



Annual Report of the Independent Monitoring Board at HMP Lowdham Grange

**For reporting year
1 February 2023 to 31 January 2024**

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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

HMP Lowdham Grange is a privately operated category B training prison which holds long-term high security prisoners and is located near the village of Lowdham in northeast Nottingham. It had been operated since it opened, in 1998, under a private finance initiative (PFI) contract by Serco Justice and Immigration, a part of Serco Plc (Serco).

In August 2022, it was announced that Sodexo Justice Services (Sodexo) had been selected as the new operator following a competitive bidding process. Sodexo took over management and operation of the prison on 16 February 2023, during this reporting year.

The prison is part of the long-term high security estate (LTHSE), and usually receives category B prisoners, either from another establishment or shortly after sentencing. Many of the prisoners have convictions for offences involving violence.

During the latter part of the reporting year, the population in the establishment was reduced. The prisons' operational capacity, the maximum number it is permitted to hold, was lowered from 908¹ in November 2023 to 823 in January 2024, a reduction of 85. The actual number of prisoners housed fell from 888 to around 808 by the end of the reporting year. This reduction followed on from an urgent request to HM Prison and Probation Service (HMPPS) for assistance, made on 12 December 2023, by the prison operator Sodexo; and subsequent to that, a 'step-in' procedure, to stabilise the prison and assist with the running, was activated by the Ministry of Justice.

At the end of the reporting period the prison was being directed by an HMPPS Governor, supported by additional 'detached duty' HMPPS staff and managers. HMPPS has operational control of the prison for an interim period (currently until 1 September 2024, but to be determined) in order to improve safety and security.

The process of step-in allows the Secretary of State to intervene when there are serious concerns over the operation of a privately run prison and the provider's capacity to fulfil obligations set out in the contract.

Healthcare at the prison is contracted to Nottinghamshire Healthcare NHS Foundation Trust. The commissioning of the service is the responsibility of the health and justice team at NHS England, with the intention of offering a range of services relevant to the needs of prisoners and which should correspond with those provided in the community.

Education service in the prison is provided by Novus, a private operator contracted to Sodexo.

A number of prisoners are released directly from the prison when they have completed their sentences. It is noted that pre-Covid, prior to release, prisoners were usually transferred to a category C prison to facilitate preparation for release once category C status had been achieved. In recent years, this process has been frustrated by the number of available prison places in that part of the prison estate.

¹ 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 HMPPS Controller

All private sector prisons have a Government-appointed HMPPS Controller team based in the prison. The role of that office is to monitor the contract between the Secretary of State for Justice and the private sector operator to ensure compliance. The Controller and members of their team will have held positions in public sector prisons prior to appointment.

The Director

The Governor of a private sector prison is referred to as the 'Director'. They are required to be a certificated Prison Custody Officer and are appointed under the terms of the Criminal Justice Act 1991.

During the course of the reporting year, the prison had four Directors appointed by the prison's private operators. Ultimately, an HMPPS Governor was appointed at step-in on 18 December 2023 and was in office at reporting year end.

Following the step-in procedure by HMPPS, the Governor took operational control of the prison. The then Sodexo Director took on the role of Sodexo lead in negotiating the necessary short-term contractual novation between Sodexo and HMPPS in what were exceptional and complex circumstances.

Name of Governor and date in post:

- HMPPS Governor Neil Thomas OBE, December 2023 to the reporting year end.

Changes of Director and dates in post:

- Sodexo Director Ian Whiteside: October 2023 to the reporting year end
- Sodexo Director Damian Evans: April 2023 - October 2023
- Sodexo Director Martin Booth: February 2023 - April 2023
- Serco Director John Hewitson: October 2022 - February 2023

Independent Monitoring Board Chair:

- David Turner

Date of HMIP visits:

- Unannounced Inspection: 15-26 May 2023
Progress visit: 8-10 January 2024

3. Key points

Background to the report

In May 2023, the Board reported that some fairly unique circumstances had a significant impact on the monitoring activities carried out by the IMB at the prison during the reporting period that covered 1 February 2022 to 31 January 2023.

In particular, it was noted that the transfer of prison management responsibilities from one private sector contractor to another had not happened before in the UK prison estate; and that it required a collaborative arrangement between Serco, Sodexo, HMPPS and the Ministry of Justice, while at the same time complying with the contract obligations and responsibilities of each of the parties.

The Board was left with the impression that there was very little guidance or experience about what had to be done to achieve this smoothly. Consequently, as the handover to Sodexo approached, the level of uncertainty about the prison regime and questions about future plans were raised repeatedly by prisoners.

In the months immediately following the operational take over by Sodexo, Board concerns regarding safety and the overall functioning of the prison escalated to such an extent that we concluded we had a duty to report to the IMB Secretariat directly and regularly on the status of the prison.

In view of increasingly worrying events, the Board also concluded that it was necessary to include an addendum to its 2023 report, summarising conditions in the prison during the weeks immediately following the transition to Sodexo. That addendum was particularly relevant in the matter of safety and control within the prison, where members of the Board, in the course of their monitoring obligations, had identified a number of serious concerns.

The Board highlighted that there had been three deaths in custody in March 2023, almost immediately after the Sodexo takeover, and that the prison was short of managers and very short of operational staff. The Board had identified a lack of leadership and direction that resulted in severe consequences for prisoners, who endured an uncertain and often highly restrictive regime, with excessive hours locked up and restrictions to social visits, showers, work and fresh air.

The Board understands that partly in response to the reporting of those concerns, HM Inspectorate of Prisons (HMIP) brought forward a planned inspection of the prison and duly attended, unannounced, between 15 and 26 May 2023.

The Chief Inspector of Prisons set out in his report six Priority Concerns and eight other Key Concerns, which essentially ran concurrent with those expressed by the IMB, confirming our findings through monitoring.

Coincident with the publication of the inspection outcome, video recordings made by prisoners in segregation were published on social media and also on television: film clips apparently depicted inappropriate language and use of force (UoF) by Sodexo staff towards prisoners held in segregation in the care and separation unit (CSU). This was followed up by an alleged 'whistle blower' being interviewed on ITV, and by further releases of prisoners' video footage. The Board has been advised by Sodexo that these matters are all the subject of an investigation, but at the time of reporting no outcomes had been reported to the IMB by Sodexo.

During the remainder of the reporting year, there were three further deaths in custody, one in October 2023 and two in November 2023, with one of those two being due to natural causes.

Coroners' Court hearings for the three people who died in March 2023 are all scheduled to be heard consecutively in September 2024 in Nottingham, but no dates have been set as yet for other hearings.

At the end of this reporting year, HMIP performed a progress inspection of the prison, between 8 and 10 January 2024. It concluded that no meaningful or sufficient progress had been made by the prison since its May 2023 inspection, other than with certain aspects of education, where Ofsted found that there had been reasonable progress.

The January 2024 HMIP conclusions again confirmed Board findings throughout the year from ongoing monitoring.

For clarity: for the first two weeks of this reporting year, the prison operator was Serco; for the following 44 weeks, the operator was Sodexo; and for the final six weeks of the reporting year, the prison was managed under by HMPPS under the step-in process.

3.1 Main findings

Safety

From the Board's observations, the prison is not safe enough.

Based on IMB monitoring and other statistical evidence collected from the prison, the Board concluded that safety in the prison deteriorated throughout the whole reporting period. We also note that outcomes are being strongly influenced by the ready availability of illegal drugs, along with the associated violence, combined with inexperienced staff who lack the skills and confidence to successfully manage prisoners with challenging behaviour.

This view, of the prison not being safe, is based on the increasing number, during the year, of prisoner-on-prisoner assaults and prisoner-on-staff assaults, a rise in prisoner self-harm, the number of 'in-cell fires' set by prisoners, and the significant number of weapons' finds, culminating, in January 2024, in the largest number of weapons' finds ever recorded in one lock down search by HMPPS.

The Board noted that by May 2023, 35% of mandatory drug tests (MDTs) carried out were positive. By the year end, this had gradually increased to over 50% positive, and there were daily incidents of prisoners being under the influence of psychoactive substances and/or alcohol.

Consequently, the underlying economy of drugs and other substance misuse increased the negative impact of gang cultures at the prison, putting more prisoners into debt and making prisoners feel less safe and more likely to self-isolate.

The Board notes that since the step-in, the HMPPS Governor has identified a series of priorities for making the prison safer for both prisoners and staff. His initiative commenced in the last days of the reporting year, with a planned full lock-down search of the establishment. It was effective in locating substantial stashes of

weapons, phones and other contraband in the four of the five house blocks searched.

HMPPS officers have been deployed to the prison on detached duty with the aim of supporting Sodexo officers in delivering a more consistent regime. In association with that, HMPPS arranged to reduce the population of the prison by around 10%.

However, at the end of the reporting period the incidences of violence and self-harm continue at a high rate, as do drugs and weapons' finds, and the Board has yet to see any significant improvement in safety.

Fair and humane treatment

From the Board's observations there is insufficient oversight and accountability for custody officers, particularly in the use of force.

Although the prison houses some prisoners with very challenging behaviour, the Board feels bound to concur with HMIP's findings that there is insufficient oversight and accountability for custody officers, particularly in the use of force. The culture amongst officers is not focused on responding to prisoner needs and the delivery of support, and throughout the year managers have failed to provide sufficient oversight to hold officers to account.

The CSU has been fully occupied for the majority of the year. The view of the IMB is that too many prisoners have been segregated for long or very long periods without access to an effective reintegration plan or a meaningful regime. At the time of reporting, one-third of the prisoners held in the CSU are on an assessment, care in custody and teamwork (ACCT) plan (see 4.2.3), which is used to support those who are at risk of self-harm and suicide.

The prison should remain aware of the potential effects of segregation on a vulnerable person's state of mind, and should endeavour not to regularly segregate prisoners, particularly for extended periods, who are on an ACCT. The Board is concerned that the number of prisoners held in the unit did not decrease during the reporting year, and this evidences the lack of reintegration planning by the prison.

In the view of the Board, segregation review boards (SRBs) have not been properly planned by the prison or convened at regular time. This has resulted in the Board not being notified and, therefore, being unable to attend the majority, so that we can observe them.

PSO (prison service order, a mandatory instruction) 1700 states: 'The IMB **must** be invited to all SRBs and every effort **must** be made to facilitate their attendance, where possible.' It continues: 'IMB members play a vital role in SRBs and must be facilitated to attend wherever possible. This is particularly important for 14-day reviews which must be scheduled to allow an IMB member to attend.'

In the Board's view for the majority of the year, the prison operator has failed to provide enough opportunities for education and work. When work was provided, the main prisoner complaint was that the daily regime failed to afford those who were working the opportunity to eat and shower after work and prior to lock-up.

Prisoners employed in the workshops regularly complained to the Board about there being no food left or only cold food for them by the time they had returned to their wings from a shift. In the Board's view, management was slow to address this, and

carried on locking up early regardless, in order to fit in with their own prisoner-facing, staff-shift patterns.

The lack of any meaningful education programme and the failure to provide full-time work and structured on-wing activity for the majority of prisoners led to a significant reduction in unlock and to prisoners continuing to spend long periods in their cells both mid-week and weekends. Following step-in, under the regime re-opened for work and education during the first week of January 2024.

From April until October 2023 'association' (when a prisoner is allowed out of their cell) as such, was mostly prohibited, with unlock only being permitted for 'purposeful activity', of which there was a significant shortage. And when offering employment, insufficient account was taken of prisoner career goals or aspirations, in association with sentence planning and/or preparation for release.

The prison complaints system was not fully effective during the year, and that resulted in a substantial number of applications (written representations prisoners make to the IMB) regarding the prison failing to respond in good time or at all to prisoners' written submissions.

It was noted by the Board that during the last three months of the reporting year, a large pile of discrimination incident reporting form (DIRF) complaints had accumulated in the post room, with the complaints not being opened or addressed by the prison. That failure had come to light through the Board's monitoring, and was pointed out to the prison senior leadership team (SLT) by the IMB.

While towards the end of the year there had been a concerted effort to improve cleanliness, the prison has been filthy dirty and strewn with rubbish for the majority of the year. It remains, in the main, 'grubby'. Prisoners frequently complained to the Board that they had no access to cleaning materials.

In the view of the Board, poor living conditions contributed towards instability and unrest amongst prisoners. It was further noted by visiting Board members from another establishment, operated by HMPPS, that the Sodexo staff failed to lead by example, with dirty, littered staff areas, and a lack of pride demonstrated by both their demeanour and the presentation of their uniforms.

Health and wellbeing

Not enough is being done to support prisoners in crisis and at risk of self-harm.

Healthcare services have continued to be under great pressure throughout the reporting period. The Board considers physical and mental health provision to have been delivered to a lower standard than that available in the community. This was, in part, due to Sodexo staff shortages for escorts, which resulted in many missed and cancelled appointments, both in the prison and hospitals.

The mental and emotional wellbeing of prisoners remains a significant concern because of the effect of prolonged periods of time spent by prisoners alone in their cells.

The Board found that, given the elevated number of prisoners self-isolating and/or self-harming throughout the year, not enough is being done to support those in crisis and at risk of self-harm.

The longstanding shortages of healthcare staff and the removal of the night staffing cover have increased the risk to the wellbeing of prisoners. This risk was exacerbated during the year by healthcare staff withdrawing from non-emergency treatment of prisoners on the wings due to safety concerns.

HMIP observed in May 2023 that the partnership between Sodexo and the healthcare provider was poor, and that the clinical judgement of healthcare staff was sometimes ignored. This included a lack of investigation into several serious safeguarding concerns that healthcare had raised.

In addition, the IMB noted that having raised early concerns regarding the planning of end of life care for a prisoner who died in custody through natural causes, the prison failed to plan ahead for appropriate terminal care.

Progression and resettlement

There is no dedicated resettlement staff or provision for housing support.

The number of prisoners who have been released directly from HMP Lowdham Grange has increased post-Covid and gives significant cause for concern, as the prison is not geared up to provide comprehensive pre-release support and guidance.

This year the Board has again noted that a failure to provide sufficient offender behaviour programmes, drug treatment courses, education and full-time work has compromised the overall progression of many prisoners in their sentences and in reducing their risks.

3.2 Main areas for development

TO THE MINISTER

- Have lessons been learned from the transfer of prison management from one private provider to another at HMP Lowdham Grange, and is action being taken to avoid the significant negative impact on prisoners and staff occurring at any future transfer between private prison operators?

TO THE PRISON SERVICE

- HMP Lowdham Grange is a prison in crisis and prisoners have been suffering for over a year through instability and, recently, uncertainty surrounding its management. How does HMPPS propose to support HMP Lowdham Grange through a period of rebuilding towards a stable and safe regime, where prisoners can live without fear and move through their sentences to rehabilitation and release?
- Prisoners who have not been recently sentenced are being transferred to HMP Lowdham Grange without a completed or up-to-date offender assessment (OASys). This means the assessment has to be completed at this prison, adding to pressure on the offender management unit (OMU) and putting prisoners at risk until it is completed. Does HMPPS feel it is acceptable that some establishments are allowing the transfer of prisoners without a completed OASys assessment, and if not, how does it propose to rectify this?
- Waiting times for offender behaviour programmes are far too long, and this has a negative impact on prisoners who are required to complete them as part

of their sentence plan, working to meet their plan and targeting Parole and Release. What actions are being taken to improve the availability of offender behaviour programmes, especially for prisoners serving long sentences and IPPs?

TO THE DIRECTOR

- What permanent action is being taken to increase staff numbers of experienced prison officers and managers, to reduce the adverse impact of a shortage of both prisoner-facing and administrative staff on prisoner outcomes?
- What action is being taken to address the serious issues raised by HM Coroner through the Prevention of Future Deaths notices relating to deaths in custody at HMP Lowdham Grange and, particularly, the cited lack of candour by managers and officers?
- What action is being taken to address HM Coroner's stated concerns, including: a failure to investigate whether anything could have been done to prevent the deaths; failure to seek any lessons from the deaths; failure to implement any findings of the Prisons and Probation Ombudsman (PPO); and the failure to inform staff of policies and procedures relating to the deaths, plus a failure to enforce those policies?

TO THE GOVERNOR

- What action is being taken to immediately address the high number of prisoner-on-prisoner assaults and prisoner-on-staff assaults, the very high number of prisoners self-harming, the significant number of weapons' finds, and the number of 'in-cell fires' set by prisoners?

3.3 Progress since the last report

At the end of this reporting year, there had been no measurable progress since the last IMB annual report.

Evidence sections 4 – 7

4. Safety

In the 2022-2023 annual report, the Board gave clear evidence of the deterioration of safety within the prison, and this has rapidly further declined during the 2023-2024 reporting period.

When HMIP made an unannounced inspection in May 2023, it found that ‘the prison was not safe enough, and the sense of instability was reflected in the availability of drugs and incidents of violence’.

From 18 December 2023, HM Government stepped-in to work with Sodexo to improve the safety and security of HMP Lowdham Grange.

It is the belief of the Board that outcomes for prisoners have been undermined by violence, readily available illicit drugs, and not enough and an inexperienced staff group lacking the confidence to provide effective supervision and management.

4.1 Reception and induction

All prisoner arrivals and departures take place through the reception and induction suite at the prison. On arrival, prisoners and their property transferred from other establishments are searched. This includes the use of a body scanner and X-ray equipment installed in the unit.

Information related to the prison regime, first night and induction arrangements are given, and newly arrived prisoners are interviewed by a member of the healthcare team to assess their immediate needs. Prisoners are then housed in a dedicated wing for a period of about two weeks, during which time various induction interviews and assessments are conducted by specialists from health, education, safety and other teams.

Board members have commented that the reception area is often untidy and cluttered, as well as poorly laid out and badly organised. They noted that holding rooms are very small and bare.

Following the deaths in custody of two very recent arrivals, in March 2023, a review of procedures and support for prisoners was conducted. However, despite requests for information about the proposed improvements, the Board was not advised of any changes and has not been party to any measures of the success of the initiative.

4.2 Suicide and self-harm

There was a total of 844 acts of self-harm amongst prisoners in the reporting year, which is an increase of almost 40% over last year. The incidents increased from around 50 in April and May to around 96 in the months of October 2023 to January 2024.

Prisoners and staff regularly told Board members that self-harm was a result of the uncertainty and of changes facing the prison, as well as bullying, debt and prisoners not being able to get help with basic requests. These constant changes in regime and several weeks of Domestic, Amber and Red Regime (which restrict the periods of prisoner unlock), from October 2023 until January 2024, plus the failure to receive answers to COMP1 complaints (see 5.3.3), contributed to prisoners’ frustration.

An Amber Regime equated to prisoners being unlocked for half a day (morning or afternoon), and Red Regime being prisoners locked-up for the whole day or, indeed, on some occasions, for the whole weekend.

The Board noted that very few serious self-harm incidents were investigated in order that lessons could be learned. Despite a large number of prisoners subject to constant supervision and many incidents of self-harm requiring hospital attendance, only three incidents of serious self-harm had been investigated. Board members observed on monitoring visits that some vulnerable prisoners are so desperate to get into the CSU for their own safety, that they are resorting to instigating violence against other prisoners or staff in order to be sent there.

Although threats by prisoners to jump from a height are not in themselves classed as self-harm, there were 154 reported incidents at height during the year, compared with 42 incidents in the previous year. In most cases, these incidents were in protest or frustration at the regime, or by prisoners unable to access their property. Those episodes lasted between a few minutes and two to three hours.

In previous reporting periods, the IMB had noted that the majority of self-harm events had been by 'cutting', and not many had involved ligaturing. Throughout the second half of this reporting year, the Board noted an increasing rate of self-harm events involving the use of a ligature. The statistics recorded do not identify as to whether or not ligatures used were 'attached' but, in any event and in light of the circumstances of the deaths in custody that have occurred at the prison, the Board considers this trend to be concerning.

In August 2023, a Board member on a visit witnessed two ligaturing events in the space of two; and another visit, in October 2023, the same member followed ambulances into the prison to the scene of a death in custody involving a ligature.

Self-harm involving a ligature									
	May 2023	Jun 2023	July 2023	Aug 2023	Sep 2023	Oct 2023	Nov 2023	Dec 2023	Jan 2024
Number of prisoners who self-harmed	50	58	58	64	76	98	81	97	109
Number involving a ligature	2	7	6	16	18	21	18	34	31
% involving a ligature	4%	12%	10%	25%	24%	21%	22%	35%	28%

4.2.1 Deaths in custody

The Board notes, with great concern, that there have been six deaths in custody in the reporting period, bringing the total number of deaths at the prison to 14 in five years.

Although the causes of the deaths are yet to be determined by HM Coroner, five of them were, apparently, self-inflicted and one prisoner died of natural causes while receiving end of life care in a hospice.

One of the deaths in custody was of a prisoner in the CSU who was subject to an ACCT.

All the deaths in custody have been investigated by the PPO and reports given to the prison management.

During the reporting year, a number of coroner's inquests have been held in respect of prisoners who died at the prison between 2019 and 2021, during the tenure of the previous operator, Serco. These were attended by members of the IMB as observers.

HM Coroner expressed concerns about the prison's failure to investigate whether anything could have been done to prevent the death; failure to seek any lessons from the deaths; failure to implement any findings of the PPO; failure to inform staff of policies and procedures relating to the deaths; and failure to enforce those policies.

After two of the inquests, HM Coroner for Nottingham and Nottinghamshire took the unusual step of issuing a Regulation 28 Report to Prevent Future Deaths²:

Whilst the circumstances and facts surrounding the deaths of these prisoners were very different, there is a common concern expressed about the duty of candour, both organisationally and individually.

HM Coroner advocates a culture of being open and honest with all stakeholders by accepting when things go wrong, taking remedial steps as soon as possible, and thus reducing the risk of events repeating themselves.

The Regulation 28 notices state that an absence of a culture of candour was evidenced by the prison management (Serco) and Nottinghamshire Healthcare NHS Foundation Trust in these cases and the subsequent inquests. The new prison operator, Sodexo, has been given until March 2024 to respond to the coroner on the many issues raised throughout the inquest and the actions being taken to prevent such circumstances being repeated.

4.2.2 In-cell fires

The Board notes that there has been an alarming increase in the number of in-cell fires set by prisoners during the year. In previous reporting periods, they were a rare occurrence (last year there were 21 fires in total), but the Board notes that as

² HM Coroner: Prevention of Future Deaths Report-Kane Boyce. HM Coroner: Prevention of Future Deaths Report-Christopher Smith.

uncertainty and anxiety increased for prisoners during the year, along with a decline in the security and safety of the prison, in-cell fires were frequently being set.

A total of 162 in-cell fires were started in the reporting period: four in February 2023, increasing to 20 in November 2023 and 21 in January 2024.

In-cell fires put the prisoner, staff and other prisoners at significant risk of harm, and cause damage to cells, which is expensive to repair. The Board understands that each fire requires the Fire Service to attend as an emergency, and this increase has placed considerable pressure on local resources.

4.2.3 Assessment, care in custody and teamwork process

The assessment, care in custody and teamwork (ACCT) process is the system in prisons to support prisoners at risk of self-harm or suicide.

In 2022-2023, there was an average of 18 ACCTs open on the last day of any month during the year.

In 2023-2024, the number of ACCTs rose to around 40 in March 2023 and, steadily, to over 50 prisoners by August, remaining constant at this level to the end of the reporting year.

The Board visited prisoners subject to ACCTs when on visits and, generally, found that they were receiving limited support. However, the recording of this was often chaotic and paperwork was hastily completed when IMB members asked to see it. The HMIP inspection in January 2024 reported: 'The quality of ACCT documentation was not good enough and did not demonstrate effective support... we could not be assured that appropriate care was in place for those in crisis.'

It was noted by both the Board and HMIP that the safer custody team had not been sufficiently resourced to support this number of prisoners at risk, and were frequently redeployed.

The prison does not have a dedicated unit for prisoners deemed to be at risk of, for example, assault from other prisoners, or because of the nature of their offence, prison debt, ethnicity, sexual orientation, mental health or behavioural issues.

4.3 Violence, violence reduction and self-isolation

High levels of violence have been consistent in the prison throughout the reporting year.

The total number of minor and serious assaults in the prison (prisoner-on-prisoner and prisoner-on-staff) was 466 over the year, which has more than doubled from the 2022-2023 annual report, when it was 192.

In June 2023, several videos showing staff assaulting a prisoner in the segregation unit were shared on social media and, apparently, investigated by Sodexo. The IMB has requested updates on the outcome but, at the end of the reporting period – seven months later – had not received any feedback.

Board members have witnessed violent incidents around the prison and noted the negative impact on prisoners and staff.

For many months (summer 2023 to January 2024), healthcare (except for emergencies), education, and OMU staff have not been regularly going onto the wings to speak to or see prisoners, due to the risk to their personal safety. However, chaplaincy and the IMB have continued to visit prisoners around all parts of the prison throughout the year.

4.3.1 Prisoner-on-prisoner assaults

Prisoner-on-prisoner assaults during the year have doubled since last year:

	Feb 2022-Jan 2023	Feb 2023-Jan 2024
Minor prisoner-on-prisoner assaults	104	205
Serious prisoner-on-prisoner assaults	27	63
Total	131	268

4.3.2 Prisoner-on-staff assaults

There have been more than triple the number of prisoner-on-staff assaults in this reporting period compared with the previous year:

	Feb 2022-Jan 2023	Feb 2023-Jan 2024
Minor prisoner-on-staff assaults	55	159
Serious prisoner-on-staff assaults	6	39
Total	61	198

Many of these assaults have resulted in serious and, in some cases, life-changing injuries to staff and prisoners.

The level of staff assaults has contributed to staff absences and, therefore, fewer officers on the wings. It has also restricted the regime and the availability of escorts to healthcare appointments, work and education.

4.3.3 Actions taken by the prison to reduce violence

HMP Lowdham Grange houses prisoners serving sentences for violence or threat to life, arson, firearms, drugs, sexual offences and robbery. Many of the prisoners require mental health treatment or have developmental or behavioural disorders.

The prison has little or no choice in the prisoners transferred into the establishment, and some of them have histories of assaults and gang membership.

The main actions to reduce violence in the prison are centred on the system of challenge, support and intervention plans (CSIPs), used to support prisoners who are at risk of harming others. It is the principal methodology implemented by the

prison to reduce violence. During the year, there was an average of 15 prisoners with a CSIP. HMIP was critical of the management of CSIPs, saying they were poor and did not challenge perpetrators of violence or support them to change their behaviour, a view with which the Board agrees.

In addition to CSIPs, other measures adopted by the prison include:

- Courses such as Kaizen (a programme for men who have been convicted of violent or sexual offences) and Thinking Skills (which involves problem solving, flexible thinking, critical reasoning and consequences of actions) are provided by HMPs and delivered by Sodexo staff. However, availability of places on such courses has been very limited, and often regime restrictions have prevented attendance.
- Key worker sessions, essential for the development of constructive and motivational relationships between prisoners and prison staff, have not in the main been taking place due to staff shortages. This has not been resolved satisfactorily by the step-in, as detached duty staff working with prisoners do not have access to Sodexo IT systems and, therefore, any IT within the establishment.

The Board notes that few offending behaviour programmes have been provided in-house (see 7.1.2). However, during the reporting year, 76 prisoners completed 'peer mentoring' courses and 42 prisoners completed a 'behaviour change' course.

Each week, a multi-disciplinary safety intervention meeting (SIM) is held to review and assess progress and measures to be taken in the management of prisoners in the CSU and/or on CSIPs and/or ACCTs. The meeting also considers prisoners subject to safeguarding measures and those who may be deemed vulnerable in the prison environment.

4.3.4 Self-isolating prisoners

The Board has noted that there is no central record of prisoners who are self-isolating, with different lists being held by healthcare and by residential staff.

In addition, the IMB has been unable to access any Sodexo policy for the management of prisoners who are self-isolating, or to determine what plans are in place for their support.

On visits, Board members will seek out self-isolating prisoners, who often relate their fears about violent reprisals and drug debt, and many have mental health needs. Staff shortages and inexperienced officers on the wings have frequently meant that these prisoners do not get a shower, exercise or their food.

4.3.5 Cell door notices

Cell door information has been noted by the Board as missing in many cases on many wings. This means that detached duty staff and those unfamiliar with the wing don't know who should be in which cell or other important information about the occupant. This has been brought to the attention of the SLT on a number of occasions during the reporting period but it remains unresolved.

4.3.6 Serious incidents

In the reporting period, there have been:

- 14 incidents of concerted indiscipline (when two or more prisoners act together in defiance of an instruction or the regime); and
- 12 incidents of disorder (barricade, prevention of access, hostage)

Although the prison management has a duty to inform the IMB of such incidents, this has not been the case in all of these 26 occurrences.

When advised and able to attend, members have observed the management of a serious incident from the command suite.

It is the view of the Board that some of these incidents have arisen from prisoners' frustration about a poor regime and constant changes to routines. However, the Board has not been advised of any investigation or follow up to these incidents, other than dealing with the perpetrators.

In August, 25 prisoners refused to lock up to allow fire officers to enter the wing where a fire had been set.

The National Tactical Response Group (NTRG), a team trained to intervene in dangerous, high-risk situations, were called on two successive nights in September, when prisoners refused lock-up in frustration at the regime. Prisoners and officers have remarked on the danger of 'losing the wing' as resentment grew over the restricted regime. Most prisoners returned to their cells after the 'Riot Act' was read to them on these occasions.

Board members reported that a typical comment made by staff was 'It's the worst I've ever known it'.

4.4 Use of force

During the year, there were 414 incidents where force was used in the prison, a significant increase from the 268 occasions reported in the previous year.

A total of 158 of those incidents were planned, such as when transferring a non-compliant prisoner to a different location, for example. However, in 256 incidents, a spontaneous response was used by officers.

Governance of use of force (UoF) incidents was judged to be very poor by HMIP, which considered that there was insufficient oversight and accountability for custody officers, and it was noted by the HMPPS Controller that substantial numbers of UoF supporting paperwork (Annex A) were outstanding during the reporting period. The Board agreed with these observations.

In the early days of Sodexo management there was a shortage of Body Worn Cameras (BWC's) for use by Prison Custody Officers. However, once supply issues had been resolved, the Board regularly noted throughout the reporting year that a considerable proportion of prisoner facing staff appeared reluctant to draw and wear a BWC, the use of which the IMB understands is not optional. This impacted upon the safety of both officers and prisoners. Whilst noting and drawing attention to this failing by staff, the SLT were not seen by the Board to be taking any robust action to resolve. Almost one year later at the end of the reporting period, although the situation had improved, some officers were still failing to conform. In addition, a

common complaint raised by the SLT at discussions during UoF meetings has been that officers drawing BWC's have failed to activate them in a timely manner, so incidents were not being captured.

The weekly meetings to review UoF incidents, attended by the Director or Deputy Director and a member of the HMPPS Controller's team, were sometimes cancelled and did not take place at all from October 2023 until January 2024. The IMB could not attend due to the frequent changing of time or day, or not being advised at all of the meeting.

Throughout the year the Board has found great difficulty when requesting access to view the video records of UoF incidents when prisoners have raised concerns with IMB members.

This included a serious allegation made to the IMB that excessive UoF was used during a prisoner's removal to the CSU. The prisoner also alleged a sexual assault by an officer and an investigation was started. However, despite frequent requests, the Board has received no update from Sodexo.

4.5 Preventing illicit items

The availability of illicit items such as drugs, fermenting liquid, weapons and mobile phones was evident throughout the year to Board members on visits, and was also commented on by HMIP: 'Large numbers of prisoners were suspected of being under the influence of illicit substances.'

Drugs are known to create misery, debt and violence, and can contribute to self-harm and suicide. Drugs undermine regimes and help crime to flourish within the prison.

Mandatory drug testing rates have risen, from 13% with a positive result in February 2023 to over 51% in December 2023, with levels at over 35% since May 2023.

Random and intelligence-led searches of prisoners, cells and visitors led to the discovery of over 900 illicit items, which was broadly comparable with the previous year.

Entry gate searches of staff coming into the prison has been commented on by all Board members as being 'very rare' prior to step-in, and usually not happening when staff return to the prison after lunch break.

The Board has expressed surprise that more thorough searches of the prison were not undertaken by Sodexo from February to December 2023, given the continual upward trend in volatility throughout the year, plus positive drugs tests, prisoner-on-prisoner and prisoner-on-staff assaults.

It is noted that the last full lock-down search of the prison, prior to that conducted during the last few days of this reporting period, was undertaken by Serco at the end of November 2022.

Since the arrival of HMPPS in December 2023, more thorough staff and visitor searches has taken place, including wing searches in the weeks commencing (w/c) 3/1/24 and 15/1/24, plus a full tier 3 lockdown search in w/c 29/01/24, where there were a significant number of finds. The Board noted that this search did not cover the entire prison, omitting house block 5, and that in the following weeks there

continued to be finds of weapons, mobile phones, fermenting and distilling liquid and illicit drugs.

Type of Illicit item	Previous full reporting year total finds: 1/02/2022-31/01/2023	01/02/2023 - 17/12/2023 (Sodexo)	18/12/2023- 31/01/2024 (after HMPPS 'step-in')	This full reporting year total finds: 01/02/2023- 31/01/2024
Drugs	158	125	72	197
Mobile Phone (inc USBs, chargers and SIM cards)	101	111	81	192
Weapons	169	214	72	286
Fermenting Liquid (<i>Hooch</i>)	413	119	70	189
Totals	841	569	295	864

Board members have noted from their monitoring visits that:

- Prisoners have expressed concerns that the numbers of new and inexperienced staff being pushed through initial training courses and thrust onto the wings with little mentoring is making them very vulnerable to corruption.
- At least one member of civilian staff has been charged with attempting to bring in drugs.
- The dedicated search team has frequently been redeployed throughout the year, so regular targeted cell searches have not always taken place.
- There was widespread evidence of Spice (a chemical compound that mimics the effects of the active ingredient in cannabis) being produced on the wings using a cleaning product, which has now been withdrawn from use.
- The very popular photo booth in the visits' hall was removed, as it was being used to pass drugs out of sight of officers.
- Drones are increasingly being used to drop off drugs and other contraband. Several have been intercepted, but unknown numbers are getting through. There are plans for mesh over exercise yards to stop items being dropped in by drone.
- The prison continued to make effective use of the Rapiscan mail scanner to intercept and limit the supply of drugs sent into the prison by post.
- Body scanners and X-ray machines are used in reception, when transferees and their property are received into the prison.
- Body scanners are also used on visitors.

5. Fair and humane treatment

5.1 Accommodation, clothing, food

5.1.1 Accommodation

Accommodation at the prison is relatively modern by prison standards and consists of five house blocks divided into 14 wings. All of the cells include a toilet and wash basin facilities and on six of the wings they include showers. The remaining eight wings have communal showers on the landings. Each house block has an exercise yard and there is a large sports field and a well-equipped gymnasium at the prison.

The lock-downs also meant that some prisoners were unable to shower. These are issues that have been raised many times by prisoners and with the SLT by prisoner council representatives.

There has continued to be a decline in cleanliness and tidiness since our last report. Litter build-up outside the house blocks has been particularly noticeable. The Board has also noticed poor standards of cleanliness on the wings and, in particular, unhygienic food preparation areas (the serveries).

All cells in the prison have telephone points and handsets for use by prisoners. All calling numbers must be approved for individual prisoners and calls are monitored. This is an important service, which gives prisoners regular access to their families. Prisoners pay for telephone credits, although free credit may be issued by the prison at times of distress or difficulty. This has also occurred during times when a Red Regime was imposed by Sodexo.

Television sets are installed in all cells, giving prisoners access to a range of in-cell activities, including education material, pastoral support and religious services, in addition to a selection of entertainment channels.

5.1.2 Clothing

Prison issue clothing is provided, but prisoners are allowed to wear their own clothes, except in certain circumstances. Each wing has its own laundry room, with a full-time (prisoner) worker having responsibility for operation and cleaning. There have been no significant complaints about machine breakdowns or maintenance. Some prisoners have complained of clothing being stolen when left unsupervised.

5.1.3 Food

Meals are prepared in a central kitchen and the food is delivered to house blocks in heated trollies towed by a truck. Each wing has a servery with heated stations, where food is distributed to prisoners. Complaints about food quality are infrequent, but there were some complaints over portion size in the early days, when Sodexo took control of the prison. And, initially, new menu items were introduced, but the return of some old favourites later in the year was welcome amongst the prisoners.

However, there have been many complaints about the food not being served hot to cells when a lock-down regime is in place. Refrigerators and microwave ovens are available on each of the wings for common use, but the Board has noted that these are often not clean and potentially pose a health risk.

5.2 Segregation

5.2.1 Care and separation unit (CSU)

The segregation unit is now referred to as the CSU. It is housed in a purpose-built block, which contains 24 individual cells, two showers and outdoor exercise areas, as well as a kitchen servery and a laundry room. Meals are prepared in the servery by prison orderlies and are either distributed by staff, or prisoners attend the servery to collect their food. Prisoners eat in their cells.

The CSU continues to deal with the most challenging prisoners, who often abuse their surroundings: damage to cells is common through acts such as flooding, fire, graffiti and dirty protests. The fabric of the unit remains tired and in need of regular redecoration.

5.2.2 Segregation staffing

Historically, the unit has been led by highly skilled custodial managers who, with their team, have displayed extensive knowledge and compassion, even in the most challenging of times. It has been difficult for the Board to observe over the last year a decline in staffing levels and experience, leading to an often chaotic and distressing environment.

At times, the unit has been chronically under-staffed and by officers with very little experience. Board members have listened to staff observing that they are exhausted, scared and unable to meet all of the demands placed on them in the unit.

The IMB is also aware of staff failing to complete paperwork. The most serious example concerned the ACCT paperwork for a prisoner who, it appears, took his own life on a weekend where staff did not make all the required entries on his ACCT documentation.

The Board is also aware of a separate incident where four staff were immediately suspended after a video was posted on social media in June 2023 showing staff assaulting and behaving in an abusive way towards a prisoner. Those officers were subsequently dismissed.

Prisoners have reported to the IMB that staff have behaved aggressively towards them and, at times, they appear very demoralised at their lack of progress in the unit, either towards reintegration or transfer.

Segregation staff are required to manage prisoners being transferred to other establishments, but this has proved to be challenging over the reporting period. For a significant part of 2023, Sodexo did not have transport available. As a result, many prisoners remained in the unit for too long, because a transfer could not be arranged for them. The Board expressed concern over this issue.

Despite this being an unstable period in the unit, the Board has observed staff and prison orderlies working hard and trying to make life better for some prisoners.

There has been little regime during the reporting period, with no visible in-cell activities and only 30 minutes outside exercise per day. Prisoners are able to shower every other day.

5.2.3 Segregated prisoners

As mentioned earlier, the CSU houses the most challenging prisoners, many with complex mental health and behavioural problems:

- The unit has been full for most of the year, with an average occupancy of 22 prisoners at any one time. Two prisoners were segregated for over 100 days and one prisoner was segregated for over 200 days, with little done to either address their issues or reintegrate them back onto a wing.
- The IMB has not been provided with statistical data for the monthly number of ACCTs in the unit, but the Board has observed a larger number of ACCTs during the reporting period.
- There has been a significant number of self-harm incidents, some of which have been serious and required hospital treatment.
- CSU staff have dealt with dirty protests and prisoners spraying faeces (from a bottle).
- There was one death in custody in the CSU during the reporting period.

It is the view of the Board that throughout the reporting period the CSU has been 'over used' and continues to be so.

5.2.4 Segregation review boards

Historically, face-to-face reviews with prisoners at the prison were scheduled to be held three times a week and chaired by qualified members of the SLT.

Due to the unpredictability of when the reviews would actually commence, the Board has attended fewer segregation review boards than we would have liked during the reporting period. The IMB is concerned that by not adhering to a fixed time and not giving the IMB notice in any event, Sodexo has not fulfilled its obligation to facilitate IMB attendance at reviews.

Board members were satisfied from the SRBs that we did attend, so we could observe the proceedings, were, in the main, conducted appropriately by the Chair. But it is noted that healthcare, mental health and offender management teams have often not been represented, and that the Board has raised their concern over this issue. It is, of course, mandatory for healthcare to attend segregation reviews. The Board is aware of ACCT reviews taking place at the same time as SRBs which, we understand, is not considered to be good practice.

5.3 Staff and prisoner relationships, key workers

5.3.1 Staff and prisoner relationships

Staff-prisoner relationships continue to be an area of concern for the Board. Staff have continued to express their fear of entering wings and worry over their hours of employment and operating with a concerning low level of morale. Staffing levels remain worryingly low.

Wing staff have been observed by the Board to spend more time inside wing offices and they have been less visible on the landings. They have frequently been moved around the prison, thereby preventing good relations being built with prisoners and allowing little opportunity to make new relationships. Detached staff have arrived with little briefing and local staff have not had the time to mentor them.

The Sodexo implementation of unpaid lunch breaks has effectively left the prison unstaffed during the middle of the day. Management has been described by prisoner representatives as being ‘invisible on the wings’.

The arrival of substantial numbers of HMPPS officers following the step-in brought a noticeable improvement in the weeks following, but more recently there appears to have been an increase in the number of incidents to near the levels seen before the intervention. The issues detailed above have, of course, impacted staff-prisoner interaction.

Both staff and prisoners have appeared disengaged during the reporting period. Board members have been repeatedly approached by prisoners raising regime issues (when staff resources have fallen below the locally agreed minimum and only a basic regime can be delivered), lost property issues, lack of purposeful activity and other issues detailed elsewhere in this report. Prisoners have been particularly resentful when Domestic, Amber and Red Regimes have been implemented at very short notice.

On one occasion, prisoners were informed that the weekend Red Regime was ‘a last-minute decision’ made on the Saturday morning, due to staff not showing up to work. Word quickly got around the prison that an instruction to prepare ‘goodie bags’ for a Red Regime weekend had been given to workers in the workshops early on the Friday morning, thus fostering further distrust of the SLT with the prisoners.

5.3.2 Key workers

Key work is a core part of prison officers’ work and it is one of the central aspects of the HMPPS offender management in custody (OMiC) model. It is aimed at improving safety in prisons by building better relationships between staff and prisoners.

For the majority of the reporting period, the Board judged keywork to be poor or non-existent, with the vulnerable cohort not being seen - which is the mandatory group.

Some prisoners have reported not seeing a key worker for an extended period of time, or being unaware of who their key worker is. The Board notes that information relating to the activities of key workers continues to be limited.

5.4 Equality and diversity

5.4.1 Prisoner representation

The prison population is diverse in terms of age, ethnicity, faith, health, sexuality and nationality.

There has been no consistent diversity and equalities manager throughout the reporting year and, therefore, no recording or analysis of data of key areas. Prisoner equality representatives have informed the Board that they have had no meetings since their task force was disbanded in January 2023, as they have no leader.

The Board can report, however, that there is a planned relaunching of meetings, where prisoner representatives will be given a forum to air their views. Protected characteristics will be identified and the aim is for each group to be represented.

A repeated complaint to the Board during the year has been the lack of provision for the older cohort of prisoners. The prison regime has meant that retired and medically

retired men have not had activities or association time, and for a significant part of the year have been locked in their cells during working hours. The Board looks forward to monitoring a proposed new programme planned to start for older and vulnerable prisoners, with workshops led by a new member of staff.

5.4.2 Disability

The special needs of prisoners are assessed at induction and referred for the relevant interventions. Prisoners with educational special needs and poor literacy skills have not been able to attend the classroom regularly during the year because sessions were continually cancelled due to lack of staff. The prison population is screened to identify learning difficulties and there are plans to recruit a neurodiversity support manager to lead prisoners with these special needs. Shannon Trust peer mentors are trained to recognise specific disabilities.

5.4.3 Support for foreign nationals

The courses for non-English speaking prisoners were abandoned and sessions for one-on-one literacy courses were shut down by Novus and replaced by group sessions. Support for foreign national prisoners is patchy, with little foreign language material available.

5.4.4 Discrimination incident report forms

The Board cannot document the number of discrimination incident report forms (DIRFs) submitted, upheld or dismissed, because no DIRF log is available. Data was not passed on from Serco to Sodexo in February 2023, so there has been no management of this important aspect of prisoner life throughout the year.

It has been noted that DIRFs had not been collected from mail boxes since November 2023 until the end of the reporting year, leaving prisoners with no immediate acknowledgement or investigation. The Board understands the backlog is being dealt with at the time of reporting.

5.5 Faith and pastoral support

The chaplaincy continues to give positive and helpful support to prisoners of all or no faith. They are also available for members of staff during stressful times such as after a death in custody or when dealing with prisoners with challenging circumstances.

A chaplain meets new prisoners within 24 hours of their arrival at the prison and chaplaincy representatives make an effort to attend ACCT reviews.

Significant religious festivals are celebrated. There are beginner and advanced classes for Muslims.

It has been a struggle to get congregations assembled, because of a lack of staff. Planning has been difficult. The Imam has endeavoured to accommodate Jumma services each Friday.

5.6 Complaints

The Board is aware of an unprecedented number of complaints throughout the prison, with many not having been replied to after being referred to management for a response. In the reporting period, there were 2,120 internal complaints submitted

but only 1,698 were sent a response (80%). There is a considerable backlog, which the Board understands is being tackled at the time of reporting.

In addition, prisoners have reported to Board members that their complaint forms were not being logged, seemingly having just disappeared, and some prisoners told of watching officers tear up their complaints in front of them.

5.7 Property

Property going missing when prisoners are transferred between prisons and between wings within the prison is an ongoing issue. It has been raised repeatedly by this Board and IMBs at other prisons across the country for several years, with little or no sign of improvement.

The Board notes that the PPO, which dealt with property complaints, has now set up an office for Independent Prisoner Complaints.

6. Health and wellbeing

As noted elsewhere in this report, formal scrutiny of the prison has been undertaken by a number of statutory bodies during this reporting period. The Care Quality Commission (CQC) inspection findings have been used to inform this section, along with evidence from IMB monitoring.

In April 2023, a CQC joint inspection with HMIP found that the quality of healthcare required improvement, and a Section 29A Warning Notice, under the Health and Social Care Act 2008 (Regulated Activities), was issued. When a further focused inspection of healthcare at the prison was carried out in October 2023, lack of progress and new concerns resulted in the issue of a Notice of Proposal to impose conditions on the provider of the services, Nottinghamshire Healthcare NHS Foundation Trust.

The concerns of the CQC were reflected in the poor healthcare experience and outcomes for prisoners that the IMB has found through our monitoring. These are summarised in the sections below.

6.1 Healthcare general

The systems for commissioning of healthcare and providing the services and oversight of the process are complex. As in any multi-agency setting, prisoner experience is influenced by the effectiveness of these arrangements. This requires co-operation among the operators of the prison, healthcare commissioners and the healthcare staff in the prison.

The framework for this is the Local Delivery Board (LDB), which the IMB had regularly attended. During 2023, the IMB was disappointed that, following the change of prison management to Sodexo, these meetings frequently did not take place and the associated governance was limited. In our view, this contributed to a deteriorating relationship developing between healthcare staff and prison staff, which compounded the already difficult recruitment and retention of healthcare staff.

Serious issues with safety, which are the overwhelming concern of the IMB throughout this report, further adversely affected the healthcare available in the prison. For a number of months, healthcare staff were not deployed on the wings except for emergency situations.

Given this, the IMB believes it is vital to initiate appropriate action after receiving requests from prisoners to respond to their health concern. However, the CQC inspection found there was no adequate system for this and limited clinical triage to manage patient risk. Not surprisingly, the IMB received increased numbers of prisoner applications complaining about the poor healthcare. The Board found that trying to respond to these was difficult, as contacting healthcare was, for a period, almost impossible.

6.2 Physical healthcare

In addition to the systemic problems described above, there have been concerns from prisoners about changes in medication and, especially, limited help with pain relief. The intention by Sodexo to have a directly employed GP service for the prison, which could have enhanced continuity for the prisoners and healthcare colleagues, did not happen.

There were delays in implementing storage of medicine in individual locked cupboards, and contact with healthcare staff during medicine rounds was fraught with difficulties because of frequent disruption of the regime.

Initial health reception screening for arriving prisoners was, for a time, carried out by a healthcare assistant. The data on the timing of this showed delays, which increased risk for prisoners.

The decision to stop the requirement to have healthcare available overnight, which the IMB regarded as vital for this prison, was a further concern, given the historic number of Serious Incidents during Night State.

The review undertaken for the LDB found that increasing access during day hours would be a more effective use of resources, but problems in recruiting have made this difficult.

Prisoners with long-term health conditions and those with more acute problems told Board members of their difficulty in accessing support and referrals. One prisoner, who had a stoma, could not obtain help with the supply and disposal of waste bags. A prisoner with terminal cancer was not transferred to a hospice until the day before his death.

6.3 Mental health

The mental health team was depleted during the year and routine services were problematic because of the safety concerns. There had been a regular presence of staff with experience and expertise in autistic spectrum disorder, which had been especially helpful to staff in the CSU and in reviews, but this did not continue under Sodexo control.

The CQC reported that needs were not met for psychological therapies. The IMB observed that the decisions by Sodexo about the model of services to be available resulted in the loss of a psychology service which had, until this year, affected major beneficial changes in the care of prisoners with severe mental health issues.

6.4 Social care

The steady improvement in input for social care at both commissioning and practitioner level has not continued. An example of the impact of this was a delay in obtaining the basic equipment necessary for a prisoner with a traumatic leg injury to be discharged from hospital. Prison staff did not seem aware of the protocols required to organise this.

Latterly, there has been more effective communication, and the IMB is hopeful that this will help to meet the needs of the growing number of older prisoners.

6.5 Time out of cell and regime

Other parts of this report have described in detail the severe limitations posed by the various regimes during the year. The negative impact on prisoner health has been manifest in prisoners' applications to the IMB, letters from concerned relatives and the number of ACCTs in place at any one time.

Time out of cell has been disrupted on several occasions during the reporting year, due to Sodexo declaring a Domestic or an Amber or Red Regime at short notice, resulting from inadequate staffing levels. Many prisoners, who have sometimes been

locked up in their cells for over 48 hours, have complained to the IMB about the impact on their mental health.

6.6 Drug and alcohol rehabilitation

The challenges faced by the prison in dealing with drug and alcohol misuse are of great concern to the IMB.

- Drug finds and incidents doubled during the year, while the number of MDTs remained the same.
- The number of fermenting and distilled liquid finds tripled during the year.
- A change to regime meant that methadone-dispensing timing was changed. This was implemented without input from healthcare, and health staff had to deal with the subsequent backlash from prisoners.
- There was inadequate care of prisoners under the influence of drugs and alcohol, and no formal protocol for prison staff to follow. This remains an issue despite the Coroner's Prevention of Future Deaths notice after a death in custody inquest.

There had previously been a Serco protocol in place, enshrined in a flow chart that the prison had followed for any prisoner suspected or found to be intoxicated with drugs or alcohol. In particular, during Night State, it required that the first action is to *'bring the night nurse to the cell door'* to evaluate the prisoner.

It was established by the Board, with the appropriate member of the Sodexo SLT at the Nottingham Coroners' Court on 20 November 2023, that there was, at that time, no Sodexo protocol in place for prisoners intoxicated by drugs or drink. And, by that time, there was no longer a night nurse service available to attend. The Board was advised during that discussion that the matter would receive attention from the Sodexo SLT. However, by the end of the reporting year, no progress had been reported back to the IMB about a prisoner safety matter the Board considers to be both vital and urgent.

In addition, there has been no strategy for a holistic approach to the drugs' problems and no preventive or early intervention programmes during the year. The IMB notes that, post step-in, the recently changed management at the prison has expressed an intention to address this.

6.7 Soft skills

The IMB notes, with regret, that early support and assistance to help prisoners' wellbeing, which was to be focused on a purpose-designed wellbeing centre, has not been progressed. Staffing issues across the prison and limitations in regime have precluded any meaningful interventions. There are now plans to address this and the IMB will monitor progress.

7. Progression and resettlement

7.1 Education, library

7.1.2 Education

When Novus took over the provision of education and learning at the prison, in February 2023, there was great optimism that standards would improve from the poor-quality delivery that the Board had reported in previous years and that Ofsted had judged as inadequate in all areas in their previous inspections.

However, a number of factors, including staff shortages, a failure to design or deliver an effective curriculum that met the needs of prisoners, and regime restrictions, has led to frustration, hindering improvement throughout the reporting year.

An education needs' analysis carried out by Sodexo in November 2023 identified significant needs amongst the prisoners. It particularly, it recognised the 11.2% of the population were foreign national prisoners who have specific needs around language, culture and sentence management.

All prisoners were screened to see if they needed educational additional support: around a third self-declared a learning difficulty, including dyslexia, autism spectrum disorder, and social and emotional difficulties.

All prisoners were assessed for English and Maths: 77% of prisoners had an initial assessment of less than Level 2 for English; and 74% of prisoners had an assessment of less than Level 2 for Maths.

The educational programmes available for most of the year were in English, Maths, art and graphic design, with painting and decorating and sports being suspended due to staff departures. It was noted that a very small number of prisoners were able to access an English course for speakers of other languages until July 2023 when, again, the course was suspended until December.

The Board was disappointed that the sports academy programme was discontinued, as prisoners reported being highly motivated by attendance at the course. Many had gone on to achieve qualifications as personal trainers/gym instructors, with opportunity for work on release.

Prisoners told the Board that they cannot progress beyond Level 1 in most courses, which stifled ambition for learning and did not support their career and personal goals.

For almost all of the reporting year, there were not enough places in education for the population. This was exacerbated by a period of restricted regimes from October until December, when lack of prison officers prevented prisoners from attending education activities for nearly three months.

During the period when prisoners were unable to attend education, it was noted that recruitment, planning and training had taken place to enable prisoners to be offered an enhanced educational and vocational training programme. However, no measurable results or record of numbers attending are, as yet, available.

At the end of the reporting year, many prisoners were allocated to places in education. However, attendance levels resumed at around 55%.

It has previously been reported by the Board that there was no effective process for supporting prisoners with additional learning needs. There appeared to have been an improvement, as Ofsted reported in January 2023, that: 'Leaders and managers had ensured that a high proportion of prisoners had undertaken an initial assessment to identify any learning difficulties or disabilities'; and 'Teachers had received training in how to support prisoners with identified learning difficulties or disabilities. They planned learning and provided effective strategies to support prisoners' needs.'

However, whilst superficial assessments were in place, further detailed assessments have often not been carried out. Consequently, teachers often did not know how to support these prisoners, and the vast majority had not been getting the learning support they needed in education or the wider prison.

During the year, training has been carried out in effective strategies to support learners with disabilities or learning difficulties. However, the Board feels that this approach needs to be implemented more widely across the whole prison.

7.1.3 Library

Despite promises from Novus in February 2023, the library remains an under-developed and under-used resource for prisoners.

Informally collected data shows that an average of just five prisoners a day visited the library, Monday to Friday, when education classes ran, and there was a period of around three months with no access. There is no access in the evenings or at weekends, so full-time workers cannot use it. Literacy was not promoted well enough, and there were no activities or initiatives to encourage prisoners to read.

Prisoners have regularly reported to the Board throughout the year that they were unable to access the library, due to staff shortages for escort. On visits to other prisons, the Board has had the opportunity to see the benefits that a well-stocked, accessible library can bring to prisoners, especially in providing books/journals/ DVDs for prisoners who do not have English as their first language.

7.2 Vocational training, work

7.2.1 Work

Prisoners told the Board that, as Lowdham Grange is a training prison, they hoped to gain useful, accredited qualifications while at work, but this is not the reality.

Admittedly, there are contracts to supply products to major employers such as the NHS, and DFS Furniture to provide work in upholstery manufacturing, textiles and packaging. But prisoners at work did not have the opportunity to translate the skills they had learned into qualifications that would be recognised by employers, other than by way of a Textiles Level 2 qualification, which became available in August 2023. Also, the Board noted that the workshops were then, in the main, closed from September until December 2023.

Other aspects of work, such as cleaning and catering, horticulture and waste management, support the prison population, but prisoners were not offered the opportunity to work towards a recognised qualification to accredit their skills at work.

Accredited completions								
	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Oct 23	Nov 23
Number of prisoners obtaining an accreditation	157	209	121	61	79	69	25	4
Number completing courses	194	250	143	81	96	90	30	4
Number of results outstanding	27	38	21	13	12	19	5	0
% completed	80.90%	83.60%	84.60%	75.30%	82.30%	76.70%	83.30%	100%

The Board noted that many prisoners who undertook cleaning jobs did not have the qualifications they needed to carry out their work efficiently or safely.

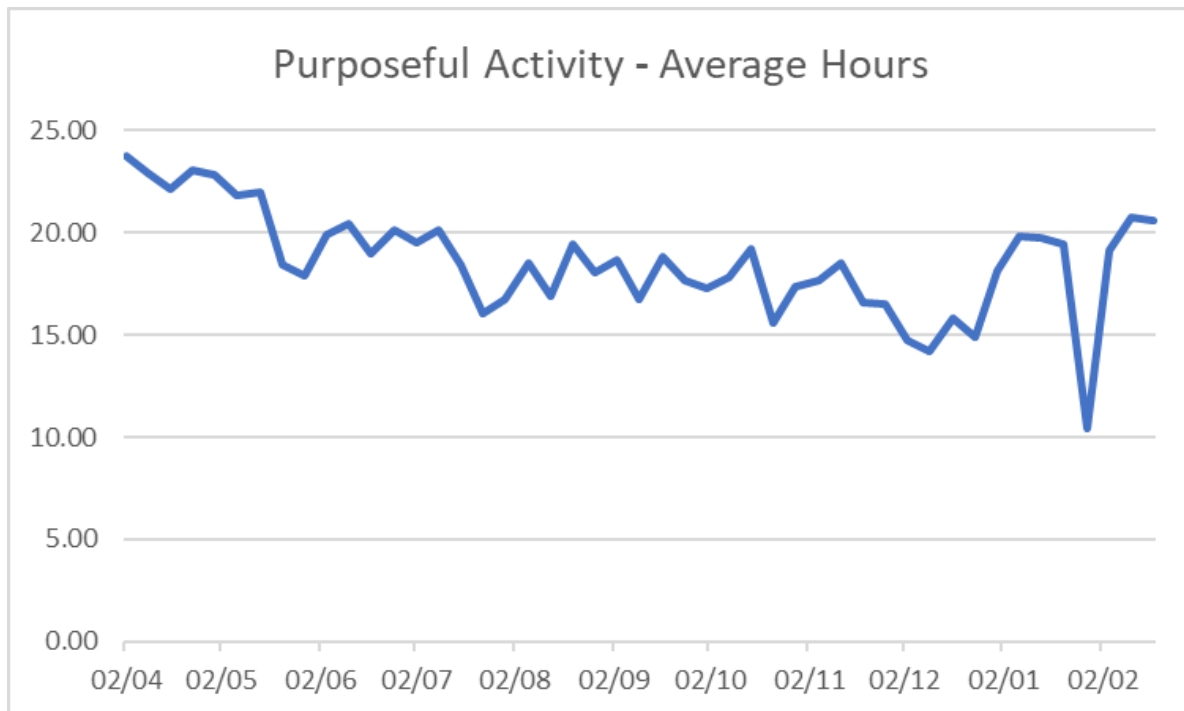
Although regular employment has continued in the kitchen, serveries, laundry and in recycling, cleaning and support for other prisoners, the Board is disappointed to report that almost a third of prisoners were unemployed for months at a time, because of a lack of opportunities for employment in the prison and staff shortages restricting movement.

7.2.2 Purposeful activity

The Board has noted that during the reporting year, purposeful activity for prisoners, which can include work, training, education, sport, progression courses, attending religious services and other structured activity, had declined steadily until the HMPPS step-in of December 2023.

The reality of this is that prisoners are locked in their cells, with attendant impacts on their health and wellbeing, and are unable to access opportunities for rehabilitation.

The graph, below, shows that from the week commencing 2 July 2023 until 31 January 2024, purposeful activity per prisoner was between 14 and 19 hours per week, which meant that they spent 21½-22 hours per day locked in their cells for nearly seven months.



NB: the significant drop in average purposeful activity hours in the week commencing 28 January was due to a Level 3 lockdown search.

7.3 Offender management, progression

7.3.1 The offender management unit

Probation staffing in the OMU was not fully resourced for the entire reporting period.

Probation officers have, again, commented to Board members this year that staff shortages continue to cause high workloads, which are difficult to manage. This has resulted in some officers having a caseload of as many as 92 high-risk prisoners, which is around twice the planned number.

High-risk prisoners are still being co-worked by prison offender managers (POMs), but in much lower numbers than reported in the last reporting period. Co-working on these high-risk cases is overseen and managed by Probation as the lead, with support from the prison staff. At the date of this report, there were seven (nine last year) low- or medium-risk and 15 (171 last year) high-risk prisoners with incomplete or out-of-date offender assessments.

Probation officers have not been attending prisoners on the wings since November 2023, but that freed up time to work through backlogs.

The Board notes that prisoners continue to be transferred into HMP Lowdham Grange from other establishments without up-to-date offender assessments (OASys). Although new arrivals are reviewed by reception staff as part of the prison's checks on custodial behaviours, the lack of accompanying up-to-date paperwork disrupts the updating of the offender management system for use by other prison departments. When prisoners have been transferred to residential

accommodation, the offender management in custody (OMiC) process has been affected in a similar manner.

In view of the potential for unfavourable outcomes for prisoners, the Board regards this disruption and the failure to fully inform the prison as unsatisfactory. It also remains concerned about possible risks to staff and other prisoners posed by potentially violent prisoners whose backgrounds are incomplete or who have not been fully assessed in their early days in the prison.

With regard to sentence-planning reviews, the aim has been to ensure that every prisoner serving a determinate sentence (which has a fixed end date) has an assessment review at least every two years, and every three years for prisoners serving life sentences. At the end of the reporting year, most or all reviews were up to date, a substantial improvement on the last reporting period, when seven low-risk and 156 high-risk reviews were out of date, and only 15 high-risk reviews were still in date.

In December 2022, the former prison management, Serco, aimed to reduce the numbers of overdue reviews by drafting in a team of five external Probation Officers with the aim of catching up by Easter 2023 (in this reporting year). The Board is pleased to report that while there is still some 'work in progress', the initiative can be seen to have been successful.

Community Probation Practitioners (CPPs) have been involved in all recall cases, parole cases, and prisoners entering the pre-release stage.

East Midlands Probation Service offer pre-release support to prisoners at HMP Lowdham Grange. OMU staff work closely with these CPPs, with the aim that prisoners are sufficiently supported up to the point of their release.

However, the Board has previously reported shortages of CPPs leading to failures in release planning and programme execution. OMU management has advised that these pressures have been relieved during this reporting year, though some areas, such as Nottingham and London, for example, remain stressed.

7.3.2 Progression

One of the main keys to the progression of prisoners in their sentences is attendance at various accredited offending behaviour, violence reduction and pro-social learning courses, such as the Kaizen programme. These programmes are managed by Sodexo and accredited by HMPPS, and have been designed in line with the latest evidence of what works to reduce reoffending. To ensure quality of delivery, HMPPS regularly monitors this using a quality assurance programme.

OMU staff complete referrals to these courses, which are conducted as group sessions for between 6 and 10 prisoners. Post-course reviews are an essential part of such courses, and the findings on prisoners attending link into their sentence planning and risk assessment plans.

As last year, the Board is concerned that these courses do not always take place, again in the main because of staffing issues.

7.4 Family contact

7.4.1 Social visits

The visits hall provides a suitable space for families and others to visit prisoners, with some facilities for children. The visits hall is pleasant but lacks a play area. The small café, which sells a limited range of cold refreshments, is operated seven days a week by prisoners.

Most prisoners are a very long way from their home areas, with only 13% coming from the East Midlands, and most are serving very long sentences, so the Board appreciates the importance of maintaining family contact.

A popular photo booth in the visits hall was removed after it was seen to be used to exchange contraband. Prisoners were told that staff would have a camera so they could have photos of themselves with their loved ones, but this has not always been available.

During the reporting year, a new timetable was introduced that provided more visits seven days a week, but with shorter time slots. This has been a source of frustration for many prisoners, particularly as many of their visitors travel long distances to see them. Prisoners booked visits themselves using the kiosks (a self-service computer system that allows prisoners to manage their daily affairs), or in-cell technology, although many have told Board members that it is difficult to secure slots at the weekends.

The Board noted that on two occasions, weekend visits were cancelled: one was due to safety concerns, as there was heavy snow at the prison, and the other to serious staff shortages. The Board was concerned when a scheduled visits' session was cancelled at very short notice on Sunday 10 December 2023, with many families not informed until they arrived at the gate after travelling from as far away as Liverpool, Birmingham and Huddersfield. After representation from the IMB, the families were offered compensation.

Support to help prisoners build relationships with children and family members is limited by lack of resources. There were no Family Days from January to March 2023. However, these were operated successfully at Easter, in the summer, and at Christmas, and were of great benefit to families and prisoners.

The Board was not able to find out how many prisoners are not receiving visits or making contact with the outside world. A prison visitor befriending service has, apparently, been introduced, but no outcomes have been reported.

During the reporting year, there was an allegation of sexual assault by staff during a visit. This followed an unsubstantiated allegation by staff of the passing of drugs, and another allegation of inappropriate treatment of a visitor. The IMB was advised that both matters are under investigation, but the Board has not been advised by Sodexo of the outcomes of those investigations.

7.4.2 Inside Media facility

In previous years, the Board has been pleased to report on the good work of the Inside Media team at the prison. In the reporting year, the facility has continued to provide in-house TV and video services in the prison. However, the Board notes that

in the reporting year, there have been fewer jobs and skills' training opportunities for prisoners while the facility waits to be re-equipped with new IT.

Until this year, the facility produced video recordings for prisoners' families. These recordings, which were available to prisoners in all parts of the prison, consisted of prisoners reading stories to their children (Storytime Dads) and video messages for families. Data provided by prison shows the following number of video productions for the last two reporting periods:

Video recordings produced for HMP Lowdham Grange prisoners	2023	2022
Stories read to prisoners' children	0	215
Video messages for prisoners' families	0	185
Total	0	400

Following the takeover of prison management by Sodexo, the Inside Media facility came under the management of Novus. It is noted, with great sadness and regret, that what was a first-class service, vital in fostering contact between prisoners and their families, has been abandoned.

It should be noted that at the time of reporting, the HMPPS Governor had expressed that the video recordings facility be reinstated by Novus, which duly advised that, as a matter of budgeting, other educational facilities would have to be sacrificed if that wish were to be enacted.

Board members understand that opportunities to engage more prisoners and aid their learning have been frustrated throughout the year by lack of resources/ equipment. A Level 2 accredited course in Film and TV has been developed, but restrictions in the regime and attendance prevented prisoners enrolling before Christmas 2023. The Board has noted that there are now five learners attending this course.

The work of the IMB

Members of the Board were able to visit the prison frequently and undertake a substantial level of in-person monitoring during the course of the reporting year. However, the work of the Board was hampered by very unsafe conditions on the wings, due to violence and understaffing, particularly during the second half of the reporting period. As noted in section 4.3, healthcare, education and OMU staff elected not to visit prisoners on the wings for many months. Board members also made personal decisions on an ongoing basis as to whether or not it was safe to directly monitor residential areas, or if it was prudent to monitor in pairs.

Given the reduced complement of IMB members, careful decisions had to be made about how the Board used its resources to achieve the maximum benefit for prisoners from monitoring outcomes. The Board used a matrix to ensure effective coverage, and consistently focused on the most vulnerable prisoners.

When visiting, the Board concentrated its attention on speaking with prisoners who were segregated, on the wings, at work/education, and also on responding to prisoner applications. In addition, members attended the following:

- Healthcare delivery meetings and Local Delivery Board meetings
- Weekly prisoner consultation meetings (Prisoner Council)
- Daily management meetings
- Segregation Review Boards with individual prisoners

The IMB found that management did not reliably schedule segregation reviews with individual prisoners at regular times, as had been past practice at the prison. As a result, the Board found it impossible to know when and where SRBs would take place and, therefore, could not plan for IMB attendance so we could monitor proceedings.

IMB Board meetings were held monthly, with a total of 11 for the reporting year. These were also attended, on occasion, by the four different Directors from Sodexo, the Controller's team, and also by the new HMPPS Governor.

Relationship with the senior leadership team and the Governor

The Board is disappointed to report that it struggled to garner co-operation from the SLT when investigating a number of incidents during the year. This suggests that its co-operative working relationship with prison staff and management may not be as strong as in previous years with the prior prison operator.

On reporting a serious incident, one Director flatly refused to accept that 'such an incident' of the type being related to him by the Board could occur at 'his prison'.

While the Board recognises that there has been a weakened and continually changing carousel of SLT members for the whole year, the work of the Board has been frustrated time and again by failures of Sodexo managers to respond to legitimate enquiries and requests about issues affecting prisoners, and to keep the Board updated on ongoing investigations.

Specific enquires about alleged serious incidents involving prisoners have come to the Board's attention through prisoner applications and other routes, such as from prisoners' families via the IMB Secretariat. However, in the main, the Board found

the SLT to be consistently unresponsive to enquiries made of them by the IMB on those matters, as well as being slow in enabling us to review of CCTV and body worn video camera (BWC) footage.

With one incident, the SLT claimed that CCTV and BWC footage had expired and been over-written after 28 days so was not available. However, the Board discovered that the footage had not been destroyed and was still available for viewing. We were able to view it - but not until three months after the initial request for information on the incident in question had been made.

At the end of the reporting year, there were nine outstanding enquiries for further information on incidents at the prison from the SLT to which Sodexo has not responded to the IMB, with the oldest dating back one full year.

The HMPPS Governor had only been in post for six weeks at the reporting year end, and those weeks encompassed the Christmas and new year holidays.

It should be noted that the Board is encouraged by the approach of the Governor to his task, and also by the early initiatives that have been put in place. The IMB is hopeful of improved outcomes for prisoners during the next reporting year, although the Board envisages that it might take a considerable period of time for the prison to fully recover - longer than a year. This is because most of the framework required to run a safe prison that is now being managed through the HMPPS step-in process appears to be 'broken'.

Recruitment

The Board is well below the approved complement of members and, unfortunately, the recruitment campaign carried out during the year did not result in any additions. A further campaign is underway at the time of reporting, and the Board is pleased to report that there are currently three new applicants.

Training and development

The Board has continued to learn and find innovative ways to fulfil its statutory role, especially during the uncertainties brought about by the contract transition period.

The Board organised an exchange visit with HMP Whitemoor IMB. We also regularly contribute to Initial Training Courses for new prison custody officers by making presentations on the role of the IMB to new staff early on in their training.

Board statistics

Recommended complement of Board members	15
Number of Board members at the start of the reporting period	9
Number of Board members at the end of the reporting period	8
Total number of visits to the establishment	343
Total number of applications received by the Board	203
Total number of Board meetings/attendances	11/75

Applications to the IMB

This is a summary of prisoners' applications to the IMB between 1 February 2023 and 31 January 2024.

Code	Subject	Current reporting year	Previous reporting year
A	Accommodation, including laundry, clothing, ablutions	4	2
B	Discipline, including adjudications, incentives scheme, sanctions	6	6
C	Equality	9	2
D	Purposeful activity, including education, work, training, time out of cell	6	10
E1	Letters, visits, telephones, public protection, restrictions	14	8
E2	Finance, including pay, private monies, spends	4	3
F	Food and kitchens	5	5
G	Health, including physical, mental, social care	30	17
H1	Property within the establishment	22	11
H2	Property during transfer or in another facility	16	26
H3	Canteen, facility list, catalogues	6	5
I	Sentence management, including HDC, ROTL, parole, release dates, re-categorisation	8	12
J	Staff/prisoner concerns, including bullying	15	10
K	Transfers	5	4
L	Miscellaneous	40	31
CA	Confidential access	23	18
	Total number of applications	213	170

The Board received 213 applications during the reporting year, submitted by 138

prisoners. A total of 98 prisoners submitted a single application during the time period, i.e. 71% of prisoners who submitted an application did so on a single occasion, with 90.9% of prisoners who submitted an application did so on one or two occasions. Two prisoners submitted 17 applications between them (8.4% of all applications).



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