



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

**For reporting year  
1 June 2021 – 31 May 2022**

**Published December 2022**



# Contents

<b>Introductory sections 1 – 3</b>	<b>Page</b>
1. Statutory role of the IMB	3
2. Description of establishment	4
3. Executive summary	5
<b>Evidence sections 4 – 7</b>	
4. Safety	9
5. Fair and humane treatment	13
6. Health and wellbeing	18
7. Progression and resettlement	22
<b>The work of the IMB</b>	
Board statistics	27
Applications to the IMB	28

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## 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 IMB is part of the United Kingdom's National Preventive Mechanism.

## **2. Description of the establishment**

- 2.1 HMP/YOI Sudbury is an open category D male and young offenders resettlement prison with a certified normal accommodation of up to 601 prisoners. The prison anticipates a further uplift in the population to 741 in the next year.
- 2.2 The prison occupies a rural location and is surrounded by open farmland. It is close to a major arterial road. The long perimeter fencing and the open category of the prison present challenges for the safety and security of the prison. The location of closed circuit television cameras at vulnerable points helps to mitigate some of these problems.
- 2.3 The prison holds a complex group of people and at the time of reporting the age range span is 21 to 83 years of age. There are currently 17 prisoners serving indeterminate sentences and 45 prisoners serving life sentences. Risk assessment necessary for managing these prisoners is a core part of the day to day management of the population.
- 2.4 The buildings were originally a United States Air Force hospital for D-Day landing casualties during World War 2. Most of the single storey accommodation is still in use following conversion and refurbishment to provide some single and mostly double rooms. There is a small secure accommodation unit (SAU) with two cells.
- 2.5 The dormitories were originally built as temporary structures and were not intended to be in use for more than 70 years and are therefore difficult and expensive to maintain.
- 2.6 Dormitory W5 is used as accommodation for induction prisoners. Most of the rooms offer shared accommodation but the small number of single rooms has been increased with the introduction of pods during the Covid-19 pandemic.
- 2.7 Healthcare services are provided by Practice Plus Group; substance misuse treatment is provided by NHS Inclusion; the maintenance and escort contracts are held by GEOAmey; education is delivered by PeoplePlus, who have subcontracted the library service to Suffolk Libraries.

### **3. Executive summary**

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

The Covid-19 situation has had a less significant impact on the Board's ability to carry out monitoring than in the previous year but has, nevertheless, reduced the ability to make visits to the prison at certain times during this reporting year. In addition to one national lockdown there have been infection rates within the prison at times which have resulted in outbreak centre restrictions being imposed.

For the most part, however, the Board has been able to return to monitoring visits.

#### **3.2 Main judgements**

##### **How safe is the prison?**

The IMB received some comments early in the reporting year from recently arrived prisoners regarding concerns that they had been required to identify their own dormitory accommodation at the end of their induction period. This situation had made some prisoners feel vulnerable in a new environment. However, the prison has recently introduced systems to ensure that this no longer takes place and that newly arrived men are allocated suitable accommodation.

Incidents of prisoner self harm remain low at Sudbury and did not increase as a result of the Covid-19 restrictions which were required. The number of assessment, care in custody and teamwork (ACCT) documents opened during the reporting year are also low. Assaults between prisoners and among prisoners on staff have been low throughout the year. However, there have been a number of cases of injury to prisoners which seem unlikely to be accidental but where the victim insists that no-one else was involved. The work of the Safer Custody Team is central to success levels in keeping prisoners safe.

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

The IMB at Sudbury has reported regularly on the poor quality of accommodation – especially the dormitories – in annual reports since 2018. The prison has struggled to provide necessary upgrades and have done excellent work in using the trade skills of prisoners to add to the projects carried out by the estate maintenance contractor. However, the dormitories are comprised of aged and originally temporary buildings which present fundamental challenges for housing prisoners decently including the lack of adequate electrical power infrastructure to provide living accommodation areas with sufficient microwaves and fridges.

Relationships between staff and prisoners show encouraging signs of improvement and the Governor has recently taken action to ensure that personal officers and prison offender managers (POMs) maintain regular contact with prisoners in their caseload.

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

The Healthcare department is fully staffed and the service is generally well run. There have been no applications to the IMB in this reporting year relating to healthcare issues and the complaints/negative comments made directly to the contractor are outnumbered by positive comments from prisoners.

There is currently about a two week wait for an appointment with the General Practitioner (GP) but approximately a 20 week wait for dental appointments. This is a situation which reflects similar waiting times in the community since the pandemic.

Mental health issues are referred to the psychiatrist who visits every two weeks and urgent cases are quickly referred to outside agencies.

There are effective substance misuse services in place and the provider has encouraging new initiatives being planned which will support prisoners in addressing the behaviours which have led to their substance misuse.

The Board has noted that the installation of a tracker unit for secure storage of medications which are held by prisoners themselves has been further delayed by technical issues.

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

During this reporting year staff shortages experienced by the education contractor have impacted significantly on the provision offered, in addition to the necessary Covid-19 restrictions imposed.

Take up of the courses on offer is variable and the Board hopes that the prison and education contractor will be able to respond to the undertaking made in the Prison Strategy White Paper (December 2021) to deliver a prison education service focused on qualifications that increase prisoners' prospects of finding work on release.

The Board has noted that a significant number of prisoners arrive at Sudbury having spent time in prisons in the closed estate but who have still not achieved much improvement in their levels of Maths and English.

During the reporting year the prison fell behind in meeting the needs of prisoners with particular learning needs and the Board is pleased to see that the education contractor has now made an appointment to support these learners. There is currently no provision for supporting learners whose first language is not English.

Monitoring visits made by Board members have identified a lack of IT provision to support teaching and learning. The Library is well run and well used by prisoners.

The prison continues to do well in arranging paid work opportunities for prisoners and there is a good range of vocational training available within the prison which is popular with prisoners.

### **3.3 Main areas for development**

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

- What plans are in place to ensure funding will support the necessary staffing levels to provide safety and effectiveness in Open Prisons given their crucial role in the rehabilitation process and the vision outlined in the Prisons Strategy White Paper?
- There is reference in the White Paper to improving the existing prison estate via the creation of a new strategy for maintenance and renewal of prisons. Such renewal is urgently needed at Sudbury where prisoner accommodation is extremely outdated and of a quality intended only to sustain buildings temporarily. What is the likely timeframe for the production of this renewal strategy and the delivery of necessary improvements?

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

- What plans are in place to ensure that the systems for the transfer of prisoners' property are improved to reduce the high number of incidents of property going missing when prisoners are moved between establishments?
- Many issues raised with the IMB indicate a lack of human resources to effectively deliver the procedures and systems in place within the prison. How can the service address issues of staffing levels – including within the probation service?
- The quality of prisoner accommodation at Sudbury is deficient in many ways and the IMB has been reporting on the poor quality of dormitory accommodation since 2018. Whilst the prison itself has managed to make some improvement to kitchen/shower/toilet facilities it remains an issue for prisoners. What plans does the service have to secure necessary resources for improvements?
- Are plans in place to drive improvement in the levels of achievement in functional skills across the closed estate in order to enable Open Prisons to be more successful in delivering their resettlement objectives?

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

- What plans are in place to ensure that the prison can meet the physical and mental health needs of the increased population at Sudbury?
- As the population of the prison continues to increase inevitably some of the additional prisoners received will have addiction issues. How does the prison plan to support these additional prisoners with their substance misuse needs? What plans are in place to prevent the ingress of these substances?
- Does the prison have an ongoing schedule of projects to improve the quality of prisoner accommodation? What is the likely timeframe for the upgrading of power supply to dormitories to support the provision of fridges and additional microwaves?

- How can the prison ensure that prisoner education, especially in relation to improving functional skills, delivers improved levels of prisoner achievement?

### 3.4 Progress since the last report

Issue raised	Response given In the Minister's response to 2020/21 report	Action taken
Lack of funding for improvements to fabric of accommodation	In December 2021 in the Minister's response HMPPS reported that a Stage 2 Business Case for 2x60 bed units to replace P5&6 was in place	Work to clear the site appears to be in progress. In addition boilers and water heaters have been replaced. Fuel tanks necessary to support these would be replaced by the end of the 2021/22 financial year, which has been completed.  Work to further improve the newly acquired accommodation pods was carried out.
Transfer of prisoners' property	Prisoner Property Framework to be produced. PER to be transferred to digital format.	The draft framework was withdrawn and as yet no subsequent document has been available. ePER now in use.
Staff/prisoner relationships		This was an issue in our last reporting year. The Board has not seen an increase in applications on this issue and there are positive signs that there have been improvements in the prison's systems to support the improvement of positive and productive relationships between prisoners and staff.
Effectiveness of DIRF processing		This remained an issue for some prisoners during the first half of our reporting year and it has been raised with the Governor in our monthly meetings. There has been a welcome focus on improving efficiency and effectiveness of the DIRF process recently and signs of improvement are evident.



## Evidence sections 4 – 7

### 4. Safety

#### 4.1 Reception and induction

4.1.1 Prisoner escort records (PER) are now completed electronically and transferred directly to the prisoner's personal records on the prison service database (Nomis). The biggest issue for many new arrivals is the unavailability of single rooms.

4.1.2 Some prisoners report feeling poorly prepared by their sending prison with the result that they have unrealistic expectations of being able to get immediate release on temporary licence (ROTL).

4.1.3 Education assessments are carried out within the first few days of arrival. Healthcare assessments are normally carried out on arrival in reception, but when prisoners arrive after healthcare closes this is delayed until the next day.

4.1.4 A specific session in the induction programme is now allocated to peer supporters, so that newly arriving prisoners have the opportunity to learn more about the support available and how to access it.

4.1.5 New arrivals are accommodated on W5 where rooms are shared. This can cause anxiety amongst prisoners who were allocated single rooms in their previous prison because they were deemed at risk. Due to the shortage of single accommodation at Sudbury, staff judge that prisoners who were considered at risk in a category C environment are not at risk in a category D because they are not locked in. Over the reporting year some prisoners have complained that they are expected to find their own accommodation when they leave W5, making them vulnerable to bullying and enabling the formation of cliques on dormitories. This issue has been addressed by the safer custody team, and prisoners are now allocated rooms when they move off W5.

4.1.6 A new induction has been introduced and has taken some time to bed-in. Sessions viewed by Board members have been poorly attended, and names were not always recorded. Some prisoners report relying on informal advice and guidance from other prisoners. Feedback from a recent visit from the regional safety team, however, was very positive about the way the programme is now operating, with prisoners reporting a positive experience of induction, and recent comments from prisoners to Board members suggest that the situation is improving.

4.1.7 Staff have commented that when the prisoner transport organisation cannot deliver new arrivals until late in the working day there is an impact on their ability to process the new arrivals adequately.

4.1.8 Many prisoners struggle with the transfer to an open prison especially if they have been in prison for several years. The Board has witnessed them being offered support with this transfer which can result in a reduction of their anxiety and the ability to settle into their new situation.

4.1.9 The newly introduced induction programme enables the prison to identify those individuals who may need support with learning difficulties or personality disorders which could affect their ability to fulfil their potential while at Sudbury.

4.1.10 Prisoners identified in this way are supported through a scheme called About Me. An individual action plan is drawn up to highlight a prisoner's needs which can be as simple as noting that he should avoid activities in a noisy workshop or that he struggles to make eye contact or make decisions. The action plan can then be shared with key staff with the permission of the prisoner. This system enables staff to avoid triggering negative reactions in those with certain issues.

4.1.11 Monthly meetings are held with all key staff to monitor the individual's progress and action further strategies if needed.

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

4.2.1 The Covid-19 restrictions have not resulted in an increase in self harm and only four incidents were recorded between April 2021 and October 2021. There have been no self harm incidents since October 2021.

4.2.2 The Safer Custody team track prisoners with a history of self harm and follow them up regularly. In January of this year 6.8% prisoners at Sudbury had a history of self harm. The team also track any reports relating to deaths in custody.

4.2.3 A total of 21 assessment, care in custody and teamwork (ACCT) documents were opened during the reporting year. This number remains low and comparable to the previous two years when 24 and 22 were opened. Many are opened when a prisoner shows signs of distress at being transferred back to a closed prison. The Board has only been able to review one ACCT document this reporting year, which was carried out with the consent and involvement of the individual concerned.

4.2.4 There are currently four Listeners at Sudbury supported by a co-ordinator from the Samaritans who attends safer custody meetings. The Samaritans help line is available to prisoners at any time.

4.2.5 Sadly there have been two deaths this reporting year. One death was apparently substance-related. The other death occurred while the prisoner was on overnight ROTL; an individual has been charged with their murder. In both cases members of the Board witnessed immediate and ongoing support for prisoners and staff.

4.2.6 The Board applauds the work not only of the Safer Custody team but all staff in keeping prisoners safe. There is an effective prisoner support network in place across a range of situations from picking up messages from the safer custody phone line to responding to staff when concerns are raised. This ensures support for individuals who are struggling to cope. Day and night staff work seamlessly together to support individuals. In the words of one prisoner who spoke to a Board member: 'They went all out to help me'.

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

4.3.1 In the past year there have been a total of 11 recorded assaults, five prisoner on prisoner and six prisoner on staff. The number is too small to detect trends or underlying causes or patterns. This is an overall decrease on the previous year when there was a total of 13 assaults, nine prisoner on prisoner and four prisoner on staff.

4.3.2 The Safer Custody team reviews the numbers and trends of challenge, support and interventions plans (CSIPs) at their monthly meetings. This enables them to monitor any variance relating to age, location or ethnicity and to record the reason why the plan has been set in place. CSIP quality is good but the reports do not always meet the 70 hour deadline. Most CSIPs relate to bullying, intimidation or debt and they can reflect problems encountered by prisoners who are suddenly obliged to share a room when they arrive at Sudbury. The incidence of CSIPs has dropped significantly since November and in recent months, particularly when Covid-19 restrictions have limited movement, numbers have been low. Recent CSIPs have been dealt with rapidly and effectively.

4.3.3 Since resuming direct monitoring, Board members have made a point during their rota visits of asking prisoners whether they feel safe. The overwhelming majority of prisoners have replied that they feel safe personally, but some observed that a more vulnerable individual might not. Since November 2021 18 prisoners have been returned to closed conditions at their own request or for their own safety.

4.3.4 There is evidence of bullying, although it does not appear to be gang related. In addition to the cases that are officially recorded through the CSIP system, there are a number of cases of injury that seem to be unlikely to be accidental, where the victim insists that no one else was involved.

## **4.5 Use of force**

4.5.1 Sudbury was criticised in Her Majesty's Inspectorate of Prisons (HMIP) report in June 2021 for the automatic use of ratchet handcuffs when prisoners are moved to secure accommodation while they await transfer. The prison is now using a dynamic risk assessment approach to handcuffing when prisoners are being moved and each incident is recorded with reasons.

4.5.2 This approach has given rise to a steady decrease in the use of ratchet handcuffs when prisoners are being moved to the secure accommodation unit before transfer. In January, out of 18 moves only two prisoners were handcuffed.

## **4.6 Substance misuse**

4.6.1 All prisoners are seen on arrival and given the necessary information on the substance misuse service at Sudbury including how to get support.

4.6.2 Mandatory drug testing of prisoners has been challenging this reporting year due to the continuing impact of Covid-19 which drew staffing away from the testing process to manage outbreaks of the virus. However, the prison maintained its zero tolerance to the taking of alcohol and illegal drugs. A total of 186 positive test results from suspicion testing were recorded with cannabis being the most commonly found (56% of all positive results). Cocaine (9%) and New Psychoactive Substance (NPS - 8%) were also recorded.

4.6.3 Searches in response to intelligence provided were carried out over the year and since pandemic restrictions have been lifted the number of drug detection dog visits has increased. It is the Board's view that as the prison returns to pre-pandemic routines it will be a significant challenge for the establishment to keep ahead of

illegal items being brought in. During this reporting year 189 finds were made with cannabis, pregabalin and steroids in both tablet and injectable form being the most common substances found. Other finds include quantities of tablets and syringes and in the past month 3 batches of home brewed alcohol (hooch).

4.6.4 Since the majority of adjudications relate to the possession of illegal items repeat offenders are being returned to a close prison. Since the beginning of May 2022 those found in possession of smart phones or testing positive for a class A drug following a mandatory drug test will be referred to an Independent Adjudicator for their adjudication. Since these adjudicators can award additional time in custody to those found guilty it is hoped that this system will discourage prisoners from getting involved with illicit items.

4.6.5 During the reporting year there have been several incidents of contaminated Mamba (artificial cannabinoid) which caused amongst staff the fear that there was the potential for a death as a result of the dangers involved in taking such a substance. The Board is aware of one prisoner requiring transfer to hospital due to the very bad effects of taking Mamba. It is the Board's opinion that staff vigilance helped to prevent any fatalities during this period. More recently there has been evidence of cocaine being converted into crack.

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

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

5.1.1 The prison's response to the need to improve staff prisoner relationships has produced better feedback from prisoners about this issue. For example systems put in place to improve and monitor prisoners' contact with their personal officers has resulted in some positive comments to the Board from prisoners. At a recent prisoner council meeting attended by an IMB member prisoners were asked to say what had been the biggest improvement they had experienced during their stay at Sudbury. The unanimous reply was relationships with staff, and the ability to work together in a constructive manner. Staff are more accessible to prisoners. Regular face to face surgeries are held where issues can be raised on an individual basis without the need to use the formal complaints process. This has promoted improved communication between staff and prisoners.

5.1.2 The IMB are now holding monthly drop in sessions which enable prisoners to discuss issues of concern in a confidential setting.

5.1.3 Members of the IMB have observed officers dealing with prisoners displaying frustrated behaviour with understanding and good humour, whilst doing their best to resolve issues raised.

5.1.4 The single pod accommodation introduced in response to the pandemic has proved popular with prisoners and has improved the availability of single occupancy accommodation.

5.1.5 The programme of accommodation improvement works was inevitably interrupted by Covid-19 restrictions. However, 12 kitchen areas and many shower facilities have been refurbished. There has been an on going issue regarding the provision of fridges in dormitory accommodation which has been the result of inadequate power supply to the site. There has been real progress recently on resolving this problem and it is hoped that fridges and additional microwaves can soon be provided. The storage of prisoners' perishable food in rooms and on windowsills has contributed to a problem with vermin. Recent attempts to resolve the infestation have had some success but prisoners are still reporting to the Board that it remains an issue.

5.1.6 The disabled shower area on E7 dormitory is still not to the best of standards but the area is waiting for the site maintenance contractor to complete work before the shower refurbishment can be completed.

5.1.7 The provision of garden furniture around the site has been well received by prisoners and it seems to be well used by staff and prisoners.

5.1.8 Food service to prisoners continues to be good and there have been no applications to the IMB in this reporting year which concerned food. Menu sheets are issued which when correctly completed enable a good range of choice for prisoners. Nutritional content is clearly labelled on all food. Food served is sampled regularly by IMB members and the serving of food is observed.

5.1.9 Faith based food needs are catered for and all religious festivals are observed.

5.1.10 The prisoner food panel meetings have now resumed having ceased during the restrictions.

5.1.11 Extra disabled parking spaces have been provided which has been well received by prisoners' visitors.

## **5.2 Segregation**

5.2.1 Sudbury does not have a segregation area.

5.2.2 The prison has a secure accommodation unit (SAU) containing two cells with toilet en-suite. A separate shower is available for prisoner use if required. There is no exercise facility available.

5.2.3 The Sudbury monitoring and review group (SMARG) analyses statistics relating to prisoners located in the SAU for each quarter, looking at a wide range of comparators including ethnicity, sending prison, reason for location and authorising governor. This enables the prison to address the factors that trigger transfers more effectively.

5.2.4 Since November 2021 four prisoners have been transferred out for reasons related to their mental health. All occupants of the SAU regardless for the reason for which they are located are assessed by the healthcare team. Chaplaincy staff visit on a regular basis. Prisoners have access to a telephone in the department corridor and are offered the services of a Listener.

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

5.3.1 At the beginning of this reporting year a number of men reported issues with staff, but these observations have become less frequent and prisoners generally now seem to find relationships with staff are good. The new residential team have been working hard to improve staff / prisoner relationships and the offer of reflective practice sessions for staff should help this trend to continue. In conversation with prisoners Board members have found that certain staff are held in high regard, but many officers fail to interact sufficiently. Some younger prisoners, in particular, feel they are treated without respect.

5.3.2 Although prisoners have an initial check-in meeting with their prison offender manager (POM) 10 days after they arrive at Sudbury a number say they do not know who their POM is. There seems to be a very small number of POM posts in category D prisons in relation to the size of the task they are faced with, but the Board is satisfied that higher risk prisoners are well supported. However, Board members feel that, due to staffing levels, prisoners representing a normal level of risk are not always receiving the level of support necessary to prepare them fully for release into the community as intensive work with their POM only begins 12 weeks before release.

5.3.4 The safer custody team keeps a note of prisoners who are not receiving domestic visits, social video calls or phone calls so that officers can check that there are no concerns and prisoners suffering from isolation can be offered suitable support.

## 5.4 Equality and diversity

5.4.1 There has been a focus within the prison on creating an environment where the varied range of people in custody are treated fairly and with respect. The diversity, inclusion and engagement (D I & E) lead manager is responsible for co-ordinating the prison's policies and practices to ensure equality of opportunity. The D I&E action team consists of the senior managers responsible for the various protected characteristic groups such as race, age, disability and meets quarterly to track progress against the objectives set out in the diversity and inclusion delivery plan.

5.4.2 Data presented quarterly to the action team is monitored to ensure that in the matter of adjudications and incentives scheme reviews and access to release on temporary licence (ROTL) prisoners within the protected characteristics groups are not disproportionately represented.

5.4.3 In the January to March 2022 quarter data shows that incentives scheme reviews were broadly in line with the proportions of protected group prisoners in the overall population, though it is clear that prisoners in the 22 to 39 years age group were more likely than other groups to be placed on a review. The number of prisoners from the black and mixed race groups placed on adjudication was higher than their proportions within the overall population.

5.4.4 It was noted in the same quarter that access to ROTL slightly favoured prisoners from white groups and this is being carefully monitored. Access to external employment opportunities is broadly in line with proportions of protected groups within the population and it is encouraging to see that the DI&E lead manager tracks the success rate of applications from all ethnic groups to all employers offering employment in order to identify any recruitment practices which may be discriminating against specific groups.

5.4.5 The submission of discrimination information report forms (DIRFs) is closely monitored. In this reporting period 35 DIRFs were submitted. Of these 16 were from prisoners within the black groups, 9 from those in the Asian and white groups and 1 from within the mixed race group.

	Asian collective	black collective	mixed race collective	white collective
Proportion within population	22.9%	15.2%	6.1%	52.3%
Proportion of DIRFS submitted	25.7%	45.7%	2.8%	25.7%

The data shows that a disproportionate number of DIRFs were submitted by prisoners from the black collective groups. In terms of the subject matter of the DIRFs the majority, 20 of 35, concerned race or faith and belief; 12 concerned disability and 1 concerned sexual orientation. These trends will be tracked by the DI&E action team.

5.4.6 The managers who oversee the various protected groups also organise forum activities and focus events to raise awareness. Events in this year have included young adults week, men's mental health day, a male breast cancer awareness event and a celebration of the life of George Floyd.

5.4.7 Dormitories are all at ground floor level and accessible via ramps. There are 4 rooms on W7 dormitory with hinged doorways wide enough to accommodate a wheelchair.

## **5.5 Faith and pastoral support**

5.5.1 The Chaplaincy Department supports the spiritual needs of all faiths or none. It is led by a full time Imam, part time Anglican, Catholic, Freechurch and Sikh chaplains with sessional input from various other faiths as required. One prisoner commented on how helpful the Christian chaplains had been when he suffered a bereavement. When there was an unexpected death of a prisoner the Chaplaincy staff offered support which was much appreciated by prisoners. This was a difficult time for prisoners and an IMB member attended a service which was very suitable for the prison population. Plans for a new multi-faith building have been drawn up but there is no date for building commencement.

5.5.2 Services are held regularly with bereavement and crisis counselling available as required to manage prisoners' needs. Festivals are observed and any special dietary requirements are supplied by the catering department. Board members have observed special services of several faiths and noted the benefits to prisoners involved.

5.5.3 Covid-19 has inevitably limited the services that the Chaplaincy Department can offer and this was the source of much frustration within the department. However, prisoners were offered social video calls and video viewing of funerals with one to one opportunities of prayer and candle lighting. In recent months the worship and prayer meetings for all faiths has resumed and there has been a general feeling of pleasure amongst all the prisoners that the Board has spoken to.

## **5.6 Incentives schemes**

5.6.1 The Board has received a number of complaints from prisoners who are working out of the prison that they are more likely to receive negative incentives scheme referrals. They believe this is because officers will note and log poor behaviour, but are less likely to give positive evaluations as they are not interacting with outworkers during the working day. The prison has been made aware of these concerns and is encouraging staff to log positive observations about prisoners who work out.

5.6.2 Records of referrals and reviews are meticulous, and the ratio of negative to positive observations is recorded quarterly. When the number of negative observations rises disproportionately officers are encouraged to register more positive observations.

5.6.3 Because the prison does not have a segregation unit the incentives scheme is the main tool available to positively manage behaviour. Reviews triggered by a



serious incident, particularly related to possession of forbidden items such as drugs or mobile phones, lead to demotion to basic level. Repeat offences can lead to transfer back to closed conditions. It is unusual for more than eight prisoners to be on basic level at any one time, and normally the number on enhanced level exceeds 500.

5.5.4 Review meetings are used positively by staff and seen as an opportunity to explore other issues with prisoners. Prisoners are given every opportunity to explain their behaviours and attainable targets are set to maintain or recover enhanced status.

## **5.7 Complaints made through the prison complaints system**

5.7.1 623 complaints were made by prisoners between April 2021 and March 2022. Almost 66% of these were processed within the required timescale. Of the complaints which take longer to process the majority are classed as external to the prison since they are received from prisoners who have transferred to other establishments and inevitably these complaints take longer to respond to.

5.7.2 During this reporting year the majority of complaints through the prison complaints system concerned Offender management issues and these accounted for 24% of complaints received. Complaints concerning prisoners' residential experience accounted for 13% of the total received and complaints about work and property were the next most frequently received. Of the applications made to the IMB this year property and offender management issues have been the most frequently raised.

5.7.3 Complaints from prisoners by age are broadly in line with the proportions of their age groups within the prison population as a whole, with the 25 to 44 years group submitting the most complaints.

5.7.4 Complaints received from prisoners by ethnicity are also consistent with the proportions of each group within the whole population.

## **5.8 Property**

5.8.1 As referred to in section 5.7.2 in the comments on complaints at the prison, the issue of missing property remains a major concern for prisoners.

5.8.2 Applications to the IMB regarding the loss of prisoners' property continue to give rise to concern and are extremely challenging for Board members to help. These issues often take up excessive amounts of members' time.

5.8.2 The Board has been disappointed to see that the promised new framework on prisoners' property has still not been published and hope that this will be rectified as soon as possible given the regularity with which prisoner property is misplaced, especially in transfer between prisons.

## **6. Health and wellbeing**

### **6.1 Healthcare general**

6.1.1 At the time of reporting there are no outstanding staffing vacancies within the healthcare team. Some healthcare services are sub contracted to Time for Teeth (dental) and Premier Services (physiotherapy and chiropody).

6.1.2 Midlands and East Midlands Advice Service provide information and advice on medication matters and meetings are held monthly. The pharmacy technician advises on matters locally.

6.1.3 Outbreaks of Covid-19 resulted in some dormitories being locked own on occasions and this affected the delivery of healthcare services during the reporting year. The team managed these difficulties well and with support from Public Health England continued to provide responsive care to meet the needs of the prison population at Sudbury. They have been fortunate to have had very little staff sickness and continue to wear face masks and carry out lateral flow tests for Covid-19 twice weekly. This practice reflects the system in healthcare settings in the community. Prisoners are required to wear face masks when visiting the centre.

6.1.4 The health resilience lead within the prison worked alongside the healthcare team and was central in helping to control the spread of Covid-19. Potential future health challenges such as monkey pox will be managed in the same way.

6.1.5 The Board has received no complaints about access to healthcare in this reporting year. The Healthcare provider has received 6 complaints and 56 concerns have been raised during the reporting year. All the issues have been addressed. 86 positive comments on the healthcare provided were also received.

### **6.2 Physical healthcare**

6.2.1 Access to a registered nurse is provided daily with referrals to specialist services as necessary.

6.2.2 A general practitioner (GP) is employed for 12 hours a week and a stand in GP is also available on one morning every two weeks. There is currently a wait of approximately two weeks to see a GP. If immediate attention is required staff will use a local urgent care centre or hospital accident and emergency department. One of the current registered nurses will very soon have completed a nurse prescribing qualification which will improve healthcare delivery. A part time agency nurse with the prescribing qualification currently provides support in the absence of the GP.

6.2.3 The Covid-19 situation has led to an increase in prisoners waiting for dental services. There are currently 122 men on the waiting list facing an average wait of 20 weeks before being seen. Prisoners are encouraged whilst on ROTL to visit their own dentist but many community dentists are in a similar position. Urgent dental cases are seen by a local dentist. There are only nine prisoners on the waiting list for physiotherapy appointments and a wait time on average of two weeks. Podiatry wait times are around six weeks.

6.2.4 There are currently five prisoners with complex health needs and they are reviewed monthly or more often if necessary.

6.2.5 Plans to install a tracker unit for the storage of medications which are held by prisoners themselves has been delayed due to technical issues. The tracker unit will store medication which prisoners will only be able to access using fingerprint technology.

6.2.6 Most prisoners have agreed to join the GP2GP system which will directly transfer their health records to their new GP when they move from Sudbury.

6.2.7 Routine clinics such as asthma, diabetes and vaccination clinics were resumed in April 2022. Prisoners eligible for aortic screening will receive appointments in July.

6.2.8 A prisoner has been trained as a healthcare orderly and helps with tasks such as taking blood pressure, weighing and with reception duties.

6.2.9 Data on attendance at medical appointments for March, April and May 2022 is included in this report. Attendance at nurse led clinics average between 75% and 78%. Attendance at GP appointments is between 81% and 100%. Non attendance is mostly due to prisoners' failure to notify the department that they wish to cancel their appointment.

6.2.10 All necessary hospital appointments for prisoners have been successfully arranged.

### **6.3 Mental health**

6.3.1 A psychiatrist visits every two weeks. If necessary individuals will be allocated to one of the mental health practitioners following assessment. There are currently 2.5 full time equivalent registered mental health nurses within the healthcare department. There is currently no access to psychologist services.

6.3.2 Individuals can be seen within one to two days if they present an urgent mental health need. In the case of an acute mental health need the department will use external mental health services.

### **6.4 Social care**

6.4.1 Social care is provided by South Derbyshire Social Services.

6.4.2 Referrals have continued throughout the reporting year. Where there have been delays in obtaining equipment or assessment this has been the result of the impact of Covid-19 on wider external services.

### **6.5 Exercise, regime**

6.5.1 Prisoners at Sudbury enjoy the freedom provided in an open establishment. Positive attempts have been made to enhance the environment, for example by the provision of outdoor seating and tables. These have been observed to be well used.

6.5.2 Use of gym facilities has again been affected by Covid-19 restrictions, which have required that prisoners have been timetabled by dormitory for 1 hour per week

during which there is access to only certain equipment. Timetabled sessions have on occasions been cancelled because of re-deployment of staff for Covid-19 lockdown duty.

6.5.3 Outdoor gym facilities have continued to be well used and staff also supervised outdoor exercise during periods when the gym could not be used. The reintroduction of the park run programme has proved very popular with prisoners.

6.5.4 With the relaxation of restrictions other activities have been organised, for example a five kilometre and ten kilometre run. A walking football competition was organised with Healthcare in May.

## **6.6 Drug and alcohol rehabilitation**

6.6.1 Substance Misuse Services (SMS) are provided by Inclusions. The centre they run within the prison is client focused and the environment is helpful to counselling outcomes.

6.6.2 When individuals are identified as struggling with substance misuse, or have previously done so, a letter providing details of the prison family engagement officer and other information is sent to the prisoner's family or named contact. The information includes details of how to contact support services for themselves or their children, how to contact the prison substance misuse team and other helpful literature on how substance misuse can impact on family and friends.

6.6.3 In common with other services, there has been a decrease in referrals to the service this reporting year due to the continued impact of Covid-19. Referrals are just beginning to increase and can be made by the individual themselves or from the sending prison. The outcomes of adjudications may also make it a condition of remaining at Sudbury that the prisoner engages with the service for support and rehabilitation.

6.6.4 The main focus of care is client centred and individual treatment plans are put in place. Acupuncture into the outside of the ear is available.

6.6.5 At the time of reporting the substance misuse team are working with about 10% of the population at Sudbury. During March, April and May of 2022 12 men had completed their treatment and are now drug free. Nine men have been released with external support.

6.6.6 The team are currently planning the introduction of the Inclusion Step Forward programme. The course will focus on changing the behaviours that have led to substance misuse and preventing relapse. It is designed to give individuals the skills to make positive changes to their lifestyle. It may be useful also to explore ways that physical and educational experiences can make a contribution.

6.6.7 The team are also planning a more family centred approach which will enable families to better understand the addiction and recovery services available to them. The Board recognises this as a positive approach which may help to prevent relapse and future return to prison.

6.6.8 The team run a monthly forum and weekly coffee mornings for current and past users of the service which can also be attended by prisoners who may want to find out about getting help and support.

6.6.9 The Alcoholics Anonymous and Narcotics Anonymous services have just started up again at the prison and a cocaine awareness group is being introduced given it's illegal use in the prison.

6.6.10 Given the wide age range of prisoners at Sudbury the team are looking to develop both young and older person centred programmes.

## **6.7 Soft skills**

6.7.1 A three stage Work Skills programme is in place with incentives for the completion of each stage. Completion is a requirement for ROTL. The programme encompasses a range of issues such as timekeeping, respect and communication and working as a team. Completion is generally in the workplace but some are completed by prisoners in their room.

6.7.2 Provision of creative activities was restricted by Covid-19. After a delay the music room has now been reopened and the equipment is well used. A creative writing course was operated through Education and the Library has received praise from participants. Creative activities are run by SMS. Art materials are made available for prisoners to use in their rooms. No art or music tuition is provided.

6.7.3 The Anglican Chaplain holds a monthly meditation session which is open to members of all faiths or none.

6.7.4 Family and relationship courses are run and the Salvation Army 'Find a Family' scheme has been approached by two prisoners.

6.7.5 In line with the prison focus on the care experience for Imprisonment for Public Protection (IPP) prisoners an IPP forum has been recently established.

6.7.6 Opportunities exist for peer support in a number of areas. For example, the prisoner information desk (PID) is staffed by prisoners at various times of the day to enable access for all prisoners to forms and information. The Prisoner Council has been reconvened and meets with the Governor monthly. Induction orderlies assist new arrivals to settle in.

6.7.7 The site environment is generally well maintained, with both open and covered areas. A small wildlife garden is being constructed and whilst problems with vermin rule out some wildlife friendly options a link has been established with Derbyshire Wildlife Trust to explore other opportunities around the site, given the undoubted contribution of nature to well being. It may be useful to consider offering employment opportunity routes in the conservation sector.

## **7. Progression and resettlement**

### **7.1 Education, library**

7.1.1 The education provider is People Plus. Functional skills courses are provided in English, Maths and Information and Communications Technology (ICT) at Entry level, Level 1 and 2. Eight prisoners are engaged in Open University courses. Education is spread across two buildings each having a welcoming appearance and attractively presented displays. Whilst facilities appear well maintained and have high accessibility the computer facility in one building has been out of use for an excessive length of time due to external damage. The inadequacy of IT facilities is an issue which needs to be addressed.

7.1.2 Access to education has again been restricted during the reporting period due to Covid-19, with class numbers limited. Staffing vacancies also created issues with education delivery. New staff have been appointed at the end of 2021 in maths, ICT and employability. Support in classes is provided by a recently appointed learning support teacher and also by prisoner peer support workers. A prison action plan was implemented to address concerns raised in the 2021 Office for Standards in Education (OFSTED) report regarding the effectiveness of in room learning offered during Covid-19 restrictions. An orderly in Education remarked to a Board member that learning in this way was ineffective or even impossible given the room sharing nature of accommodation. By the beginning of 2022 the focus had returned to classroom delivery.

7.1.3 Take up of courses is variable. By the time prisoners arrive at Sudbury their primary aim is to pursue vocational opportunities within and outside the prison. In addition, the average length of stay in the prison is short. 75% of prisoners serve about one year or less and 45% less than six months. This situation discourages prisoners from starting on longer term courses. Communication of information about courses is problematic. The information sheet given to prisoners at induction gives only a bare outline of courses. The course displays and task booklets displayed in the dining hall are rarely looked at by prisoners. In any case, the dining hall is now unused by most prisoners since they collect their food and return to their rooms to eat. However, this system is being reviewed. There is a concern about the educational levels of some prisoners arriving at Sudbury. During April and May of 2022 22% of arrivals were below Level 1 in English and 25% were below Level 1 in Maths. Liaison with prisons routinely sending prisoners to Sudbury is now taking place to ensure that both other establishments and prisoners understand the importance of English and Maths for progression.

7.1.4 When prisoners begin education or training courses they are expected to complete them. The nature of a prisoner's experience, however, means that they may be unable to complete what they have begun because of operational reasons beyond their control. Such cases represent an agreed withdrawal from the course. If the prisoner withdraws from the course because they do not want to remain it will be defined as a non-agreed withdrawal. Prisoners are encouraged to improve their levels of achievement in English and Maths (functional skills). In this reporting year 34 men began level 1 qualifications in English and 38 in level 1 Maths. 14 men failed to complete their Maths course and of these 7 were non-agreed withdrawals. This seems to indicate that the retention of learners is low.

7.1.5 There is limited progression onto level 2 English and Maths courses. Only 3 men began level 2 English and 4 began level 2 Maths during the 2021 to 2022 reporting period.

7.1.6 The prison fell behind in 2021 in providing support to prisoners with specific learning needs due to staffing issues. The newly appointed learning support member of staff has made progress in addressing this and now screens prisoners at induction for learning strengths and weaknesses. Identification of learning needs is made from this and from records of previous achievement. However, problems can arise for prisoners arriving from private prisons where attainment has not been recorded and when certificates have been mislaid. This leads to frustration on the part of prisoners who are required to repeat courses.

7.1.7 The criteria used for curriculum planning include labour market intelligence and regular needs analyses from prisoners and focus mainly on providing training which will lead to qualifications and experience in line with traditional employment opportunities. There are no courses offered in developing vocational areas such as biodiversity or conservation.

7.1.8 There is no course provision for English as a second or foreign language (ESOL). It is expected that help for prisoners will be provided by learning support staff and peer mentors. Similarly there are no courses with the needs of older prisoners in mind.

7.1.9 The virtual campus provides IT access for prisoners. Some tutors have also uploaded work programmes onto this facility. Access to the virtual campus is limited by computer provision and whilst two additional computers have been allocated to the Library one of the computer facilities in Education remains out of use. Three applications for Open Borders access were approved in April and three Coracle laptops issued to Open University students. There is a high degree of frustration amongst staff at the inadequacy of the IT provision.

7.1.10 The Library service is provided by Suffolk Libraries. The Library provides a welcoming environment and is well resourced with a range of books and DVDs as well as newspapers and magazines and materials required by statute. The Library service is advertised on Way Out TV. Long term staff shortage due to illness has placed considerable pressure on other staff and the Library Support Workers who are prisoners who volunteered to keep the Library open when no staff were available. Whilst the Library has been closed on a number of occasions every effort appears to have been made to avoid closures. In March 2022 the Library was open for 93% of it's scheduled hours. Reading materials were provided in those dormitories experiencing lock down.

7.1.11 The Library is run positively and imaginatively. One Librarian has recently been awarded 'Outstanding Family Reading Co-ordinator by the prisons reading group for introducing Share a Story at Sudbury which proved popular during lockdown. Staffing has been arranged for Storybook Dads but this has not yet begun due to waiting for memory devices to be provided by the prison.

7.1.12 Displays are placed in the dining hall monthly to promote the range of library stock available to borrow. Some raise awareness of equalities issues such as black history month and others social issues such as stress awareness week. Displays

have also encouraged prisoners to pursue cultural activities such as the Koestler Arts awards. A World Book Day competition was advertised.

7.1.13 A Library Induction has begun again. In March / April 2022 61 of 62 prisoners attending induction joined the Library. DVDs are the most popular items to be borrowed and accounted for 60% of items borrowed in March / April when books accounted for 30%. On average there are around 100 prisoner visits to the Library each day. The ethnicity of visitors broadly reflects the proportion of each group within the whole population.

## **7.2 Vocational training, work**

7.2.1 For a considerable part of the year Covid-19 restrictions limited numbers in some work placements. Internal work provides qualifications in bricklaying, painting and decorating, and catering. Courses run by Railtrack and Step into Construction have both restarted. Both these courses are popular and have waiting lists. Learners on these courses have been well retained with only 4% of those who did not complete being non agreed withdrawals. Men have frequently commented very positively about the support offered by some of their tutors.

7.2.2 Other internal work includes Recycling Lives, market gardens and wood assembly work. Prisoners also work in the kitchen and laundry, recycling and as dormitory cleaners. The projects team utilises the skills of qualified prisoners and carries out plumbing, electrical and building work around the site. The re-opening of the fully functioning café outside the gate at Sudbury provides authentic public facing front of house roles, including developing barista skills, in addition to work opportunities in the kitchen. The garden shop outside the gate sells produce from the market gardens area and provides a retail work experience. Both café and garden shop regularly receive positive comments from members of the public who use them.

7.2.3 On arrival at Sudbury men can select a work or training placement if the criteria are right. Many, however, are given an initial eight week placement in the wood assembly areas where orders for pallets, fence panels and military target boards are completed. Following this period they can apply for a change of work location.

7.2.4 Whilst Covid-19 disrupted the number of external work placement opportunities staff in the resettlement area continued to liaise with employers regarding job vacancies for ROTL and on release. By March 2022 numbers in external work placements were approaching pre-pandemic levels at 168. Initially there were some issues with insufficient numbers of prisoners on the scheme to fill the vacancies on offer but this has now begun to ease. There is no shortage of warehousing type vacancies but employers seem reluctant to offer more specialised opportunities and this has been frustrating for some prisoners. Placements in charity organisations ceased with the Covid-19 restrictions and have been slow to reappear.

7.2.5 Men are required to complete a course in employability skills before gaining an external work placement. These were run on a one to one basis for several months with men completing tasks in their rooms. This negatively affected the experience for prisoners and attendance suffered as a result. New staff have been recruited and class based activity has resumed. There is a waiting list for the course.



7.2.6 A new employment hub has been set up where vacancies are advertised and support offered. The hub is open most of the day and evening to ensure prisoners can access it.

7.2.7 Some prisoners attend external training courses with four having completed an electrician course at Derby University.

7.2.8 A significant number of men express a wish to develop their own businesses. The Prisoner Council has proposed using expertise of prisoners in a job club type of facility. A course offered by Rocketeer is being set up but otherwise there seems to have been a limited response to this idea.

7.2.9 Some men have been set targets by the parole board which cannot be met through the course provision at Sudbury and on at least one occasion this has meant a prisoner has had to return to closed conditions in order to complete the requirements set.

7.2.10 Discussions with the Prince's Trust are taking place to try and provide more opportunities for younger prisoners. In addition an IPP forum has been set up to consider the support needs for those prisoners in terms of applying for and undertaking external work placements.

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

7.3.1 Staff in the offender management unit ( OMU ) have been under pressure since restrictions eased and absence through illness has added further strain. The need for additional staff has now been recognised and funded.

7.3.2 Issues related to offender management account for 24% of prison complaints over the year. A significant number of applications to the IMB also concern offender management. Comments received have related to lack of communication from POMs following their induction interview. Also commented on has been the seeming differences between prisoners in terms of the waiting times for approval of applications for ROTL. It is clear that these dissatisfactions are partly due to an unrealistic expectation of the processes involved. Sending establishments could assist in reducing this by providing accurate information to prisoners before they transfer into the open estate. The approval of ROTL often relies upon collaboration with a range of external agencies which cause the delays experienced by prisoners. For example, it would appear that some police forces take longer than others to complete vetting procedures. Similarly, one case of delay in approving ROTL notified to the IMB was due to the offender manager in the community having left their post without the prison being notified and so communication was unsuccessful. Application for ROTL is potentially complex and sometimes delays will result because necessary information has not been supplied on the application.

7.3.3 It is the case that members of the Board do also receive comments from prisoners which shows they are satisfied with the speed and efficiency with which their ROTL applications have been handled. This highlights the need to ensure consistency of approach across the organisation.

7.3.4 Men receive an induction talk by the OMU on arrival at Sudbury including information sheets. They receive their initial interview promptly. Complaints relating to offender management seen by the IMB have been responded to promptly.

## **7.4 Family contact**

7.4.1 The Covid-19 restrictions affected the ability to offer family visits hugely and for a considerable time there were no family visits at all. Families were able to keep in touch through the provision of video calling which enabled the maintenance of visual contact. The reintroduction of face to face visits has meant that family visit activities can now be offered. A family worker is available, funded by the Prison Advice and Care Trust (PACT), and this has provided great support to prisoners and their families.

## **7.5 Resettlement planning**

7.5.1 Of men discharged between December 2021 and May 2022 45% left with employment to go to. Amongst those men who had been on the paid out work scheme whilst at the prison 79% left with employment to go to. However the number of men discharged into employment specifically between March and May of 2022 (58% overall and 88% of those previously on the out work scheme) indicate that before March employment opportunities for discharged men were still affected by Covid-19 factors. Between November 2021 and April 2022 7 men were discharged without recorded accommodation to go to and were referred by the prison to their Community Offender Managers.

7.5.2 In March/April there were 321 overnight releases on ROTL and 973 day releases. In only 0.6% of these did prisoners fail to comply with the terms of their ROTL agreement.

7.5.3 Prisoners are still finding difficulties with opening bank accounts before they are released. The prison is required to use the New Futures Network bank which rejects many applications. Some men have applied to other banks but find that their identification documentation does not meet requirements.

7.5.4 The recently appointed employment hub manager has identified that some men do not have curriculum vitae (CVs) prior to release. This is being addressed in induction and with weekly CV building sessions. The prison has now addressed the problem of a lack of computers for CV writing and is trying to find a solution to the problems with printing facilities.

7.5.5 Good progress has been made in reducing action points on the reducing reoffending action plan.

## The work of the IMB

The work of the Board has been only partially affected by Covid-19 restrictions this year. For the most part Board members have been able to visit the prison and carry out rota visits and attend meetings as usual. The Board had two member resignations within a few weeks in early autumn 2021 which has naturally applied more pressure on the remaining members. We currently only have less than half of the recommended number of Board members. Three recruitment campaigns have produced no additional applications for membership.

The Board continues to enjoy effective relationships with senior managers and the Governing Governor.

### Board statistics

Recommended complement of Board members	11
Number of Board members at the start of the reporting period	7
Number of Board members at the end of the reporting period	5
Total number of visits to the establishment	210
Total number of shifts on the 0800 telephone line*	N/A
Total number of segregation reviews attended	0

\*if relevant

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

Code	Subject	Previous reporting year	Current reporting year
A	Accommodation, including laundry, clothing, ablutions	0	3
B	Discipline, including adjudications, incentives schemes, sanctions	0	0
C	Equality	1	1
D	Purposeful activity, including education, work, training, library, regime, time out of cell	1	4
E1	Letters, visits, telephones, public protection restrictions	0	3
E2	Finance, including pay, private monies, spends	0	1
F	Food and kitchens	0	0
G	Health, including physical, mental, social care	0	0
H1	Property within this establishment	0	0
H2	Property during transfer or in another establishment or location	2	7
H3	Canteen, facility list, catalogue(s)	1	0
I	Sentence management, including HDC, release on temporary licence, parole, release dates, recategorisation	1	7
J	Staff/prisoner concerns, including bullying	0	3
K	Transfers	1	0
L	Miscellaneous, including complaints system	0	6
	Total number of applications	7	35



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