

Chair, Independent Monitoring Board  
HMP Bedford  
St Loyes  
Bedford  
MK40 1HG

11 January 2023

*Dear Chair,*

**HMP BEDFORD: INDEPENDENT MONITORING BOARD ANNUAL REPORT  
FOR 1 JULY 2021 – 30 JUNE 2022**

Thank you for your Board's report for the year ending 30 June 2022. I am very much aware of the amount of effort that goes into producing annual reports and thank you for providing a comprehensive picture of HMP Bedford over the reporting period, particularly as you continued to operate with several vacancies.

I was saddened to hear there were three deaths in custody during the reporting. As you are aware the Prisons and Probation Ombudsman (PPO) carry out independent investigations into deaths in custody and I would like to assure the Board my officials take recommendations from the PPO very seriously. I address below the specific points you have raised for my attention.

We are committed to improving mental health outcomes for people in contact with the criminal justice system ensuring that people with acute mental health needs receive timely support and in the most appropriate setting. In June 2021, the Government published the draft Mental Health Bill for pre-legislative scrutiny. The Bill contains measures to speed up access to specialist inpatient care and treatment. This includes the introduction of a statutory 28-day time limit for transfers from prisons and other places of detention to secure hospitals. This time limit, together with operational improvements, will help reduce unnecessary delays and ensure people in the criminal justice system receive swift access to treatment.

A new National Partnership Agreement on Health and Social Care in England is also due to be published shortly. This will set out a detailed shared priority workplan to deliver safe, decent and effective healthcare for people in prison. At HMP Bedford, it is acknowledged that earlier this year the 28-day target was not being met and in some cases was taking considerably longer. The Governor and his team consequently worked closely with healthcare commissioners to strengthen this pathway and the most recent referrals resulted in prisoners being promptly admitted to an appropriate mental health facility.

Support for prisoners presenting with personality disorders is provided through a national service offer in place for all prisoners that are screened into the Offender Personality Disorder (OPD) pathway. Support is also available to Offender Managers overseeing these cases. At HMP Bedford, the OPD Core Offender Manager service is now in place through the Offender Management Unit, with probation staff working alongside psychology practitioners. This service is designed to identify those prisoners who are in scope for the pathway and where required delivers psychological consultation and formulation activities with the Offender Manager to support the development of an appropriate sentence plan. OPD Pathway treatment and progression services are available nationally in every security category for those who require a specialist intervention. These services also continue out in the community.


More locally, the Governor has introduced, and chairs, a monthly Mental Health Steering Group which is attended by the prison's healthcare provider and others such as the Head of Mental Health and Forensic Inpatients for Specialist and Secured Services, Lead Clinical Psychologist, and the prison's relevant functional heads. The purpose of the meeting is to enhance and expand the mental health support within the prison. Other strands of work currently undertaken by the Governor are a project with the Police and Crime Commissioners Office to look at pre and post custody mental health support and the effectiveness of diversion from custody at the point of arrest, along with engagement with the new integrated care service model.

As the Board will be aware, the prison was subject to a full HM Inspectorate of Prisons inspection in 2022, which included the Care Quality Commission (CQC), and many positive remarks were made, namely between 4.67 and 4.71 of the report (published June 2022; full report available on the HM Inspectorate of Prisons website and at <https://www.justiceinspectorates.gov.uk/hmiprison/inspections/hmp-bedford-6/>). Despite all the challenges faced within the prison, the healthcare provider was deemed to be providing satisfactory mental health care.

It was encouraging to receive your comments about continued improvement of purposeful activity together with workshop provision. I was also pleased to note the positive action resulting from the monthly Diversity and Inclusion meetings, and the continued service and dedication of the Chaplaincy Team to support prisoner wellbeing.

I note you have raised some local issues of concern in your report which the Governor will continue to keep you aware of as work continues. HM Prison and Probation Service (HMPPS) comments in response to other issues raised in your report are set out in the attached annex.

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

Sincerely  


**Damian Hinds**  
**Minister for Prisons and Probation**

## HMP BEDFORD: INDEPENDENT MONITORING BOARD ANNUAL REPORT FOR 1 JULY 2021 – 30 JUNE 2022

### HMPPS comments on matters raised in the report

#### **Assessment, Care in Custody and Teamwork (ACCT)**

##### *Effectiveness Evaluation*

An evaluation of ACCT v5 was conducted which led to the development of the revised ACCT v6 which was piloted before being rolled out across the prison estate. These revisions include better multi-disciplinary team working; a consistent quality assurance process; and an improved focus on identifying and addressing an individual's risks, triggers, and protective factors.

##### *ACCT Form*

The revised ACCT v6 included revisions to the process and document. The care plan section of the ACCT v6 document is a separate section at the beginning of the document which is designed to contain all of the key information pertaining to the individual which staff require. This enables any member of staff working in an establishment to read the care plan and understand; the person, their situation, what they struggle with, what helps them to cope and the support for the individual. Having all of this information readily available ensures that gaps are identified and areas of risk are reduced. The care plan helps the ACCT case co-ordinator to effectively assess and respond to identified risks using a person-centred approach. All staff working within a prison are responsible for completing the care plan with key information as and when it may arise.

HMPPS is developing a suite of modules as part of a Safety Support Skills Training package. One of these modules will focus on risks, triggers and protective factors. This will improve staff understanding and knowledge of what drives violence and self-harm in prisons, how to identify individuals at risk of harming themselves or others, how to record and share this information with those involved in the individual's care, and how to take effective action to mitigate against those risks and protect staff and prisoners.

#### **Overcrowding**

Accommodating two prisoners in a cell designed for one is never desirable but continues to be necessary across the estate in order to accommodate all those committed to custody by the courts. Annually published figures show that crowding across the prison estate reduced from 22.5% of the population to 20.6% between 2018/19 and 2021/22, equivalent to approximately 4,300 fewer prisoners held in crowded conditions.

HMPPS is investing £3.8 billion to deliver 20,000 new, uncrowded prison places. There may be options in future to further reduce crowding levels, for example if population growth is slower than projected and there is sufficient headroom in the estate, it will enable targeted reductions of the least suitable prison places (including crowded places), but it is not possible to commit to this based on the latest projected population. It is also difficult to predict how these national trends will play out at a local level and the proportion of prisoners held in crowded cells at HMP Bedford will ultimately depend on regional population levels and demand.

In May 2022, HMPPS published a revised framework for the certification of prisoner accommodation, from which the useable operational capacity of the estate is derived. While most single cells in the prison system could physically hold two people, the determination of the maximum crowded capacity of a particular establishment is a matter of operational judgement, considering risks to safety and stability. In

times of severe population pressure, establishments will be expected to hold as many prisoners as they can safely accommodate, but equally clear that that number should be determined by the operational managers responsible for managing the prison, not by a central process or by wider supply and demand issues.

### **Disabled Prisoners**

Prisoners with disabilities at HMP Bedford are accommodated as much as possible, however it is acknowledged there are challenges at the site due to the prison's built environment as a Victorian-era prison. The initial design of the prison did not take account of the accessibility needs of disabled people and HMP Bedford is also a Grade One listed building and subject to regulations which protect its historical and architectural significance. Consequently, any alterations and building work cannot be carried out without written consent from the relevant authorities.

Capital investment is needed to adapt more cells, to install ramps and lifts, and this is unlikely to be made available due to the current financial climate. Currently there are no works scheduled for adapted/accessible cells at HMP Bedford. If there is a specific need and solution, this will need to be raised by the establishment through the correct channels. Additionally, due to the limited funds available, HMPPS has to prioritise works very carefully to make best use of that funding focusing on risk to life and risk to capacity, decency and sustainability, and currently demands for maintenance are much greater than the available funding. Although disabled prisoners are restricted by features of the built environment at HMP Bedford, the prison and HMPPS will continue to facilitate the needs of these prisoners as much as possible.

### **Personal Escort Record (PER)**

Healthcare providers can access the digital PER and guidance was issued to all providers across HMPPS when the digitalised PER was introduced. Reception and Healthcare staff at HMP Bedford work collaboratively to ensure that relevant information from the digitised PER is communicated to Healthcare staff. Several nurses are now able to access the new system and access for all nurses is being rolled out. Nurses now have to sign to confirm that they have read the PER to demonstrate management of this risk.

The prison asked the escort contractor (Serco) to improve the quality of the information provided in the PER, including about any known health issues, detoxification requirements, offences and risks. The prison carries out quality assurance checks on PER documents and the information being provided has improved.