



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

**For reporting year  
1 September 2022 to 31 August 2023**

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# Introductory sections 1 – 3

## Executive summary

In the reporting year, the IMB made a total 468 visits to Feltham and received 134 applications (written submissions that young people and prisoners make to the Board). Our conclusions are:

- The lack of available operational staff and the loss of experienced staff are hampering the delivery of a rehabilitative regime.
- Staff shortages were a major problem in the reporting year on both A and B sides. As a result, the prison struggled to deliver the basic regime and time out of room was severely curtailed. Cancellation of activities was ongoing over the course of the reporting year.
- Education and rehabilitative programmes are limited and often not appropriate for the children and men in custody.

## 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 recognizes 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

Feltham is situated to the west of central London in the London Borough of Hounslow, very near to Heathrow Airport. It is now in the London ULEZ (Ultra Low Emissions Zone). The prison buildings are low rise, spread over a 45-acre site with extensive green open spaces. There are two large car parks for staff and visitors and a bus stop in the prison grounds. There is no train or tube station within walking distance.

The establishment comprises Feltham A YOI (Youth Offender Institution) for males aged 15 to 18 years, both convicted and on remand; and Feltham B HMP, which is a category C prison for men who are convicted and sentenced.

The age of the population has increased in the reporting period. At the end of the reporting year, approximately 33% of the A side population were over 18 years of age and 30% of B side were aged between 22 and 30 years<sup>1</sup>.

	1 Sept 2022		31 Aug 2023
Roll A (YOI) side	66		113
Roll B side	282		456
Including foreign national prisoners, A YOI side			35
Foreign national prisoners, B side			78

A total of 138 young people came in on remand over the course of the reporting year. At the time of writing (October 2023), approximately half of the A side children were on remand, awaiting conviction or sentence.

In previous reports for Feltham B, the term 'young adults' was used to refer to prisoners between 18 and 21 years old. However, with the increased age range, we now use the words 'men' or 'prisoners'. Where comments refer to both Feltham A and Feltham B, the term 'prisoners' is used. The words 'children' and 'young people' or 'young people' have been used to refer to prisoners on Feltham A, who are between 15 and 18 years old.

Where appropriate, this report has differentiated the Board's findings for Feltham A and Feltham B.

**Feltham A** comprises seven residential wings, but at no point during the reporting period have they all been operational, with Grebe unit permanently closed. In addition, the prison had an enhanced support unit (ESU), Alpine, for a small number of children with very complex needs; plus, a wing, Falcon, to temporarily house children separated under Rule 49 (where they are kept apart if they are judged to be a risk to

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<sup>1</sup> Figures included in this report are local management information. They reflect the prison's position at the time of reporting, but may be subject to change following further validation and therefore may not always tally with Official Statistics later published by the Ministry of Justice.

the rest of the prison population or staff, or would create a disturbance; or for a young person's own protection).

All rooms are single occupancy and fewer than half have in-built showers. The refurbishment programme to install showers in the remainder of the rooms halted throughout the reporting period.

The reporting year began well in Feltham A but became increasingly challenging as staffing levels fell. From July 2023, staff shortages led to a number of weekends where children were behind their doors for over 23 hours.

The Independent Review of Progress (IRP), carried out by HM Inspectorate of Prisons (HMIP) in October 2022, reported that children were unlocked for an average of 6 hours per day at the weekend, compared with 2.5 hours previously, an increase since the A side inspection. IMB monitoring does not support that these figures have been sustained throughout the year.

Tribute must be paid to the officers on duty. IMB monitoring repeatedly reports officers making every effort to maximise the regime. Reports also refer to the attitude and conduct of officers who treat the children with dignity and respect.

**Feltham B** holds sentenced prisoners and until January 2023 held young adults aged 18 to 21 years. The increased number of prisoners across the UK and pressure on places has necessitated a change to the maximum age cap and by August 2023 30% of B side were aged between 22 and 30.

This year, two units were re-opened. Cells are a mixture of single and double occupancy. All have toilets and basins and also phones, although some of these do not work. A rolling programme of refurbishment meant that not all units were open during the reporting period. Nightingale unit remains closed. There are no shower units in individual rooms. Ibis, the care, separation and reintegration unit (CSRU), is for men attending adjudications (a disciplinary hearing when a prisoner is alleged to have broken prison rules) or who have been placed in segregation following either adjudication or the good order or discipline (GOoD) process.

Wren unit is a therapeutic environment for those whose needs cannot be met on their residential unit. Formerly, it was a healthcare unit. Now, it no longer has nursing staff based there but has a group of experienced staff who, in the Board's view, deliver exceptional care to vulnerable prisoners.

The Board's monitoring reflects the fact that Feltham A and Feltham B operate as two discrete establishments. There is a single Governor and some joint resources, but the regime and many of the rules and operating procedures differ across A and B.

The Board can only monitor effectively with the co-operation and support of the Governor and her staff. The IMB appreciates the extraordinary job that the prison senior management and staff do on behalf of the public to contain and keep safe those held in custody and it wishes to commend the staff for their dedicated service.

### **3. Key points**

#### **3.1 Main findings**

##### **Safety: A side**

- Low staffing levels substantially reduced time out of room (TOoR) and caused a rise in incidents of protesting behaviour in the latter stages of the reporting period.
- In the Board's view, the needs of an increasing number of children with complex mental health needs cannot be met at Feltham. Children are referred to the ESU from other establishments with little prior consultation; no consideration is given to the impact on existing residents or how these children will interact with each other.
- There is an increased number of children self-isolating and this has an impact on the regime for others.

##### **Safety: B side**

- There has been a significant number of assaults in communal showers.
- There are high numbers of men refusing to attend education and/or workshops out of fear for their personal safety.

##### **Fair and humane treatment**

The integrated framework known as "Secure Stairs" for support, care and regular engagement with young offenders in custody does not appear to the IMB to be in successful operation. We understand from both the Youth Custody Service (YCS) and the Prisons Minister (with whom we corresponded in August) that Secure Stairs is the central policy governing YOIs. There are certain elements of Secure Stairs in place, such as guided reflective practice for staff, and "formulations" of child needs are prepared for each child. However, young people at Feltham do not come out of their rooms for enough time for meaningful engagement with support services. Rehabilitation is not delivered.

The Board reports that lost property causes anxiety and distress amongst all prisoners and creates volumes of frustrating work for staff whose time could be better spent elsewhere. The handling and transfer of prisoners' personal property is poorly managed throughout the prison estate, with no use of up-to-date bar code and tracking technology. Property is lost without trace; staff resources are wasted.

##### **Health and wellbeing**

Wellbeing services delivered through outreach to the residential units have been severely curtailed by both a lack of prison staff (and, to a lesser extent, a shortage of health care staff) and a lack of suitable private spaces on the residential units. There is a system for booking these spaces, but they are very limited and needed by multiple different agencies.

Lack of time out of room prevented access to exercise and education activities at different times throughout the reporting year, but particularly in the last three months over the summer. Custody Support Plan (CuSP) and Key Worker meetings were increasingly cancelled as staffing levels worsened.

### **Education and training**

Staff shortages on A and B sides limited access to education, particularly in the last three months of the reporting year. Fear of violence also prevented prisoners attending, particularly on B side.

Education for separated prisoners through generic “work packs” delivered to rooms is not effective, as these are over simplistic, poorly presented and not tailored to a child’s specific learning needs or objectives.

It is commendable that all prisoners now have laptops, but the IMB has yet to see these used as tools for delivery of education and vocational learning.

On B side, education and purposeful activity are not keeping pace with the needs of an older population. Workshops are now open and running but attendance is poor, facilities are under-utilised and many of the education and skills pathways are not meeting the real needs and future aspirations of the men now in Feltham B.

### **Progression and resettlement**

Lack of staff, both in the prison and working in probation in the community, is hampering sentence planning and release. Feltham B lost experienced Prison Offender Managers (POMs) in the reporting period. Resettlement meetings often happen only within a week of a release date.

The Board understands that, currently, the general policy is that no single transfers are permitted across the prison estate, which causes extreme distress for those far from home.

## **3.2 Main areas for development**

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

- What measures will you take to improve levels of available staffing for Feltham? What steps will be taken to retain experienced staff?
- The lack of staff in the Probation Service negatively impacts sentence and resettlement planning. This results in more work for prison staff. What steps are being taken to affect recruitment to the Probation Service?
- What measures will you be taking to ensure that staffing levels allow for prisoners to spend time out of their room engaged in purposeful activity?
- When will there be resources targeted to address the issue of prisoners’ lost property?

- In the previous year's annual report, the Board reported that the proportion of young people on Feltham A who have been in the care of the local authority is very high. In this year's report, there is no current accurate data, due to shortfalls in information available to the Social Work Practitioner at Feltham. The IMB suspects that it is still the case that many young people on Feltham A have moved directly into custody from local authority care, with either full-care orders or child-in-need status. What will the Government do to achieve better information sharing between Social Services and Youth Custody Services so that Looked After Children (LAC) can easily receive their statutory entitlements?

It remains the view of the IMB that the numbers of LAC with care orders held in prison is a serious indictment of the effectiveness of the care system, which the Government needs to address. Will you follow up on measures promised last year about how this can be addressed?

### ***TO THE YOUTH CUSTODY SERVICE/HMPPS***

- The IMB is aware that additional support measures are being provided by the YCS to assist Feltham YOI (A side) review its existing manpower resources and overcome some of the problems identified in this report. However, B side has staff shortages and absence remains high, with many staff calling in sick and experienced staff resigning to work elsewhere. What steps will be taken to address staff absence and improve the retention of staff?
- What is being done to improve maintenance of the site? There are many long-standing unresolved issues, such as leaking roof lights.
- On A side, it is the view of the IMB that the education contract commenced in 2022 is not being adequately delivered. Those requiring outreach education are especially poorly served. One-third of children on A side have Special Educational Needs (SEN). Can steps be taken to ensure the Local Education Authority funding for these children follows them?
- On B side, prisoners complain that Feltham lacks facilities and workshop opportunities offered in other category C prisons (see annex D for workshops). These prisoners are older than those previously held on Feltham B and some have already had training and jobs. What is being done to ensure an older cohort of prisoners have access to further education and training such that they can secure employment on release?
- Underinvestment in the fabric of the Feltham estate remains an issue and the introduction of improved rehabilitative facilities will require investment.

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

- What proactive steps could be taken to reduce staff absence and to provide support for those on sick leave?
- What can be done to improve delivery of Key Worker and CuSP sessions?



- Please could more information be made available regarding TOoR - e.g. inclusion of data in Daily Briefing and flagging all children with less than two hours TOoR?
- Could someone identify which spaces are available for outreach meetings. e.g. out-of-use corner rooms, etc?
- Is the prison investigating why the population of Wren unit is generally made up of white young people, when a significant proportion of the prison population is black, Asian and minority ethnic?

### 3.3 Response to the last report

Issue raised	Response given	Progress
<p><b>To the Minister</b> How is TOoR measured - still using mean not median.</p> <p>A side: insufficient TOoR engaged in purposeful activity.</p> <p>LACs - too many entering custody from the care system. These are often not receiving visits.</p>	<p>TOoR data is monitored daily and an 'activity reporting tool' used to assess each individual child's engagement with specific activities.</p> <p>YCS reviewing regime to include 'enrichment activities' during evenings and weekends. Updated curriculum design being considered, including homework groups music, digital design, art, sports clubs.</p> <p>New education contract to improve outcomes by supporting integration of custody, education and health services. Greater emphasis on vocational training and technology through virtual campus.</p> <p>YCS will liaise with the Youth Justice Board to ensure this is highlighted to appropriate Children's Services. YCS head of safeguarding will raise</p>	<p>The IMB has not observed use of a digital reporting tool. No TOoR data is in the daily briefing or highlighted on notice boards on units. The IMB has not seen any flags around any particular children who have two hours or less TOoR.</p> <p>There were some evening activities scheduled and delivered, but after March 2023 staffing shortages prevented delivery of these for the rest of the reporting year.</p> <p>The IMB understands that by 'integration of services' the Minister is referring to Secure Stairs. Education staff have been allocated to attend Core support meetings. There is an increase in vocational training places, but the virtual campus has not been evident.</p> <p>The IMB cannot measure any progress on this because it has become harder to obtain the relevant information for children.</p>

	concerns at Head of YOT regional meetings.	
<p><b>To the YCS/HMPPS</b> B side fabric of the prison: showers on B side; bricks and paints workshops; leaking roof lights.</p>	<p>Steps being taken to improve delivery of reactive repairs and works projects: Bricks and paints due open in March 2023; replacement of CSRU leaking roof part of roof-replacement programme due to start in July 2023. Capital bids for refurbishment works from 23/24 budget submitted for CSRU and Mallard, Nightingale and Wren units.</p>	<p>The bricks and paints workshop is fully refurbished and open. The roof-replacement programme has not started: leaking roof light on CSRU has worsened and Conflict Resolution Office has had a leaking roof light for eight months. Some fabric much improved, e.g., Teal and Mallard units are now open and the CSRU exercise yard has been enhanced.</p>
<p><b>To the Governor</b> Improvements in violence reduction during Covid-19 should not be lost in the post-Covid regime with higher roll. Concern about 'keep apart' numbers.</p> <p>Delay in opening staff canteen.</p> <p>Support for the IMB with technology and introducing itself to prisoners.</p>		<p>The roll is now higher and violence has risen in line. Violence in education prevents delivery of classes and attendance by prisoners. 'Keep apart' numbers remain high.</p> <p>This is now successfully fully open and well attended by staff.</p> <p>The prison IT hub assisted the IMB in making a film about itself for inductees to view on laptops.</p>

## **Evidence sections 4 – 7**

### **4. Safety**

#### **Safety at Feltham B**

Adequate staffing is key to preserving safety. We are concerned that, at the time of writing (October 2023), out of 192 Band 3 officers who are in post, only 138 are available for operational duties. These staff may also not be able to be detailed due to training.

#### **4.1 Reception and induction**

##### **Feltham A**

The processing of arrivals now runs smoothly and efficiently. Van arrival and departure times have improved since our last report and there is better communication between reception staff and drivers regarding timings. Waiting time in reception for young people going out to court has been reduced and boys are now kept on their unit for as long as possible before being brought to reception for transfer. Bookings for video links with legal and court services are centralised for both A and B sides.

At present, only 40% of new young people arriving are receiving a comprehensive healthcare screening within two hours of admission, against a National Target of 95% for YOIs.

The current A side induction unit (Jay) is not suited for induction. Unlike Bittern unit, previously used, rooms are in a poor state and do not have showers. On occasions, new arrivals are only seen by Healthcare at the door of their rooms because they cannot be escorted to the Healthcare Centre (situated on Bittern). This compromises privacy. In the last three months of the reporting period, there were also non inductees residing on Jay (including self-separating young people on Rule 49), and staff reported having to run several regimes. This restricted Time Out of Room (TOoR).

##### **Feltham B**

Transfers to Feltham B have increased over this reporting year (sometimes four vans per week). Vans can arrive late. Documentation from transferring prisons is poor: assessment, care in custody and teamwork (ACCT) plans, used to support prisoners who are at risk of self-harm and suicide, are sometimes missing. 'Keep apart' issues (when young people are separated in case they fight) are left to the Serco driver to highlight.

Missing property is an ongoing concern to prisoners following transfers and many applications to the IMB relate to this. There is now a designated prison officer dealing with missing property, but the issue remains significant. With the increase in the upper age limit at Feltham, some property acquired by prisoners in the adult estate is not permitted so requires storage. PIN allocations for in-cell telephony can take up to two hours, with the result that young men who arrive on a Friday are not in receipt of a PIN over the weekend. The prison endeavours to make temporary arrangements for family contact in the interim, but it is not always possible.

Prisoners' understanding of the role of the IMB has been facilitated by a short film available on the prisoners' in-room laptop. Men report to the IMB that they are well informed about all Feltham procedures.

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

### **Feltham A**

There have been no incidents of suicide or deaths in custody. The Board believes that officers do their utmost to prevent prisoners from attempting suicide and self-harm. This was witnessed recently in the enormous efforts made by officers to support a young person who was, apparently, determined to take his own life.

### **Feltham B**

There have been no deaths in custody. The number of ACCTs opened on Feltham B increased throughout the reporting period with the rise in receptions. It was noted that many new arrivals from February onwards were arriving already on ACCTs. On Feltham B there were between 14-27 incidents of deliberate self-harm per month throughout the reporting year. However, this could involve as few as six individual prisoners. There is only one Samaritan Listener (trained to provide peer support). At the time of writing (October 2023), 10 men are about to train as Listeners.

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

### **Feltham A**

At the beginning of the reporting year, incidents arose when young people were out of their rooms with little to do. In January, there was a lengthy incident on a Sunday afternoon, when three young people on a wing went at height (an Incident at height would typically be climbing over bars on a landing). At that time for a weekend day the T00R expectation was set at six hours, but there was no purposeful activity and nothing to occupy the young people. Many staff on duty were inexperienced. Staff shortages in the summer of 2023 and long hours behind locked doors led to frustration and a breakdown in trust in staff. This resulted in an increase in incidents (most commonly going at height) when children were out of their rooms. During the week of 15 August there were 18 incidents at height, some involving multiple young people, and the IMB was called five times. At that time, we were highly concerned about the stability of Feltham A.

The number of physical assaults decreased, but the number of other assaults, e.g. those involving liquids, increased. Assaults were both peer-on-peer and on staff. As reported last year, most violence is attributable to a small number of young persons with extremely challenging needs. One such person assaulted 38 members of staff in seven months. In May, the level of assaults was such that dogs were temporarily introduced to Falcon unit to support the staff who were fearful for their own safety. This did appear to have a calming effect.

There has been a significant increase in rooms damaged, with furniture destroyed and observation panels smashed.

There has been an increase in the use of improvised weapons, such as plugs in socks. In February, there was a three-on-one assault with a weapon made of a screw attached to a pencil.

Significant numbers of children self-isolated during the reporting period, the majority expressing concerns around safety or being unable to mix with specific young people. In addition, the number of 'keep apart's has risen from 2.5 per 100 to 4.1 per 100 - up by 65%.

This has a highly deleterious effect on the delivery of regime. The IMB observed officers attempting to manage 13 different groups for regime in one day. The result is that many children were behind room doors for up to 23.5 hours per day during some summer weekends.

## **Feltham B**

Despite the marked increase in the average monthly population from below 300 to nearly 450, the rate of violence on Feltham B per 1,000 prisoners has decreased from the high of 135.42 incidents in September 2022 to 67.98 in August 2023. However, there were a number of spikes during the reporting year, particularly in January 2023, when the roll was relatively low. It is possible that the decrease in the rate is attributable to the influx of adults aged up to 25+, who are more mature and less inclined to use violence as a first resort. The introduction of PAVA (a type of pepper spray) in Feltham B in May 2022 may have also had an impact on the rate of violence.

There were a number of serious prisoner-on-prisoner assaults over the reporting year, many involving multiple assailants, and a number of which were carried out in the showers (where there is minimal supervision and no CCTV). A very serious shower assault took place in December and further assaults took place frequently through February and March. In the first two weeks of February there were four incidents in the showers and staff told the IMB that "showers are dangerous for the boys". Incidents and unexplained injuries occurred on all B side units until staffing was reviewed so that showers could be more effectively and regularly checked. However, unexplained injuries are still occurring in showers, but now less frequently. Workshops were flashpoints in the period April-June, with 13 incidents recorded there, which was slightly more than on any units at this time. Many front-line staff complained to Board members that, due to staffing levels, they felt that the prison is not a safe place to work.

### **4.4 Young people with specific vulnerabilities**

As of September 2023, approximately three-quarters of the young people were Looked after Children.

In June, an Advanced Social Work Practitioner was appointed after a six-month period of no one in the post. Unlike last reporting year, there is no clear data as to whether children are on a Section 31 care order (which gives the local authority parental responsibility for a child), Section 20 (where children and young people can be 'accommodated' with the permission of those with parental responsibility) or Section 17 (where the local authority has a general duty to 'safeguard' and promote the welfare of children in their area who are in need) prior to coming into custody. The IMB

understands that there is no integrated system for information sharing between YCS and Local Authority Social Services. This creates delays, as individual local authorities and social workers have to be sought and identified for young people to receive any statutory entitlements from Social Services.

Care Plans (up to the age of 15) or Pathway Plans (for those over 16 years) set up by Social Services do not follow the child into custody. This can only be ascertained through the hard work of the social worker and other staff.

For the second year running, the Social Work Lead has complained to the Board that there is no channel for effective sharing of important information that Social Services gather about children.

In the last three months, Social Work Assessments for young people have often not happened due to the lack of staff and consequential difficulties: young people cannot be unlocked to meet the social worker when she attends the unit.

In the Board's view, prison officers provide high levels of care to children with specific vulnerabilities. Children with Education Health and Care Plans (EHCP) are well championed and there is evidence of careful planning to meet their needs, although the implementation of these plans is very variable.

The ACCT process is followed rigorously and officers treat children who have specific vulnerabilities with dignity and respect.

Psychology appointments have been cancelled due to low staffing levels. In August 2023, there was a two-week period where all appointments were cancelled. Overall, 50% of appointments were cancelled in the reporting period.

At the time of writing (October 2023), over a third of the A side population are aged 18 years+. This raises general safeguarding concerns, as young men of that age group can easily influence younger boys, although there have been no specific referrals regarding this particular issue.

## **4.5 Use of force**

### **Feltham A**

All possible efforts are made to de-escalate situations and avoid use of force. Figures for Minimising and Managing Physical Restraint (MMPR), per 100 population, are similar to previous years. Young people are treated fairly and the IMB has not witnessed any excess use of force. All MMPR incidents are closely scrutinised by prison staff and Board members observed that 'hot debriefs' (a review completed straight after an incident, when all the main people are still present and can remember the details) were well run and reflective.

Any safeguarding referrals arising from restraints is the priority work for the Social Work Practitioner working with the Safeguarding team. The use of Body Worn Video Camera (BWVC) footage is crucial here in assisting the Safeguarding team, but occasionally it has not been available. The IMB understands that where BWVC footage is missing, the lack of evidence causes protracted issues which, on occasion, results in staffing restrictions. This could easily be overcome if BWVCs were used without fail on every occasion.

## **Feltham B**

The use of force on Feltham B mirrors the level of violence, peaking in May and June.

### Between August 22 and September 2023

- PAVA drawn but not discharged: 22 incidents involving 72 prisoners.
- PAVA drawn and discharged: 36 incidents involving 158 prisoners. This includes both primary and secondary exposure, e.g. if PAVA is deployed on an exercise yard, figures will include people who are showing no effects of PAVA, but to ensure delivery of aftercare they are included in the figures. Secondary exposure can also occur when the discharge of PAVA is in a sweeping movement, rather than targeted.

In the run-up to September 2022, BWVCs were rolled out, which has improved incident recording during the reporting period. The existence of BWVCs and extensive CCTV on units, in corridors and on exercise yards meant that there was usually recorded footage of the vast majority of incidents. Staff did not always turn on their BWVCs to capture the build-up to incidents. A new BWVC facility was piloted for a short time so that 20 seconds of footage could be recorded retrospectively when a BWVC is turned on.

'Keep apart' (KAs) numbers have risen in line with the rise in roll. They peaked in November 2022, with 412 KAs for an average roll of 300. A total of 185 individuals had KAs at that time. High numbers of KAs cause problems for delivering regime and T0oR. We understand that the numbers of KAs may be unnecessarily high due to the inexperience of staff and lack of updates to security information when prisoners come off a KA list. Conflict resolution work is done to resolve issues between prisoners.

## **4.6 Substance misuse**

Staff remain vigilant and IMB monitoring shows that they act quickly on any intelligence provided. Nevertheless, drugs still get in via various means.

There is a Substance Misuse service for young people and adults in Feltham, which is provided in-house by Central and North West London NHS Foundation Trust (CNWL), substance misuse nurses and a consultant psychiatrist. This is a comprehensive, well-delivered programme that meets its target of seeing all new young people within five days of arrival. However, due to staff shortages, there is a currently small waiting list for the rehabilitation and care programme.

Feltham B prisoners are seen by the team on the induction wing within five days. If they arrive at Feltham and they are on a detox programme, they will be assessed immediately and put on the case load. At time of writing (October 2023), there were 41 adults on the case load and 29 on the waiting list. The sessions are one-to-one and are delivered on the units (subject to staff and room availability). At present, there is no capacity to run group sessions in education.

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

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

Landings and communal areas are generally clean. However, leaking roofs mentioned in previous reports remain unresolved. Currently, roofs are leaking on Swallow and Jay units, in the Visits Hall, Conflicts Resolution Office and the No1 Governor's office. A skylight above the corridor in the CSRU has been leaking rainwater for years, with buckets strategically placed in the corridor to collect the brown liquid (see image, below, in paragraph 5.2).

The expanded prison population at Feltham has significantly increased pressure on the amount of accommodation available, despite the reopening of Teal and Mallard units. Nightingale unit remains closed, as it does not meet minimum standards. On A side, this pressure is made worse by the number of rooms unavailable due to damage caused by prisoners. On Alpine and Falcon units, deliberate damage to rooms has been caused by a few very destructive young people. At the time of writing (October 2023), Alpine unit is closed for this reason.

As we reported last year, a considerable amount of works department resources are spent repairing damage resulting from these acts of vandalism.

On numerous occasions, the damage to rooms on Falcon unit has meant there has been no accommodation available to separate young people involved in incidents on the residential units.

The lack of accommodation has also been noticed on the induction units, where officers have expressed concern about the challenges in managing regimes for a mix of inductees and long-stay residents.

A number of complaints to the IMB concerned heating issues (both too hot and too cold, or the supply of hot water). Extra blankets were provided during cold periods, but the design and age of the buildings means there are few measures available to mitigate against extremes of temperature.

There are self-contained shower pods on some units on Feltham A, but not all. There are only communal showers on Feltham B.

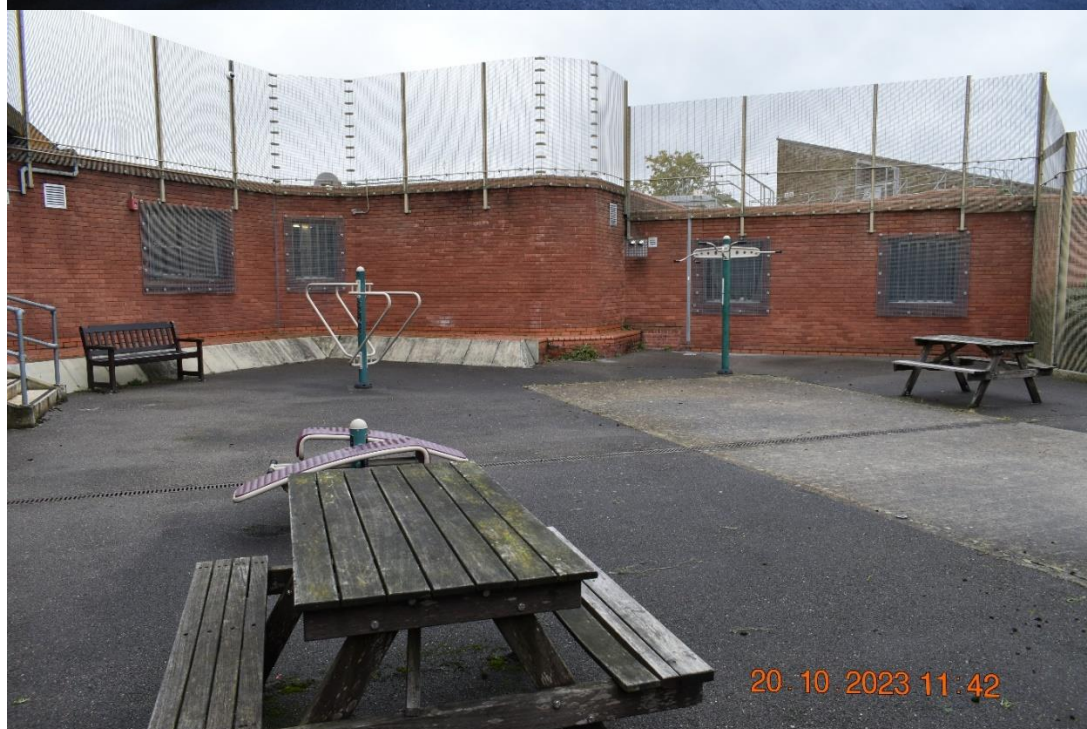
Exercise yards remain desolate and uninviting (see image of the A side exercise yard on page 18). Corner rooms are devoid of any stimulation (see image of a corner room on A side on page 18). Residential blocks are spread across a wide area of grounds, which appear unkept and neglected.

Prisoners have told the Board that the food in Feltham is better than at other establishments. During Ramadan, the kitchens worked hard to accommodate fasting requirements, providing 183 Ramadan meals per day. The Imams praised the kitchens for both the content and presentation. Feedback from prisoners was universally positive.



Weekly spending limits on canteen were increased nationally from 1 September 2022. Despite this increase, many prisoners felt that their spend had not kept pace with the increased prices charged for canteen.

Work has been done to review the facilities' lists to bring Feltham B into line with other category C establishments.



## 5.2 Separation

### Feltham A

#### Falcon unit

The Board is constantly impressed by the tireless patience of staff on Falcon unit and were pleased that the team won an award from the Youth Custody Service (YCS). The highly complex needs of those on Falcon remain a significant challenge for staff. From time to time, a few very challenging young people necessitated special safety measures due to their violent and disruptive behaviour. It is then very hard for staff to deliver proper regime, as safety of the young people and staff must be prioritized.

Education outreach for separated young people on A side is, in the Board's view, inadequate. There is one corner room where teachers can see a child and for some time it was out of use.



### Feltham B

#### IBIS/CSRU

Conditions on the segregation unit have been improved this year, with upgrading and redecoration of the exercise yard. However, the main corridor roof has been leaking for years and drips continuously causing a slipping hazard (see image, above).

The average stay in CSRU, of between three and six days, remained roughly the same throughout the reporting period.

Prisoners who self-isolate have difficulty accessing regime, time out of room or any education or purposeful activity. There are no mechanisms for delivering adequate regime and such men spend long periods alone. They do have access to laptops and to in-cell telephony (if it is working) in their cells. There were no laptops on CSRU during the reporting period.

## 5.3 Staff and young people relationships

The IMB has generally observed excellent relations between staff and prisoners. In the last few months of the reporting year, this was undermined by the staff shortages. Staffing levels have been an issue throughout the reporting year. In April, staff non-effectiveness was running at 32%. This was in part due to the number of new staff who were attending training college. Staff shortages became more acute through July and August, with high levels of sickness and annual leave at the maximum level allowed. On one Sunday in August, the IMB monitored A side, which had only 14 members of staff on duty.

Staff continually complain to the IMB of low morale. Many long-serving staff have resigned from the service, leaving new joiners without the benefit of experienced seniors. Currently, approximately 30% staff have less than two years' experience.

The IMB is concerned about whether very inexperienced staff on A side have the necessary level of expertise to interact effectively with often traumatized adolescents who have highly complex needs.

The staff shortages and consequential breakdown of regime delivery undermined trust and good relations between staff and prisoners, leading to violence from prisoners and lower staff morale – a vicious circle. Staff shortages also remain on B side. Despite these difficulties, staff work hard to foster trust and good relations with prisoners.

CuSP and key worker sessions have been curtailed due to staff shortages. Key workers have had sessions cancelled so they could be cross-deployed to ensure regime delivery, particularly in the last three months of the reporting year. The key worker system of 45 minutes a week with every prisoner is not being delivered to support prisoners. Steps were taken to ensure prisoners on ACCTs were given support. However, most prisoners were without someone to turn to, to discuss their problems. Also, without support from the Offender Management Unit (OMU) or Prison Offender Manager (POM), prisoners become frustrated and stressed, which sometimes leads to poor behaviour.

#### **5.4 Equality and diversity**

Any apparent disparities in the treatment of/outcomes for prisoners with respect to the nine protected characteristics are scrutinised at monthly meetings held for both A side and B side. Staff are well informed regarding the narrative behind the numbers presented.

When an incident of homophobic bullying was brought to the attention of the prison diversity and inclusion lead by an IMB member, it was dealt with promptly and effectively.

An ongoing concern is that, despite the fact that over 50% of the population across B side is made up of black, Asian and minority ethnic prisoners (B1/B2/B9), those housed on Wren unit (the B side medical wing) are, almost without exception, white prisoners.

#### **5.5 Faith and pastoral support**

The prison has a multifaith chaplaincy team of 11, the majority of whom are part-time. The IMB regularly sees the team on residential units speaking with individual prisoners, who engage well and appreciate the pastoral support given. This is particularly so in cases of bereavement and ill-health, but also the outreach with local mosques and churches ahead of release.

Friday Prayers and Sunday Services are held weekly. The IMB has attended and monitored collective worship on a number of occasions and observed “*a calm and pleasant atmosphere*” (in a Church of England service) and active participation by young people (in a Roman Catholic service).

There are four groups who have to be accommodated for Sunday Services between 9am and noon and often time does not allow for all prisoners who wish to go, to

attend. We are receiving increasing complaints about the time allocation for Christian worship.

The number of prisoners attending all formal religious worship remains lower than before the pandemic. Only six prisoners attended church on Christmas Day. A family event at Christmas, arranged by the Anglican chaplains, was attended by only two prisoners and their visitors. Rehabilitative courses are run for men on B side, such as a Leadership course and a Sycamore Course, which both ran for 4-6 weeks from February. Prisoners on Rule 49 are seen by Imams and Chaplains on the unit.

## 5.6 Complaints

From 1 September 2022 to 31 July 2023, the prison received 127 first-stage complaints from young people on A side and 623 from prisoners on B side. Second-stage complaints (appeals) were received from six young people on A side and 10 prisoners on B side.

Complaint	A side	B side
1	Other: Not feeling safe; Home Detention Curfew (HDC; which allows some prisoners to be released early from custody if they have a suitable address to go to); sentencing; transfers; and issues with other prisoners.	Finance
2	Lost property	Lost property
3	Staff	Residential issues
4	Finance	Other: Not feeling safe; HDC; sentencing; transfers; and issues with other prisoners.
5		Staff
6		Transfers, allocations, OASYS (Offender Assessment System)/OMU.

Applications are shown in section eight. The high number of applications to the IMB concerning bullying reflects the fact that between January and late March, the Board received four written apps and complaint forms, plus four verbal complaints from men on one unit. We referred these to the Governor for investigation.

## 5.7 Property

As reported last year, the handling of prisoners' property remains a serious problem. Prisoners can wait months to receive property from other establishments. Often the property is never found. This can include family photographs and items of sentimental importance, as well as documents and papers needed for court. These issues have an enormously negative impact on prisoners' mental wellbeing.

As Feltham now has a tracing system, the IMB only deals with property applications when the prison's complaints service has been exhausted.

## **6. Health and wellbeing**

### **6.1 Healthcare general**

Services are accessed by making appointments on the in-room laptops. The number of available appointment sessions has not increased in line with the roll.

Approximately 20% of all appointments result in a Did Not Attend (DNA). This is often due to prisoners choosing to attend other activities, e.g. gym or education. The primary care room on B side is worn and in need of new paintwork. The treatment rooms are overlooked by Teal unit's exercise yard.

Prisoners have to be escorted to a hospital if they require in-patient care or X-rays, as Feltham does not have these facilities on site. In March 2023, the IMB learned that on numerous occasions these appointments were cancelled or postponed due to prison staff shortages preventing escorts.

There is 24-hour nurse cover, a GP on site six days a week and a consultant psychiatrist four days a week.

### **6.2 Physical Healthcare**

The services provided on A Side include nurse-led clinics, medication, sexual health and a General Practitioner (GP).

Young people have to be escorted to B side to access optometry, podiatry, physiotherapy, the dentist and the dental hygienist. This leads to poor access and consequently, only three young people are seen on average each day by primary care. This has resulted in waiting lists for the young people for these services, the longest wait being for optometry. Between October 2022 and August 2023, A side waiting lists were as follows:

- Physiotherapist and podiatrist: up to 78 days
- Optometrist: up to 103 days
- Dentist: up to 72 days
- Dental hygienist (started in December 2022): up to 35 days

MMR (measles, mumps and rubella) immunisations have been a priority on the Feltham A side. A total of 28 young people were vaccinated between May and August 2023.

A review of healthcare facilities on Feltham A is underway, including commissioning additional optometry and other equipment, which could be located on Bittern unit.

### **6.3 Mental healthcare and drug and alcohol rehabilitation**

A wellbeing service is provided by psychologists, psychiatrists, mental health and substance misuse nurses. They are supported by speech and language, occupational, drama and art therapists. These are all outreach services that have to be delivered on the residential units. However, sessions are often cancelled due to:



- prison staff shortages
- an incident, meaning prisoners cannot be unlocked
- staff shortages in healthcare
- no available dedicated spaces for private consultations on the units.

The IMB is not aware of difficulties in transferring mentally ill prisoners into mental health care facilities. In July, a hospital place was found quickly for one extremely troubled child remanded on Alpine unit.

#### **6.4 Time out of room, regime**

Time out of room is reported throughout, notably in paragraphs on safety and education.

##### **Exercise**

The IMB remains concerned that restricted-category young people (who are convicted or on remand and whose escape would present a serious risk to the public) are not allowed onto the sports field. It is understood this is a national policy, which the governor has raised with YCS.

The Gym runs two full-time classes (Level 2 Gym Instructor Certificate) for groups of 20 B-side prisoners lasting eight weeks. The certificated course trains prisoners to a competent level to deliver safe and effective exercise programmes.

The Football Changes Lives course is now held twice a year, lasting eight weeks, for 20 prisoners. On completion, they are awarded an FA Level 1 in coaching football.

An eight-week rugby course is also held twice a year for 20 prisoners, but with no accredited award.

A rowing course, Boats Not Bars, takes place five times a year for 10 prisoners, but with no accredited award.

The Duke of Edinburgh Bronze Award programme for young people is now available through to completion, with the exploration element now held on the playing field.

On weekends, additional activities are available, with extra gym sessions available for enhanced-level (the highest level in the incentives scheme, with extra privileges) prisoners. The Saturday Park Run has been re-introduced and is very popular, with outside groups also invited to take part.

## 7. Education and training

### 7.1 Education

#### Feltham A

This has been the first full year of a new seven-year education contract with Shaw Trust. The IMB has been concerned about the delivery of the contract and has shared this concern with the Governor and YCS.

Funding is under constant pressure. In particular:

- Additional activities, such as cadets, workshops and enrichment activities, have not been delivered. The prison itself has provided leaders for some of these courses through the year to plug gaps in education staffing.
- A significant proportion of young people are Looked After Children (LAC) by the local authority. However, there is no national mechanism to allow the additional funding normally attached to each LAC to follow them into prison.
- A significant proportion of young people have special educational needs (SEN). However, the additional funding normally attached to children with SEN does not follow them to the establishment.
- A high proportion of children require basic foundation courses in Maths and English. Conversely, some require education above GCSE level, so a wide range of tuition needs to be provided.
- The contract does not provide for one-to-one outreach for children who are separated.

The A-side education block was closed twice between October 2022 and March 2023 but became more regularly closed, mainly due to operational staffing levels being too low to provide escorts. Cadets was also not available at times, due to staff shortages. A very serious incident closed Education on 22 August 2023, not to reopen fully until mid-September. On occasions when Education is closed, teaching either takes place on the residential units or work packs are given out to be done in rooms. On-unit teaching tends to be shorter and prone to disruption. Work packs are ill-thought through and are frequently ignored by children, who tell us they put them in the bin. The level of work is frequently inappropriate and is often unmarked. Children do not like working by themselves.

The IMB has received many complaints from young people that they are waiting too long to be assigned to educational and vocational pathways. The IMB understood that until July one reason was protracted risk assessments. For example, in February, there were 19 outstanding activity risk assessments due to short staffing in security. The Governor advised the IMB that there were also staff shortages in education. (In March, there were nine staff vacancies, and it is understood that all but two of these were filled by the end of the summer.)

Matching normal school terms and filling breaks with enrichment activities remains an aspiration.

Attaining basic levels of Maths and English remains a priority, as does changing the mindset of boys who have never seen the value of education in the past.

A total of 52 GCSEs were taken by 27 children, with four passes in Maths and English and some attaining a grade 3. A few also pursued higher level courses such as BTEC enterprise, AS English Literature and Level 3 Maths. The logistics around delivery of invigilated exams is very difficult and all Feltham A staff deserve praise for efforts made to ensure the success of the exam sessions.

Until December, young people generally reported education as a safe place with few incidents, but there was a serious assault on a teacher in January. The second half of the year showed a deterioration, including the very serious incident on 22 August 2023.

The children's laptops, which they have in their rooms, are not used for education. The IMB considers this is a lost opportunity. YCS projects, such as Oak National Academy, are discussed, but it is hard to see how this could be delivered without additional digital support. The A-side digital support lead is very capable, professional and dedicated and is, therefore, in constant high demand from staff and prisoners.

A-side education has held several days where parents are encouraged to sit in classrooms alongside their sons and see what they are doing.

Maintaining a stable education environment on A-side remains challenging with operational staff shortages and an increased YOI roll with one-third being over 18-year-olds.

## **Feltham B**

In January, HM Inspectorate of Prisons (HMIP) identified as a key concern "that too few prisoners had access to education, skills and work".

The IMB is told constantly by men on B side that they are bored, that the workshops and pathways are often cancelled so there is nothing to do, and that the courses offered are not what they want to do. Many new arrivals have transferred from other category C prisons where there is a broader range of courses. HMIP also identified in January that "there was not enough access to accredited courses in industries that would help YAs gain employment once released".

The large numbers of 'keep apart' continues to restrict the numbers attending courses. Violence continues to occur in classrooms and workshops, meaning a large number of prisoners are reluctant to attend.

The IMB has received applications over the course of the year from men concerned that they refuse to attend education because they fear getting into fights, but refusals to attend education are issued with an incentive warning, as it is a requirement for convicted prisoners to work. These prisoners tell the IMB they feel they are in a Catch-22 situation.

## **7.2 Library**

### **Feltham A**

A separate library for A side opened during the year, but has largely had to operate a mobile service due to staff shortages.



The Shannon Trust supports prisoners across the UK to read but has been under-utilised at Feltham. There is currently a renewed push to regenerate this intervention.

The Shannon Trust aims to have at least one mentor on each unit and applications from prisoners to become a mentor are growing; prisoners can also sign up to be learners.

The library is run by staff from Hounslow Specialist library services, who work hard, but prison staff shortages prevent regular usage.

### **7.3 Vocational training workshops Feltham B**

The refurbishment and upgrading of workshops has, after considerable time, been completed. The necessary tutor recruitment has not been achieved, although the IMB has seen a significant increase in the workshops offered over the year. Staff shortages mean workshops are regularly cancelled.

In theory, prisoners attend nine sessions every two weeks. In practice, this rarely happens. Novus delivers qualifications in the kitchens and mess. The new staff mess could potentially provide an opportunity for the horticultural department to start growing fresh produce for consumption there. The mess could also provide training in food safety and qualifications in food preparation and cooking for more than the five young people currently employed.

## **8. Progression towards transfer or release**

### **8.1 Case management and progression and Resettlement Planning**

#### **Feltham A**

There is no Resettlement Hub, as on B side, to complete forms, open bank accounts and source IDs, so there are occasions when a young person will be released without any of these. To circumvent this problem, the resettlement team has formulated a process in order to open a bank account for a young person. They are also awaiting approval to be able to issue a citizen card should the young person not have an ID card prior to release.

All young people should be released with accommodation and education training employment (ETE) plans in place six weeks prior to release. The IMB is aware of many occasions when there were no ETEs or accommodation arrangements in place until 24-48 hours prior to release. This can cause untold stress and often leads to unnecessary bad behaviour.

Of the 18 releases between May and August, data given to the IMB shows that six young people had part-time ETEs and 12 had nothing.

- 6 had an address 6 weeks prior to release
- 4 had an address 10 days prior
- 4 had an address in less than 10 days
- 3 had an address the day before release
- 1 had an address only on the day of release

As of August 2023, there were approximately 27 individuals over 18 years of age on A side eligible and waiting to transfer to the adult estate. Pressure on spaces across the prison estate makes suitable transfers more difficult, with prisoners often finding they cannot relocate near their homes. There is a particular problem for over 18s on remand: youth offending teams (YOTs) will not continue to supervise them, as they are no longer deemed to be children. They pass them onto the probation service, who will not take them unless they are sentenced. There is no service-level agreement in place to fill this gap.

#### **Feltham B**

Resettlement within Feltham B is managed by the probation service and the offender management unit (OMU) within the prison. The probation service remains understaffed and a number of experienced staff within OMU have left, putting added pressure on those remaining. At the time of writing (October 2023) recent recruitment had taken place, so there is now one outstanding vacancy in OMU. Of probation service workers, there are two out of a possible five in post. Lack of key worker support to prisoners has also led to additional demands placed on OMU staff.

The IMB received a notable number of applications concerning transfers to another prison. This became an issue, because the Board understands no single transfers are

currently permitted. The IMB has been told that this is because the transport contractors have no capacity. The IMB knows this has resulted in considerable anxiety for prisoners who may be far from family and friends for a long time.

### **Feltham B**

The HMPPS deputy director for reducing reoffending advised at an IMB members' training day in March that there was a focus on providing opportunities for employment within resettlement prisons, including providing apprenticeships. The IMB has seen scant progress at Feltham in terms of skilling up prisoners in readiness for employment.

Improvement in provision for resettlement support has been achieved with the soft opening of a planned employment hub in January 2023 for prisoners being released within three months. The hub assists with CV writing, setting up bank accounts and other skills for independent living. A huge amount of work went into setting up the hub and contact was made with multiple private companies. Presentations from potential employers were planned. However, the challenges caused by 'keep apart', low staffing levels and poor engagement by prisoners limited the number of attendees. In the eight months from January to August 2023, the hub invited eight employers to present and 54 men attended these events.

The hub had successes between February 2023 and the end of August in the setting up of 92 bank accounts, obtaining 13 driving licences and organising 98 IDs. However, obtaining national insurance numbers remains a problem, with only one obtained from nine applications.

Hounslow's department of work and pensions has a full-time coach based at the feltham resettlement hub, providing advice on universal credit claims and employment opportunities prior to release and organises an appointment with JobCentre Plus.

The charity St Mungo's has a part-time representative who works with referrals from probation to assist those who will be released into homelessness. Those without a permanent address are able to use the prison address to open bank accounts.

### **Use of release on temporary licence (ROTL)**

On Feltham A, very few young people are eligible for ROTL. On Feltham B, ROTL has been very limited. The IMB has been told this is because the men are not employment-ready so no paid work can be offered, although volunteering placements are possible.

## **8.2 Family contact**

Social visits have continued to increase over the year for both A and B side. Monthly family days are popular. Much effort goes into these days, including provision of refreshments and games. Sports days and Fathers' Day events have also been organized.

A high rate of 'no-shows' in the past has been noted and monitored in the past and this year the rate has improved with most visitors turning up.

Facilities for visitors are poor: the Visitors Centre at the main gate in a portacabin was deemed unfit for purpose and closed down. For a while there were only portable toilets and no other external facilities, e.g. lockers, play area, refreshments or general staff to help. Visitors had to wait outside in all weathers until they were processed through bag search to access facilities. At the time of writing (October 2023), this area was reopened but requires substantial capital investment.

On B side, the play area is under-used because prisoner fathers are not allowed to accompany their children on to it.

There is a poor uptake of social video calls, and the IMB has had requests for these to be available in evenings and weekend when families are at home. In-cell telephony provides privacy.

## The work of the IMB

### Board statistics

Recommended complement of Board members	16
Number of Board members at the start of the reporting period	17
Number of Board members at the end of the reporting period	14
Total number of visits to the establishment	468

### Applications to the IMB between 1 September 2022 and 31 August 2023

Code	Subject	Previous reporting year		Current reporting year	
		Feltham A	Feltham B	Feltham A	Feltham B
A	Accommodation, including laundry, clothing, ablutions	1	4	0	9
B	Discipline including adjudications, incentives schemes, sanctions	4	6	1	8
C	Equality	1	2	1	2
D	Purposeful activity, including education, work, training, library, regime, time out of cell	1	2	1	8
E1	Letters, visits, telephones, public protection restrictions	0	1	0	8
E2	Finance including pay, private moneys, spends	0	4	0	8
F	Food and kitchens	0	0	0	0
G	Health including physical, mental, social care	1	4	1	3
H1	Property within this establishment	1	8	1	2
H2	Property during transfer or in another establishment or location	0	16	0	33
H3	Canteen, facility list, catalogue(s)	0	3	0	7
I	Sentence management including home detention curfew, release on temporary licence, parole, release dates, recategorisation	0	4	2	11
J	Staff/prisoner concerns, including bullying	6	4	0	16
K	Transfers	0	3	2	17
L	Miscellaneous, including complaints system	0	0	1	2
<b>Total number of applications</b>		<b>15</b>	<b>61</b>	<b>10</b>	<b>134</b>

## **Annex A**

### **List of abbreviations**

- LAC: Looked After Children (children with Local Authority care orders or looked after by reason of remand status)
- CNWL: Central and North West London NHS Foundation Trust
- EHCP: Education and Health Care Plan
- ACCT: Assessment and Care in Custody Teamwork
- T0oR: Time out of Room
- ETE: Education, Training and Employment plan
- OMU: Offender Management Unit
- POM: Prison Offender Manager
- CuSP: Custody Support Plan
- YOT: Youth Offending Team
- HDC: Home Detention Curfew
- ROTL Release on Temporary Licence

## **Annex B**

### **List of service providers**

- Education: Novus and Shaw Trust
- Visits: PACT (Prison Advice and Care Trust) took over from Spurgeons and now runs visits and family days for A and B sides
- NHS England is responsible for commissioning health services and Central and North West London NHS Foundation Trust (CNWL) provides those services.

## Annex C

### Number of prisoners in CSRU and average days stayed

September 2022	50	3.2 days
October	52	3.5 days
November	22	3.6 days
December	67	3.6 days
January	65	5 days
February	67	4.5 days
March	75	6.7 days
April	70	5 days
May	81	3 days
June	71	3 days
July	84	4 days
August 2023	110	4 days



## Annex D

### Workshops available in Feltham B

- Life skills
- Construction skills and decorating
- Bike repair
- Recycling and Industrial cleaning
- Airline headset cleaning
- Kitchen NVQ Levels 1 and 2 Food Safety and Hygiene
- Horticulture
- Crutch cleaning for hospitals
- Tyre fitting and balancing *is planned*



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