

Annual Report of the Independent Monitoring Board at HMP Wayland

**For reporting year
1 June 2024 to 31 May 2025**

Published January 2026



Contents

| Introductory sections 1 – 3 | Page |
|-------------------------------------|-------------|
| 1. Statutory role of the IMB | 3 |
| 2. Description of the establishment | 4 |
| 3. Key points | 6 |
| Evidence sections 4 – 7 | |
| 4. Safety | 12 |
| 5. Fair and humane treatment | 18 |
| 6. Health and wellbeing | 29 |
| 7. Progression and resettlement | 35 |
| The work of the IMB | |
| Board statistics | 43 |
| Applications to the IMB | 43 |
| Annex A | |
| Service providers | 44 |
| Annex B | |
| IMB survey | 45 |

All IMB annual reports are published on www.imb.org.uk

Introductory sections 1 – 3

1. Statutory role of the IMB

The Prison Act 1952 requires every prison to be monitored by an independent board appointed by the Secretary of State from members of the community in which the prison is situated.

Under the National Monitoring Framework agreed with ministers, the Board is required to:

- satisfy itself as to the humane and just treatment of those held in custody within its prison and the range and adequacy of the programmes preparing them for release
- inform promptly the Secretary of State, or any official to whom authority has been delegated as it judges appropriate, any concern it has
- report annually to the Secretary of State on how well the prison has met the standards and requirements placed on it and what impact these have on those in its custody.

To enable the Board to carry out these duties effectively, its members have right of access to every prisoner and every part of the prison and also to the prison's records.

The Optional Protocol to the Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT) is an international human rights treaty designed to strengthen protection for people deprived of their liberty. The protocol recognises that such people are particularly vulnerable and aims to prevent their ill-treatment through establishing a system of visits or inspections to all places of detention. OPCAT requires that states designate a National Preventive Mechanism to carry out visits to places of detention, to monitor the treatment of and conditions for detainees and to make recommendations for the prevention of ill-treatment. The IMB is part of the United Kingdom's National Preventive Mechanism.

2. Description of the establishment

HMP Wayland, for adult men, in Thetford, Norfolk, is one of many category C training and resettlement prisons (for prisoners who pose a lower risk to the public and are not considered to be an escape risk) in England. Such prisons are officially described as providing prisoners with ‘the opportunity to develop their own skills so they can find work and resettlement back into the community on release’.

Despite the apparently limited description of the purpose of a category C prison, such responsibilities are usually described as ‘rehabilitation’. Therefore, that is a test we have applied throughout our work and this report, especially in the linked issues of responses to identified learning deficits, prisoners’ rehabilitation needs, their sentence progression and their release planning: are the prison’s activities and, therefore, the treatment of its prisoners rehabilitative?

Wayland is a large site, with 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 863 at the close of the reporting period¹. Its prisoners are housed in two radically different types of accommodation:

- the ‘old build’, a 1985 series of five linked brick and block buildings, with integral sanitation but no in-cell showers, holding 511 prisoners; this includes 62 prisoners who are in ‘doubled’ cells, that is, cells built for one prisoner but which have recently been fitted with two bunk beds as a Prison Service mandated effort to accommodate additional prisoners due to the accommodation crisis in English prisons, and which we will examine in detail in this report;
- a newer accommodation unit, the Wensum unit, for 96 prisoners, with integral sanitation; and
- the ‘new build’, a separated sector of the site, comprising five individual, ready-to-use units, all holding 60 prisoners each in double cells with full, integral sanitation including showers, and a small unit of 14 as the first night unit, in total providing the balance of 312 prisoners to the prison’s operational capacity.

With the exception of the Wensum unit, all the prisoner accommodation throughout the site has continued to be plagued with serious structural and maintenance problems. Some are so severe that the affected areas have occasionally been taken out of use for emergency repair; apart from the work on the new build to the units’ fire management system, which has entailed taking a complete unit out at a time to erect scaffolding, such repairs have been ad hoc and not strategic.

In addition to the standard prisoner accommodation, a new, purpose-built care and separation unit (CSU), with a capacity of 14 prisoners, opened just before the start of the reporting year.

A total of 43 rapid deployment cells have been installed and are due for occupation imminently.

Looking ahead, there are plans to erect a four-storey 240-place accommodation unit, and supporting facilities, to the same design as other new-build prisons on a corner of the site which until now has provided horticultural training and growing areas. There are

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

also plans, we are informed by prison management, to refurbish the existing old build units with new showering facilities, cell windows and ventilation management, new pattern cell doors throughout, and upgraded electrical and data management. However, this will mean a four-to-five-year programme as each accommodation block is taken out of use in turn.

Some five years ago, the Board suggested that the only logical solution to Wayland's structural problems would be to build a new prison on the free land to the rear of the site, demolish the old, and then build additional accommodation on the old sites. That proposal would have provided both a modern prison by now, and the option of a second new prison on the cleared site, to a build timescale well within the period now anticipated to achieve a new unit and refurbished old ones, and probably at lower cost. In the Board's opinion, it is an example of a failure to think strategically, and creatively, which will have resulted in staff and prisoners having to endure substandard accommodation for more than a decade.

Education and work skills are provided across two large buildings capable of providing, at current usage activities, educational, vocational and workshop skills for, the Board believes from its monitoring of actual capacities, more prisoner activities than the current prisoner numbers, especially as at least two areas could be logistically re-purposed.

The prison is 13 miles from the nearest rail station and three miles from the nearest bus stop, which makes visiting both difficult and expensive, as around only 15% of the prisoners are from Norfolk and Suffolk, and almost all the rest are from London and the southeast of England.

3. Key points

3.1 Main findings

Please note that these key points are the condensed judgements of the Board for which the evidence is both referenced in our recommendations to Minister, HMPPS and the Governor and in the body of the report.

Safety

- Over the reporting year, prisoner safety has varied, judged by the number of prisoner-on-prisoner assaults reported in the daily briefings. In the IMB's 2025 survey of prisoner attitudes, which received a response from just under 25% of the prisoner population (see page 13), the number of prisoners who reported fearing for their safety nearly doubled this reporting year, from 14% in 2024 to 27% in 2025.
- However, there is better news in that the number of prisoners self-isolating due to those fears for their safety has declined markedly from what it was a few years ago and has been maintained at that much lower level for much of the year. In the Board's opinion, this indicates that the measures staff have taken to identify, manage, and remove either the causes of those fears, or the prisoner from those causes by a relocation of either within the prison or by transfer, have succeeded in keeping both the numbers of self-isolators low and very possibly limited the actual number of assaults.
- Drugs, and their availability, however, are believed by prison staff to be the causes of many of the assaults, as dealers pursue their unpaid debts from users. The Board believes that the effective prevention of illicit items does not just mean measures taken by current local staff and resources, but with a full acceptance that there must be a radical approach to prevention taken together by government and Prison Service at large. This must recognise that the success of any rehabilitative emphasis on the task of the Prison Service must first ensure the elimination of such illicit items, although it will be undoubtedly expensive in staff and material.

Fair and humane treatment

- Bed bugs, mainly in the new build units have been an intermittent problem throughout the year, although, with experience, the reported instances are managed more swiftly than previously.
- The problems with mould, again a predominately a new build issue, has been similarly better-managed by experience, but the problems of these units, as we have itemised for the past several years, will only be solved either by their demolition and replacement, or their thorough refurbishment, as a less acceptable but inevitable solution, sometime in the next few years.
- The new segregation unit has been plagued with problems of poor design of some of the internal services, allowing considerable, and persistent, damage done by prisoners. The failure to consider the use of adequate sound-deadening or absorption material continues to make the unit a noisy and unacceptable environment for both staff and prisoners. We have again recommended in this report that efforts are made to remedy these faults.
- The Board has remained concerned at the use of single cells for double occupancy, from the lack of predictable decency in their use by the seemingly impossible task of providing, and maintaining, adequate screening of the cells' toilets. We have made recommendations to compensate for their enforced use.

- The management of prisoners' property within the establishment is greatly improved and occasion few complaints from prisoners now, although there have been exceptions to this. The main challenge is getting a sending prison to send on the property which, for one reason or another did not come with the prisoner on transfer. We have called for improvements to this situation to be accepted as a Prison Service responsibility.

Health and wellbeing

- Drug and alcohol abuse and self-harm incidents have increased in number during the year; and we comment on the diversion of effort from improving physical and mental health care amongst the prisoner population due to the consequences of responding to incidents where prisoners are seen to be under the influence of illicit substances (UTIs) and incidents of self-harm and call for a renewed effort to deal with what we see as the integrated spheres of drug abuse, prison culture, and rehabilitation.
- We also return to the financial costs, and forgone care opportunities, of a persistent percentage of failures to attend booked appointments either by prisoner volition or by operational failures.
- We have, however, commented positively on the increased prisoner care management through a greater number of planned appointments, although prisoner and operational DNAs (did not attend, where a prisoner fails to attend an appointment) are still too numerous.

Progression and resettlement

- The work of the library, the education and work training areas, and the work done to assist prisoners with reading challenges, have continued to show improvement, with many bright spots, including the greatly-improved horticultural side of the prison. The offender management unit (OMU) department also coped more than adequately with the tremendous pressures placed upon the teams through the frequent and changing governmental instructions for early releases during the year, and we have drawn attention to this in detail.
- However, we are concerned at the imminent change to the education contract, as with the rest of the service. We have been informed that the reduction in total funding will be in the region of 38%. In order to make the most positive use of the funding, this will necessarily result in fewer vocational training courses. The prison intends to redesignate the workshops to prison industries to maintain purposeful activity levels. Nevertheless, this risks reducing the prison's rehabilitative efforts and seems at odds with the declared intention of the Prison Service not just to keep prisoners in custody but to rehabilitate them as well. This change will make that harder. We have commented forcefully on this reduction.

3.2 Main areas for development

TO THE MINISTER

- We do not recommend a method for so doing, *(to further interdict the importation of illicit substances)* but how does the Minister plan to tackle the nationwide problems with illicit substances entering prisons, and give more resources to Governors to manage this issue?' **Section 4.5**

- That (*a reversal of the Prison Service's decision to reduce taught hours provided by education contractors*) being unlikely, can the Minister reassure the Board that no further cuts will be made to the education budget? **Section 7.2**
- We recommend that further effort is made to plan and prepare IPP prisoners for release through a programme of 'de-incarceration', as it is beyond doubt that the majority of IPP prisoners have been, in almost every case we have observed, institutionalised by their prison experience with an unknown end date and need considerable support to prepare for, and survive, in a world they may no longer have the skills to navigate. How does the Minister plan to resource such needs to alongside the efforts which are being made by the Parole Board to take such learned institutionalisation into account in their decision-making. **Section 7.3**

TO THE PRISON SERVICE

- We make the repeated recommendation to the Prison Service that there should be a thorough re-evaluation of the staffing profile for the old build wings, which we believe would justify an increase in staffing at the prison officer level and result in a safer and more decent environment for prisoners. **Section 4.4**
- We recommend that the Prison Service recognises the potential harms that enforced sharing in single cell spaces can lead to, and accepts that there needs to be a renewed consideration of how such harms could be mitigated and to consider how this might be achieved. **Section 5.1**
- We therefore recommend to the Prison Service that the design of care and separation unit cell doors, indeed all cell doors to which this stricture is applicable, be reviewed to make staff's task easier, and health safer (as at least one member of staff has been injured by flying glass from such an example of destruction), as well as improving the safe management of prisoners. **Section 5.1**
- In terms of noise levels, we again recommend to the Prison Service that it seeks the advice of a respected acoustic management consultancy to establish how the building can be retro-fitted to achieve a much lower reflected noise level and thus assist the total calm management of this unit. **Section 5.1**
- We would suggest that the Prison Service set a victualling allowance at the start of each year and then arrange that this be automatically increased on a three-monthly basis as required by food cost inflation data. At least that would allow some degree of predictability in menu planning and delivery. **Section 5.1**
- Because of this evidence and the admitted need to improve the quality of key work, we would again urge the Prison Service to use its national training resources, or other bought-in experience, to provide quality staff training opportunities to build those necessary skills across the staff, at all levels. **Section 5.3**
- Perhaps if the national list (*of permitted items*) were re-issued afresh each year, this would encourage a closer adherence to its restrictions, or the Prison Service agree to compensate prisoners who have legitimately purchased an item in one prison but are refused to have it in possession in another. We so recommend to the Prison Service. **Section 5.6**
- We would recommend that the Prison Service reviews its guidance to its governors (*on property management*) to underline vigorously the need to move property quickly on after transfer. **Section 5.8**
- We emphasise that this is not new thinking, the points we have made above which have arisen from our own monitoring and discussions with prisoners and staff, are laid out in much more detail in the Prison Service's own national drug

strategy of 2019. We can therefore do no better than draw attention again to that strategy and call for the financial and organisational commitment to improve its practical realities on the ground. **Section 6.6**

- We are aware that the long-awaited lift provision is on the refurbishment programme, but would ask the Prison Service if there is any way that this, obviously separate construction, can be advanced within the programme.

Section 7.4

- We therefore make the recommendation to the Prison Service that the operative PSI (02/2012) is amended to authorise the creation of bank accounts outside of the normal six-month rule and to take such action as is necessary to ensure that its contracting bank complies with such authorisation. **Section 7.5**
- We recommend to the Prison Service long term planning directorate that prisoners held far from London might have an opportunity for what used to be the reasonably common practice of ‘accumulated visits’ (where visitors can accumulate a certain number of visits over a specified period, typically 12 months, to receive visits at a different prison closer to their family). **Section 7.5**

TO THE GOVERNOR

- It is likely that this (*key work training*) would entail more specific and targeted training being needed for the largely inexperienced staff, perhaps using the psychology resources available in the prison, we so recommend to the Governor. **Section 4.2**
- The stability in prisoners’ fears for their safety in Wayland surely demands some deeper investigation, and effective responses, by prison management to any drivers of this fear discovered, and we so recommend. **Section 4.3**
- As the work of the CRED team (*Clean Rehabilitative Enabling and Decent, a programme that enables ex-offenders to join purposeful work placements*) is not currently signed off by a GFSL (Gov Facility Services Limited, which is responsible for providing maintenance, repairs and cleaning in the prison) staff member, and prisoners have reported to us that the work has not been successful, we recommend that such staff are required to sign off the completed work carried out by the CRED team in the future. **Section 5.1**
- We request that senior management readdress the issue of the maintenance of privacy curtains in shared accommodation to find a way of both incentivising prisoners to care for the cell’s decency structures and fittings, and for staff to actively stay on top of the outcome of that incentivisation. **Section 5.1**
- We therefore suggest that the Governor requests that the specialist training care and separation unit (CSU) staff need be provided face-to-face from wider Prison Service training resources and not merely by expecting online programmes to deliver the interpersonal skills so needed. **Section 5.2**
- We also look forward to a new (CSU) management policy and approach to provide a sound and a consistent base from which staff can manage this challenging task. **Section 5.2**
- The only recommendation which the Board believes it can make in response to the results of the prisoner responses to the freeform questions in the IMB Survey is to ask senior and operational management to take note of them, and look for ways of rebuilding a sense of community amongst all prisoners in decision-making arenas where and when managerial impacts on the community are under review. **Section 5.3**

- We make the recommendation to the Governor that a copy of the record of a key work session should be made available to the prisoner if he wishes and the record endorsed to that effect. **Section 5.4**
- We recommend to the Governor that a review to improve cross-team working is considered as an integral part of any future effort to increase the rehabilitative potential of all the prison's activities. **Section 6.1**
- The Board would like to suggest to the Governor that Practice Plus seriously consider running a survey of their own amongst prisoners to test for themselves the themes we have mentioned, and to which we have drawn detailed attention to in our commentary of the survey. **Section 6.1**
- We would also, as a response to the themes we have identified, recommend that the Governor request Practice Plus consider providing a clear confirmation of the diagnosis made and treatment to be provided after a consultation, so the prisoner has something tangible to review and not just his memory of what the consultation concluded and why. **Section 6.1**
- The Board would encourage the Governor and the healthcare contractor, Practice Plus, to consider these findings (*on ease of prisoner contact with Practice Plus*), perhaps carry out their own assessments of the situation, and take such action as required to at least return these metrics onto an improving path. **Section 6.2**
- With Healthcare DNAs, we again make the recommendation to the Governor that his staff redouble their efforts to ensure that healthcare appointments are not foregone by staff actions, or lack of them. **Section 6.2**
- The Board is not privy to the cost of the dental contract to the prison but, given the high cost of dental treatment generally in the community, the total of 17% of the Wayland dental costs being wasted by DNAs is surely a cause for redoubled organisational efforts to reduce that significant financial loss, and the foregone improvement to prisoner oral health. We so recommend to the Governor and the prison contractor. **Section 6.2**
- We recommend to the Governor that when the induction programme comes up for its review, perhaps after its first six months, that the issue of mental health is given space in this review, perhaps as part of a renewed attempt to reduce the numbers of self-harm incidents, upon which we comment elsewhere in this report. **Section 6.3**
- At least such courses (on the mental and physical harm of consumption of illicit substances) could be part of the induction programme and we so recommend to the Governor to consider such. **Section 6.3**
- We hope that the combination of the two schemes, the Shannon Trust and That Reading Thing, seeking to bring on those who have the most limited understanding of reading, can be properly managed by the education provider to ensure a well-organised attempt to provide a comprehensive pathway to literacy for those who need that support, which the Board can comment on positively in our next report. We so recommend to the prison's head of education, skills, and work. **Section 7.1**
- However, such decision-making (over a holistic sentence plan, in collaboration with the prisoner) could conceivably happen as part of the induction period and we recommend to the Governor that, when the new induction process is properly bedded in, this aspect of release preparation should be considered for inclusion in the total decision-making process. **Section 7.2**

3.3 Response to the last report

- **By the Minister**

We appreciated the swift response of Minister's response to our 2023-2024 report. We also appreciate the effort that the Prison Service has obviously made to respond in more detail to our recommendations.

Unfortunately, from those responses, it would seem, in general, that what we have asked for is impossible to deliver, either because, in rough terms, work to address the general issue raised is underway, or has been reviewed and improvements will be seen in due time, or there is no finance in the straightened circumstances of the Prison Service or the government generally to address the issue further than what is currently being done.

We accept the political and financial legitimacy of all those reasons, but it will be no surprise to learn that this year's report will not resile from making those recommendations we see appropriate arising out of our continued, and experienced, monitoring of HMP Wayland.

However, we were encouraged by the Minister's recognition of the value of the Wayland Governor's initiative in his open and transparent management of his prison's responses to our recommendations, and trust that that initiative can be encouraged in other establishments.

- **By the Prison Service**

We acknowledge the specificity with which the Prison Service responded to the issues we raised for the Service in our last report, particularly, its support of the current Governor's approach to the information we provide the prison with from our monitoring, and trust that that endorsement will see a similar response in other Prison Service establishments.

We also acknowledge that, within the constraints of his financial and resource envelopes the Wayland Governor has done much to improve the 'offer' that Wayland makes to its prisoners and will comment in detail on such in the body of this report.

However, the Prison Service will recognise that much of what we asked for in our last report would involve the provision of more resources to the Governor; in part, to make up for the significant reduction in experienced staff by the actions of previous governments and Prison Service directing managements; and in part to compensate for the severe under-resourcing of critical establishment infrastructure maintenance over almost every year since the prison was first built in 1985.

We wish to state clearly, that, in the past year, the staff working at HMP Wayland, and its governors, have shown determination and effort to address the prisons' problems and it is far from an example of a 'broken' Prison Service establishment. However, we will continue to raise issues of resources, of all kinds, if we believe that lack of resources is at the base of at least some of the problems that Wayland's Governor, staff, and prisoners endure on a daily basis, as we highlight in the report.

Evidence sections 4 – 7

General note about the Board's survey of prisoner attitudes mentioned throughout this report

As in previous years, we asked prisoners to take part in the Board's 2025 survey, but this year we were able to have survey placed on the Wayland prisoners' digital service, so all 850 prisoners could choose, or not, to complete it. In the ten days it was available, 189 prisoners chose to complete the survey in its entirety, a response rate of just under 25% of the total population. The responses made, can be taken note of as a sample commentary on where Wayland is now in the minds of prisoners' experience of their treatment.

Comments on prisoners' views revealed in the survey are included in appropriate evidence sections below.

4. Safety

4.1 The triad of: Reception, first night management, and induction

Initial reception and property issues

Reception has been more than very busy this year, caused by the government's various emergency measures for the release of prisoners earlier than anticipated, because of the pressure on the Prison Service by increased prisoner numbers. Nevertheless, despite a daily throughput of more than two or three times the designed capacity of the reception areas, the need to process large amounts of property in and out, the improvement in property management noted in last year's survey, when we reported that 66% of prisoners received their property within two weeks of arrival, double the proportion in 2023, has been repeated again this year with 65% reporting property being received within two weeks. It should be noted that this is largely the result of better management of property which has arrived either with the prisoner, or shortly after, although we have investigated a number of such difficulties where property has 'gone missing,' only for it to be discovered some weeks after its arrival.

Those prisoners still awaiting their property two weeks after transfer has been reduced to 29% still awaiting it in 2025. We believe (from our other IMB activity in responding to prisoners' applications to the IMB about the failure of the previous prison to post on property still held in that prison) that this is mostly due to sending prisons' failure to process follow on property promptly. We are pleased to note that, at the time of writing, the Prison Ombudsman has written to the Prison Service seeking their views on property management improvement proposals, all of which the Wayland Board has previously discussed with Wayland management and many of which are now accepted as current objectives within Wayland. We therefore hope that these improvements will be achieved in this operational year in other establishments as well.

First night unit

The picture of the second part of the triad, first night management, has continued to be less acceptable, some of which is due to the increasing pressure on accommodation. This has continued to mean, as we reported at the end of our previous report, that prisoners' time in the first night unit of 14 cells has been measured in hours not days, before the pressing need to move them on to their allocated permanent unit. Essentially, this has meant, again, that the critical first few days in custody in a new prison, when prisoners need to talk to staff about their personal problems and staff

need to identify concerns with these same new prisoners, is such that only the most serious of observable problems is likely to be identified, and an opportunity to encourage new prisoners to see Wayland as a welcoming and useful experience in their sentence is made much more difficult. Unfortunately, this situation is compounded by the high proportion of inexperienced officer staff in their allocated units, who, hindered by that inexperience, find it difficult to carry out anything like a deeper assessment of prisoners' needs in the early days of custody.

Last year, therefore, we recommended that the Governor should consider whether the 14 cells of the first night unit actually provide the best use of its accommodation, and that such a review might be helpful in considering how best management might address the continuing challenge of the third and, in many ways, most important part of the triad, which is induction.

At the close of this reporting year, we were informed that the prison had indeed decided to consider an improved management of first night and induction and were actively planning to bring first night and induction responsibilities into one section of a unit in the old build. We trust this will address the needs of newly received prisoners better and although we make no underestimate of the challenges that the new approach will bring, not least of which is the need for more staff training in managing such a unit, we hope that in our next report we shall be able to do so on the basis of a successful development of this initiative.

Induction

In previous reports we have called for better, and more focused, management of the induction process as our monitoring had revealed considerable prisoner disenchantment. In the year we were informed that an induction working party was planned to begin the process of improvement, including the use of the prisoners' intranet to provide material for their unhurried later viewing.

Unfortunately, however, the external pressures we have noted above meant that management attention had to be directed elsewhere to cope with the unexpected deluge of additional work.

Nevertheless, in April the new first night and induction policy was approved and published. Unfortunately, although the policy is long on requirements, and says all the right things about what should happen during these critical periods, it is very light on how these good ideas will be put into practice and the management of the actual requirements almost completely absent. It also still maintains the existing 'first night' experience in the 14-cell accommodation before the prisoners are distributed around the prison on the second day, a practice which we have consistently pointed out results in only a patchily successful induction period. As we have noted above, however, by the end of our reporting year the Governor had instructed that the two elements should be brought under the management of one accommodation unit as an integrated process, taking advantage of the temporary lull in reception and discharge pressures being experienced. The Board therefore looks forward to this initiative being implemented successfully.

4.2 Suicide and self-harm, deaths in custody

As with our last report, we note that the number of self-harm incidents has shown that Wayland's record is usually amongst the lowest in the prison's comparator group. However, the numbers are still too high, and what is worrying is that the trend line has

been steadily upwards each month, and therefore it is unlikely, though not impossible, for this to have been affected by a small number of prisoners who self-harm frequently.

From the evidence of the daily briefings, and IMB Board members' discussions with prisoners, it appears that the great majority of these self-harm incidents continue to involve cuts to the arms or upper body. The reasons given by prisoners to our questioning over the year has frequently been frustration with the regime, that requests or complaints felt to be legitimate or justified had been ignored, or that it was because of general feelings of despair, very infrequently because of a single traumatic anniversary or incident.

As we observed in our report last year on this issue, these offered explanations of self-harm behaviour are similar to self-harm activities amongst young people in open society, for which the explanation of a need to react to feelings of helplessness is frequently put forward by those in contact with young people, such as teachers. In the Board's view, although the feelings and the outcomes in both groups seem alike, in the closed society of a prison there is surely much more that could be done to address the more concentrated reasons for self-harm shared across participants in this behaviour.

In section 5.3, we refer to the result of our recent survey's continuing confirmation of the large number of prisoners who admit to feelings of loneliness in Wayland and the very low percentage who would approach staff with their concerns. This is an area where, the Board believes, key work should be concentrated, with the key worker creating an atmosphere of approachability, even if on just a personal level at first, for such self-harm feelings to be admitted before they get to self-harm actions. It is likely that this would entail more specific and targeted training being needed for the largely inexperienced staff perhaps using the psychology resources available in the prison, we so recommend to the Governor.

We regret that we must record two deaths in custody in the reporting year, although the inquests have yet to be held, so the causes of death have not yet been established.

4.3 Violence and violence reduction, self-isolation

Violence against staff and other prisoners

We noted in our last report that the violence experienced by staff from prisoners and by prisoners from each other, had reduced significantly from what it had been like in previous periods. For much of this year that continued to be the case, and although Wayland has not been the lowest scorer in these league tables very frequently, it has been consistently under the comparator average in both issues.

However, it seems that towards the end of the reporting year, the trend is upwards rather than downwards, with the CSU full, with many prisoners there for violence-related reasons. We have noted the Governor's swift response and the proposed innovation of a specific violence reduction unit in an attempt to divert at least some prisoners from repeated violence, and from at least a period under segregation. We trust that this is in place as soon as possible in order for Wayland to improve, again, in its delivery of a safe custodial experience.

In this context, in our latest IMB survey, the proportion of prisoners who report that they did **not** feel safe on arrival at Wayland is, at 27%, almost twice as many as the 14% who reported that feeling in 2024. Whatever the origin of this deterioration, the responses are striking in that the numbers reporting that they did not feel safe after lived experience of Wayland, did not change. This is an identical result to the situation

previous surveys where, again, prisoners did not feel safer after some months in the prison than they did on arrival. The stability in the 'fear factor' surely demands some deeper investigation, and effective responses by prison management to any drivers of this fear discovered and we so recommend

Staff management of violent behaviour

In our last report we expressed the view that the balance of training time on the prison officer initial training course was heavily weighted, in practical terms, towards the management of violent prisoners and with insufficient time spent on the deeper skills of violence de-escalation and prevention. The response from the Prison Service referred only to the annual refresher training, however, quoting eight hours of physical use of force training and four hours of digital de-escalation training. From the information provided to the Board, the initial training course for Band 3 Officers has 72 hours of physical violence management training, but only 20 hours of prisoner communication skills of all kinds (Key Work and Five-Minute Intervention training, not specifically de-escalation skills). The Board therefore remains of the view that the amount of practical training in non-violent management techniques needs to be increased, seeing how prisoner violence, although less than it was two years ago, is still too high and at the end of this reporting year seems to be gradually increasing. We take note of the Prison Service's stated priority to support and encourage improved key worker management and will look to the outcome in our next reporting year. We return to this point in Section 5.3.

4.4 Use of force

We continue to be impressed with the care with which the use of force statistics have been collated and are reviewed on a monthly basis. We note that the end of the year saw a pro-active use of use of force statistics with the local creation of a 'staff best practice' information initiative. We hope that this will form part of regular updates on violence management training for staff.

The majority of use of force incidents happen on the old build, and from many of the daily briefings it appears that a significant proportion are due to prisoners being under the influence (UTI) of illicit substances. These considerations again prompt the Board to repeat previous recommendations that the staffing complement of these four wings needs to be reviewed. As we noted last year, the 'standard' of two staff for 60 prisoners, while perhaps adequate for well-designed and open, galleried landings and wings, appears under-resourced for the old-build units, given their poor design and the lack of direct observation possible. Prisoners have also told us of frequent occasions when they cannot find staff when they needed them.

We are aware of the Governor's tight staffing envelope and therefore appreciate the difficulty the prison has in increasing the number of staff on a daily basis. Therefore, we make the repeated recommendation to the Prison Service that there should be a thorough re-evaluation of the staffing profile for the old build wings, which we believe would justify an increase in staffing at the prison officer level and result in a safer and more decent environment for prisoners.

4.5 Preventing illicit items

During this reporting year it has been a fact that drugs are readily and easily available, prisoners tell us, in every wing and unit of the prison, even in the 'drug free' unit. This must mean that there is a supply route, or routes, into the prison of at least the precursor chemicals, if not the final products. And latterly, either finds of, or evidence

that use has been made of (during UTI investigations and responses) illicitly brewed alcohol (IBA, otherwise known as 'hooch'), with very high alcohol by volume levels, have increased. The specialist dogs have been used with good effect but most alcohol is detected by staff on normal working or searching. Therefore, it is clear that the demand for drugs and hooch has thwarted the attempts, from reception through accommodation searching, made to reduce or prohibit the supply.

IMB conversations with prisoners who have been caught with drugs reveals the complexities of this trade, and the large amounts of money to be made by suppliers. There have been successes by staff in seizing large drug consignments; nevertheless, drugs are being imported, or somehow made or recovered, in quantities which have seen the 'street price' lower than in the past. And, as last year, we have learned from prisoners that psychoactive drugs of unknown strength of efficacy have been offered, 'free of charge', to the more naïve, and often new, prisoners; thereafter, with such freebies being charged for, with the usual consequences of failure to pay leading to punishments, often physical but also including the infamous 'double bubble', where an unpaid debt is doubled every week. This situation often leads either to self-isolation, recourse to applications for 'own interest protection' segregation, and sometimes, when this fails to be accepted, gratuitous violence towards a staff member by the prisoner to ensure that he is segregated and thereafter either moved on, or re-categorised at a higher level and so transferred under that result. The situation, therefore, not only puts prisoners at risk of violence, but their families at similar risk to ensure payment, and staff at risk as, in prisoners' eyes, a reasonably foolproof way of achieving the transfer needed.

The Board believes that the effective prevention of illicit items does not just mean within the total gift of current local staff and resources, but with a full acceptance that there must be a radical approach to prevention taken together by government and Prison Service at large. This must recognise that the success of any rehabilitative emphasis on the task of the Prison Service must first ensure the elimination of such illicit items, notwithstanding that it will be undoubtedly expensive in staff and materiel.

Throughout the year the most observable result of the use of illicit substances is the frequency that prisoners are identified - and confirmed by healthcare staff - as being 'under the influence' (UTI). It is a rare daily briefing report that details only one or two prisoners identified as UTI the previous day, most such reports have many more. We return to this issue in section 6, below.

Efforts have been made by prison management to disrupt the supply and control of the illicit trade by transferring to other prisons the prisoners believed to be controlling the trade. Sadly, however, because of the demand for drugs, previous 'lower tier' suppliers are likely to step up and there will be efforts made by these prisoners to establish their own new hierarchy of control.

The Board understands that there are measures planned by the Prison Service nationally which may make it easier to interdict the use of drones to deliver the illicit goods, and trust that these will be effectively deployed at Wayland.

The key issue to the maintenance of this trade, of course, is the ubiquity of the mobile phone. There have been successful interventions, through searches, or more frequently through intelligence and the use of detection equipment, and, of course, by the airport scanners in reception. However, the phones still come in, even iPhones are found, not just the miniature purpose-made-to-be-smuggled phones, but Wayland is

under the group average for finds, although whether this means there are fewer phones to find, or that Wayland finds fewer of them is unclear.

However, we end this section on a more positive note, in that all UTI incidents now have a referral process to Phoenix Futures, the drug rehabilitation contractor, and to the key worker, in a staged process until the third such incident by a prisoner in 28 days. The Board therefore hopes that a consistent delivery of this approach may encourage greater abstinence as with the success of the 'resilience training' given by gym staff with their Stoic course, which we described in detail in our last report and which was given positive coverage in the major regional newspaper.

5. Fair and humane treatment

5.1 Accommodation, clothing, food

Accommodation

The Board wishes to report that the work that was carried out during the year, coupled with the mild winter, meant that its previous constant refrain about the poor heating in the new build cells does not need repetition this year. In addition, work has proceeded on the fire safety improvements to these wings, even though this has meant the taking offline of 60 cells at a time for months. In this context, we would observe that if only the internal refurbishment work which everyone agrees is necessary could have been progressed at the same time, the considerable further disruption which will be caused by these works when scheduled could have been avoided. We called for this work to be done in our last report, but have decided to wait until the longer-term refurbishment programme is clearer before making further comment.

However, the prison had to contend, as did the prisoners involved, with two other problems with the new build cells: bed bugs and mould. With bed bugs, the prison has had to take cells off line in order to fumigate them properly, as well as high temperature washing of prisoners' personal clothing and other contaminated items, or the longer process of freezing these, to kill any bugs which had become trapped in such. Specialist firms, and even a specialist dog, have been used in detection of these insects. The prison's efforts have matured over the reporting period, but we were disappointed with the dismissive attitude of at least some staff who, it seemed to the Board, did not take the issue seriously enough at least at first, which led to complaints from prisoners for compensation when a clearer system for the management of the problem could have prevented disputed claims. We recommend that, in cases like these, there should be a full disclosure, to prisoners as well as staff, of the procedures which will be adopted to manage issues like this.

With regard to mould, this was, mainly, a problem in the new build units as the cells there have an internal shower without adequate ventilation, and are constructed of materials which absorb water over-splash from the shower, which has caused floors to rot and wall coverings to grow black mould. Cells were cleaned by the CRED (clean, rehabilitative, enabling and decent) team of prisoners, but there is only so much that can be done by cleaning and repainting, as IMB Board members have observed after at least some cells have been declared habitable again. We were not aware whether competent, that is appropriately trained staff, signed off the completed work before prisoners reoccupied the cell. If not, and as the problem is likely to be repeated, we recommend that such staff are required to sign off the completed work carried out by the CRED team in future.

Having said that, we can again report, however, that the combined efforts of a rejuvenated government facility services limited (GFSL) team, the support of the two staff-managed prisoner works parties of the mobile maintenance group and the CRED team, have meant in the Board's view, the entire prison feels - indeed, is - cleaner, more cared for and more swiftly repaired and refurbished when the inevitable prisoner or other accidental damage takes place.

We reported last year that the prisons grounds, too, had been vastly improved, with innovative flower-bed designs and judiciously placed, large plant boxes designed, installed and maintained by a similarly rejuvenated horticultural team. That progress has been turbo-charged this year and those IMB Board members who have been at

Wayland for some years cannot remember when the prison has looked so well-tended. The grounds team were even confident enough this year to enter for the annual Windlesham competition for prison grounds management. The insistence of the governing Governor, which we reported on last year, that a prison is more than a collection of prisoner-holding buildings but a living community which, if given the right encouragement, would prefer to live in tidy and pleasant surroundings, has been taken forward by the staff and prisoners involved, and one of the pleasing things about the change is how the prisoners on the grounds parties have no reluctance in telling visitors how much they enjoy not just their work but in the results of that work. A real example of the 'soft skills' acquisition that this prison employment can offer.

We should also note in this section the result of the prison's, externally-conducted, living conditions audit, carried out at the beginning of this reporting year, which gave Wayland the grade of 'substantial green'. It is one of the very few prisons, of whatever category, to be so ranked. and it has been good to see the pride taken by staff at all levels in this result.

The care and separation (segregation) unit

While we comment on the operation of the segregation unit later in this section, we feel it necessary to describe the situation with the unit's physical construction here. We repeat our observation made in our last report, that the Board cannot understand why such a unit has been built to a design so noisy and so easy to damage, when it has been known for some time that such units house the most disruptive men and those most likely to damage their surroundings who have often been removed from 'normal' accommodation because they have vandalised it.

For example, a period of severe disruption ended with almost half the CSU cells being out of action, including by the trashing of the central light fittings, but mainly from the easy-to-damage cover to the electrical switches in the cell. Apparently other prisons had suffered similar damage and a strong plastic plate had been devised to robustly cover the necessary switchgear. This was eventually installed in the damaged cells and has been effective. The other problem, that of prisoners smashing the observation panel, is more difficult, as, unbelievably, we have been told by senior Prison Service directing staff that the observation glass has to be easy enough for staff to smash in order to insert fire-suppression mist or water dispenser if a prisoner has set fire to the cell's contents and the inundation point cannot be made to work. We therefore recommend to the Prison Service that the design of CSU cell doors, indeed all cell doors to which this stricture is applicable, be reviewed to eliminate this difficulty and thus make staff's task, and health (as at least one member of staff has been injured by flying glass from such an example of destruction), easier, as well as improving the safe management of prisoners.

In previous reports, we have commented on the high level of noise in the unit, resulting from the activities of a number of prisoners, which frequently makes the unit an unbearable place in which to work or inhabit. We again recommend to the Prison Service that it commissions an acoustic management consultancy to examine how the building can be retro-fitted to achieve a much lower reflected noise level and thus assist the calm management of this unit.

Doubled occupation of single cells

We made a considerable point in our last report on the unsatisfactory nature for all concerned, staff as well as prisoners, of the national policy of crowding cells built for one person with declaring them appropriate for double occupancy. We then covered

the humiliating outcomes, in almost every aspect of daily life, consequent on sharing a space designed, and fit, for only one person. We have not repeated those extensive comments, since they have not changed and can be seen on pages 15-17 in our 2023-2024 Annual Report.

We would comment now, however, on the lack of response by the Prison Service to our recommendations arising out of our concerns for the decency and respectful management of prisoners forced to share such accommodation. We uncharitably suspect this lack is likely because any defensive answer to the issues raised would be demonstrably unsatisfactory, especially as recourse could be had to the statement in Lord Woolf's Report on the Strangeways riot of 1990 that such enforced sharing of single cells was, by itself, unacceptable. Nevertheless, we hope that the Prison Service, and the Minister, would agree that such cells should, as far as possible, provide a living experience which is not harmful to either occupant, indeed, that is the basis of the CSRA (cell sharing risk assessment) made before prisoners can be allocated a shared cell, whether of standard size for two persons or one. However, the CSRA limits harm to the risk of one prisoner harming another by violence, it does not take into consideration other harms, such as being forced to share a cell with another prisoner who constantly vapes, or whose body care is less than complete, or whose choice of relaxation is consuming drugs or alcohol, or whose willingness to make a go at rehabilitation does not match another's, all of which have been raised, on members monitoring visits, by prisoners forced to accept such conditions.

All these can be argued as harms.

All we ask is that the Prison Service recognises the potential harms that enforced sharing in single cell spaces can lead to, and accepts that there needs to be a renewed consideration of how such harms could be mitigated. Prisoners have, for example, suggested voluntary compacts which would attract positive incentives records at agreed intervals, by additional privileges, or other such actions which would be targeted at an open compensation for the necessity of such required single cell sharing. We so recommend the creation of such a national compact to the Prison Service.

As a final issue in this complex problem, we have, since the policy was implemented, frequently reported to senior staff of the unsuitability, or even absence, of a suitable screen for the toilet, so that a prisoner was not forced to actually watch his cell-mate defecate. This was agreed as necessary action, but the applicability, and maintenance, of the measures put in place has not been seen as a priority, even when cells have frequent fabric checks. IMB members are constantly being told, therefore, and have seen for themselves on numerous occasions, that the curtains, or their hanging arrangements are either deficient or missing. Board members have therefore had to make themselves, and staff, at every level, uncomfortable by the frequent need to report the failure of this example of decent accommodation management. We therefore request that senior management readdress this issue to find a way of both incentivising prisoners to care for the cell's decency structures and fittings, and for staff to actively stay on top of the outcome of that incentivisation.

Clothing

As a category C prison, men are allowed to wear their own clothes. This has two major results (apart from saving the Prison Service money, as it doesn't have to provide 'uniforms'). Firstly, prisoners must spend their own money on the clothes they require (with the exception of working clothing and outdoor, wet-weather gear) once the items they arrived with, or have purchased, become worn out or damaged. With the expense

of many items, this means some prisoners have very little clothing to change into. However, one select group - lifers and IPP prisoners – have permission to receive an annual ‘clothing parcel’ sent in by their families. This creates discontent amongst those prisoners who are outside this group yet are serving long sentences. The Board therefore recommends again that prison management should consider, perhaps within the local incentives framework, that all prisoners who are expecting at least a further year in custody should have access to a regulated ‘clothing parcel’. This would reduce the felt cause of unjustified discrimination between prisoner groups.

Food

In the reporting year, for some considerable time, the prison had to operate with, in effect, only one kitchen as the second kitchen has required extensive refurbishment. Since there have been two fully working kitchens, again the number of food complaints made to IMB members has decreased, and the Board has lately seen a visible improvement in the quantity and apparent palatability of the kitchens’ offerings. Perhaps this dislocation was responsible for a 10% drop in the responses of prisoners who felt that the prison’s food was okay, with a corresponding 10% increase in the proportion who felt that it was poor. Although there have not been many official complaints to the IMB, where there has been a flurry of complaints to IMB members, we have drawn these to the catering manager’s attention. On one occasion the manager agreed with the prisoners’ complaints (overcooked potato wedges) and explained that this was due to a single supplier’s issue and that supplier would be avoided in future wherever possible.

The victualling allowance has increased but, in the Board’s view, does not match the need or reflect the inflation of food prices seen recently and likely to be maintained in the future by all accounts. At the very least we would suggest that the Prison Service sets a victualling allowance at the start of each year, and then arrange that this be automatically increased on a three-monthly basis as required by food cost inflation data. At least that would allow some degree of predictability in menu planning and delivery.

5.2 Segregation

Care and separation unit (CSU - segregation)

We reported last year that the staff of this critical unit for the prison’s stability and management of violence had had to face long periods when some prisoners have maintained, and worsened, their behaviour, through noise, extensive damage to cells and physical challenges to staff. There have again been periods when prisoners have been diagnosed with such severe mental health problems that, we have been informed, they need specialist medical custodial care to be safely managed, which is not available in Wayland. The efforts of staff to manage the extreme results of such behaviour have been personally witnessed by the IMB in our monitoring of this unit. Staff have compassionately and heroically done their best but they are not trained medical professionals. Again, it will be no surprise that we have to record the considerable periods that such behaviour must continue to be managed on a daily basis due to the lack of suitable beds available for the transfer of such prisoners. Therefore, we continue to pay credit to the basic grade operational staff who, from our observations, have, on a daily basis, still maintained a high degree of commitment to the management of their responsibilities.

However, we must also report, from close observation of the CSU as part of our monitoring duties, that many of the staff are often almost as inexperienced as the bulk

of HMP Wayland's officer staff, and have not been as supported as the Board believes they should have been and should be.

At the beginning of this reporting year, the Board asked senior management if there would be a revised management manual and operational policy for the unit as we had noted that the one in operation had not been changed, still referring to the situation in the old unit with only half the number of cells. We did note, however, the addition of another officer to its daily management. We were assured that a revised policy was under review. During the year the unit's managing staff was changed but the looked-for policy revision did not appear. We were informed that the drafts of the new policy were deemed unsatisfactory and had been sent back for revision but would be ready by the end of our reporting year. We trust that this further revision will see a care and separation unit given the direction, and the support, that it needs in what is clear are increasing demands on the staff and its management as the level of prisoner violence has begun to increase again, after a lengthy period when it had fallen to a lower level than many other similar prisons.

The above factors mean we must restate our view from a previous report that the CSU which should be the centrepiece of the prison's skill at managing very challenging prisoners, needs experienced staff but, where experience is not available, considerable effort in training must be made. Despite the difficulties the Board remains of the view that staff must be given better tools, through a renewed training effort rather than just with encouragement from other staff to do their best and learn from each other, which we have been told by staff is the only option. We therefore suggest that the Governor could request that the specialist training CSU staff need be provided face-to-face from wider Prison Service training resources and not merely by expecting online programmes to deliver the interpersonal skills so needed. We also look forward to a new management policy and approach to provide a sound and a consistent base on which staff can manage this challenging task.

5.3 Staff and prisoner relationships, key workers

Staff and prisoner relationships

We have taken this to include the relationships prisoners have with each other, and not just their relationships with staff. The results of our 2025 survey are instructive. As we have said in previous reports, we believe relationships between prisoners and staff and between prisoners themselves, are the most important area in demonstrating how the prison sees its task and how it puts into practice the two key outcomes of prison service work – security and rehabilitation. We asked 11 questions on this topic in our 2025 survey, focusing on the issue of how prisoners saw their relationship with staff, how effective that relationship was and how much they trusted, or did not trust, staff. The comparisons with previous years' responses are instructive.

The first question we asked prisoners was if they had felt lonely in Wayland. Because very few prisoners know each other prior to being in prison, it seems to us that this is a key question in gauging the success of the prison in forming a real community rather than just a prison containing almost 1,000 prisoners, as it might be expected that the additional reality of a frequent chance of violence or victimisation would add to a feeling of being unable to let one's guard down and so perhaps prisoners would try and form relationships as a protective factor.

The reality is still different. The response in the past few years was repeated in 2025: 60% of prisoners did admit to feeling lonely. This therefore is the backdrop to the shockingly high change in the increase of the number of respondents who said they

trusted no other prisoner in Wayland. Approximately 25% of prisoners had said they trusted no-one in 2023 and 2024. This reporting year that number had doubled to 50% of respondents. There was also a significant reduction in the number who trusted 'one, two, or a few' other prisoners, from an average of around 40% of respondents previously to less than 25% now.

The Board is unwilling to speculate on the reasons for this significant reduction in general trust, but it is almost impossible to believe that it represents a statistical anomaly this year against a broadly stable situation over the previous four years and should therefore, the Board believes, be taken as a serious call for attention to this significant reduction in interpersonal trust in what is often called the 'Wayland Community'. A community in which about 75% of those who responded to the survey say they trust either no-one or a vanishingly few others is a community in name only, with all that implies for mutual cooperation, interpersonal help and concern, and fellow-feeling, all markers of a thriving community, the absence of which makes every management attempt at improving the life of a community so much more difficult.

The only recommendation which the Board believes it can make in response to these results is to ask senior and operational management to take note of them and look for ways of rebuilding a sense of community amongst all prisoners in decision-making arenas where and when managerial impacts on the community are under review.

Nevertheless, it is not just the feeling of being lonely that is important; it is what then happens. Unfortunately, although in 2023 the response to the question of whether prisoners had talked with staff about their feelings indicated a willingness to do so by about 50% of prisoners, in 2025 this had dropped catastrophically, to just 5%. The Board believes this is a serious call to prison management to investigate further, since the feeling of loneliness seems to be a proxy for a significant degree of detachment from the prison and what it can offer prisoners in the way of rehabilitation.

We, therefore, recommend that prison management make efforts to follow up this finding through a variety of means and devise appropriate training modules for staff to encourage sensitivity to this issue and confidence in talking with prisoners about it. The lack of experience of a large proportion of prison staff is a problem acknowledged by all, including prisoners, and it would seem to the Board that the only way to address the issue is to accept that training must try and give what experience has yet to teach.

That there is a reservoir of goodwill amongst prisoners for staff, however, is revealed in responses to other questions in this section, which reported that around 50% of prisoners who responded to the IMB survey thought they could trust staff, which is a similar proportion to previous years, and that almost 60% were willing to say that staff relationships were 'good'. It is against this more positive background that we believe appropriate training for all staff, not merely the young and inexperienced, would tilt the perception of positive staff relationships further and could unlock a greater willingness, indeed desire, amongst prisoners to fully engage in their rehabilitation instead of just tolerating their imprisonment and waiting until it is over.

Our comments above might prompt some readers to ask 'how?' we asked this of prisoners, and the answer is clear and simple. We have shared all the freeform responses from prisoners with prison management, but, as in previous years, they can be summed up as:

- listen to us and do something about what we tell you;
- treat prisoners as humans, be open with communication, we're adults;

- move away from the ‘need to punish’ mindset;
- spend more time out of the office, be better trained;
- staff-and-prisoner trust-building exercises; and,
- talking more.

We would commend what has been initiated in one wing, and that is ‘reverse mentoring’ where, in a small group, prisoners are invited to be honest with operational staff about what they see as improvements that could be made in their relationships. But the facts have been known for some years through our surveys, and the freeform responses by prisoners to questions on how the prison could be improved have been shared with all staff through the publication of our commentary on the survey. We publish the detail of this year’s survey as part of this annual report.

Key working

Evidence from the quality assurance of key work reports demonstrates that Wayland’s staff manage around, or slightly under, the average quality benchmarking. As staff become more proficient, and as key-working becomes more regular, the Board trusts that this scoring will improve in the coming period. There is now an emphasis on the date of the last key work session added to the daily briefing report of a prisoner’s challenging behaviour, and along with this there has been renewed management effort to improve the quality and not just the frequency of key work sessions. However, prisoners tell the IMB (and we have been present when they have said this to management) that for many prisoners, the objective is just to reassure their key worker that all is OK with them. We understand how, for many prisoners serving extended sentences such as lifers and IPPs (imprisonment for public protection), to have these sessions frequently is meaningless for them, but, at least, the system gets a staff member and prisoner together, out of which could, indeed should, come a gradual increase in better relationships through the shared purpose that is key working. However, the Board believes that in the pursuit of the metric of frequency, the issue of the effectiveness of these interventions in changing the thinking and behaviour patterns of prisoners has been largely overlooked, or at least, not emphasised. We are not aware, for example, if there has been any attempt to track behaviours against key work discussions and, hopefully, behavioural targets.

Of course, however, that presumes that staff have been properly trained in the necessary skills of key-working, which go beyond the very limited capability attempted in the key work and five-minute intervention training input in an officer’s initial training, as we have noted previously. Board members have asked the specific question of a number new officers who have had at least six months’ experience of working in Wayland since their training: ‘did your training help you to manage the need to make effective relationships with the prisoners in key working?’ Their answers were all variations on ‘no’ or ‘not much help’.

We have also discussed the programme of training inputs within the weekly training debrief with senior staff but, unfortunately, we have not seen evidence that that training has been fully researched from evidenced training programmes, but instead relies upon, for example, senior staff trying to ‘upskill’ newer staff, who may have had a bit more experience but have not had such enhanced training themselves, nor had any training in the skills of training itself. Because of this evidence and the admitted need to improve the quality of key work, we would again urge the Prison Service to use its national training resources, or other bought-in such experience, to provide quality staff training opportunities to build those necessary skills across the staff, at all levels.

5.4 Equality and diversity

One member of the Board has equality and diversity as a special interest and has reported that the group's multi-disciplinary meetings are well attended and issues raised at the meetings are promptly dealt with. However, those who also read the Board's latest published survey report may find that, in the two questions for which we asked for freeform responses about prisoners' experience of Wayland, there are claims of racist and other unacceptable behaviours by staff. It will be appreciated that, as the responses are totally anonymous, it is impossible to follow up the veracity or otherwise of such comments. Nevertheless, whenever such claims have been made to the Board, either in an IMB complaint or in discussion with prisoners, we both investigate the reasons for any such claim with the prisoner who has made the complaint, encouraging a full DIRF (discrimination incident reporting form) is made by him if this has not already been done, and also discuss the matter raised directly with the prison's equality lead to ensure that the prison's appropriate staff are aware of the concern. IMB members also talk with the Zahid Mubarak Trust prisoner representatives about their understanding of the state of race relations and responses in the prison as part of our monitoring duties. It should also be noted that members have not observed any such unacceptable staff behaviour in our monitoring, which would immediately be brought to the prison authorities.

The Board has noted that the increasing emphasis on the issue of neurodiversity in general discourse and publicity has been embraced by the prison. There has been an increased acknowledgement of the issue and the problems of neurodiverse behaviour amongst prisoners, and we have seen a greater understanding amongst staff who have discussed such issues with us, of the real problems some prisoners have with the demands of prison life in a crowded and noisy environment, or in managing the results of their own personal traumas, including those brought on by their own criminal behaviour. This has been an area where the neurodiverse lead has taken explanatory sessions with all levels of staff to increase awareness of the well-springs and potential outcomes of some prisoners' personal challenges.

However, one IMB application from an acknowledged neurodiverse prisoner prompted the Board to investigate the practice of key work record sharing, as the prisoner in question could not remember anything of his, only one to that date, key work session. It is apparently not practice to share a key work record with a prisoner, and the Board cannot understand why not, especially as this could be a valuable feature in sharing an understanding of progress made, or not made, which is clearly in the interests of both prison and prisoner within the incentives process. We therefore make the recommendation to the prison that a copy of the record of a key work session should be made available to the prisoner if he wishes and the prison's record endorsed to that effect.

5.5 Faith and pastoral support

We repeat our previous assessments of how the chaplaincy team has continued to demonstrate comprehensive support to those of all faiths - and none - throughout the reporting year. When Board members have been on monitoring visits, they have noted how often they have seen chaplains around the prison, in the wings and in the CSU. All the important religious festivals have been celebrated and, with the skilled work of the catering staff, catered for.

The major setback, and criticism, of the year has not been of the chaplaincy or its efforts but of the Prison Service and its lack of support for those efforts.

To the consternation of prisoners who had been waiting for a place on the highly-regarded Sycamore Tree victim awareness course, it was closed by the Directorate of Rehabilitation. This was a complete surprise to the chaplaincy, who was not aware of its impending closure, to the incomprehension of many senior operational staff, because they had seen the positive effects on participants of the course, and to the incredulity of the Board who had monitored both the delivery of the course and the prisoners' positive reactions to it, as well as sharing in the reactions of other IMB Boards in other prisons who also had had good experience of the course.

The directorate had suddenly announced that the course was, in summary, unacceptable for an educational accreditation, which Sycamore Tree had achieved, because of its efforts to change the thinking of participants. They were also of the view, we understand, that the delivery of the programme was unsafe, because there was the risk of inappropriate onward restorative justice referrals, when in fact there were no onward notifications made by Sycamore Tree and any such requests by prisoners were always referred to the police's specialist victim restoration personnel.

An appeal was made by the fellowship, the Board understands, but although the 'scores' assessed by the directorate were marginally improved, the answer was the same: the course must remain forbidden.

While it is true that the course did indeed try to encourage a different mindset amongst the prisoner participants in their relationships towards their victims, that was something that, prisoners told us, they had either never considered, or had deliberately shut it out of their minds because they didn't want to deal with it, and had been glad that the course had helped them deal with it in some sort of forgiveness way. In fact, a long-term prisoner, sentenced for an offence of extreme violence, has admitted to the IMB that his experience of being on the Sycamore Tree course was a life-changer for him, subsequent to which he has turned his in-prison life around and is determined to continue that approach after his eventual release.

The Board believes that, indeed, trying to change prisoners' thinking about their crimes and about their antisocial behaviour is something that the prison's total regime is, or should be, about, with or without psychological oversight, in order to work towards rehabilitation.

The only 'light at the end of the tunnel' on this, in the Board's assessment, totally unnecessary decision, is that the fellowship informs us that they are putting together a course to replace the Sycamore Tree format but which they hope will be even better than before and which will again be accredited, but in a more psychologically-protected way. The Board hopes that this will indeed be the case and that the Directorate will then live up to its by-line of rehabilitation, and support it.

5.6 Incentives schemes

In our last report, the Board stated that, in its opinion, the prison was neither in conformance with the latest prison service instructions for an incentives policy and that even the outdated policy that was referenced had frequently failed the procedural justice test.

We are pleased to report that the revision of the local policy which was promised was indeed delivered and the prison has responded to the Board's concerns that prisoners should be fully involved in the management of the scheme on a personal level and not just informed later of decisions made in their absence.

Since the new approach has been in operation the applications made to the IMB about its operation have much reduced, with the majority now concentrated on the issue of items allowed in possession when in a previous category C (or even category B) prison but which are not allowed in Wayland. Sometimes these have to do with the items allowed at different levels of the incentives scheme (a system of earned privileges to encourage positive behaviour) but many because, it seems, other prisons do not always appear to follow the national permitted lists, while Wayland does.

Perhaps if the national list were re-issued afresh each year, this would encourage a closer adherence to its restrictions, or the Prison Service agree to compensate prisoners who have legitimately purchased an item in one prison but are refused to have it in possession in another. We so recommend to the Prison Service.

On a day-to-day level the impact of incentives is on the entries made on a prisoner's NOMIS record of behaviour by either a 'negative' or 'positive' comment. The Board has been concerned from its investigations into prisoners' applications which have concerned incentive management, that there are far more negative entries made than positives. It has often brought this situation to the notice of management, and has been pleased by the, admittedly slow, increase in positive comments following the new scheme's introduction. This has followed the revised policy on distinguishing between 'negatives' and 'negative incentive behaviour' comments. The former is just a note of 'low-level behaviour which should lead to a challenge to the prisoner, the latter a considered warning about poor behaviour that will contribute to any incentive review in a way that a simple negative may not and will lead to an official communication about the issue which the previous simple negatives often did not, leading to a surprise to the prisoner when he later suffered an incentive downgrade. The Board hopes that this new distinction could have more positive value in encouraging honest debate, especially between key worker and prisoner, over the reasons for the poor behaviour, and the need to adopt different strategies if a downgrading of incentive level is not to be triggered. At the very least it will make the system's penalties clearer.

5.7 Complaints

Once again, the Board is grateful to the complaints department of the prison for another year of unstinting help and support. The team tries to make sure that Board members have the right information to assist their investigations into applications from prisoners, who may, or may not, have availed themselves of the prison's complaints process, and with what result.

In response to IMB applications, Board members have noted that they have needed to make fewer referrals to management about official responses to complaints being either insufficiently informative or inappropriate. The Board believes that management quality assurance has achieved these improvements alongside a greater involvement of supervisory staff especially at custodial manager (CM) level. The Board hopes that this improvement will lead to a reduction in the actual number of complaints, as it has been informed that the trend line has tended to be significantly upward, with Wayland frequently taking, or almost taking, the top spot for the number of complaints in the prison's comparator group.

Where there is, however, a much less encouraging situation is where a complaint has to be responded to by another prison, where approximately a third of such complaints are not answered within the proper timescale. Serious cases are brought to senior management's attention, and, as a last resort, the Wayland IMB Chair has had recourse to notifying the other prison's IMB Chair of the delay and request that the

delay be brought to that prison's senior management attention; more often than not, this strategy has been effective.

In considering the IMB's responsibility to monitor the treatment received by prisoners, through managing applications, and accepting that responses can take significant effort, we firmly believe that the system nevertheless provides a valuable insight into what concerns prisoners about their treatment and how they see the prison either responding or not to them and their needs. As we stated last year, one IMB Board member put it: *'The prisoners may not be independent but they do monitor the prison, between them, 24/7/365!'*. The Board will continue to follow the authority of Rule 78 of the Prison Rules 1999 and continue to 'hear any complaint or request which a prisoner wishes to make to them' by maintaining its efforts with the IMB application process.

5.8 Property

The major issue with prisoners' property experienced at Wayland is property on transfer. The prisoners' property policy framework itself acknowledges the importance of this problem, observing it is vitally important to a prisoner's wellbeing that he has access, without undue delay, to his property. If it fails to arrive for some considerable time, his worries could obviously impinge on his ability to cope successfully with his new situation in an unfamiliar prison.

As we have reported above, the improvement in last year's survey (2024) when we reported that 66% of prisoners received their property within two weeks of arrival, double the proportion in 2023, has been repeated again this year with 65% reporting property being received within two weeks. We applaud the Wayland reception senior officer's lead, in turning this figure round, and ensuring reception staff manage received property promptly. However, the escorting contractor has maintained its contractual stance (for the most part) on the amount of property carried on transfer. Our suggestion in our last report that the Prison Service reviews its prisoner transport contract to allow a greater volume of prisoners' property to be carried was not responded to. Instead, we were informed that a renewed Prison Service effort would be made on restricting prisoner' property to the laid down volumetric limits, thus passing the problem to the individual prison to manage property more closely. If the prison population were more stable, and if there were a greater system capacity, such hopes might have a reasonable chance of being adhered to. But in the current, and the likely future, situation, this is an unrealistic expectation.

6. Health and wellbeing

6.1 Healthcare general

In this section of our 2023-2024 report, we tried to put forward for consideration a strategy of greater multidisciplinary working between all departments of the prison which had prisoners' behaviour as their focus as our monitoring had convinced us that there was rarely just one simple answer to the treatment of prisoners' concerns and their unacceptable behaviours. We have noticed a greater willingness to call for such multidisciplinary working, involving healthcare alongside the offender management unit (OMU) and psychological services providers, but this has mostly been as a response to the Board's, or others', presentations of difficult cases and not as a fundamental way of working. We do not wish to repeat in detail the case for such working to be made more central, interested parties can easily refer to this section in our 2023-24 report. We would, however, recommend to the Governor that a review to improve cross-team working is considered as an integral part of any future effort to increase the rehabilitative potential of all the prison's activities.

In our 2025 IMB survey we again asked questions about satisfaction with the management of any healthcare complaints. The result for 2025 shows that responses to this question reveal that half of all healthcare complaints (51%) were judged satisfactory by respondents, which demonstrates the success of the healthcare leaders in continuing a more responsive response to complaints than had been the case in the past.

Nevertheless, the detailed responses by prisoners in explanation of their scoring still shows that there is much more work for the Wayland healthcare contract to do. The details are included in our published commentary on the survey, but we would draw attention to one of the issues for improvement made by respondents from the 49% who were dissatisfied with the outcome of their complaint; that there was an unwillingness among many healthcare staff to see the person before them as a patient, rather than as a prisoner, in making their judgements. The Board accepts that there are often unrealistic expectations of what healthcare can do, in prison as in open society, but would hope that this piece of commentary could be considered carefully when, in future, the healthcare team is discussing feedback from prisoners. In this regard, the Board would like to suggest to the Governor that Practice Plus seriously consider running a survey of their own amongst prisoners to test for themselves the themes we have mentioned, and to which we have drawn detailed attention to in our commentary of the survey.

We would also, as a response to the themes we have identified, ask the Governor request Practice Plus consider providing a clear confirmation of the diagnosis made and treatment to be provided after a consultation, so the prisoner has something tangible to review and not just his memory of what the consultation concluded and why.

The Board had anticipated that the previous year's survey results of an improvement in the ease of making medical appointments within the various healthcare departments would be continued and possibly improved this year. Unfortunately, the comparison between 2025 findings and previous years shows that has not been the case. An examination of the various years' returns shows that the current expectations of contact between prisoners and healthcare professionalisms have returned, largely, to the figures reported two years ago, which is disappointing, both in terms of patient care and in contrast to the maintained improvement noted in response to complaints. The table below gives the detailed responses:

| SPECIALISM / RATING YEAR | EAS Y 2025 | EAS Y 2024 | EAS Y 2023 | OK 2025 | OK 2024 | OK 2023 | DIFFI CULT 2025 | DIFFIC ULT 2024 | DIFFI C 2023 |
|---------------------------------|-------------------|-------------------|-------------------|----------------|----------------|----------------|------------------------|------------------------|---------------------|
| DENTIST | 18% | 31% | 17% | 37% | 40% | 34% | 45% | 29% | 48% |
| GP | 18% | 29% | 20% | 43% | 54% | 48% | 39% | 17% | 31% |
| NURSE PRACTITIONER | 25% | 40% | 32% | 46% | 54% | 39% | 29% | 6% | 28% |
| MENTAL HEALTH | 16% | 23% | 17% | 45% | 55% | 46% | 39% | 22% | 37% |

The Board would encourage the Governor and the Healthcare Contractor, Practice Plus, to consider these findings, perhaps carry out their own assessments of the situation, and take such action as required to at least return these metrics onto an improving path.

6.2 Physical healthcare

This is now the third year in which we have been concerned about the high number of failures to attend medical appointments, either through the prisoner involved forgetting, or refusing, to attend a booked appointment for him, or for the prison to fail to unlock or otherwise permit a prisoner's attendance. Such absences are known as 'DNAs' (did not attend).

We have two observations on the 2025 survey figures. First, that the DNAs by prisoners and by prison failings have reduced from those of 2024, being now 5.5% and 5% respectively from the previous 7.4% and 6.4%. Secondly, that the healthcare provider has worked hard to increase the number of booked appointments by a significant percentage, at 36,303 this year against 23,751 in 2024, or an increase of 34%. We commend Practice Plus for the hard work that their staff have put into this improvement, which casts a different light onto the comments by prisoners as we have reported above, that ease of making appointments has declined from last year's results; perhaps the increased actual number of appointments made has led to that perception. Perhaps the healthcare provider might usefully make that point to prisoners at the same time as they might wish to make a repeated plea to prisoners to attend the appointments actually made for them. We recommend that Practice Plus considers this point.

Nevertheless, we also wish to draw attention to the, reduced but still high, percentage of DNAs which are attributable to the operational prison's failures, through poor communication (as we have sometimes been told by prisoners who have not been unlocked for an appointment) or by the, still too frequent, roll-count failures or delays. We do note that the Governor's efforts to improve the prison's operational failings in this regard have had a small but positive effect. We trust that this can be further improved upon in the coming year, after all, even just 5% of lost healthcare hours by such DNAs is not a small sum, and, as has become clear in other areas, with straitened budgets, such losses of time should be avoided. We again make the recommendation to the Governor that his staff redouble their efforts to ensure that healthcare appointments are not foregone by staff actions, or lack of them.

Below, we give the actual appointments and failures to attend in the year.

Missed appointments (excluding dental) with reasons

| <i>2024-2025 month</i> | <i>Total appointments booked</i> | <i>Did not attend (prisoner failures)</i> | <i>No access (prison operational failures)</i> |
|-------------------------------|---|--|---|
| <i>June</i> | 2639 | 142 | 137 |
| <i>July</i> | 3282 | 155 | 181 |
| <i>August</i> | 3300 | 167 | 160 |
| <i>September</i> | 2999 | 167 | 167 |
| <i>October</i> | 3622 | 188 | 227 |
| <i>November</i> | 3046 | 207 | 143 |
| <i>December</i> | 2846 | 136 | 133 |
| <i>January</i> | 3578 | 206 | 209 |
| <i>February</i> | 2840 | 142 | 132 |
| <i>March</i> | 2879 | 122 | 166 |
| <i>April</i> | 2680 | 153 | 108 |
| <i>May</i> | 2592 | 195 | 68 |
| <i>Total</i> | 36303 | 1980 | 1831 |

Dental provision

In our report last year, we noted that the dental contractor reported that a total of 1431 appointments were booked, but there was a total of 194 failures to attend. Of these, 138 were prisoner DNAs and 56 were ‘no access’, that is, prison operational failures. Prisoner failures to attend were, therefore, just under 10%, with almost a further 4% due to operational failures.

Although dental procedures are something that few of us look forward to, given the often poor dental health of the average prisoner and the high cost of treatment, the Board hoped that both contractor and prison would have taken note of the high DNAs we reported then.

Unfortunately, the needle on the prisoner DNA dial has hardly shifted; 2025 results, from a total number of appointments booked of 2006, show prisoner DNAs at almost a fraction over 10% at 210.

What is concerning however is that the needle on the Prison DNAs dial has increased by over 50% from a little under 4% to the 2025 figure of 6.3%. That percentage is greater than for the figure for general healthcare DNAs, as we show above.

The Board is not privy to the cost of the dental contract to the prison but, given the high cost of dental treatment generally in the community, the total of 17% of the Wayland dental costs being wasted by DNAs is surely a cause for redoubled organisational efforts to reduce that significant financial loss, and the foregone improvement to prisoner oral health.

6.3 Mental health

In Section 6.1 above we have commented on the ease or difficulty of making healthcare appointments, as reported by prisoners in our 2025 survey. With almost 200 respondents to the survey, the fact that 39% reported that making a mental health appointment was ‘difficult’ is an indicator that mental healthcare, despite the emphasis

that modern culture has on the need for good mental health, is not fully responding to the felt needs of prisoners who responded.

The Board believes, however, from its discussions with prisoners over this issue, that more could be done to create an environment where openness about mental health might be given greater acknowledgement, and where there could be, as we called for in our last report, a more obvious move towards what might be termed 'preventative mental health care' rather than reactive. We said then, that such an approach would involve a prison-wide admission that imprisonment, no matter how deserved as a punishment for a crime, brings with it reactions and behaviours that may exacerbate a prisoner's already fragile mental health. The incidents of self-harm are an obvious indicator of such feelings.

We believe that such an approach could usefully begin during the induction phase of a prisoner's time at Wayland, even more so now that prisoners are coming to Wayland at an earlier stage in their sentence than has otherwise been the case. The new induction programme, begun at the close of this reporting period, does have a great deal of good 'process and procedure' requirements but is very light on mental health as more than something signalled by previous advice, care in custody and teamwork (ACCT) records or the necessarily brief assessment by a member of the mental health team in the first 24 hours (and the programme accurately predicts that not all the issues in the first 24 hour process might be covered due to operational challenges).

The Board therefore believes that both more openness about mental health, and that the prison knows and acknowledges the heavy demands that its environment is likely to make on new prisoners' mental health, could make for a greater, later, confidence in its staff's understanding and ability to help when prisoners need it most. This is a demanding issue, but the Board believes an important one, and would recommend to the Governor that when the induction programme comes up for its review, perhaps after its first six months, that this issue is given space in this review, perhaps as part of a renewed attempt to reduce the numbers of self-harm incidents, upon which we comment elsewhere in this report.

UTIs

A huge amount of time is spent every week by healthcare staff on assessing, or confirming, that a prisoner is under the influence of illicit drugs or alcohol, time that could be spent on more proactive approaches to curb drug use. For example, there are no courses run by healthcare staff on the effects of drug use, as a constant educative effort against such activity. Such courses might, cumulatively, create more of culture against drugs, instead of the current one where the prison community sees such use as an individual and not cultural problem, and where the frequent prisoner term for drug use is 'time travel'; in other words, it is a way of deadening the pains of imprisonment, if only for a while, by self-administered oblivion. At least such courses could be part of the induction programme and we so recommend to the Governor to consider such.

In the current year the recorded healthcare interventions in UTIs totalled 565 instances, with the first half the year (June to December 2024) running at an average of 33 per month which doubled to 67 per month between January to May 2025. There were significant attempts by the prison to disrupt the supply-management of drugs in this period but the increase in known UTIs seems indicative of a more persistent supply problem. Indeed, the problem is likely to be even worse than the figures indicate, as last year we revealed that prison healthcare staff believed that the known cases were probably only 20% of the actual usage, given that there is undoubtedly the inhibitory

factor of likely detection during the day when consumption during the evening and night hours, when prisoners are locked in their cells with very little supervision by staff, did not carry such risk. In this sense, although the known UTI figures give a crude indication of use, they disguise the real extent of the problem.

However, we did call, in our last report, for there to be an automatic referral to the key worker for those found UTI, this is now policy and we believe will contribute to the general call we make to try and move the prisoner culture against drugs.

6.4 Social care

On average, there were 25 prisoners with care plans in the year, and there is an effective relationship with the occupational therapist for assessments of those who are reported as requiring a care plan. It remains the practice that such prisoners often have formal or informal 'buddy' support, which often means the less mobile prisoner can at least have his meals brought to him and assistance with other domestic activities, if he so chooses.

6.5 Time out of cell, regime

The calmer, more open regime which we commented on last year has been maintained for much of the year, and the observed improvement in atmosphere, cheerfulness, cooperation between prisoners and staff, and the look and feel of the prison has also continued and developed. For much of the year the disruptions to the regime, due to a lack of staff, have been markedly fewer and the greater predictability to the regime has allowed the prison visibly to relax. That predictability did mean that time out of cell has largely stabilised and delivered, according to the agreed programme, and for enhanced prisoners on some wings there have been evening out of cell routines on a limited basis. Unfortunately, towards the close of the reporting year staff shortages began to bite again, but the Board hopes that replacement staff will be quickly provided, although, of course, this will mean a further injection of totally inexperienced staff.

The difficulty with roll counts and checks, although improved, has not gone away and late roll counts are still biting into the regime, although, despite these roll count delays, we have been informed that total reported attendances at activities has continued to improve, with the prison during the reporting year being the top-performing category C prison in the Prison Service for prisoner activity attendances.

6.6 Drug and alcohol rehabilitation

Last year we reported almost two-thirds of respondents in our 2024 survey said that drugs and 'hooch' (prison-brewed alcohol) were easily available. Our 2025 survey asked the same question and the same proportion of this years' 200 prisoner respondents replied again that drugs and alcohol were easily available. So, despite the staff in reception, intelligence-led and the sniffer dog team searches, discovering significant amounts in attempts to bring drugs into the prison, it remains the case that drugs are still easily finding their way in. Phoenix Futures, the drug treatment and recovery provider, has continued its efforts against this backdrop but, for all its efforts, it seems makes little more than a dent in the problem, and faces the constant challenge of a never-ending supply of new prisoners, as those who can be are either released or moved to lower category prisons.

There are very few visits made by the IMB to the prison that do not include some involvement, understanding or new information on the continuing easy availability of illicit substances. As is well-known, a driver for illicit substances is money, and the

organisation of supply is often mobile technology. The two together make even the best efforts at local level, modest at best. The Board was informed, last year, that additional technology would be made available, but the Board looks forward to a properly-funded implementation of the National Drug strategy of 2019 to make a reality of the Reducing Demand, Restricting Supply, and Building Recovery strategy. We see the prison doing its best in all three essential areas, but much more, effective work could be done with better funding in all three areas. We therefore ask the Prison Service to identify, in the coming year, what additional funding will be made available to the prison to support the work of staff in these three core areas of drug and alcohol rehabilitation.

The Board, when an occasion presents itself, as when a prisoner makes an IMB application which has a bearing on the prisoner's alleged drug-taking, tries to understand his motivation for drug-taking, but this is very hit and miss. The Board is therefore considering a special IMB survey on this issue in the next reporting year.

However, to end this section on an uplifting note, we reported last year on the innovative involvement by gym staff to provide a course heavily influenced by the Greek philosophy of stoicism. This has continued in this reporting year, and is building on its success, and gym staff are being asked to talk to other prisons about the course. The Board would encourage this style of approach, which complements both punitive and simply educative approaches, by seeking to increase a prisoner's inner resilience, not just in the avoidance of drug taking but in improving his personal attitude to life and its challenges. The Board hopes that appropriate funding will be available to make more of this successful approach in the coming year.

6.7 Soft skills

In previous reports, we have commented on the increase in responsible positions such as Shannon Trust mentors and safer custody mentors, and the CRED and mobile maintenance teams, where those on the team may experience working for a 'customer' in terms of their work and indeed overall behaviours, which we welcomed. These have continued to expand in the reporting year, extending into work training assistants supporting the professional trainers as we have reported elsewhere, but also into a larger number of responsible 'social' positions, including wing library assistants, the Zahed Mubarrack Trust advocates, and those employed in C wing of the Old Build where there is dedicated accommodation for lifers and IPP prisoners. All these roles, including such 'traditional' ones such as reception, segregation, and general wing orderlies, help to ensure that there is a background of responsible prisoner employments where there can be a positive contribution made to the safe and efficient management of a wing, unit, or even the prison as a whole.

7. Progression and resettlement

7.1 Education, library

Education

As we worked on the compilation of this report we had wished to record, indeed we had recorded in a first draft report, that the work of the education provider had continued to develop and had resulted in a greater impact on the cultural life of the prison, which we hoped had further improved the chances of a successful rehabilitation for those prisoners released. However, towards the end of our reporting period, we began to hear disturbing hints of a likely major change in the way that both the education and vocational training provision was to be managed. There was little or no detail from the official side at that time, although the hints within the wider IMB network became stronger that a change to the education budget in all public prisons, not just at Wayland, was being planned. We therefore decided to 'carry on as normal' with the compilation of our annual report. In this sense we intended to repeat what we observed last year, and which we include below in italics, with our monitoring showing building on that basis for further improvements in the year.

We said then:

During the reporting year, art classes have been reintroduced and not only are they appreciated by prisoners, but they can act as a gateway to further educational achievement. By a mixture of educational stealth and design, prisoners who would reject 'education' find that, through art and music, it is not the threatening scenario they feared (perhaps through failure at school in earlier years), but an opportunity that allows them to succeed in something worthwhile, on which further education can be built. This is not to paint a picture of unalloyed success, but its contribution should be an acknowledged counterpart to the mantra that the only good education is one that is explicitly focused on only engagement with so-called 'employability qualifications'; prisoners can get to employability by more methods than the obvious.

However, we must report that that successful change in the education offer is now much more difficult to be built on as, after the conclusion of our reporting year, we first heard that the education budget for teaching hours was to be cut by the Prison Service by between 30% and 35% (other HMPPS personnel then seemed unsure where exactly the axe would finally fall).

Now we know that the final cut is a swingeing 38%.

As a Board, appointed by the Minister for Justice and Rehabilitation, we fail to see how much longer, with a cut of more than a third in funding for educational and rehabilitation activities, the Prison Service can continue to be justified in calling Wayland, or any similar prison, a Training Prison. In fact, for a reduction of such magnitude, we would expect there to have been some serious research into the failure of existing educational and vocational inputs to make the existing Prison Service financial expenditure on education and vocational training unjustifiable. We have been unable to find any such research, including requesting for any relevant information from the Cambridge Institute of Criminology, who are also unaware of any such research.

The decision, therefore, seems to the Board not to have been informed by evidence on the value of education in reducing reoffending. As the old saw has it that there are no votes in prisons, it seems likely that public reaction to these cuts will be muted.

Finally, as a by-product of this reduction in educational provision, we believe it will make the job of the staff, particularly basic grade staff, even harder as they face the increased boredom and nihilism of a prisoner population which already sees little of value in their lives on a day to day basis, and where possibilities of personal achievements, and therefore a little more meaning in their lives, will now be further reduced.

In Section 7.2, below we give more detail of the Vocational Training losses due to this funding reduction.

Library

At the close of the reporting year, we were informed that the current contractor, Suffolk Libraries, would be changing to a new provider. We trust that they will be as supportive of the energetic and competent librarian who has now seen two years' worth of improvements in and to the library. Improvements in its work have been maintained, posters around the prison encourage, and remind prisoners of the existence, and the value, of the library with now almost 80% of prisoners registered with the library as borrowers, while in the year almost 20,000 books were borrowed, from a stock of very nearly 12,000 books. The library also loans out from its stock of 800 DVDs and 200 CDs. In other words, it is a regular library, equivalent to that in a large village.

But one of the significant achievements that the librarian has developed is that the library is now very much more than just a bookstore in its approach to its task. This has meant that prisoners have begun to be allowed, for example, to play chess in the time the regime gives them for a library session, as well as browse books to take out on loan, consult contemporary reference material, and even to allow discussions to be had over prisoners' personal management of their reactions to elements of their treatment from more knowledgeable and 'prison-wise' prisoners. In other words, the library has started to become more of a community hub, which the Board has frequently observed during its monitoring visits, and which it supports as evidence of the increasing 'normalisation' of prison life.

Unfortunately, however, there was a period during the reporting year when we were informed that prison staff, mostly newer personnel, had begun to question that aspect of the library's work, had begun not to visit the library as frequently to check on prisoners' behaviours, and to suggest that it had become a centre for illicit activities and so should therefore be returned to a more limited facility. This was jointly well-managed by the librarian and operations team, however, and by the close of the reporting year the relationships between library and operations had returned to their more normal and helpful level.

Activities have continued to include library reading challenges, prisoner writing competitions, and the initiative, with the Shannon Trust, of a 'book hut' in the library. This offers books for the 'Share a Book' scheme, whereby books come in pairs, one for the prisoner and one sent home to the prisoner's child or children, so that parent and child can read together over the phone or during social visits.

The library has also continued to manage the Storybook Dads scheme. This has ensured 41 prisoner fathers have managed to maintain such a contact with their children in the year as they video their reading a story for the children in their family. This continues to be appreciated by prisoners as a unique way of keeping the family bond together in the difficult circumstances of a having a father in prison.

Although we have noted the improvements in the total 'library package' above, a major function of any library is still to provide access to books and that must mean that there should be readers available to take advantage of that function. In our report last year, we laid great stress on the need to recognise that a better effort was needed to remedy the large number of prisoners who told us that they had difficulty in reading, and that is after a successful passage through basic skills education in English.

We were pleased to see that the education provider has responded to these concerns by the inauguration of a new attempt to address this challenge through the involvement of a third sector provider of basic skills, an organisation called 'That Reading Thing'. Although only started in the latter part of the reporting year, some 30 men have accessed this new service which we understand takes those who can read a little, and understand the phonics approach to reading, onto an efficient reader level, capable of a 'normal' reading level of skill.

The Board had looked forward to this initiative complementing the work of the Shannon Trust in helping a small, but significant, number of prisoners out of their inability to read. Unfortunately, the Shannon Trust worker suffered an extended bout of illness necessitating a considerable period away from her duties. On her return she informed us that, for some unknown reason, all her records had been wiped from her computer. She was therefore unable to evidence what work had been done in the earlier part of the year.

We do trust, however, that the combination of these two schemes, with the Shannon Trust seeking to bring on those who have the most limited understanding of reading, and That Reading Thing taking poor readers further, can be properly managed and integrated by the education provider to ensure a well-organised attempt to provide a comprehensive pathway to literacy for those who need that support, which the Board can comment on positively in our next report. We so recommend to the prison's Head of Education, Skills, and Work.

7.2 Vocational training, work

In our last report, we had commented on the Board's disappointment with the loss of several well-regarded and popular vocational and other training courses. As with education generally, we had hoped that this seemingly retrograde step would be, if not reversed, at least not further managed downwards in the coming period. However, as we have already described, we were taken by surprise by the information at the close of this reporting year, that there were likely to be significant reductions in the budget for the new education contractor's work in the coming months, not anticipating that this cut would amount to 38% of funding.

This level of detail of the reduction was also an unwelcome surprise to the prison's Governor, but we have been informed by him that strenuous efforts are already being, and will be, made to preserve, and protect what can be so preserved and protected. He has commissioned the Head of Education, Skills and Work to work up programmes which, as we describe, can be taught, or mentored by prisoners and also to create innovative ways of ensuring that some skills can be salvaged by the creation of such prisoner-led multi-skill instructional courses across the range of vocational training skills that will need to be terminated. These lost courses will include: a range of information technology courses, bricklaying, plastering, plumbing and electric installation skills. These courses were almost all highly popular, well-attended, and gave a sense of achievement to many prisoners. These losses, of course, come on top of the losses we reported in the last years which included Painting and Decorating, Small Engine

Maintenance, Vehicle Bodyshop skills, and Welding. Almost everything in this list were examples of the practical and manual skills that prisoners felt more confident in tackling, and were proud of achieving.

However, on the plus side, at least as far as daily meaningful work is concerned, the Governor has secured funding for the conversion of a workshop to a 24-place laundry, for Wayland's needs, as well as managing the laundry needs for two other local prisons, together with a 40-place workshop for the assembly of modern prison service whitewood furniture.

However, as a final comment on this new situation, the Board cannot understand how, despite the government's clear financial difficulties, such a swathe can justifiably be cut through the core provision of critical inputs to almost every prisoner's educational and training needs, and therefore his better chances of a successful return to society at the end of his sentence. If there were any hope of any recommendation of this Board to reverse this policy decision being taken seriously, we would so recommend to the Prison Service. That being unlikely, we would at least recommend to the Minister that further reductions to something so central to prisoners' rehabilitation should be strenuously avoided.

Returning, to this reporting year's evidence of positive efforts made to increase prisoners' chances of employability through training courses as well as trying to make up for the educational lack in basic English and mathematics we have noted with satisfaction that the forklift qualification has seen another year of successful passes, 43 in number. It would be better if more candidates could be put through the course, as it represents just 2% of the churn in prisoner numbers, but the course is expensive in time at the current rate of just three trainees per course, with just one forklift to train on. The Board had wondered if there could be an enlargement of the area, as there is certainly enough room in the large workshop building, in order to have more than three prisoners per course, although there may be limitations on the number permitted per trainer, but the funding reduction noted above would seem to make that idea unlikely to succeed.

In other areas it is gratifying to note that the certification in employability saw 117 passes this year, together with almost 400 certifications for various skills and levels of competencies in the construction industry, always useful skills to acquire, especially as 58 prisoners did sufficiently well to acquire their 'CSCS ticket' which will substantially increase their construction industry employability. For those who do not spend long enough in Wayland for the chance to gain any longer-term vocational experience, the education provider had broken down parts of those courses which can support certification on smaller modules, which is reflected in the gross figure above. As supports for the trainers in some courses, the education provider has also introduced the role of the prisoner assistant tutor with success, both for increasing the skills of the prisoner assistant, and also allowed the trainer to concentrate more on those who need his skills, while the better trainees can still benefit from the prisoner assistant's help. As described above, this approach may go some way to making up the lack of skills because of the funding reductions described above, but it is a 'make do and mend' policy forced on the prison by the un-evidenced policy of education funding reduction.

In other areas of the prison's activities, the provider has succeeded in 'certificating' some of the work in an approved certification process for such things as warehousing and storage competencies, although the Board was surprised at what appears to be a

low level of such certification, 32 persons this year, considering the large number of prisoners employed by the DHL canteen packing and distribution management for a number of local prisons.

A similar approach has been taken with 'food safety passports' with 89 delivered, and with a host of other prison activities such as the CRED and mobile maintenance teams, the horticultural team, and any prisoner work which can be properly and externally and officially accredited.

If there is one doubt that the Board has over this catalogue of good accreditation and other work, it is that the information advice and guidance (IAG) element does not appear to be routinely linked with the prisoner's sentence plan, which seems to concentrate on behavioural and psychological courses and programmes rather than holistically considering all aspects of a prisoner's personal, social, and post-release employment needs. Such decision-making (in collaboration with the prisoner) could conceivably happen as part of the induction period and we recommend to the Governor that, when the new induction process is properly bedded in, this aspect of release preparation should be considered for inclusion in the total decision-making process.

7.3 Offender management, progression

Last year the Board saw a welcome trend towards a reduction in the applications it has received referencing complaints about their involvement with the offender management unit (OMU). This has continued, although at a slower pace, this year. Many of such applications have referenced the bewildering array of governmental initiatives for early release seen in the reporting year. However, when we have needed information on particularly challenging cases, the staff of the OMU, particularly the senior probation officers, have responded promptly and knowledgeably.

Population management schemes

We give the early release initiatives prominence in this section of the report as an example of just how much work was needed to ensure that the releases proceeded smoothly.

As an overview, however, of the prison-wide impact of these changes, between June 2024 and May 2025 Wayland discharged 741 prisoners. The main areas for discharge were London (25%) and Essex (20%). The 'local' region including Norfolk, Suffolk and Cambridgeshire accounted for only 18% of releases. On discharge, 19% were released into approved premises, 41% were released into some form of 'permanent accommodation', and 17% were released into other forms of supported accommodation.

These figures give an indication of the work necessary to achieve these types of discharge when only 41% had a home or other permanent accommodation to go to, and when 20% had to be released with no fixed abode, often due to the extreme urgency of the need to fulfil the government's instructions for their release. There was no additional finance made available to assist this process.

Such releases, and the previous emphasis on releases to category D prisons for every eligible prisoner, resulted in Wayland receiving in the same period 1,566 new prisoners through reception. The whole prison population (around 900) was 'churned' in around 7.5 months between May 2024 and December 2024. It is therefore no wonder that, in this period, many IMB applications concerning the OMU procedures commented on the difficulty of contacting their prisoner offender manager, mainly because he or she was

working flat out on the necessary investigations and procedures resulting from the sudden telescoping of the discharge demands of a large number of prisoners in a shorter timeframe.

The details were:

The government introduced nine different population management schemes to address the overcrowding in the estate. In the period between June 2024 and May 2025, these included:

- 23/05/2024 – ECSL70: Extended the release window of the end of custody supervised licence (ECSL) early release scheme to 70 days before conditional release date (CRD).
- 17/06/2024 – TPRS12: Extended the eligibility of the temporary presumptive recategorisation scheme for category D(TPRS) to 12 months before CRD.
- 17/06/2024 – HDC4+: Removed the four-year sentence length cap of home detention curfew (HDC) to extend the eligibility to all prisoners. Over the span of the annual report period, Wayland released 181 prisoners on HDC. This is more than any other 12-month period on our records.
- 10/09/2024 – SDS40: Introduction of the 40% release point of the sentence for eligible prisoners. This saw the prison having to recalculate around 300 prisoners' sentences. This brought forward a significant number of prisoner's release dates and saw 23 discharged on the first tranche release date.
- 10/03/2025 – TPRS24: Extended the eligibility of the TPRS to 24 months before CRD.
- 28/04/2025 – five-year category D: Amended re-categorisation policy to extend the eligibility period from three years to five years before CRD.

IPP prisoners

Although other prison management challenges have largely driven attention away from prisoners serving sentences for public protection (IPP), we wish to record that there are still considerable numbers imprisoned by a sentence, which is no longer allowable, throughout the prison service, and Wayland has a number of them.

At the end of May 2025, Wayland had 40 IPP sentenced prisoners. All of these are over tariff (the minimum amount of time a person must spend in prison before they can be considered for release), with the oldest tariff date being 03/08/2007. 13 of these prisoners have never been released, 27 of them are licence recalls (when an individual is taken back to prison due to noncompliance with the rules they must follow in the community, as part of their sentence). There are now some minor 'improvements' to those suffering this sentence, with time limits on liability for recall after being released on licence, but little questioning of the morality, or lack of it, of prisoners being handed a two-year sentence and still being in prison some twenty years later. A nationwide, properly financed and managed, 'de-incarceration scheme' to safely manage these prisoners out of prison would thereafter represent the equivalent prisoner places of a brand new 1000-plus prison. We say 'de-incarceration' as it is beyond doubt that the majority of such prisoners have been institutionalised by their prison experience and need considerable support to prepare for, and survive, in a world they may no longer have the skills to navigate.

OASys backlog

We have commented in previous reports on the fact that many prisoners are received at Wayland with a vital document, their OASys, uncompleted. This situation was similar

this year. Between June 2024 and May 2025, the OASys backlog fluctuated significantly. At its height there was a backlog of 71 cases (at the beginning of October 2024) and was at its lowest at 15 in April 2025.

Prisoners are continually received into Wayland with no OASys which ultimately contributes to the backlog. Generally, around 40% of all receptions into Wayland have no current OASys. This all adds to the work that the OMU has to do for which, apparently, it does not have the staff provided.

7.4 Family contact

Since last year's report, the visits hall has been further improved, physically, and, despite some minor problems with some Barista prisoner staff taking advantage of their position, that facility has gone from strength to strength and is now a well-regarded feature of social visits, offering a range of hot and cold snacks to visitors who have frequently travelled a considerable distance. The decoration of the visits area is now first class and the relaxed and welcoming atmosphere has been warmly appreciated by visitors who have spoken to IMB members on our monitoring visits. In fact, such has been the positive changes that the number of prisoners' IMB applications complaining of some aspect of visits management is now in very small numbers.

A further initiative has been the provision of a table tennis table so that older visitors, and older children, can play a game with their imprisoned relative, adding to the family atmosphere and providing a 'normal' interaction activity instead of just sitting in the marked chairs and talking.

Additionally, a younger children's activity area has been set up with a purpose-built series of drawing, colouring and other activity spaces, much like those children might find in their local school, thus extending the normalisation of their visiting experience even further.

The connection between an imprisoned father and a child at home is obviously challenging for both to maintain, so it is with pleasure that the Board can record the considerable initiatives and support that the family team has provided this year, not just for the use of Barista profits to support a family's special needs for baby milk and feeds after travelling for many hours to Wayland but also for the innovative 'baby bonding' sessions that are now managed for new fathers, from simple things like caps for a father to wear for a time before a visit with a new baby so the baby can become acclimatised to the father's personal odours, to the provision of a specially equipped private room, supervised by a female officer, where new baby and father and mother can take part in physically bonding with the child in ways which would be normal in outside society but, without this initiative, impossible in the prison environment.

But we must now come to the only negative issue which we feel we must raise, which is that disabled visitors who are wheelchair bound must still use the chapel as the visiting area. Not only is this a much less welcoming experience, despite the efforts of staff, but, when there are insufficient additional staff to manage this type of visit then the stairlift chair must be used to the first-floor visits hall, a seriously uncomfortable solution for such visitors and one which puts their safety at risk. If this cannot be done, we have been informed, the visit has to be cancelled. We are aware that the long-awaited lift provision is on the refurbishment programme, but would ask the Prison Service if there is any way that this, obviously separate construction, can be advanced within the programme.

7.5 Resettlement planning

During the year the IMB came across an anomaly in the provision of assistance for a successful release, for while prisoners without a bank account are helped to obtain a basic bank account through Barclays so that they can manage their financial affairs on release, including that of Universal Credit payments, it seems that serving prisoners, without bank accounts, and who are not in their pre-release run up in their last six months, are excluded from this arrangement and there no other arrangements which can help.

The operative PSI is 01/2012 updated September 2022. This contains the following in reference to monies being held by prisoners in their prison bank accounts:

2.2.19 'Governors are able to grant permission for individual payments which would exceed the cap on account balances to be made by exception, only if the serving prisoner has exhausted all reasonable options for accessing banking outside the prison. For example, money received from house sales or inheritances should be held by a solicitor or executor until the prisoner sets up a personal bank account outside prison.'

On the face of it, this clearly recognises the problem this prisoner had, with no external bank account, with a sentence (IPP) which precluded forward planning for release, and a considerable sum of money to manage. But although this clause, and other parts of the PSI, clearly understand the need for prisoners to have external bank accounts, there is no approved mechanism, either by the banking contractors, Barclays, or the prison staff who manage that arrangement, to actually ensure that a bank account can be created. In the end the Governor accepted the open-ended commitment to permit the prisoner's account balance to exceed the permitted cap.

The PSI clearly expects a bank account to be held by a prisoner in such circumstances, or expects that a prisoner can have a bank account created for him or her without great difficulty. However, great difficulty there is, as it appears from all we have been able to discover that there is no mechanism to make a bank account available in the circumstances described. We therefore make the recommendation to the Prison Service that the operative PSI is amended to authorise the creation of bank accounts outside of the normal six-month rule and to take such action as is necessary to ensure that its contracting bank complies with such authorisation.

A significant problem for pre-release is the remote geographical location of Wayland in relation to many prisoners' homes. This has caused an increase in applications for transfer to prisons nearer home, with many cases supported by close family with serious illnesses. Unfortunately, the population management unit has been unable, or unwilling, to make such arrangements either quickly enough, or at all, to satisfy the apparent requirements of prisoners to enable better family contact. This is on top of the cost of transport for families. What is needed, of course, is a significant increase in prison capacity in the immediate London area, but, of course, London building costs and lack of suitable space means that that desirable outcome is unlikely to be a reality.

Perhaps, when government budget and prison capacity constraints ease, thought might be given to designating a number of spaces in London prisons to be held for temporary 'visitation transfers', along with an amended prisoner escort contractor requirement, so that prisoners held far from London might have an opportunity for what used to be the reasonably common practice of what were known as accumulated visits. We so recommend to the Prison Service.

8. The work of the IMB

Board statistics

| | |
|--|------------|
| Recommended complement of Board members | 15 |
| Number of Board members at the start of the reporting period | 6 |
| Number of Board members at the end of the reporting period | 8 |
| Total number of visits to the establishment | 341 |

Applications to the IMB

| Code | Subject | Previous reporting year | Current reporting year |
|------|---|-------------------------|------------------------|
| A | Accommodation, including laundry, clothing, ablutions | 11 | 23 |
| B | Discipline, including adjudications, incentives schemes, sanctions | 21 | 19 |
| C | Equality | 10 | 4 |
| D | Purposeful activity, including education, work, training, time out of cell | 11 | 9 |
| E1 | Letters, visits, telephones, public protection, restrictions | 38 | 31 |
| E2 | Finance, including pay, private monies, spends | 15 | 16 |
| F | Food and kitchens | 5 | 8 |
| G | Health, including physical, mental, social care | 39 | 53 |
| H1 | Property within the establishment | 34 | 24 |
| H2 | Property during transfer or in another facility | 60 | 80 |
| H3 | Canteen, facility list, catalogues | 4 | 2 |
| I | Sentence management, including HDC (home detention curfew), ROTL (release on temporary licence), parole, release dates, re-categorisation | 82 | 75 |
| J | Staff/prisoner concerns, including bullying | 42 | 35 |
| K | Transfers | 7 | 10 |
| L | Miscellaneous | 0 | 0 |
| | Total number of applications | 379 | 389 |

The Board again observes the close adherence of many of this year's application topics with that of the previous years and would only comment that the significant increase in property during transfer or in another facility underscores the comments we have made on this topic in our reports. We would also note the reduction in complaints about staff is encouraging as the inexperienced staff of earlier years have 'grown more into' their jobs.

Annex A

Service providers

- Education:
 - People Plus
 - Shannon Trust
 - That Reading Thing
- Healthcare:
 - Practice Plus Group
 - Forward Trust
 - NHS England
 - Norfolk and Suffolk NHS Foundation Trust
 - CDS (Community Dental Services)
- Prisoner canteen: DHL Ltd
- Facilities Maintenance: Gov Facility Services Limited (GSFL)
- Prisoner visits: Ormiston Prisoners' Family Services

Annex B

Local Wayland IMB survey

For the last five years, the Wayland IMB has asked a random sample of 10% of the Wayland population to complete a survey under the general title of 'prisoner attitudes'. The 2019 survey comprised 60 questions, which we reduced to 47 in the 2025 survey, although this time we were able to put the complete survey onto the prisoners' digital system and received 189 responses, with no spoilt papers, in other words more than 20% of the total prison population. We have kept many, although not all, questions deliberately identical in order to track changes over the years in a number of areas the Board considered most important. We have referenced our commentary on the latest survey in appropriate sections of this report, including our appreciation of the new Governor, who has taken the Board's recommendations in its survey commentary and required his staff to respond to these in the same way as they are doing to the latest HMIP report.

The survey's questions and the Board's commentary on the responses, are available separately on the IMB website, rather than in this annex, due to their considerable combined length.



This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit nationalarchives.gov.uk/doc/open-government-licence/version/3

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at <https://www.gov.uk/government/publications>

Any enquiries regarding this publication should be sent to us at imb@justice.gov.uk