

## Written evidence submitted by Independent monitoring boards

### Introduction

1. Independent Monitoring Boards (IMBs) have a statutory duty to monitor conditions in prisons across England and Wales and to report on whether proper standards of care and decency are maintained. Their role includes observing and reporting on outcomes for prisoners in relation to their safety, fair and humane treatment, health and wellbeing, and progression and resettlement.
2. IMBs are also part of the UK's National Preventive Mechanism (NPM), set up under the UN Optional Protocol to the Convention against Torture, to prevent inhumane treatment in places of detention.
3. This submission is based on recent findings and observations of four IMBs monitoring in prisons across Wales (IMBs at Berwyn, Cardiff, Swansea, and Usk and Prescoed). The submission aims to address the following specific questions from the inquiry's terms of reference:
  - How suitable is the Welsh prison estate for keeping prisoners healthy, safe and ensuring they can access effective rehabilitation services?
  - How effective are offender management services - both in custody and the community - in reducing reoffending and keeping offenders and the public safe?
  - How does the lack of a women's prison in Wales impact upon the experiences and rehabilitation of Welsh women offenders?
4. While this submission has focused on IMBs' findings in relation to Welsh prisons, the issues highlighted are not new or unique. IMBs have been reporting on these issues for a number of years across the prison estate in England and Wales.
5. The IMB has also published a number of thematic reports which may be of interest to the committee, on subjects including the impact of a crumbling prison estate,<sup>1</sup> the damaging loss of prisoners' property<sup>2</sup> and the segregation of men with mental health needs.<sup>3</sup>

### Findings

#### *Population pressures*

6. Population pressures continued to pose difficulties at some prisons: men shared cells designed for one at Cardiff and Swansea, and Cardiff reported that cells could not be taken out of use for basic refurbishment, and were therefore drab and unappealing. The situation was much the same at Berwyn, the largest prison in the UK, where only four cells can be taken out of use at a time for refurbishment, rather than the 88 before the population crisis.
7. Additionally, population pressures across the estate in England and Wales led to a greater number of out-of-area prisoners being held in Welsh prisons. Usk and Prescoed, Cardiff and Berwyn IMBs all raised the specific difficulties faced by these prisoners, who were often held far from their families. Cardiff and Usk and Prescoed IMBs also noted that English prisoners could face additional obstacles to progression and resettlement. Berwyn IMB noted that an increase in prisoners from organised crime groups in the North West of England exacerbated safety concerns.

8. Late arrivals continued to be common, largely linked to the number of prisoners arriving from out of area. Cardiff, Berwyn and Usk and Prescoed IMBs were all concerned about the limited care that staff could provide to late arrivals – at Berwyn and Usk and Prescoed, healthcare provision was a particular concern.

### *Staffing*

9. Boards monitoring Welsh prisons frequently raised concerns about staffing levels and the inexperience of operational staff. This was particularly acute at Berwyn, where in January 2024 over 40% of band 3 officers had less than 12 months' service. Key work was a poor picture, with Cardiff, Berwyn and Usk and Prescoed reporting that it was inconsistently delivered and too easily cancelled when other needs, such as healthcare escorts, arose. Cardiff reported an 11% compliance rate for key work sessions delivered against their targets. At Berwyn, some prisoners told the Board they did not know who their key worker was.

### *Living conditions*

10. Living conditions varied throughout prisons in Wales. They were particularly poor at Cardiff, which faced persistent heating and hot water issues, as well as mice infestations. Cardiff and Swansea IMBs both raised concerns about the lack of communal dining spaces, leaving prisoners nowhere to eat except their shared cells. As these cells also contained their toilets, this was considered to be both unsanitary and undignified. Cardiff, Berwyn and Swansea all reported delayed cell refurbishment, which at Swansea was linked to poor provision from the maintenance provider and at Berwyn and Cardiff resulted from population pressures. At Swansea and Cardiff, the infrastructure of the prisons made it unsuitable for prisoners with mobility issues and disabilities.

### *Healthcare*

11. At Eastwood Park, a women's prison in England where over a third of prisoners come from Wales, delays were experienced in securing health records from GPs in South Wales. The prison healthcare team did not have direct access to these records, as they did for prisoners registered with GPs in England. Prisoners had to be given interim treatments before their history and prescription record was available, causing frustration.
12. Cardiff had concerns about the high level of applications it received regarding healthcare and prescriptions, though noted this was partially related to an empty GP post which has since been filled. Both Cardiff and Berwyn saw increased rates of missed appointments in their 2023-24 reporting periods.

### *Mental health*

13. Cardiff, Usk and Prescoed and Berwyn IMBs raised some concerns about mental health staffing. At Cardiff, weekend cover was inadequate, Usk and Prescoed IMB was concerned that the mental health staff complement had not been raised despite an increase in mental health need, and at Berwyn the mental health unit was understaffed. Berwyn IMB also highlighted the long delays men with severe mental illness faced when awaiting transfer to suitable mental health facilities; in the meantime, these men were often held in segregation.

14. Eastwood Park IMB raised concerns about the process for women waiting for a transfer to medium secure hospital provision. Particular delays in the assessment process were noted with some health trusts in South Wales.

*Purposeful activity, progression and resettlement*

15. While purposeful activity, progression and resettlement work were generally delivered more successfully in Wales than in England, Cardiff IMB saw some indications that pre-release work was often rushed. While 84% of men were released to accommodation, of 24 men due to be released within the next week surveyed by the Board in August 2024, over half said they did not have accommodation secured and some prisoners stated they were unaware they were due to be released the following day.
16. Usk and Prescoed are concerned that English prisoners have to apply individually to the Department for Work and Pensions to access funding for courses, while courses are automatically funded for Welsh prisoners by Careers Wales.
17. At Berwyn, transition back into the community generally seemed smooth for Wrexham and Welsh individuals, as there was increased liaison between the prison and Welsh local authorities. However, the assessments, funding streams and placement processes are more problematic for English prisoners being resettled in England. In addition, at Berwyn there were indications that short-term recalls were common, at around 18% of releases.

*March 2025*

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<sup>1</sup> [\*Breaking point: the impact of a crumbling prison estate on prisoners\*](#), IMB, 27 November 2024

<sup>2</sup> [\*Chaos in the crisis – the damaging loss of prisoners' personal property\*](#), IMB, 25 September 2024

<sup>3</sup> [\*Segregation of men with mental health needs\*](#), IMB, 25 January 2024