mail.

4.6.4 The prison recently launched a joint operation with Cheshire Police, whose support has played an active role in reducing the supply of drug into the prison – namely, the decrease in the number of drones and throwovers during the year. With the number of drones and throwovers declining, together with no physical visits taking place, it is anticipated that new routes for smuggling illicit items are likely to come to light in the near future. The security team continues to focus heavily on this. The Board regularly attends the security briefing meetings and commends their identification and prevention work in this regard.

4.6.5 The number of drug-related reports submitted in this period has reduced compared to the previous year, with the trend in the number of incidents of prisoners found under the influence of illicit substances also steadily declining.

4.6.6 Unfortunately, no mandatory drug testing has been available during the pandemic; however, the Board welcomes the plans in place to reintroduce this shortly.

4.6.7 The year-on-year trend in the number of fermenting liquid finds has also declined; however, HMP Risley is currently top of the regional establishment list with regard to the number of such finds, although the volumes are lower.

5. Fair and humane treatment

5.1 Accommodation, clothing, food

5.1.1 Generally, the residential areas are clean and tidy, but with the majority of the areas ageing, they are in need of comprehensive refurbishment and this will require significant investment, including in fire and general alarms, roofs, flooring and showers, as well as ensuring all areas of the prison are Equalities Act compliant. Some steps have been taken in this regard, including installing privacy curtains and lockers in all double cells.

5.1.2 Shower surveys have continued to be conducted by the Board during this reporting year, and the condition of the showers continues to be of concern. In the Board's opinion, showers across all wings continue to be in need of major refurbishment, with many out of action for long periods of time, as well as peeling paint and tiling. In addition, the issue of maintaining the consistent provision of hot water for showering, as well as adequate water pressure, remains unresolved, as this is still proving problematic and requires frequent attention.

5.1.3 The issue of many of the cell vents on F wing being inoperable and in need of repair is ongoing.

5.1.4 Again, the issue of telephone faults has been a consistent problem. However, the introduction, during Covid-19, of in-cell telephones may have resolved some of the impact previously encountered. This is an ongoing issue that is currently being addressed by senior management.

5.1.5. Several IMB complaints boxes have been replaced.

5.1.6 The Board still has concerns that cell clearances are not carried out promptly when a prisoner moves location within the prison, leading to loss of property and also potentially posing risks due to Covid-19.

5.1.7. Discussions are continuing with regard to the Board's concerns over the issuing of clothes and footwear, as there have been issues of new arrivals not receiving clothing from the stores. This has led to prisoners having to walk around in their own clothes. Board members are proactive in discussing this ongoing issue, with a view to resolving the matter with the management team.

5.1.8 Following on from last year's report, the Board remains very impressed with the quality of the catering provided.

5.1.9 The catering contingency plans are strong and are continually under review. The Board is still confident that, should any unforeseen issues arise, the contingency arrangements would prove adequate to maintain a continued service. Throughout the pandemic, all catering obligations have been met.

5.2 Segregation, special accommodation

5.2.1 Prisoners located in the segregation unit (care and separation unit; CSU) fall into three categories: those who have committed misdemeanours, those facing threats from other prisoners and put in the CSU for their own protection, and those segregated for good order and/or discipline (GOOD) reasons.

5.2.2 The unit comprises 12 cells, including one constant observation cell, special accommodation cells, one holding cells and a meeting room used for adjudications, GOOD reviews and general meetings. There are a number of showers, toilets, a small kitchen and dedicated exercise yards.

5.2.3 All prisoners on arrival in the CSU are seen by healthcare staff, and they monitor the prisoners thereafter on a regular basis. A governor, healthcare worker and a chaplaincy member visit the CSU on a daily basis. The Board visits all prisoners weekly.

5.2.4 Under statutory regulations, the Board should be informed of any new prisoners as soon as they arrive on the unit, so that a member may visit the individual as soon as possible, to ensure that all their statutory needs are met. Unfortunately, the advice to the Board in these instances is not consistent, and process improvements need to be made in this regard.

5.2.5 GOOD reviews are carried out routinely as required; however, due to room capacity not being in line with Covid-19 restrictions, Board members can no longer attend. Board members have been able to take part in some recent reviews via telephone. Board members follow up with a notification to the Chair via the duty governor of the outcome via CJSM.

5.2.6 The Board has not been able to monitor adjudications due to Covid-19, due to room capacity not being in line with Covid restrictions.

5.2.7 The Board considers the CSU to be a well-run unit, with staff providing a high standard of care. It continues to be clean and relatively peaceful, given its purpose. At a time of extreme difficulty in relocating prisoners from the CSU to other establishments, the Board has witnessed the hard work that officers put in during the reviews, particularly to achieve relocation to other establishments, when appropriate to do so. Prisoners on the unit inform us that they are well treated by the officers, who form a small, dedicated and appropriately trained team. However, the Board remains concerned about the vulnerable prisoners with mental health issues held in the CSU. We believe that more appropriate accommodation should be provided for these individuals.

5.2.8 Comprehensive CSU statistics are kept by the prison, and the segregation monitoring and review group meets regularly to monitor trends and to address any key issues.

5.3 Staff/prisoner relationships, key workers

5.3.1 Prisoner information champions have been introduced to improve overall communications.

5.3.2 Prisoner council meetings are run every two weeks by the senior management team and provide prisoners with a useful and constructive outlet to bring their thoughts and views to the table for discussion and consideration. These have been well received by the prisoners.

5.3.3 Each prisoner at HMP Risley had an identified key worker, who used their time to constructively support the prisoner through their sentence by building a working relationship, thereby identifying concerns and signposting the prisoner to the relevant

support where applicable. This work was impacted by the pandemic and was restricted to welfare checks.

5.3.4 The allocated time for key workers of 45 minutes per week spent with each prisoner has been severely affected by the pandemic. Unfortunately, it is now operating at once per month when conditions allow. Having originally operated at 90%, falling to 40%, it is now operating at 20–30% of target.

5.3.5 The impact of the key worker scheme has been to reduce the number of violent and self-harm incidents substantially (see paragraph 4.2.2).

5.4 Equality and diversity

5.4.1 Equality and diversity continue to have a high profile and there is a clear coordinated diversity and inclusion policy, committed to 'promoting fair and equitable outcomes for all prisoners in an inclusive, supportive and tolerant environment'.

5.4.2 The initial and ongoing identification of prisoners with protected characteristics is working well and the prison has a good understanding of the make-up of its population. Equality-related data is monitored and presented for review and discussion at the regular diversity and inclusion senior management team meetings, with actions identified, agreed and monitored by the team.

5.4.3 Diversity and inclusion, including coverage of the nine protected characteristics and how to make a discrimination complaint, if required, is comprehensively covered within the induction sessions.

5.4.4 Transgender prisoners we have spoken to are very happy with the care and support they receive at Risley and feel that their practical needs are adequately met. In addition, they say they feel safe and do not feel compromised about being open and upfront about their gender identity (see also paragraphs 5.4.5 to 5.4.7).

5.4.5 All transgender prisoners at Risley are treated in line with the newly introduced 2019 Framework for Operational Guidance, and the Board is invited to reviews for these prisoners and attends as many as is possible.

5.4.6 Steps have been taken to improve the management of transgender prisoners' issues and the needs surrounding the provision of care – for example, ensuring that all items allowing prisoners to live as females are now easily available to order on the canteen sheets; however, the Board would welcome transgender toiletries and cosmetics being added to the first night induction canteen list.

5.4.7 Transgender prisoners are able to request clothing parcels to be sent into the prison every three months, provided that the proper application and approval process is followed.

5.4.8 Disabled prisoners are flagged up on arrival at Risley; however, the Board notes that not all areas in the prison are compliant with the Equalities Act.

5.4.9 The Board recognises the good work undertaken to conduct comprehensive staff training in conjunction with the National Autistic Society to ensure that staff may more

easily recognise/identify those prisoners suffering from autism, as well as helping to better address and deal with their needs.

5.4.10 Personal emergency evacuation plans and care plans have been adapted to cater for autism needs, and now all learning disability and/or mental health issues are recorded and addressed on care plans, with reasonable adjustments implemented where deemed applicable.

5.4.11 Plans are under way to invite outside agencies into the establishment to train on and heighten awareness in disabilities caused by blindness and deafness. One member of staff has successfully completed a British sign language course (see also paragraph 5.4.13).

5.4.12 The diversity and inclusion team has worked hard with the specialist nurse practitioners in identifying those prisoners with special needs – for example autism and deafness – and addressing their individual requirements (see paragraph 5.4.9).

5.4.13 Deaf Awareness Week was well promoted within the prison, which resulted in some favourable outcomes for prisoners, including identifying those members of staff who are trained and experienced in British sign language.

5.4.14 Collaborative work has also been undertaken with ACE (speech and language therapy for adults), to assist those prisoners with acquired disorders of speech, language, communication, voice and/or swallowing, by providing them with access to assessments, diagnoses, therapy, practical advice, education and equipment to ensure that they are able to live to their maximum ability.

5.4.15 There is good overall provision for those prisoners with disabilities and the 'buddy' scheme in place is working well; however, many prisoners with disabilities say that they have experienced a high level of bullying and/or victimisation, which corresponds to the results published in the recent HMIP survey.

5.4.16 The number of foreign national prisoners has increased during the last reporting year and now accounts for nearly 25% of the total population at Risley. While immigration surgeries took place once a month on all wings, legal advice on immigration issues was not always easily accessible for many prisoners. This resulted in a high level of frustration, which, together with long repatriation delays, manifested itself in a rising number of incidents of self-harm among this section of the prison population (see also section 4.2.10).

5.5 Faith and pastoral support

5.5.1 The chaplaincy team is led by a full-time Sikh chaplain, who is supported by a mix of full-time, part-time, and sessional chaplains, catering for a diverse mix of faiths, as well as celebrating the full range of multi-faith festivals throughout the year.

5.5.2 Chaplains are accessible to new receptions on the morning after their arrival.

5.5.3 Times of services are well advertised and if prisoners cannot attend services for whatever reason the chaplaincy team would make every effort to attend an individual if they were too ill or frail.

5.5.4 Vulnerable prisoners have the same access to services as other prisoners.

5.5.5 The chaplaincy makes visits to segregated prisoners on a daily basis and attends GOOD reviews and ACCT sessions.

5.5.6 Chaplaincy members give excellent pastoral support to all prisoners, whether they follow a faith or not, and prisoners are generally very positive about the support they receive from them. The chaplaincy team is well represented across the prison and attends a wide range of multi-functional meetings. They work closely with the prisoners, providing an excellent support service on both a short- and long-term basis, as dictated by the needs of the individual prisoner.

5.5.7 The chaplains provide pastoral support for bereaved prisoners, as well as those visiting dying relatives or attending funerals. They also speak to families, arranging compassionate visits if and when appropriate, as well as providing palliative religious support to both the prisoner and their family, if that is what the prisoner wants.

5.5.8 No applications or significant issues in respect of the chaplaincy have been brought to the Board's attention during the year. Indeed, the chaplaincy has been open to the Board's enquiries about wider pastoral matters and has often assisted the Board in addressing particular prisoner applications in respect of personal issues.

5.6 Incentives and earned privileges

5.6.1 Data available shows that the IEP scheme (now known as the incentives policy) is fair and effective, and that prisoners make good progress under this scheme where it is warranted. All IEP (now known as incentives policy) reviews are conducted in line with the Lammy Review recommendation number 24, regarding fairness and effectiveness. <https://www.gov.uk/government/publications/lammy-review-final-report>

5.7 Complaints

5.7.1 A prisoner application system was introduced last year and is supported by monthly analysis of statistics, to help monitor effectiveness. The senior management team monitors these complaints at each of its meetings. Trends are identified and any emerging issues are addressed through the functional head.

5.8 Property

5.8.1 The Board still recognises that there are problems with individuals' property going missing, as this remains one of the most frequent subjects of prisoner applications, many relating to transfers between prisons. We again suggest that action should be taken up nationally regarding this issue.

6. Health and wellbeing

6.1 Healthcare: general

6.1.1 Healthcare services, for both physical and mental health, are provided by Greater Manchester West NHS Foundation Trust. The service aims to provide primary and mental health services within the prison setting that are equivalent to those that would be available within a community setting.

6.1.2 The healthcare building is clean and well equipped, and regular clinics are held for GP, dental, optometry, physiotherapy and mental health appointments. Waiting lists for GP, dental, optometry and other services are within national time scales; due to Covid-19, these services have been limited; however, the Board has noted that, in certain circumstances, appointments are cancelled/missed owing to staff shortages at busy times.

6.1.3 All ACCT reviews are attended by the mental health team representative. Due to the planning and social distancing required during the Covid-19 crisis, these reviews have been well attended. In last year's annual report, the Board made comments regarding some untimely attendances by healthcare staff at ACCT reviews. In this reporting year, the service provided by healthcare and mental health staff has been excellent, considering social distancing and the flexibility of staff with regard to the Covid-19 testing of prisoners on modified isolation wings within the prison.

6.2 Physical healthcare

6.2.1 C-wing has been designated a health and wellbeing unit, with the north side holding prisoners who require clinical intervention, and the south side being the recovery unit. Other projects across other wings are currently in progress, including hepatitis C testing/diagnosis.

6.2.2 Medication is only withdrawn for a 24-hour period when prisoners are found to be under the influence of an illicit substance, thereby ensuring that any possible medical complications are prevented.

6.2.3 There are currently dental sessions and optician clinics running weekly. There are many external hospital appointments every day, and there is access to regional inpatient beds at HMPs Preston, Liverpool and Manchester, although this process remains difficult.

6.3 Mental healthcare

6.2.1 All referrals are discussed at a single point of access meeting each week and either left within the mental health screening clinics x 3 per week, to identify each prisoner's clinical needs and allocated for the required clinical interventions, or referred to the appropriate partner agency, as required.

6.3.2 The mental health care unit provides secondary and primary mental health input equivalent to provision in the community, incorporating psychiatric nurses, psychological wellbeing practitioners, visiting psychiatrists and visiting advanced nurse prescribers and counsellors.

6.4 Social care

6.4.1 The Board is pleased to report that prisoners needing special aids or physical adaptations to cells or equipment generally receive them in a timely manner. The Board has not had any complaints during this period from prisoners about a lack of equipment, although adequate wheelchair provision still continues to be a problem.

6.4.2 It must also be noted that the Board has received a lot of concerns regarding the thinness of mattresses; this matter was raised in last year's report and is still an ongoing concern.

6.5 Exercise, time out of cell, gym

6.5.1 All prisoners have time in the fresh air based on the Covid-19 restrictions and national directives, which at the time would have meant that all prisoners were offered exercise every day but the length of the exercise would be reduced to half an hour.

6.5.2 Outside exercise equipment has been placed on all exercise yards and this has been well received.

6.5.3 It is to the credit of everyone in the prison that changes to the regime were accepted and adapted to so well. Most prisoners understood the need for restrictions in very unusual circumstances.

6.6 Drug and alcohol rehabilitation

6.6.1 There is a substance misuse team (provided by CGL comprising a specialist GP (substance misuse) and two nurses during the day. A healthcare improvement adviser attends and offers wellbeing services both for staff and prisoners, which is commissioned by NHS England from Warrington Borough Council. Their role is an integral part of the Prison Health Improvement Group and ensures the implementation of the prison health improvement plan, a multidisciplinary approach to wellbeing across the whole prison.

6.6.2 The Change, Grow, Live (CGL) team, which provides substance misuse services, has continued face-to-face contact with prisoners, providing increased use of in-cell and self-help materials. There has been a steady reduction in the number of referrals to CGL during this reporting period, standing at 190 at the end of March 2021; however, it is unfortunate that CGL has recently terminated the contract for delivering the BADD (Beating Alcohol and Drugs) programme.

6.6.3 An incentivised substance-free living wing has been introduced at HMP Risley, which offers prisoners a safe and supportive environment in which they are able to address their substance misuse and partake in a culture of recovery.

6.7 Soft skills

6.7.1 Due to the Covid-19 pandemic, the Board does not have any current information on this subject.

7. Progression and resettlement

7.1 Education, library and purposeful activity

7.1.1 Education services are provided by Novus, and library services by Livewire.

7.1.2 For almost all of the reporting period, education and library services have been curtailed. Most staff were not in the prison from March until August. During this time, the learning and skills manager worked tirelessly to keep a skeleton service going in both areas.

7.1.3 From March to August, all enrolled prisoners were provided with packs which supported their course. Work could be done in cell, but was not differentiated and, with no access to course tutors, learners had no real sources of help. Well over 2,000 packs were issued but there was only an 8% return rate for completed work at this stage.

7.1.4 As more education staff returned to work, the education offers increased, with a focus on functional skills. Other vocational areas, such as warehousing and storage, also provided in-cell work. By October, the return rate on work packs was up to 97%, largely as a result of education staff being able to access the prison wings, which were Covid-19 free. The small number of prisoners we interviewed were all appreciative of the in-cell work provided, which kept them occupied, but of course it was no substitute for face-to-face learning.

7.1.5 Ofsted was part of the HMIP scrutiny visit in November. Comments were largely positive and have guided planning for the future. Thorough plans are in place, which should help the department move forward, perhaps with different models of delivery.

7.1.6 While no classroom education was taking place, the opportunity was taken to develop another education building, to enable those convicted of sexual offences to have the same access to education and vocational learning opportunities as other prisoners. This had not been possible previously due to the location of the education block within the prison.

7.1.7 A lack of in-cell telephony has not helped the delivery of education during this time. As this is now being rolled out across the prison, it provides more opportunities for a blended learning model, going forward, with some skills being taught face to face but other work being done in cell. While access to a tutor is essential, it encourages independence.

7.1.8 Foreign national prisoners have been affected more than most during this period. Dictionaries and other aids to learning, such as reading pens, would have helped those prisoners who wanted to engage in education. The education department has now developed a bank of these aids, which should help in the future.

7.1.9 The library was closed throughout the year but a delivery system for each wing was maintained. About half of the prisoners are library members and they made

good use of the delivery system to request books and other items. The library also produced distraction packs, newsletters and competitions, which were warmly received.

7.1.10 The library has been relocated to a stand-alone building, so that all prisoners now have equal access to its facilities. It is a welcoming space and is well stocked. A recent focus on mental health awareness, teach yourself and self-help manuals are useful additions.

7.1.11 Plans are in place to recommence the Shannon Trust reading initiative as soon as possible, with mentors and learners identified.

7.2 Vocational training and work

7.2.1 Vocational training and work opportunities have been extremely limited during the year. Only work deemed essential has continued. Prisoners have maintained their pay rates throughout the year.

7.2.2 Wing cleaners, who have done an excellent job in the fight against infection within the prison, have had the opportunity to take a qualification in infection prevention control. This group would not normally have gained a qualification. A number of wing cleaners we spoke to have taken great pride in the work that they do, as it has been so important this year.

7.2.3 In-cell work to support ongoing vocational qualifications has been provided in a number of areas. Unfortunately, some prisoners did not keep up this work.

7.2.4 A number of vocational training areas within the prison have been developed during the year. As with education and the library, all prisoners now have equal access to the training on offer.

7.2.5 Engagement with local employers has historically not been great. The Board is pleased to note that recent discussions with local employers in the construction trades have led to some new non-accredited courses being developed which will give learners an opportunity to create a portfolio of evidence showcasing their skills. Local employers say that they would welcome this. In the future, it is the intention to continue to develop local links so that courses can match local labour market information.

7.2.6. During the year, work began on replacing the roof on some of the workshop buildings. This long-term project would have reduced workshop capacity in normal times, so it has not been as disruptive as it could have been, happening at a time when the workshops were closed or working with a small number of prisoners only. The laundry was one area which was affected. Industrial machines had to be shut down when work began on the roof, and laundry was done by other prisons.

7.2.7 The Board would welcome a modernisation of the current work offer for prisoners, giving them the chance to gain skills for the current and, indeed, future world of work, which could help them gain employment when they leave prison.

7.3 Offender management and progression

7.3.1 HMP Risley follows the offender management in custody model (targets, parole, progression), to encourage effective use of the time spent in custody.

7.3.2 Offender assessment system (OASys) assessments are compiled within six weeks of induction, which is an improvement since the previous reporting period, when the compilation time was at least 10 weeks. The OMU manager is supported by an assistant and several officers, as well as prison offender managers (POMs). A problem can arise when officers are redeployed to other duties because of staff absences and this may have resulted in backlogs. OASys assessments focus on targets, parole and progression.

7.3.3 According to the HMIP survey (see HMIP scrutiny visit report, January 2021) 64% of prisoners know their targets, but they generally complain that they are not supported by staff to achieve these.

7.3.4 The increase in the number of prisoners convicted of sexual offences has impacted on the management of the prison generally, and particularly on arrangements for parole and progression. It is of concern that there are no intervention programmes offered to these prisoners, who are often sent to other establishments to carry out relevant schemes.

7.3.5 The public protection unit holds monthly meetings, and the Board is able to report that POMs are clearly able to describe the progress or otherwise towards timely release dates. This contrasts with continual complaints from prisoners about the lack of contact with their allocated person(POM). In addition, the HMIP scrutiny visit report notes the significant delays in telephone call monitoring. As yet, there appears to have been no improvement in this.

7.4 Family contact

7.4.1 Family services are provided by Phoenix Futures.

7.4.2 As with all prisons, family contact has been severely curtailed this year. The contract with Phoenix Futures has been adapted and the team, when back in the prison, has had more contact with individual prisoners than usual. Families have sometimes asked the team to check on the welfare of a prisoner.

7.4.3 A very small number of prisoners have participated in projects such as filming messages to family at Christmas and on Valentine's Day. There have been no family days at all.

7.4.4 The visits hall now has a bank of computers, so that prisoners can participate in secure social video calls (formerly known as Purple Visits).

7.4.5 Prisoners seem to have mixed views about secure social video calls (formerly Purple Visits). Problems with the application were mentioned by the limited number of prisoners we talked to. Others whose family lived a long distance away were glad of them. The take-up of secure social video calls (formerly Purple Visits) was not as

high as envisaged. However, there does seem to be a role for this type of family contact in the future, although they should never replace face to face family visits.

7.4.6 The in-cell telephony currently being installed would have helped enormously this year. Despite the extra credit given to all prisoners, it was still a source of frustration for them when wing telephones were out of action or the times when they were able to use the telephone coincided with family members being unavailable.

7.5 Resettlement planning

7.5.1 Information has been provided recently at monthly meetings regarding HMP Risley being classed as an 'accelerator' prison. This is due to the high percentage of prisoners who are released from there. Consequently, it will gain some Ministry of Justice funding which will focus on accommodation and employment. It will mean an increase in the operational capacity by 200 (under the auspices of the Vanguard project).

7.5.2 There has been an improvement since 2020 regarding preparation for release, as information technology facilities are being improved, enabling prisoners to personally apply for bank accounts and so on. There are plans to provide links with Nationwide Building Society. The Board is concerned that prisoners are only informed on their release day if their application for an account has been successful. We accept that they cannot have their account number until then.

7.5.3 It is worth noting that one gain of the pandemic has been that some prisoners have been able to maintain their accommodation under the Government's, 'No evictions' policy, being able to return there on release. This is likely to change as the Covid-19 situation improves. However, there is a concern that the homelessness prevention task force (HPT), which has supported over 3,000 prisoners in its first year, is likely to be replaced under new contract arrangements. HPT interventions have meant that last year, out of 90 prisoner releases, only four were designated as having no fixed abode. The team holds regular meetings with Cheshire, Liverpool and The Wirral local authorities regarding accommodation. Bury, Tameside and Salford are to be targeted, as these are the main areas that the establishment releases its prisoners into.

7.5.4 Currently, the POM makes the application for accommodation, a bank account and so on; it is likely to be taken on by probation officers in the community, but there are no confirmed details of this as yet.

7.5.5 Community rehabilitation companies (CRCs) were allocated to support prisoners for resettlement; however, the Board has been unable to contact them to discuss how this works. The HMIP scrutiny visit report noted that the CRC was providing limited face-to-face contact; in their survey, only 32% of prisoners who were due for release in the next three months said that they had received any support from the CRC prior to release. In addition, there is a backlog of telephone call contact.

7.5.6 The prison is in the process of setting up an employment hub, which will operate on the lines of a job centre. Alongside, the 'through-the-gate', and information, advice and guidance services, this should improve prisoners' access to

employment. Staff have proactively contacted prisoners by posting leaflets and so on under cell doors, from agencies such as Innovative Alliance. However, the prison has acknowledged that it needs to strengthen its employment links and there are no statistics available to judge this yet.

7.5.7 The HMIP scrutiny visit report commented that HMP Risley uses a lot of written correspondence with prisoners (for example, questionnaires); the response from prisoners is mixed, but, regrettably, these are not often followed up. The introduction of virtual resettlement boards should improve this substantially, particularly if they operate on a multi-agency basis.

8. The work of the IMB

The national pandemic and lockdown commenced a week before the end of last year's reporting period. The Board's monitoring was limited due to the pandemic and the Board being below full complement. The Board were limited on number of attendances throughout April 2020 – March 2021. Limited monitoring was carried out upon the Board's return and this was in line with national Covid 19 restrictions and directives.

Board meetings continued to be held on a monthly basis, during the pandemic. These were mainly held remotely by telephone and the Governor's reports were discussed.

Board statistics

| | |
|--|-----|
| Recommended complement of Board members | 20 |
| Number of Board members at the start of the reporting period | 9 |
| Number of Board members at the end of the reporting period | 6 |
| Total number of visits to the establishment | 294 |
| Total number of segregation reviews attended | 0 |

Applications to the IMB

| Code | Subject | Previous reporting year | Current reporting year |
|------|---|-------------------------|------------------------|
| A | Accommodation, including laundry, clothing, ablutions | 3 | 1 |
| B | Discipline, including adjudications, incentives schemes, sanctions | 1 | 2 |
| C | Equality | 6 | 5 |
| D | Purposeful activity, including education, work, training, library, regime, time out of cell | 3 | 3 |
| E1 | Letters, visits, telephones, public protection restrictions | 4 | 5 |
| E2 | Finance, including pay, private monies, spends | 0 | 0 |
| F | Food and kitchens | 2 | 3 |
| G | Health, including physical, mental, social care | 48 | 29 |
| H1 | Property within this establishment | 72 | 34 |
| H2 | Property during transfer or in another establishment or location | | |
| H3 | Canteen, facility list, catalogue(s) | | |
| I | Sentence management, including home detention curfew, release on temporary licence, parole, release dates, recategorisation | 47 | 25 |
| J | Staff/prisoner concerns, including bullying | 29 | 16 |
| K | Transfers | 14 | 4 |
| L | Miscellaneous, including complaints system | 40 | 14 |
| | Total number of applications | 269 | 141 |



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