



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

**For reporting year  
1 November 2023 to 31 October 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

Drake Hall is a prison (HMP) and young offender institution (YOI) for women aged 18 and over in rural Staffordshire, near Eccleshall and Stafford. It does not hold women on remand (those held in prison until the time of their trial or subsequent sentence hearing). Although designated as a closed prison, the environment is less restrictive than in other prisons. In this sense, the environment is unique in the women's closed estate and comparisons with other prisons must account for these differences.

The prison has an operational capacity (the maximum number of prisoners that can be held without serious risk to safety, security, good order and the proper running of the planned regime) of 340<sup>1</sup>. Women are accommodated in 15 individual houses, each with around 20 rooms. Most are single rooms, with a small number of doubles. The closed element of the prison has a capacity of 315.

The prison also has a care and support unit (CSU), which contains six cells and is used when a prisoner needs to be segregated from the main population for disciplinary or safety reasons. This is the only cellular accommodation in the prison.

An open unit provides additional capacity for 25 women outside the main prison. This unit aims to support the reintegration of women into society.

Women at Drake Hall come from a wide geographical area across England and Wales to serve a variety of sentences, ranging from a few months to life. Their ages range from 18 to 70 years. Many of the women are some distance from home and family.

The prison population averaged 93% (317) capacity in the reporting year. The increasing prison population and the lack of prison space mean that women are moved to where spaces are available. The allocation based on space over function means there are questions about the suitability of some of the women transferred to Drake Hall.

Increasing numbers of women have complex needs associated with their mental or physical health, substance misuse and history of trauma or abuse or experience of the care system. The prison is also seeing an increasing number of women who have a propensity for violence, self-harm, non-compliance and disruption. This can be challenging to manage in a fairly open environment without the structural security that is a feature of most closed prisons. It can be disruptive and impact on the safety of other women and the stability of the prison.

In July and August 2024, the prison was subject to an unannounced inspection by HM Inspectorate of Prisons (HMIP). This was the first inspection since 2020 and the inspectors concluded that the prison continued to provide impressive outcomes for the women. The establishment was assessed as 'good' for safety, respect and preparation for release. This is the highest possible outcome. The outcome for purposeful activity was 'reasonably good' and it was noted this was better than many similar institutions.

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<sup>1</sup> Figures included in this report are local management information. They reflect the prison's/YOI'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.

### **3. Key points**

#### **3.1 Main findings**

##### **Safety**

- From its observations, the Board believes that, generally, the prison provides a safe, calm and structured environment. However, the increasingly complex nature of the prison population means that self-harm, violence and reported bullying have increased. As a result, there are undoubtedly some women who feel unsafe in the prison and there are certainly some who struggle without the structural security of a more traditional prison environment.
- The increase in self-harm has been quite marked, although it is not clear exactly why this has occurred. Any explanation must consider a range of factors, including the complex nature of the population. The support for women who self-harm continues to be characterised by a multidisciplinary approach, trauma-informed interventions and good leadership.
- Levels of violence have also increased. This violence is directed at both peers and staff and several incidents have been serious. Two barricade incidents were designated serious. One of these required assistance from the national Tornado team (specialists deployed to prisons when there is a serious incident). Perhaps unsurprisingly, use of force is also higher. From the Board's observations, disruptive incidents are managed professionally and the governance is effective.
- As noted in previous reports, the presence of women with complex needs, challenging behaviour and a history of offending leads to management problems in an open environment with limited cellular accommodation. The presence of complex interpersonal relationships, as well as the prevalence of bullying, can be a source of stress for women who might be vulnerable.
- Given the complex nature of the prisoner group and the relatively open environment, there are concerns about the staffing resources available. On a regular basis, the number of officers available to support the basic regime is minimal and this affects what can be provided. This must also impact on the morale of the staff themselves, who are constantly balancing the urgent (such as medication administration) with the important (such as key work); sometimes, both are not achievable.

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

- It remains the view of the Board that women are treated fairly and humanely. Procedural rules are implemented in a reasonable way, although some women take a contrary view. Positive relationships between staff and prisoners are a notable feature of the prison.
- The quality of accommodation is of a reasonable standard, except for the Richmond and Plymouth houses, which have significant structural defects. Unfortunately, the poor condition of Richmond and Plymouth remains a continuing concern; the Board, the women, prison staff and management all agree that these facilities need to be replaced. The Board has now complained about the suitability of these facilities for over 20 years.
- The care and support unit (CSU) provides a safe and fair regime, where women seem to be treated helpfully and respectfully. Time spent in the CSU is short and there have been occasions when the facility has been empty. However, there have also been long periods when it is very busy. Unfortunately, the fabric of the building and its facilities are showing evidence of wear and tear and needs some

refurbishment. The condition of the roof means that, in heavy rainfall, the main entrance to the unit is subject to flooding.

- The Board is extremely concerned about the use of the CSU to manage women who have an acute mental illness and are awaiting transfer to hospital. Unfortunately, there is no safe alternative to this situation. In no way is this a criticism of staff but quite the reverse, as they must be commended for their work which is exemplary. Members of the Board have observed directly the high quality of support provided in an environment totally unsuited to managing the needs of individuals experiencing acute mental illness, as well as interventions that are professional, compassionate and therapeutic. However, the prison system more widely accepts the normalisation of an increasingly unacceptable situation, whereby individuals who are mentally ill spend long periods in segregation. This is not acceptable and the situation needs to be addressed at a national level; it is beyond the control of the local prison management.
- Sadly, property remains a significant and ongoing issue across the prison estate and Drake Hall is no exception. The Board continues to receive applications (written representations) from women, particularly following transfer from other establishments. Frequent failings in the handling of prisoners' property continue and often cause unnecessary distress. This is an unacceptable situation.
- The Board continues to observe interactions between staff and the women that are positive, professional and compassionate and are a feature of their relationships. However, it must also be noted that individual women continue to raise issues about some staff.

## **Health and wellbeing**

- The healthcare provision at Drake Hall is predominantly Monday to Friday, with a reduced service at weekends and on bank holidays. A recent review by the Care Quality Commission, forming part of HMIP's inspection, was positive. However, the Board does receive regular feedback from some women who challenge this perspective.
- Staffing levels appear to be comparable to many areas of the NHS, but a high level of turnover and a few vacancies have been noted. Agency staff are often used to cover staff shortages.
- The complex nature of the population at Drake Hall, and of new arrivals, means that an increasing level of health need is apparent. In our previous annual report, we noted that the need for healthcare exceeded the resources available, and this situation is even more evident in this reporting year. A rapid health needs analysis was completed in 2024, in response to these additional pressures, and further funding was provided to support service enhancements.
- Unfortunately, the Board continues to receive a high number of applications relating to healthcare and some women speak in very negative terms about the service provided. Although healthcare staff are always helpful in trying to resolve problems, the ongoing number of applications is a concern.
- The Board appreciates the delicate balance between safety, security and the promotion of an enabling environment. However, the regime is more restrictive when compared with the position prior to the pandemic. Women are particularly vocal about the lack of fresh air and opportunities for meaningful exercise. Their view was shared by the inspectors during the recent HMIP inspection. They concluded that opportunities for women to spend time in the fresh air or to take exercise were needlessly restricted.

## **Progression and resettlement**

- The provision of education is essential to effective rehabilitation and is a priority for the prison. It is not acceptable that there has been no increase in the budget for over 10 years. When inflation is considered, this constitutes a reduction in the available resource. Resources available are below levels for education in the community and there appears to be little political commitment to rectify this problem.
- All women are provided with the opportunity to work or attend education, and facilities such as Halfords and DHL offer excellent opportunities for employment following release. It is regrettable that the range of options has decreased since the pandemic, although the prison continues to look to increase the number of workplace opportunities available.
- Efforts are made to ensure that women are prepared for release and leave with both accommodation and employment; ensuring both can be challenging and the level of success observed is a credit to the prison.
- Population pressures and churn continue to be observed. These can be disruptive to the resettlement process, as many of the women arriving at the prison are serving short sentences or are very close to release. These impact on the rehabilitative ethos of the establishment, as they allow insufficient time to prepare adequately for release. Nearly 20% of women are subject to recall.
- The Hamlet Project, designed to support women who have difficulty engaging in the programmes offered by the prison, has continued to develop and clearly has a significant impact on the group of women for whom it is designed. These are women who have struggled to make the most of the rehabilitative programmes on offer and have often had difficulty in complying with the prison regime. This is due to their particular needs and experience.

### **3.2 Main areas for development**

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

- The Board has, yet again, to raise the conditions observed in Richmond and Plymouth houses. It has raised concerns since 1999 and makes no apology for any repetition. As noted in last year's report, despite considerable efforts by the prison to improve conditions, problems remain. Maintaining these facilities is a time-consuming and pointless task. Structural problems make attempts at improvement short term and, ultimately, futile. The process of cosmetic improvement cannot and will not resolve the underlying issues. Women should not be expected to live in such conditions. The Board again asks the Minister why these facilities have not been replaced.
- The use of segregation to manage prisoners experiencing a mental health crisis is an increasingly disturbing and unacceptable situation. The lack of available secure beds cannot continue to be used as an excuse for a systemic problem in the prison system. The criminal justice system, in its entirety, must urgently address this complex problem. Some of these women should never have come to prison, while others should be transferred out for treatment as a matter of urgency. Alternatively, some bespoke initiative developed between the health and prisons systems should be considered.

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

- The Board must again report that property delayed or lost on transfer remains a significant problem and causes unnecessary distress. As noted repeatedly in

previous reports, it is a systemic issue that requires action across the prison service.

- Again, the Board must raise the issue of the increasing number of women subject to short sentences or being transferred shortly before their release date. This makes both rehabilitative work and preparation for release at best difficult and at worst impossible.

### **TO THE GOVERNOR**

- Applications relating to missing property continue and the Board again asks if it is possible to appoint a single point of contact responsible for property. This should ensure better cooperation from transferring prisons and more accountability within the prison for the resolution of property-related issues.
- The Board remains concerned about the implementation of offender management in custody (OMiC) and is interested in further action to improve the amount of key work undertaken.
- The Board remains concerned about the low number of prisoners released on temporary licences (ROTLs), particularly for childcare resettlement.
- The Board is concerned about the ongoing problems regarding medication management. This has three components:
  - The process for administration of medications needs a complete and radical overhaul.
  - A means of controlling prescription medication needs to be found to reduce the risks associated with trading medications.
  - The design of the dispensary does not facilitate the effective administration of medication.
- Given recent discussions about the regime and comments made by HMIP about the limited exercise available, the Board is interested in how the prison will work to change this situation as we are also concerned that the current regime should facilitate more exercise and fresh air for the women.

### **3.3 Response to the last report**

<b>Issue raised</b>	<b>Addressed to the:</b>	<b>Response</b>	<b>Progress</b>
Condition of Richmond and Plymouth.	Minister	No action has been taken.	The issue remains unresolved.
Implementation of a capital programme to increase the operational capacity and function of the prison.	Minister	A political decision not to proceed with this initiative has been taken.	No further action has taken place.
Property delayed or lost on transfer.	Prison Service	No action has been taken.	The issue remains unresolved.
Transfer of women shortly before their release date.	Prison Service	Women continue to be transferred with minimal time to serve.	The issue remains unresolved.



Transfer of women from other prisons to Drake Hall on Friday evenings when there is minimal staff resource.	Prison Service	This issue has not been observed with the frequency and regularity noted in the last annual report.	Issue partially addressed.
Booking of social visits.	Prison Service	The situation appears to have improved.	Issue partially resolved.
Allocation of a single point of contact responsible for property.	Governor	No single point of contact is available, so dealings in relation to property remain inconsistent.	Issue remains unresolved.
Increasing the number of women who are released on temporary licence (ROTL), particularly for childcare resettlement.	Governor	The number of ROTLs remains low and the issue was also noted by HMIP in their recent report.	Issue remains unresolved.
Parking.	Governor	This appears to have been less of an issue during the reporting period.	As the capital programme to increase the operational capacity of the prison is unlikely to go ahead, this is less of an issue.
Access to, which provide guidance to prison staff in England and Wales.	Governor	This matter has been considered in some detail via the prison council.	The issue will not be resolved without the implementation of an IT solution.
Control of prescription medication.	Governor	This has been addressed to some extent via work undertaken on the drugs strategy and the management of medications more broadly.	This remains an ongoing issue, even though it has been partially addressed.
Support for women isolated from family and friends.	Governor	The charity, Prison Advice and Care Trust (PACT), is involved in providing social activities and support. There have been some problems with availability of prison staff to assist.	Some positive developments have been impeded by staffing shortages. The issue remains partially resolved.

## **Evidence sections 4 – 7**

### **4. Safety**

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

The population of the prison is now broadly similar to that found prior to the pandemic. During the reporting period, the prison had an average of 317 prisoners, equating to a 93% occupancy rate.

All women arriving at Drake Hall were transferred from other prisons and are sentenced prisoners. According to information provided to the Board, 125 arrived during the reporting period, mainly from HMPs Foston Hall, Styal and Peterborough.

The reception area itself is clean, tidy and well-kept, with a comfortable seating area where hot and cold drinks are provided and women can order canteen (a facility whereby prisoners can buy snacks, toiletries, stationery and other essentials using their allocated funds) and arrange phone credit. This reduces the risk of debt. Toiletries and sanitary items can be provided.

The formal admissions' process is dealt with in a secure area, where all necessary checks, including a health screening, take place. On occasion, women arrive late in the afternoon and evening, which can present problems around health screening, given the absence of a 24-hour service. However, assessments are often facilitated by staff remaining on duty after the end of their shift.

Peer support is provided to help women settle into the prison regime.

Following transfer, women are located in Keele House. They receive a welcome pack and welfare checks are undertaken on the first night. As all women coming to Drake Hall are sentenced prisoners, this induction house replaces the first night unit found in other prisons. Women remain there while completing the induction process.

The induction is a structured programme that aims to integrate women quickly into their new environment. The process is important, as the establishment is usually very different from the prisons women have been transferred from.

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

There have been no deaths in custody during the reporting period. However, one woman died within 14 days of release, although the cause of death has yet to be ascertained. An investigation by the coroner and the Prisons and Probation Ombudsman (PPO) is ongoing.

Additionally, a single death, due to natural causes, has been noted in each of the last three reports. Despite this length of time, the PPO report has still not been published, and the coroner's inquest has not yet taken place.

Historically, the prevalence of self-harm at Drake Hall has been generally lower than at other women's prisons. Before the pandemic, the average number of women self-harming was 11 per month; during the pandemic, the average was eight. However, in the last report, a significant increase in incidents was noted. This trend has continued in the reporting period, with an alarming increase: 782 incidents compared with 546 in the previous year, an increase of 43%. Figures for previous years are noted in Table 1.

**Table 1**

Reporting year	2023-24	2022-23	2021-22	2020-21	2019-20	2018-19
Self-harm incidents	782	546	180	278	226	337

Incidents of self-harm are now a daily occurrence, often with multiple incidents in any 24-hour period. Table 2 provides a breakdown of incidents over the reporting period.

**Table 2**

Month and year	Number of incidents	Number of individuals
November 2023	59	15
December 2023	54	20
January 2024	59	19
February 2024	34	14
March 2024	80	20
April 2024	85	23
May 2024	83	16
June 2024	55	17
July 2024	44	12
August 2024	66	17
September 2024	72	22
October 2024	91	25
<b>Total</b>	<b>782</b>	<b>-</b>

Most of these incidents involve a small number of women who self-harm frequently and regularly. Many incidents involve cutting, scratching or the use of ligatures. A small number have involved the ingestion of foreign bodies, such as batteries, or medication overdoses. Some women have required hospital treatment.

Discerning any pattern is difficult, as the number of incidents per month ranged from 34 in February to 91 in October, while the number of individuals ranged from 12 to 25. Also, the reasons underlying self-harm are multiple and can exist in numerous combinations, while triggers can vary and are specific to the individual.

Given the dramatic increase in recent years, identifying the causes is crucial but almost impossible to explain via any single case, given the range of possible contributory factors.

The assessment, care in custody and teamwork process (ACCT) is a fundamental part of supporting women who self-harm. It is a positive way of reducing the risk of self-harm and appears to function effectively. The prison has seen a concerning 35.6% increase in ACCTs, from 188 reported in last year's report, to 255 this year. The comparative figures for previous years are noted in Table 3.

**Table 3**

Reporting year	2022-23	2021-22	2020-21	2019-20	2018-19
ACCTs	188	147	107	156	263

It is important to note that a few women are transferred to Drake Hall on open ACCTs, often without prior communications. This increases risks to the women and is not an acceptable practice.

All women subject to an ACCT are reviewed regularly, although there are still occasions when problems arise with healthcare staff attendance, due to practitioners only having short notice regarding a forthcoming review. Issues also arise in relation to accurate completion of the documentation. The IMB reviews the number of ACCTs on an ongoing basis and has noted that a small number of women are subject to the ACCT process for lengthy periods of time. Members of the IMB will, on occasion, attend ACCT reviews as observers.

The constant supervision suite supports women at significant risk of self-harm. It was noted in previous reports that this resource was used minimally. However, this year has seen an increase in the number of women subject to continuous supervision with, at one point, four women needing this level of care. When more than one woman requires this type of support, the CSU must be used, as the prison has only one constant supervision suite. Unfortunately, the CSU is not a suitable facility in which to undertake such activity and is only used out of necessity. It constitutes the least harmful option.

The Board again wishes to note the professional and proactive approach to intervention by staff generally and the overall coordination of the process by safer custody staff particularly. This must be commended. Vulnerable women are well supported and, in the face of increasing levels of self-harm, staff have worked hard to provide the right level of support, often in challenging circumstances. When a woman demonstrates high levels of self-harm, senior staff are involved in managing their support plan.

The overall approach to managing risk is well coordinated, with a multidisciplinary process in place, illustrated by the safety intervention meeting (SIMs) held every week. This appears to work effectively. The approach aims to be trauma-informed, individualised and proactive. It attempts to ensure appropriate management, and support for women with complex needs is provided.

The monthly safer custody meeting involves reviewing detailed information about all the factors that impact safety. This approach is data-informed and comprehensive.

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

At Drake Hall, acts of violence, either prisoner on prisoner or prisoner on staff, have historically been at a low level. Many of these incidents were also relatively minor, with only rare occasions when staff or prisoner were seriously injured. Unfortunately, recently, the prison has seen an increase in incidents, a number of which were more serious.

In last year's report, it was noted that 109 acts of violence had been recorded. This compared with 40 incidents in 2021-2022. However, this year has seen 105 incidents: 18 assaults on staff and 87 on other women. Of these, 13 were considered serious. Unsurprisingly, an increase in the number of incidents involving the use of force has been noted.

The prison uses challenge, support and intervention plans (CSIPs) to manage women who pose a raised risk of harming others through their behaviour. This includes an increased risk of violence. In last year's report, it was noted that the use of CSIPs had increased from 12 to 15 (out of 507 referrals). This year, the corresponding figure was 68 (with 759 referrals), an increase in both.

Why there is such a discrepancy between the number of referrals for a CSIP and the actual number implemented is unclear. It might be that this reflects a more challenging prisoner group that engages in more acts of violence at a low level. Alternatively, it may be that preventative measures in place provide an adequate level of control. However,

the 353% increase in CSIPs suggests that the level of risk posed by the women is increasing, which indicates an ongoing problem; and, with levels increasing so dramatically, this must be a cause for concern.

Women with highly complex needs who demonstrate more challenging behaviour are being transferred to Drake Hall, so the propensity for violence has increased. Add to this the potential for other forms of aggression, such as taunting, verbal abuse and bullying, and it is apparent that, for some women, their experience of imprisonment is difficult, which is exacerbated by their level of vulnerability.

There is nothing to suggest that women at Drake Hall are more at risk than at other prisons; in fact, there is much to suggest the reverse, in the Board's view. However, the population includes individuals who are quite volatile and others who are vulnerable, thus producing a concerning mix within a fairly open environment. The increasing number of incidents over the last two years, the number of women requiring the use of CSIPs and the number of serious assaults and incidents is a real challenge for the prison, particularly given the low numbers of staff. Although from the Board's observations, it is, on balance, managed effectively, the time and effort put into dealing with increasingly volatile and challenging behaviour detract from time for rehabilitative activities. A casualty may be the low rates of key work.

#### **4.4 Use of force**

The total number of use of force incidents (UoF) increased during this reporting year, with an approximate increase of 17%, from 63 to 74. This figure includes 25 women who have been involved in more than one incident. As has been previously reported, most of the times when control and restraint techniques were used (39) involved guiding holds (taking the prisoner by the arm and leading them to the CSU). Handcuffs have been used on only 35 occasions.

Two serious incidents are included in this year's total: two women separately barricaded themselves in rooms and denied entry to staff. Both incidents were dealt with successfully, without injury either to staff or to the women involved. On one occasion, a national tornado team was deployed in support.

It should be noted that staff try to limit the use of restraining methods to enforce compliance and ensure that women comply with instructions, preferring to use persuasion and/or de-escalation techniques to achieve the desired outcome. Handcuffs are only ever used as a last resort and, in some cases, to prevent self-harm. This is because mental health issues among the women and the needs of those who are neurodiverse should be considered when officers are using restraint. Some of the women at Drake Hall are very vulnerable so a sensitive approach, which demonstrates decency and respect, is vital.

There were 18 assaults on staff and 87 prisoner-on-prisoner assaults, 13 of which were classed as serious. This increased number of incidents could be down to women being transferred to Drake Hall who are not suitable for the prison's conditions. However, due to overall capacity issues, the spaces must be filled.

Every incident that involves force, no matter what level of control and restraint is used, is reviewed weekly. Following each incident, body worn video camera (BWVC) footage and officer accounts are analysed. Additionally, a monthly restraint minimisation meeting takes an overarching view of incidents that have occurred in the preceding month. It looks for trends and examples of both poor and outstanding performance on the part of the staff involved. Action is then taken to ensure that lessons are learned and promoted throughout the prison. A member of the Board attends these meetings on a regular basis.

## **4.5 Preventing illicit items**

Preventing drugs from infiltrating the prison is a constant challenge and takes up a considerable amount of staff time. It is necessary, as there is a link between the level of illicit substances and the incidence of bullying behaviour, drug debt and violence. Intelligence-led searches are a regular occurrence and drug-detection dogs are often deployed to support this process. Mail is checked using Rapiscan (X-ray) screening, which enables incoming mail to be tested for illicit substances. Mandatory drug tests (MDTs) are routinely undertaken and positive results that are proven result in an adjudication (a disciplinary hearing when prison rules have been broken).

A monthly drug strategy meeting coordinates the strategic and operational activity required to manage the overall approach to drugs. The appointment of a new drug strategy lead has added impetus to this process and a new strategy is being developed in response to the national framework published in October 2024. The strategy has three distinct aims:

- to restrict supply
- to reduce demand
- to build recovery.

The main problem at Drake Hall relates to the trading of prescription medication. This is likely to be due to difficulties in supervising the medication queues.

An important development has been the introduction of an incentivised substance free living unit (ISFL) in one of the houses. This commenced in October 2024, so is very much in its early stages. However, the approach is a positive and welcome development.

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

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

Plymouth and Richmond houses are a long-standing problem that remains without resolution. Spending money on refurbishing them is not cost effective. Although the problems caused by rats, reported two years ago, are considerably reduced, these units are not fit for purpose. Despite the efforts of prison management to mitigate the worst aspects of these dilapidated buildings, they still represent extremely poor accommodation compared with the more acceptable accommodation elsewhere in the prison.

The poor state of these houses has been highlighted in annual reports for many years but, still, no programme of work has been initiated to replace them. They were erected during the Second World War to house munitions workers and were never intended to provide long-term accommodation. The Board continues to contend that they are not fit for purpose and is supported by HMIP in its latest inspection report, which called for them to be replaced. The IMB has, for some time, been frustrated by the inactivity around this particular issue.

The IMB annual report for 2021-2022 elicited a 20 April 2023 response from Damian Hinds, then Minister of State for Justice, who stated that a feasibility study, commissioned in August 2022, had recommended the replacement of both accommodation units at a cost of around £46 million. This estimate seemed, at the time, to be excessive for two units comprising 44 rooms plus communal areas.

Subsequently, the IMB questioned this estimate in its 2022-2023 annual report, urging the Ministry of Justice (MoJ) to reconsider it, with a view to establishing a more affordable price that would allow work to commence as soon as possible.

The response to this, from Edward Argar, then Minister of State for Justice, on 14 May 2024, stated: 'MoJ Property Services acknowledge that the buildings are nearing beyond repair.' The Board understood from the response that a design existed for replacement units and that this was the basis for the projected cost of £46m.

This begs the question: if the buildings are nearing beyond repair, how much more time does MoJ Property Services give these buildings before they can no longer be used? And when was the survey conducted from which this 'beyond repair' conclusion was arrived at?

It seems that there is now tacit acknowledgement that the projected cost of £46m, which equates to £29K per m<sup>2</sup> (or £578k/room), is excessive and Mr Argar's letter goes on to state that other options to replace these houses 'are now being explored'. However, it is not clear what these options are.

Finally, as it is now obvious that the projected cost of £46m is excessive, the Board urges that a more acceptable estimate be established and that it should be included in the capital funding budget as soon as possible.

Apart from Richmond and Plymouth, the Board believes that accommodation at Drake Hall is acceptable. In recent years, new boilers have been installed and, generally, rooms are warm and well decorated. Bathrooms have been upgraded and are of an acceptable standard. House kitchens are well equipped and are a useful amenity, while association rooms are generally pleasant. When issues are raised by the women, the prison appears responsive. The Board does not receive many applications (women's written representations) relating to the state of the accommodation, although some comments have been made about the poor condition of some furnishings.

As reported in last year's report, the roof of the CSU continues to leak and poses a risk to safety. This is potentially dangerous, as the major leaks are situated at the entrance and could pose a serious risk in the case of a woman being located into the unit under full restraint. Flooding remains a problem in the open unit, necessitating the use of sandbags to mitigate any risks. The women have also raised concerns about the heating in the charity shop, as it cold for those who work there and stock can go mouldy.

The IMB has also noted the high level of fire alarms, many of which appear to have been started deliberately. The constant breakage of keys is also concerning.

Wearing their own clothes is the norm for women at Drake Hall. This is not usually a problem, except for women whose property has gone astray, leaving them with little to wear. Access to the charity shop is a necessity for some, while others may have limited funds. Clothing can also be accessed via the donated prisoner attire (DPA) system.

Some women have raised concerns about the availability of sanitary wear in workplaces; this can be very public and embarrassing for women, especially in the presence of male officers.

From the Board's observations, the kitchens provide an excellent service. Consistent leadership and staffing mean that previous high standards in the provision of tasty, balanced meals are maintained, despite it being increasingly difficult to do this given the rate of food inflation and budget constraints. Feedback provided by the women indicates that the majority find the menus easy to understand and, generally, the food is described as tasty with good portion sizes. The Board rarely receives applications or concerns about food. Overall, the provision is excellent, with women often complimentary about its quality, particularly in comparison with other establishments. The women continue to prefer eating in the houses rather than dining communally, which was the norm prior to the pandemic.

## **5.2 Segregation**

As a result of significant pressures on spaces in the prison system, Drake Hall now receives more women with complex needs, particularly mental health issues, and more women who are uncooperative. The result of this situation is that use of the CSU has increased.

There are only six cells in the prison and these are all located in the CSU. There is a specific constant supervision suite located on St David's house but, when occupied, the cells in the CSU can be used for constant supervision. The cells are used for disciplinary reasons, as well as women segregated for their own safety, mental health or personal protection. It is notable that the number of days spent on Rule 45 (where a woman has been segregated due to disruptive behaviour) has increased from 1279 to 1596, a 25% increase.

One area of concern for the Board is that although there aren't many young offenders in the prison - typically around 1.4% of the population - between March 2024 and September 2024, the number subject to adjudications appeared to have been disproportionate. In total, there were 95 adjudications, averaging 14 per month. Usually, the number would be in single figures. The reasons are not clear, but may point to a need for more support, as well as reflecting the behaviour of specific individuals.



It is in this context that the use of segregation must be viewed and Table 4 provides more detail:

**Table 4**

	<b>Reporting year</b>	<b>2022-2023</b>	<b>2023-2024</b>
1.	Adult adjudications	1235	1222
2.	Number of individuals segregated	253 (20% of adjudications)	274 (22% of adjudications)
3.	Total days spent in segregation	1279 (av 107/month)	1596 (av 133/month)
4.	Total days spent on rule 45	466 (36% of No.3, above)	826 (52% of No.3, above)

From the above figures it could be concluded that, while the number of adjudications and individuals segregated have been maintained at similar levels to 2022-2023, the seriousness of the infractions has risen, resulting in the increase in R45 decisions. However, increasingly, the CSU has been used to accommodate women with mental health conditions. Data appear to be fragmented regarding this aspect of the work of the CSU, but it is suspected that the number of women affected comprise a significant proportion of the increase in R45 decisions. These women are either awaiting transfer to hospital or an assessment to facilitate such a move. The absence of alternative cellular options means that these women cannot be located elsewhere and their presence on normal location is unsafe.

Many of the women have complex needs and the way such women are supported is, in the view of the Board, excellent. Where women must be segregated under R45, reviews are dealt with professionally, with women encouraged to participate and express their views. The staff try to reintegrate women as soon as practicable.

The Board is advised of R45, or Good Order and Discipline (GOoD) reviews, and members observe them whenever possible. During the reporting period, the IMB observed 106 reviews.

The Board wishes to note the professionalism and compassion with which women are treated in the CSU. Staff go above and beyond to maintain excellent relationships with the woman detained in the CSU and they deal with women with challenging behaviour in a positive and appropriate way.

Since last year's report, community payback, a prison-wide initiative, has been introduced. The initiative means that women who have committed minor infractions can avoid a reduction in earnings, which could precipitate other problems, by choosing the option of being sent out into the prison grounds and buildings for two hours to undertake tasks such as cleaning windows. The Board believes this is an excellent programme, with 35 sessions completed so far. We hope this will reduce the number of minor infractions.

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

The Board continues to observe positive relationships between staff and the women and has witnessed professionalism and compassion in the face of difficult situations, challenging behaviour and staff shortages.

Although some women have raised concerns about inappropriate behaviour from staff, involving poor attitudes and bad language, it is not something that has been observed by Board members. However, it must be noted that complaints about staff were high and a number of these were upheld. In the reporting period, 46 complaints were submitted by women about various members of staff. These related to attitude, decision making and unprofessional behaviour. All were reviewed by the Deputy Governor and 50% of cases were upheld.

The OMiC (offender management in custody) system was introduced in 2021, two years after its introduction into the male estate. Part of this process is the allocation of a key worker, who is responsible for providing support to a woman during her time in prison. Regular one-to-one sessions should facilitate this process. The system is different for women assessed as having the highest levels of need. They get additional time with their Prison Offender Manager (POM). The overall system facilitates increased support for women in prison. The Board takes the view that this system has the potential to improve the experience of prison for many of the women.

Unfortunately, uptake remains far from ideal, with fewer sessions taking place than the prison would like; women are often sceptical of the system's value and say they never see their key worker. The figures associated with the implementation of key work would seem to support this view. The annual target for key worker sessions is 12,940, of which 2221 were completed, a compliance rate of 17%. There are 62 active key workers and women are allocated a key worker within 24 hours of arrival at the prison. Despite this, the average wait for the first key worker session is 25 days.

The reasons for this relate to the shortage of staff and operational pressures, which are deemed more urgent. Staffing levels were set some time ago and do not meet the requirements of the prison population. These often override the delivery of key work and the Board continues to believe this affects the women's overall wellbeing.

Additionally, the Board believes effective implementation could reduce the number of complaints and applications to the prison and applications to the Board. There are also implications for both safety and security, as staff could be more connected to the day-to-day experience of the women and issues that might be developing.

As well as the impact on key working, staffing levels affect a number of other areas. These include late dining, cancelled activity and exercise in the evening, completion of social video calls and inter-prison calls and the ability to respond to applications in an effective and timely manner. Furthermore, the Board has no doubt that staffing pressures impact on communication between the women and staff generally. When some women feel staff do not respond to their needs, this might, in fact, be due to work pressures but, unfortunately, could lead to a perceived lack of care and fairness. The Board welcomes the recent work to review the staffing requirement for the establishment and hopes this can be hastened.

Of note in promoting positive relationships between prisoners and staff is the prisoner council. Board members have observed several of the meetings and it was described in positive terms by HMIP. It is, indeed, an excellent initiative of which the prison should be proud.

## **5.4 Equality and diversity**

The equalities committee operates as a number of subgroups, with one subgroup for each of the nine protected characteristics (which include, among others, age, disability,

race, religion, pregnancy, gender reassignment and sex) set out under the Equality Act 2010.

Prisoners are represented on each of these subgroups and there is also prisoner representation on the main committee. All functions and activities in Drake Hall must comply with the provisions of the Equality Act 2010 and the equalities committee is no exception. The prison provides a well-resourced framework for ensuring that the nine protected characteristics are fully understood and respected. This vital work helps the women feel that there is a good awareness of their statutory rights and protections.

From the Board's observations, good effort is made overall to ensure that prisoners are involved in the introduction of new initiatives, as well as encouraging the women to monitor how well existing policies are applied. In conjunction with the chaplaincy team and the women themselves, the equalities committee also coordinates the promotion and celebration of all major religious events during the year.

A key part of the equalities function is to encourage women to raise concerns about equality issues that they feel are affecting them and to submit these concerns to management by completing a discrimination incident report form (DIRF).

The submission of DIRFs, over the last six years, has been at a low level. However, the prison has seen a significant increase in the number of forms submitted during the reporting year: 52 DIRFs have been submitted compared with 11 in the previous reporting year (2022-2023). This increase is viewed by the Board as an indication of how successful the equalities team has been in publicising their important work and making sure it is relevant to the women's everyday lives.

Submitted DIRFs are investigated and the outcomes are reviewed by a monthly independent scrutiny panel. This rigorously reviews the approach taken when investigating DIRFs and it also undertakes a critique of the conclusions, prior to the outcomes being fed back to the complainants.

Out of the 52 DIRFs submitted this year, 19 concerned race as a protected characteristic and 14 related to medication/healthcare impacting on disability. Those concerning race mainly related to the use of racist language which, despite efforts, is difficult to eradicate.

Medication/healthcare DIRFs are an area of serious concern because, as far as the prison is concerned, this is a new issue. Healthcare services come under the auspices of Practice Plus Group, the health provider, so DIRFs related to medication/healthcare are forwarded to the head of function, who handles them in accordance with patient confidentiality rules. This means that outcomes are not known across the wider prison.

The Board is concerned about the length of time it takes to complete a full review of individual DIRFs, with 14 outstanding at the end of the reporting period.

The increase in DIRFs is to be applauded, in the Board's view, as it can be viewed as a response to the efforts of the prison to encourage women to come forward if they have concerns. However, a solution must be found to the concerns that are raised in connection with those medication/healthcare issues that impact on a disability.

## **5.5 Faith and pastoral support**

Previous reports have noted the excellent service provided to the women by the chaplaincy team. An integral part of the prison, their role is highly valued.

The chaplaincy team has a strong and regular presence in all areas of the prison and the staff play a critical role in supporting women who may be vulnerable or in distress. They work closely with other staff to ensure that such women are safe and their needs are met.

Last year, the Board's main concern in this area related to the composition of the team. Vacancies existed in several areas: paganism, Catholicism, Islam, Sikhism and Buddhism. A number of these vacancies have now been filled and a more comprehensive service is available to the women.

Every attempt is made to ensure that all religious festivals are recognised and celebrated during the year and appropriate food is available.

The work of the chaplains is challenging yet undertaken diligently with compassion and good humour. Pastoral care and individual support are provided to women and staff in distress or crisis. The chaplains regularly attend ACCT reviews, visit the CSU routinely and provide bereavement support when required. The service they provide to the women, often in the face of staffing constraints, must again be commended.

## **5.6 Incentives scheme**

The local incentive system is a means of rewarding good behaviour and providing disincentives for poor behaviour. There are three categories: basic, standard and enhanced. Women are assigned to one of these categories according to their behaviour. Most women are on either the standard or enhanced levels. The allocation has important financial- and sentence-related implications. At the end of the reporting period, 170 women were on enhanced, 136 on standard and 12 on basic. During the reporting period, on average, 59% of women were on enhanced status, 38% on standard and 3% on basic.

The Board's observation is that the high level of women on the enhanced status is surprising. This view is based on several reasons:

- The complex nature of the women detained at Drake Hall.
- The levels of adjudication (disciplinary hearings when prisoners are alleged to have broken prison rules) and the use of the CSU for disciplinary reasons.
- The levels of conflict and violence reported.

This raises the question whether the use of the CSU and the adjudication process is the default mechanism for dealing with disciplinary matters, rather than being part of a graduated approach that first makes use of the incentives system. This might explain why some women who are consistently presenting with disciplinary problems remain enhanced and women subject to sanctions under Rule 55 (which means that a prisoner found guilty of a disciplinary charge may be subject to cellular confinement or removal from their unit) do not automatically experience sanctions associated with the incentives programme.

If our supposition is correct, then it raises the possibility that the system is not applied in a consistent and objective way, as some staff undoubtedly do apply it in the intended way. This perspective is supported by the fact that some women complain that there is a lack of consistency in the application of prison rules.

## **5.7 Complaints**

The complaints system is the main route for women to raise concerns if they believe they are being treated unfairly or that prison rules have not been followed.

The complaints policy gives guidance on timeframes for responses and access to the independent prisoner complaints investigations (IPCI). Women also have direct access to the Governor for confidential complaints.

In the Board's view, this guidance is complied with and is well administered via the business hub. Procedural arrangements for processing and responding to, and auditing, complaints are well established. All complaints are logged centrally and response times are monitored. The Board reviews the number of complaints outstanding during each monitoring period.

The process appears to work effectively, although there was a short period during the reporting period when delays in dealing with complaints was experienced due to some administrative issues. These were quickly resolved.

Complaint forms are available in each of the houses and the women seem to be aware of the procedure. The number of complaints submitted supports this view.

Statistics about the number, type and management of complaints are available to the IMB monthly and are reviewed at Board meetings.

During the reporting period, there were 1184 complaints compared with 1070 in the previous reporting period. The last two years have shown a marked increase from 2021-2022, when 696 complaints were received. The reporting period has seen an average of 99 complaints per month, ranging from 58 in June 2024 to 120 each in January and April 2024.

Figures for recent years are noted below. The number of complaints in the last two reporting periods appear to reflect the numbers received prior to the pandemic. The significant factor may, therefore, be the number of women detained in the prison, as the population is now like that observed prior to the pandemic, whereas it was reduced during the pandemic.

**Table 5**

Reporting year	2023-24	2022-23	2021-22	2020-21	2019-20	2018-19
Complaints	1184	1070	696	432	566	1076

The nature of the complaints varies, but the top 10 issues related to:

- property
- other establishments (often an ongoing issue regarding property)
- residential issues
- security
- staff complaints
- bullying
- OMU/sentence management
- PIN phones
- visits
- employment

These issues were broadly in line with previous years, although complaints against staff in 2023-2024 were more prominent than in the previous reporting period. Of 48 complaints against staff, 50% were upheld. Issues raised included inappropriate language, poor attitude and level of care and fair and equitable application of prison rules.

The prison management audits a 10% sample of replies to all complaints monthly and just over a third of complaints are upheld (35%).

As reported in previous years, the Board remains concerned about the lack of support for women with poor literacy or understanding of English, who want to complain. Support appears to depend on the availability and approach of the key worker. As noted elsewhere in the report, this can be variable and, given the challenges in maintaining an adequate level of key work, is an ongoing concern. Complaint forms in other languages can be facilitated, but the business hub has received no such requests.

## **5.8 Property**

Property is the source of many complaints to the prison and applications to the Board are common. This relates to property lost during transfer from other prisons and issues around property stored at Drake Hall.

As noted in our previous annual report, across all prisons the system is broken and prisoners continually arrive, following transfer, with property missing. Again, as previously reported, some of the missing items, often lost forever, are of personal value to the women and are often irreplaceable. The Board regularly hears about property that has been lost, which is the only thing they have left to remind them of a family member who has died or a child they no longer see. This is unacceptable, yet responding to these concerns appears to be a low priority across the prison system.

The complaints process relating to property is often a laborious, drawn-out affair, with the situation frequently remaining unresolved. It can go on for months and even years, with women often reluctantly accepting they will not see their property again. The compensation process is equally frustrating, with prisons arguing about who is responsible for providing compensation and even questioning the very existence of the property concerned. This is a situation not helped by the fact that some claims appearing to be spurious. Unfortunately, even when the case is clearly genuine, full value of the property is often not recognised. This situation would not be accepted outside the prison system.

On a more positive note, the problems associated with the distribution of parcels received by the women appear to have been addressed, with the Board receiving very few applications in relation to this matter during the reporting period.

## **6. Health and wellbeing**

### **6.1 Healthcare general**

The Prison Service, in partnership with healthcare providers, is required to ensure that the women have access to health services equivalent to those in the wider community. Practice Plus Group (PPG) is the leading provider of all commissioned health services, and certain specialties are subcontracted to alternative providers. PPG has provided services since 2016; the contract was renewed for seven years in 2023, with an optional two-year extension.

Primary healthcare, including substance misuse treatment, continues to be provided by PPG. They are the lead provider and work with the Midlands Partnership NHS Foundation Trust, which offers mental health services. The prison has no inpatient facility. Healthcare at Drake Hall is available seven days per week, operating a nurse service from 7.15am to 6.30pm on weekdays and 7.30am to 5pm at weekends and on bank holidays. Other professionals provide services on a sessional basis. A list of services provided can be found in Annex A.

In last year's annual report, the Board noted that the population of women now present at Drake Hall is characterised by an increasing level of health problems, both physical and psychological. The women coming to Drake Hall have complex needs and are often unstable. This is exacerbated by the fact that many have usually only recently come to prison. This high level of need impacts on the level of service that can be provided, and the available resources are often stretched, particularly around medical appointments and prescribing. It is becoming increasingly clear to the Board that the available resources are outstripped by demand. This may explain, at least in part, the frustration expressed by the women about the service provided.

The health needs analysis, undertaken in 2019, is now out of date and the commissioning decisions it resulted in are, therefore, in need of review. A rapid health needs analysis took place in 2024, and some additional funding has been provided for additional staff to enhance the service in response to increasing pressures.

The complex clinical picture described above has been accompanied by a regular turnover of staff and a number of vacancies. Although there is a proactive approach to recruitment, which has been reasonably successful, gaps in provision inevitably impact on the overall provision of service. Agency staff are regularly used. Pressures associated with restricted GP cover, the limited availability of a pharmacy technician and the shortfall in advanced nurse practitioner time impact on safe and effective prescribing. This is an important issue, given the level of medication prescribed in the prison.

Healthcare was part of the recent HMIP inspection, which was undertaken with the Care Quality Commission (CQC). Despite these problems, the CQC found there were no breaches of relevant regulations, and the report was positive. They commented positively on leadership, oversight and assurance. Comments about staff were positive and they observed good standards of record keeping. They described good services for sexual and reproductive health and primary care and no overall concerns about the services provided were raised.

However, the CQC did note that responses to the prisoner survey were mostly negative and this has been a feature of the Board's interactions with the women over the last two years. The number of applications (prisoners' written representations) to the IMB

regarding healthcare continues to be high. Over the last three years, these applications have increased from 7 to 19 to 58. In the reporting period, 54 applications (31% of the total number of applications) have been received and healthcare continues to be the main reason why women contact the IMB.

The issues raised related to:

- access
- medication
- responsiveness
- treatment
- perceived service deficiencies.

Although some of the applications are based on unrealistic expectations, in the Board's view, this cannot explain the overall increase over the last two years, and the reasons for the increases remain unclear.

When applications are received, the response from healthcare has been positive. The patient engagement role is a particular asset. The engagement lead works with women when concerns are raised and has supported the IMB when applications related to healthcare. This has often resulted in a positive outcome. There are regular forums to gain feedback about healthcare, and information is provided to the women via a regular newsletter.

## **6.2 Physical healthcare**

On arrival, all women are subject to a health screening. They have access to a range of health services, including general practice, dentistry, pharmacy, podiatry, opticians, physiotherapy and sexual health.

The University Hospitals of North Midlands NHS Trust provides more specialist secondary healthcare services at the Stafford Hospital or Royal Stoke University Hospital, where necessary.

No concerns have been raised by healthcare staff regarding the provision of escorts for women requiring hospital treatment, either routinely or in case of emergency.

Waiting times for each service in the prison continue to be monitored closely and reflect experience in the wider community. Women are, however, subject to long waits for secondary services over which the prison has no control.

Medication administration can be challenging and is a major concern that cuts across the work of healthcare professionals and operational prison staff. There are several ongoing challenges:

- The process of medication administration is often drawn out and impacts negatively on the wider prison regime and healthcare delivery, as staff are not available for other activities.
- The dispensary is not fit for purpose and a capital solution is required to resolve the difficulties encountered.
- Resources only permit the administration of medicines on a twice-daily basis. The increasing number of women with complex health needs means medication might need to be administered more frequently. Consequently, some women receive medication in a way that is therapeutically suboptimal.

Trading prescribed medication is the major drug misuse problem faced by the prison and



the points made above all contribute to creating it. This issue has received increased managerial focus and, at the time of compiling the annual report (December 2024 and January 2025), several improvements were noted. These efforts to improve the process and the environment are welcomed.

### **6.3 Mental health**

Mental health services are essential, as around two-thirds of the women have complex mental health or emotional issues, often associated with trauma and emotional fragility. The service is generally well staffed, although turnover does appear to be a problem.

Urgent and non-urgent referrals are seen quickly, and the service has access to a psychiatrist. A range of therapeutic activities is provided on one-to-one and group bases. These help women deal with their emotional and psychological difficulties, and specialist interventions are also available. Therapies available address trauma, anxiety and the management of emotion.

The mental health service office accommodation was moved at short notice due to a perceived need to vacate the call centre building where it was previously located. This left the service with no phone lines and problems with connectivity and communication. This remains frustrating for staff as the call centre remains unused.

Increasing numbers of women have a diagnosis of a severe mental illness. This impacts particularly on the requirement for a psychiatric assessment, and the demands for a psychiatrist are increasing. The available time now is limited and, despite an increase in the sessions provided, this remains insufficient to meet the clinical demand. An increase in demand in the region of 50% has been noted by the Board.

In the past, the number of acutely ill, overtly psychotic women seen in other women's prisons was less marked at Drake Hall. Although there was, undoubtedly, an increase in women experiencing severe mental illness generally associated with secondary care, the numbers were not high. Furthermore, the small number of women requiring transfer to hospital, under the Mental Health Act, were generally moved quite quickly. In our last report, it was noted that the situation was changing and this has, indeed, been the case.

The number of women requiring transfer to hospital has increased and a number of these women have needed to be in the CSU under Rule 45 (where a prisoner is segregated to maintain the good order and discipline of the prison, often due to disruptive behaviour). These women have been acutely ill and segregation has been for their own safety and/or the safety of others. This is the only safe option in a prison that has minimal cellular confinement and, as such, it is the least harmful option. However, as with other custodial environments, it is not appropriate and could well be damaging. Keeping such women on normal location would risk harm both to the woman and, on occasion, to others. This is not a criticism of Drake Hall, but the Board notes an unacceptable situation across the prison estate. We are aware that many prisons experience more challenging situations than those observed at Drake Hall. This does not detract from the fact that, in the Board's view, this situation is unacceptable.

Several women have remained in segregation for long periods of time, awaiting a bed in a mental health facility. Although, in the Board's view, they were well looked after by a committed and skilled staff team, who went above and beyond to protect their safety and ensure their wellbeing, from a mental health perspective, these women could only receive minimal treatment, if any. This makes longer-term treatment more difficult and impacts on the overall prognosis. Unfortunately, it appears that the prison system, unlike prison staff who experience this daily, has become desensitised to an increasingly unacceptable

situation, which should not be allowed to happen. The solutions are not easy and the options in some situations are minimal. Changes to the Mental Health Act may resolve some of the issues, but this lies sometime in the future. In the Board's view, immediate action is required at a political level, and this should be considered a matter of urgency.

#### **6.4 Social care**

Staffordshire County Council and the prison have an agreed memorandum of understanding. In situations where a prisoner requires social care support, the local authority completes an assessment under the Care Act 2014.

The Board is aware, from observations of a number of prison forums, that social care assessments have taken place quickly and resulted in the development of a plan of care to support the individual concerned. Where equipment was required, it was delivered promptly, usually the next day. Equipment was provided by Mediquip and distributed by nursing staff.

As noted in previous reports, the number of women requiring social care interventions is generally low but can be challenging if a social care assessment reveals a high level of need, such as mobility issues and problems in completing general activities of daily living. Although there are some adapted facilities on St David's, the environment at Drake Hall is not conducive to supporting women who have mobility problems or need accommodation with a separate bathroom facility specifically adapted for a person with disabilities. Where this occurs, a transfer to an alternative establishment is usually the only option.

#### **6.5 Time out of cell, regime**

Compared with other closed prisons, Drake Hall is unique in that prisoners are in residential houses, with around 20 women per house, and are not isolated in cells for lengthy periods.

Historically, Drake Hall operated a very open regime, where women were out of their houses most of the day and expected to work or undertake an educational activity.

Since the pandemic, except during education and work, women have been isolated, house by house, and not allowed to associate with women from the other houses, although this has recently become more relaxed. This system remains in place and is popular with many women, as it reduces opportunities for bullying. When confined to their houses, the women have constant access to showers, an association room, a small kitchen, the house phone and in-cell telephony. In addition, women are escorted to collect their meals. They also leave their houses to collect medication, attend healthcare appointments and collect their canteen (a facility whereby prisoners can buy snacks, toiletries, stationery and other essentials using their allocated funds). The prison regime offers access to purposeful activity, work and education.

Regular exercise and association off the house are in place for an hour per day, but this compares unfavorably with the situation prior to the pandemic. The regime is more restricted than it once was. In the previous two reports, the Board has noted that although it appreciates the sensitive balance between safety, security and the promotion of an enabling environment, it is concerned about whether the restrictions are optimal for the type of regime the prison tries to promote. The women, via the prisoner council, have certainly expressed this opinion, and HMIP took the view that the prison regime and access to fresh air and association is now overly restrictive. They also felt that the gym needed to be better promoted. This judgement appears to be shared by the prison

management and, as this report was being prepared (December 2024 and January 2025), action was being taken to review the situation, with a view to implementing changes in the regime.

## **6.6 Drug and alcohol rehabilitation**

Many of the women have complex health needs associated with the use of illicit drugs. As noted in previous reports, Drake Hall has a well-established clinical substance misuse service, which provides the full range of prescribing options available in the community. These are tailored to a prison environment and are patient-centred. All new patients are seen on induction and support is provided based on that assessment. Given the level of need, caseloads are high.

The women are offered the opportunity to participate in therapeutic programmes to support abstinence or the management of their addiction. Many women are prescribed methadone. There is access to clinical staff and recovery practitioners, who provide clinical treatment, such as methadone maintenance, prescribing of buprenorphine, psychosocial interventions and harm-reduction advice. The approach is focused on the individual needs of a prisoner. A range of psychological and educational interventions based on harm reduction are available. Group interventions include:

- Narcotics Anonymous.
- Alcoholics Anonymous.
- Gym activities.
- Managing emotions.
- Acupuncture.
- Relaxation.

Take-home naloxone (a medicine that rapidly reverses an opioid overdose) is also offered, and training before release supports this. During the reporting year, access to naloxone nasal spray across the prison, and training of staff in its administration, has been introduced. This is a welcome initiative and it is hoped that negotiations with the Prison Officers' Association regarding its implementation will be completed quickly, with any outstanding issues resolved.

As noted previously, an incentivised substance-free living unit opened in October 2024. However, short sentences and the transfer of women close to release limit what can be done due to lack of time, as meaningful assessment and rehabilitation is impossible.

## **6.7 Soft skills**

Soft skills relate to how individuals work together, particularly in activities that require some form of teamwork. There are several examples of efforts made to make the prison environment more interesting and provide opportunities for developing people, communication and creative skills, and facilitating engagement with families, charities and the public. These include:

- artwork, including participation in the Koestler Art Awards
- motivational and educational events involving outside speakers
- social events and on-house activities
- inter-house competitions
- therapy dogs to promote positive interactions
- exercise classes promoted by the gym
- craft, sewing, knitting and similar practical activities.

## **7. Progression and resettlement**

### **7.1 Education, library**

#### **Education**

The education department has had to contend with a number of issues during the reporting year, an ongoing one being that the budget has not increased over the last ten years, despite the effects of inflation. This is a de facto cut. Another is the churn in the prison population, which means that courses cannot always be completed: for example, on the day of one prisoner's final exam, she was transferred. This problem has been exacerbated by the pressure on prison places and the resulting effects of SDS40 (which allows prisoners serving a 'standard determinate sentence' - with a 50% conditional release point - to be released at the 40% point of their sentence, subject to eligibility criteria), one example being the prisoner (above) who was released shortly before completing an expensive beauty course.

Adapting to a changing ability profile, Halfords had to lower its entry requirements to fill spaces. Additionally, mental health needs have to be considered: long spells in the classroom can be counterproductive for those with certain types of neurodiversity, while others affected by previous adverse educational experiences find more formal settings difficult to cope with. To counter these, extensive use is now made of outreach, where prisoners are taught one-to-one in less 'threatening' surroundings, and alternative education delivery (AED), where education is delivered in the workplace.

Wherever education is delivered, most of the budget still goes on English and maths provision. Also crucial for rehabilitation and integration into modern life is computer literacy, yet prisoners still have very limited access to computers or laptops (unlike in many male prisons). There is no immediate prospect of this changing, a hugely disabling feature of educational and rehabilitative provision.

Factors outside the education department's control have also affected progress. Low officer numbers, allied to the prison regime that allowed free flow at restricted times of the day, meant that attendance and punctuality were negatively affected. For example, a designated attendance officer brought absences down from 181 in November to 13 in May, an astounding reduction. But this progress was severely compromised when the officer was no longer doing this job. Additionally, in August, healthcare accounted for 44% of absences, due to the women attending medical appointments. Attendance is a priority and, hopefully, changes in place to the regime and in the administration of healthcare will hugely mitigate these factors, as will rewards and incentives for good attendance.

Women are aware of the opportunities available to them from the moment they arrive at Drake Hall: attendance at a revamped induction introduces them to what is available via an attractive booklet, which uses presentational devices, such as flow charts and bullet points, to aid accessibility.

Once engaged, they are taught by a committed, mutually supportive team, in the Board's view, which disseminates good practice. This includes implementing technology and utilising artificial intelligence to create engaging and accessible resources such as multiple choice answers for comprehension questions. Ambitions are supported by running a business course and higher achievers can undertake qualifications such as GCSEs.

Concern for the women is evident in the approach to supporting those who find failure, sometimes repeated, at academic subjects demoralising, and a more holistic approach is

adopted with talents other than the academic being developed. Self-esteem is bolstered by direction towards activities such as art, pottery and music, which help develop learners' artistic skills while contributing to good mental health. Additionally, *Cooking with Confidence* guides learners through popular dishes that can be completed at home and on a budget to support them on release. A Writer in Residence has a rotation of four learners each quarter, developing the *Take a Drake* magazine. Each learner uses their skill, be it writing articles, using IT to put the magazine together or art and design work.

Women who take advantage of the opportunities on offer seem well supported by the staff and their achievements in a range of areas are celebrated, although it can be difficult to continuously create exciting incentives and enticing rewards. However, displays showcase their achievements and 'celebration evenings' are well attended by prisoners and their friends and families. A particularly positive example has been the participation in the Koestler Art Awards. A design by a woman from Drake Hall was used as the basis for a ministerial Christmas card. This is a positive and motivating achievement.

The physical and mental health wellbeing of prisoners can have a detrimental effect on their ability to fulfil educational opportunities and employment. However, there is an effective support system for those women with neurodiverse needs, in the form of two inclusion support coordinators working in education and industries and the neurodiversity support manager who focuses on the operational aspect of their care.

## **Library**

Beset by two major difficulties, the library still manages to deliver an efficient and enriching experience for the majority of the women at Drake Hall who wish to use it, in the Board's view.

The first difficulty is physically getting women into the library. It is only open three days a week - Monday, Tuesday and Wednesday - and it closes at 3.10pm each day. These hours are problematic, as the women are then in employment or education and the regime means they must be escorted, which is often unfeasible given the low staffing numbers. However, a timetable, which regularly changes to obviate any unfairness, has been devised, which brings work parties to the library. Additionally, induction sessions are held each week in the library, which further promote it and draw in new arrivals. HMIP took the view that the library needs more promotion and better access, a view that the Board would support.

The potential second problem is that the original space is encroached on by the coffee shop and a multi-use pod. However, rather than being seen as a problem, the librarian sees the coffee shop as a potential bonus, as it helps create a lively, welcoming environment. This, along with a full programme of activities such as Storybook Mums on Wednesdays, a weekly silent reading session for those who require quiet, the Ten by Ten Reading Challenge in March, in which Drake Hall women achieved gold, silver and bronze awards, and the Reading Challenge in May, has helped boost library membership and borrowing. Capitation (money allocated for the library's use) has been used to expand the range of books and, in April, 1234 books were issued, rising to 2014 in September, according to Staffordshire County Council Libraries' figures; a healthy 92% of the women are library members.

Despite the constraints on space, hundreds of DVDs have recently been relocated to the library, further diminishing the space available for reading. However, imaginative plans have the potential to mitigate the problem caused while supporting the library's fundamental aims: to improve literacy, thereby promoting reading for pleasure, while helping employment prospects, as well as developing a valuable life skill.

Plans are in progress to further enthuse readers with, hopefully, visits by popular authors such as Miranda Dickinson and Helen Fields. Links with other areas of the prison, such as displaying information about the composers, featuring in a piano concert by the acclaimed Clare Hammond in the chapel, are mutually supportive and beneficial.

Overall, from its observations, the Board believes the library does a good job, especially given the environment in which it operates. Its contribution to the rehabilitative ethos of the prison is steadily improving and should continue to do so, especially as the librarian is now supported by a library orderly, appointed in May, who herself is benefitting from being on a course to achieve a Level 2 in Customer Service, and a part-time library colleague who works every Tuesday.

A Shannon Trust facilitator, working two days a week, has been in post since December 2023 and she is supported by a full time Shannon Trust mentor. The focus has been to build up the mentor pool so there is coverage across residential locations and workplaces. Given the pressures on space in the library, this is a welcome initiative.

## **7.2 Vocational training, work**

Working outside the prison has long been a feature of Drake Hall, despite the problems posed by it being located in the Staffordshire countryside, with no public transport. Around 40 women used to be released to work outside but, more recently, numbers have fallen, and it is primarily women from the open unit who do so. They work with a variety of employers including, in October, FirstFix, St Giles Trust, Staffordshire Council, DHL, MOTO and Max Spielmann. Women have also been volunteering at a local football ground. Only one prisoner accessed outside work from the closed establishment in October. A monthly meeting between the head of education, skills and work, the prison employment lead and outwork and resettlement officers is now scheduled to discuss outwork and ensure all women are engaged in meaningful activity, although the need for their own transport is a limiting factor.

Employment events are held throughout the year and the prison is proactive in trying to get employers to locate work in the prison, but this is proving difficult. However, Costa Coffee, Halfords and DHL have training establishments in the prison and other qualifications for work being done include one from WAMITAB for waste management. Cleaners and kitchen workers need accreditation for the work they do, but it is extremely expensive to get this for the small numbers involved.

Vocational training in the prison has benefitted from a focus on workbooks and learners now know better how to act on feedback. Staffing has had its problems, with new staff for the laundry having to be recruited, but training courses for baristas are run by Costa Coffee and links have been made with local branches to help women on their release.

There is a commitment to getting more employment activities to help around release on temporary licence (ROTL). Regular employment events take place, with the prison constantly seeking a wider range of employment opportunities to provide the women with a greater choice of employment following release.

Overall, the prison has seen a decline in available employment opportunities since the pandemic. The call centre is no longer operational and work in 'projects', a workshop historically used to support women requiring more supervision at work, has been relatively menial and of dubious value. A loss of around 60 workplaces must have an impact on outcomes. A commitment to the development of quality workplaces in the

prison is welcomed. The New Futures Network has worked closely with the prison to develop workshops and partnerships, but funding has been lacking. The Board is concerned that the women's estate can appear to be less of a priority than the larger male estate in this respect.

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

The offender management unit (OMU) works to progress women through the prison system. Many women arrive with complex issues associated with offending behaviour such as drug misuse, homelessness, trauma and mental health problems. Moreover, the level of need is increasing. These problems need to be addressed to reduce reoffending and, therefore, each prisoner requires an individual sentence plan. The OMU is the driving force behind a woman's sentence progression and ensures a clear pathway of support. It is also responsible for the home detention curfew (HDC) processes. Staff seem knowledgeable and helpful and demonstrate a professional approach to their work.

Each prisoner is allocated either a key worker or additional time with their prison offender manager (POM), which helps guide them through their sentence. The POMs and community offender managers (COMs), employed by the probation service, work together. This enables the production of assessments, sentence plans and interventions supporting a woman's move from Drake Hall to the community probation services. National standards and policy guidance are in place around inputs, such as completion of the offender assessment system (OASys) and the activity of the POM. This enables offenders to participate in activities inside and outside the prison establishment that are aimed at assisting them with resettlement into the community.

The open unit provides up to 25 women with the opportunity to live independently before release while also being employed in the local community or accessing higher education. As reported in our last annual report, this facility is underused. The unit continues to carry vacancies and an increasing number of the women are not employed. Consequently, they have less access to funds, which affects their ability to function independently. The prison continues to try and increase the occupancy levels and is looking at ways of integrating more closely with work in the closed part of the establishment.

An important component of the work of the OMU is the management of the ROTL process. This assists resettlement and promotes good family ties, enabling women to participate in activities outside the prison that are aimed at assisting them with resettlement into the community.

In the past, the prison made extensive use of ROTLs, but since the pandemic numbers have declined rapidly. In our previous report, the Board noted that 66 applications for ROTL were received and 48 approved. In the reporting period, there were 46 applications, of which 44 were approved. So, the number of applications and events has fallen. If the year prior to the pandemic is used as a comparator, there were nearly 300 applications and close to 200 actual ROTL events.

Several factors contributed to this situation:

- the changing profile of the prisoner group at Drake Hall means fewer women may be eligible;
- the increasing number of women transferred who are either short-term prisoners or have little time left to serve means minimum time is available to provide additional support to develop any sustained rehabilitation activity;

- the extensive work required in relation to policy changes associated with recall and early release must have also had some impact.

The Board does, however, believe that the concerns raised in the last report remain valid. These are:

- the low number of applications
- the low number of actual ROTLs
- the lack of childcare-resettlement ROTLs.

The Board is aware that this matter is under close consideration by the prison, and this is welcome.

A number of policy changes were initiated in the reporting period. At the start of April, changes were made to fixed term recalls (FTR). This meant that most adult prisoners, whose sentences were for less than 12 months and had been recalled, would be subject to a FTR and automatically re-released after 14 days. All eligible prisoners had to have their sentences recalculated and, if appropriate, would be released on 2 April. It was identified that Drake Hall had six such prisoners. They had to be released on the implementation date, otherwise they would have been held unlawfully.

In June 2024, changes were made to the home detention curfew (HDC) process. Those serving standard determinate sentences (with a fixed end date) over four years were eligible for consideration. The lifetime ban for prisoners who had been recalled for breaching HDC conditions was lifted and replaced with a two-year ban. Calculations had to take place regarding 75 women who became eligible under the new rules.

In July, SDS40 was introduced, and this was a significant piece of work. The prison received the first communication on 12 July and work had to commence on 15 July. Staff had very little time to read the instructions prior to commencing the work. Every prisoner had to be looked at individually and it had to be ascertained whether their sentences were eligible for 40% calculation or whether they should remain at 50%. Prisoners were split into two tranches: those serving under five years were in Tranche 1, while those serving five years or over were in Tranche 2. Calculations for all prisoners identified in Tranche 1, approximately half of the population, had to be completed by 26 July to enable contact to be made with outside agencies in preparation for release by the implementation date of 10 September. As soon as the calculations were completed for Tranche 1, work was started on Tranche 2. A total of 26 prisoners were released on 10 September as part of Tranche 1.

This process entailed a tremendous amount of work for OMU and every other department. Numerous interdepartmental meetings were needed to co-ordinate details so that the prisoners could be released seamlessly and safely. It was identified that the prison only had four women to be released as part of Tranche 2 but, again, meetings were held prior to the date. The pressure on staff, in the OMU particularly and the prison more generally, was immense. Staff worked additional hours to ensure that the mandatory work was completed within the timeframes. All women released had accommodation arranged and appointments set up with probation staff in the community. On the day of release, a high staff presence and visible leadership ensured the process worked effectively.

#### **7.4 Family contact**

Practitioners and policy makers now understand parental imprisonment as an adverse childhood experience (ACE). Maternal imprisonment has a far greater impact on children



than paternal imprisonment, as mothers are more often the sole or primary carer. It is important, therefore, that women who have close ties with their families are better supported mentally and emotionally when in prison, while children with mothers in prison are especially vulnerable and are more than three times likely to end up in prison themselves<sup>2</sup>.

Unfortunately, the trauma of separation from children is not sufficiently recognised or understood by the prison system. Mothers experience significant emotional distress, which prisons are not equipped to deal with. Behaviour linked to this distress can be labelled as aggressive, which perversely counts against mothers in procedures related to contact with their children. Moreover, practical barriers in the system undermine the ability of mothers to maintain contact with their children, including ROTL processes, prison transfers and closed prison conditions.

Given the effect of separation and the emotional and psychological damage that results and the adverse impact on children, everything possible should be done to ameliorate barriers to contact and to encourage it. As a result, the prison tries to facilitate ways of overcoming some of these challenges, but is sometime inhibited due to its location and certain practical problems.

Drake Hall is situated in rural Staffordshire and has poor public transport links, so most visitors must travel many miles to get here. As if this were not problematic enough for the maintenance of family links, the visitor car park has been partially flooded on numerous occasions in the past year and is also used by staff as parking space is at a premium.

However, the visitors' centre, where visitors check in, is a cheerful, colourful place, where refreshments are served to weary travellers by a local charity and young children, in particular, find plenty to occupy them.

The visits' hall, where visitors meet prisoners, is well managed by the prison, in the Board's view. It is a bright, airy and welcoming space, which is generally clean and well maintained, as well as child friendly. Reports of problems with cleaning, particularly at the weekend, appear to have been taken seriously and addressed by the prison.

Where social visits are not an option, the women are able to access family via the social video calling system. Other than this, women have in-cell telephony and can call the numbers on an approved list, so many contact their families in this way. Unfortunately, some women have no family: half of the prison population has not had a visitor in the last six months, so an initiative called Fusion of Friends was launched to support them. Sadly, this had to be cancelled due to lack of prison staffing.

The work of the charity, PACT (prison advice and care trust), is fundamental to maintaining family links at Drake Hall for those who do manage to physically visit the prison.

PACT aims to achieve this in several ways. Spaced throughout the year, PACT organises 12 family days, which cater for different cohorts of women, children and wider families, where they can spend quality time together. A football table and console games are provided for activities. Recently, additional card games and games that initiate conversations have been purchased. Private visits for families are facilitated outside the

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<sup>2</sup> Counting the cost of maternal imprisonment, by Julia Pitman and Jess Hull (October 2021); Insights Report, London; Crest Advisory.

usual visiting times, as are some for children with diverse needs. Unfortunately, overnight stays for mothers and children in a suite in the open unit seem to have ceased.

Within the prison, ongoing support is available, linking women and the local authorities that are caring for their children to try and improve these relationships by encouraging and supporting positive communication. PACT supports women to attend care plan meetings and meetings with the school, facilitating face-to-face visits where possible and via video conferencing for women whose children are in the care of the local authority. Final contact meetings with children who are being adopted and meetings with the adoptive parents are facilitated. Relationships with adult children are also supported and women speak gratefully of this support. The Dove Service, a local charity, offers counselling to deal with loss and separation from children.

A free legal service is provided to women not entitled to legal aid to pursue and improve contact and this can include access to applying for contact through the family courts. This support will soon be extended to a legal clinic, held bi-monthly. Getting women to engage with those who care for their children helps to improve relationships whilst they are in custody and promotes a more positive and less intimidating relationship when they are released. Underpinning this aim of positive resettlement, in January 2024 a PACT family resettlement worker was engaged who addresses practical problems such as tenancies and housing.

Having noted the emotional distress caused by imprisonment and how behaviour associated with this may impede women's access to family contact, it is unfortunate that childcare ROTLs are underused. This is regrettable, in the Board's view. In previous years, Drake Hall has been proud of its record in supporting women applying for childcare resettlement ROTLs, but this now appears to be inadequately advertised, and women seem unaware of their entitlement. The ROTL process is complicated if women are meeting families and, while women on the open unit use the process, it is rarely used by women on the closed site. The Board believes that it should be promoted more, and the application criteria should be accessible and clear. There is a definite need to consider ways of enabling the women to better utilise access to childcare resettlement licences, given the numerous benefits.

## **7.5 Resettlement planning**

Drake Hall aims to provide a rehabilitative environment, where women are supported to achieve their potential. The reducing reoffending strategy outlines the approach to working with women to ensure they are prepared for release.

The strategy has nine pathways, with associated work programmes, to ensure it is implemented effectively. These are: accommodation; education; health; drugs and alcohol; children and families; finance, benefits and debt; attitudes, thinking and behaviour; domestic violence; working with sex workers. A reducing reoffending meeting takes place regularly and progress in relation to these work streams is closely monitored. The aim is to ensure that each woman undertakes a structured programme designed to improve their health, wellbeing and education, while ensuring they are provided with suitable accommodation and employment on release. This task is made all the more difficult, given the acute shortage of approved accommodation for women.

In our previous annual report, the Board noted the complex policy framework surrounding individuals leaving prison and the disconnect between prison and probation, often exacerbated by staffing shortages. This means roles and responsibilities can be confused, with communication between pre- and post-release teams often challenging. A shortage of probation officers impacts resettlement work, and high-risk releases, involving

multi-professional meetings and comprehensive release plans to reduce risks, are particularly challenging in this environment. The Probation Service has major staffing problems and relies on community services, which are often poorly commissioned. Drake Hall and other women's prisons continue to operate in this challenging policy framework.

That said, some excellent facilities remain for assisting women during the period leading up to their release. Women must be able to take full advantage of all the facilities at Drake Hall to reduce the chances of returning to prison. Unfortunately, as noted elsewhere, short sentences and transfers towards the end of a woman's sentence adversely impact resettlement, making it a challenge to address offending behaviour and reduce the chances of reoffending. Women transferred close to release make meaningful resettlement plans difficult, if not impossible. During the reporting period, 128 women arrived within three months of their release from prison. Moreover, around 20% of the population are subject to recall.

From the Board's observations, the prison staff work hard in the best interests of the women. However, the Board continues to believe that progress can depend on the woman herself taking the initiative and, even then, it can be at the mercy of staffing levels and a fragmented national picture, which is largely beyond the control of the prison. Unfortunately, women can, at times, appear to lack an understanding of the support available to help prepare them for release and to help them when they leave prison. Add to this the current economic crisis and a shortage of affordable accommodation, and the system can sometimes seem like it works against them.

These points must not detract from the excellent work we have observed to help women progress. In some cases, a practical and structured approach, providing information, advice and guidance, supporting the work undertaken by the woman whilst in prison to improve her health, wellbeing, life skills and employability, can result in positive outcomes. There are regular reports of staff going above and beyond to facilitate the effective planning before release, which reduces the chances of reoffending.

A particular area of good practice is The Hamlet Project. This facility is the first of its type in the women's estate. It provides additional support to women who struggle to engage fully with activities on offer before release or may struggle to relate positively to peers. A dedicated staff team provides tailored support that has the potential to be a model for across the prison. The project focuses on:

- life skills
- resettlement support
- practical skills development
- personal development
- an individual approach
- group and individual work in a safe environment
- an eight-week structured programme
- coaching guidance and personal development.

This facility continues to develop.

It is pleasing to note that the rates of women leaving with accommodation to go to is much higher than at many other women's prisons. Unfortunately, many women are returning to prison via recall, which is, again, a sad reflection of the national picture.

## 8. The work of the IMB

### Board statistics

Recommended complement of Board members	12
Number of Board members at the start of the reporting period	10
Number of Board members at the end of the reporting period	12
Total number of visits to the establishment	390 (this includes attendance for Board meetings and direct monitoring)

### Applications to the IMB

Code	Subject	Previous reporting year	Current reporting year
A	Accommodation, including laundry, clothing, ablutions	6	4
B	Discipline, including adjudications, incentives scheme, sanctions	25	8
C	Equality	1	7
D	Purposeful activity, including education, work, training, time out of cell	5	7
E1	Letters, visits, telephones, public protection, restrictions	14	5
E2	Finance, including pay, private monies, spends	2	10
F	Food and kitchens	1	1
G	Health, including physical, mental, social care	58	54
H1	Property within the establishment	15	4
H2	Property during transfer or in another facility	21	11
H3	Canteen, facility list, catalogues	3	0
I	Sentence management, including HDC (home detention curfew), ROTL (release on temporary licence), parole, release dates, recategorization	21	22
J	Staff/prisoner concerns, including bullying	21	20
K	Transfers	7	4
L	Miscellaneous	5	18
	<b>Total number of applications</b>	<b>205</b>	<b>175</b>

## **Annex A**

### **Healthcare services**

- Primary health care
- Clinical substance misuse
- Primary and secondary mental health care
- Dentistry
- Podiatry
- Physiotherapy
- Optician
- Loss counselling: Dove Services
- Sexual violence counselling: Staffordshire Women's Aid
- Ultrasound in-reach; healthcare
- Telemedicine: Airedale NHS Foundation Trust
- Social prescribing



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