



Chair, Independent Monitoring Board  
HMP/YOI Bronzefield  
Woodthorpe Road  
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**MoJ ref:** SUB102719

2 February 2023

Dear Chair,

**HMP/YOI BRONZEFIELD: INDEPENDENT MONITORING BOARD ANNUAL REPORT  
FOR 1 AUGUST 2021 – 31 JULY 2022**

Thank you for your Board's report for the year ending 31 July 2022. I am very much aware of the amount of effort that goes into producing annual reports and I am grateful to you for providing a comprehensive picture of HMP/YOI Bronzefield, especially as you had a few vacancies. I note several surveys were undertaken by the Board throughout the reporting period and I thank you for drawing the results to my attention.

I was saddened to hear there was one death in custody during the reporting year. As you note the Prisons and Probation Ombudsman (PPO) carry out independent investigations into deaths in custody and I would like to assure the Board that my officials take recommendations from the PPO very seriously. I was pleased to read that HMP/YOI Bronzefield had acted on those recommendations made following the death of a newborn baby in 2019.

I address below the specific points you have raised:

The transition period following the unification of Probation Service has indeed affected the delivery of resettlement services in some prisons. As the Board may be aware, the embedded Pre-Release team in HMP/YOI Bronzefield is responsible for providing immediate resettlement needs and pre-release support for all women in the prison including the unsentenced and women out of area. The minimum screening for resettlement needs is through completion of the Basic Custody Screening Tool 2. This includes sustaining accommodation where possible. I would like to reassure the Board that HM Prison and Probation Service (HMPPS) Regional Probation Directors are working to stabilise the Pre-Release teams and Commissioned Rehabilitative Service (CRS) provision to improve service delivery to all people in prison. Within the annex of this letter is the Mayor's Office for Policing and Crime (MOPAC) response to women being released in London with no fixed abode.

Recently, the London Probation Service has developed a new co-commissioned Women's Service, in partnership with MOPAC, Lambeth Local Authority and NHS England. The contract is split into three sub-regional lots and provides the service for North London and South London. This new service went live on 1 December 2022 and, in addition to the original CRS service delivery offer, provides an accommodation worker at HMP/YOI Bronzefield for urgent accommodation referrals (less than 14 days before release). This includes voluntary Health Advocacy services to link women with substance misuse, mental and

physical health issues into relevant statutory services on release and continuity of care and services to unsentenced women on remand at HMP/YOI Bronzefield. This new model, which includes a specific strand for housing, is being implemented for the first time at HMP/YOI Bronzefield. A new provider has taken over responsibility and is putting in place the required staff and resources. Outcomes will be tracked as part of this service and there are measurable outcomes specific to housing after release.

I note the Board's comments about transgender prisoners. All transgender prisoners at HMP/YOI Bronzefield have management plans in place, which are carefully monitored. Latest figures show that over 90% of transgender women are managed in men's prisons. The Ministry of Justice and HMPPS takes the allocation of these prisoners very seriously, and those allocated to the women's estate are subject to a rigorous risk assessment. My officials are currently strengthening policy so that transgender women who have committed sexual offences or who retain birth genitalia will no longer be held in the general women's estate, with exemptions to these new rules considered on an exceptional basis.

I recognise the vulnerability of many transgender prisoners in custody, and all known risks, both towards and presented by a transgender person, will always be factored in their care and management. If there are exceptional circumstances where the new policy would create such serious risk to an individual these will be considered, and HMPPS will continue to support prisoners to live in the gender with which they identify, regardless of where they are held. The new transgender prisoner policy framework is due to be published early 2023.

Turning to some positive comments captured in your report, it was encouraging to read, despite it being a challenging time, prisoners felt safe and well cared for by staff during the Covid-19 pandemic. Likewise, the feedback from peer workers how much they enjoyed their jobs around the prison and the good care one woman received facilitating her partner's presence at an antenatal class. Your comments about the opening of the Everyday Situations Made Easier (ESME) room were also pleasing to note.

I note you have raised some local issues of concern in your report which the Director will continue to keep you aware of as work continues. HMPPS comments in response to other issues raised in your report are set out in the 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/YOI Bronzefield.

Yours sincerely,



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

## **HMP/YOI BRONZEFIELD: INDEPENDENT MONITORING BOARD ANNUAL REPORT FOR 1 AUGUST 2021 – 31 JULY 2022**

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

#### **Self-Harm**

Self-harm remains an exceptionally challenging issue for HMP/YOI Bronzefield. Funding has recently been approved for a pilot with young adult women (who make up a disproportionate amount of all HMP/YOI Bronzefield's self-harm rates), which it is hoped, will be successful in reducing self-harm among this specific group. Working with the mental health provider the Director is introducing the Sunrise project aimed at providing therapeutic and psychological interventions with several women with identified complexities and mental health. The Director hopes to see a decline in self-harm incidents as a result of this programme of work.

HMPPS will continue to do everything it can to address self-harm in women's prisons and recognises that there are considerable differences in self-harm trends by gender. A Women's Self-Harm Taskforce has been established to address the high rate of self-harm in women's prisons. To date, the Taskforce has undertaken the following:

- Recruited psychologists to assist delivery of enhanced support to women with the most complex needs;
- Funded a pilot to better support women in the early days of custody;
- Developed bespoke selection and assessment criteria for staff in women's prisons and started to roll out a bespoke model of staff training;
- Implemented a gender specific Offender Management in Custody model to provide each woman with dedicated support;
- Jointly commissioned a review of health and social care in the women's estate with NHS England to better understand the health needs in the women's estate.
- A Female Offender Delivery Plan is due to be published shortly which will describe further steps HMPPS is taking to reduce self-harm in the women's estate.

#### **Equality and Diversity Survey**

It is recognised some elements of the equalities provision suffered during the reporting year, largely because of staff shortages, as well as some of the Covid-19 restrictions the Director was required to comply with to manage local outbreaks. This made it very difficult to hold prison focus groups and face to face meetings. The Director is committed to having a proactive equalities provision and to promote a safe and inclusive environment for everyone. A new senior manager now has oversight of this area; governance and oversight are improving. Prisoner consultation has recommenced, and representatives are being developed across the range of protected characteristics. Local data is being effectively analysed to identify any issues of concern/weaknesses.

Nationally, we are hoping to relaunch the discrimination incident reporting form (DIRF) process this year (some staff have already started training on the process). It is hoped that with support from regional Equality Advisors and voluntary sector partners this will help improve the DIRF process for HMP/YOI Bronzefield and instil more confidence in the process.

External scrutiny for the DIRF process is currently agreed through the Zahid Mubarak Trust (ZMT) for seven establishments across the women's directorate and we are currently working with ZMT to plan the first round of visits to these sites. The remaining sites (including HMP/YOI Bronzefield) have been

encouraged to seek a credible source for scrutiny such as Criminal Justice System (CJS) partners. The embedded process and ensuring the forums specific to recommendation 24 of the Lammy Review will increase the confidence in internal systems.

In response to the other Diversity and Inclusion (D&I) issues identified from your survey, HMPPS D&I team is working closely with the regional Equality Advisors to provide support and guidance to HMP/YOI Bronzefield's D&I Leads. This team is also in the process of developing some new procedures which will help the local D&I Action Plan (AP). HMPPS Equalities Leads visit sites across the directorate to ensure compliance against policy, HM Inspectorate Prisons expectations, Lammy recommendations and other expectations.

More broadly, HMPPS Womens Directorate is committed to ensuring equality across the directorate, in order to meet the needs of a diverse population, as such all sites are requested to have the following in place to deliver against equality objectives:

- Local data analysis with live data not solely reliant on the equality monitoring tool, each outcome area to have a demographic lens to test for disparity, this data to be discussed at Equality meetings and help to create meaningful actions to remedy disparity and address negative perceptions
- The use of the Equality Health Check as a local assurance tool for D&I Managers/teams
- Have a strategy, AP and a bespoke need analysis against all protected characteristics and also include Ethnic Minorities, Foreign Nationals and Gypsy Romany Travellers cohorts.

### **Mother and Baby Unit (MBU)**

There is a wide range of fresh fruit and vegetables that mothers can order for their babies with many of these items provided free of charge. Other items can be purchased. Fresh items come from chosen suppliers and are subject to standard quality assurance processes. Should any of the goods be deemed unsatisfactory on delivery to the MBU, they are returned. As fresh products can be stored safely for seven days, staff work with the women on quantity control, so items funded by the prison are often ordered communally to try and reduce waste, avoid excessive ordering and the food running out of date.

### **Smear Tests**

Two additional nurses have been recruited and once their supervised practice has been completed, additional clinics will be established to reduce the current cervical smear waiting list.

## **The Mayor of London's comments on matters raised in the report**

### **Accommodation**

In the period following probation reunification it was recognised the in-prison housing support was insufficient, so in collaboration with the London Probation Service extra resources were added to this service to provide a dedicated housing support worker at HMP/YOI Bronzefield from January 2022. Unfortunately, long term staff sickness, recruitment and vetting issues led to periods when this support was not consistently available.

MOPAC has contributed to the Safe Homes for Women Leaving Prison Initiative and have worked with London's partner agencies to produce the recently launched Women's Prison Release Practice Briefing. This is a unique resource for agencies not only in London, but across England and Wales, that seek to

improve accommodation outcomes for women leaving prison. It gives an overview of factors to be aware of when commissioning or delivering services to women in the CJS, it explains why a distinct gender-specific, trauma-informed approach is needed; sets out agency roles and responsibilities; and provides examples of good practice and governance. It is primarily aimed at commissioners, Governors/Directors of prisons, prison resettlement leads, local authority housing teams, housing providers, police, probation practitioners including third sector Women's Specialist service providers and government departments.

MOPAC is working with a local authority in London to explore options for additional dedicated accommodation that can be specifically ringfenced for women who have been affected by the CJS.

### **Home Detention Curfew (HDC)**

MOPAC is aware of the delays and issues concerning the Metropolitan Police not risk assessing accommodation in the London area for early HDC releases (in other contexts to support the imposition of electronic monitoring). These issues were highlighted and underlined in the recent HMI Probation thematic inspection report on Electronic Monitoring published on 18 January 2022. MOPAC has worked in consultation with London Probation and the Metropolitan Police Service to ensure that a solution is found. A process is in place for checks to be undertaken more reliably, especially for cases with known risk of serious harm. A new unit is now being created in partnership between London Probation and the Metropolitan Police Service to provide additional resources for these checks to be conducted in a streamlined process and for relevant information to be passed back to probation and prison authorities for HDC decisions to be made. MOPAC will continue to monitor and advocate for improved performance in this area, which remains a keystone of effective risk management and reducing risk of violence against women and girls.