



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

**For reporting year  
1 November 2024 to 31 October 2025**

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## **Introductory sections 1 – 3**

### **1. Statutory role of the IMB**

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

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

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

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

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

## **2. Description of the establishment**

Drake Hall is a prison (HMP) and young offender institution (YOI) for women aged 18 and over situated in rural Staffordshire, near Eccleshall and Stafford. It does not hold women on remand (those held in prison until the time of their trial or subsequent sentence hearing).

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

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

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

The establishment has several workshops and opportunities for training and rehabilitation.

Women at Drake Hall come from across England and Wales to serve a variety of sentences, ranging from a few months to life.

The prison operated at an average of 92% capacity in this reporting year. A lack of space in the wider prison estate means that transfers are arbitrary, and the prison is seeing an increasingly challenging group of women with a high level of needs associated with complex offending profiles. An average of 20 women per month arrive with less than three months to serve, 18% of the population is subject to recall and over two thirds of women will be released within twelve months.

Practice Plus Group is the leading provider of all commissioned health services. They provide primary healthcare, including substance abuse. The Midlands Partnership NHS Foundation Trust provides mental health services. The prison has no inpatient facility.

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

## **3. Key points**

### **3.1 Main findings**

As a closed prison, Drake Hall faces the same challenges found in other women's establishments. The prison population is increasingly complex and many of the women have poor physical and mental health and experience of trauma. Substance misuse is common and some women have been in care. Many have a poor experience of the education system. A lot of the women have dependent children and were the main carer prior to coming to prison. There are questions about the suitability of some of the women transferred to Drake Hall, which lacks the structural security of most closed prisons. Such women may constitute a risk of harm to themselves or to others.

#### **Safety**

- From its observations, the Board believes the prison provides a generally safe environment in increasingly difficult circumstances. The approach to safety is multidisciplinary and data informed.
- The challenging nature of the current population means some women must feel unsafe and others might exploit this vulnerability. The prison staff's ability to manage these challenges on a day-to-day basis is a credit to their professionalism.
- Self-harm is a regular occurrence, although many incidents are due to a small number of women. The challenges posed by these women are observed to be responded to in a compassionate and effective way.
- Violence has increased both in number of incidents and severity; however, use of force is low and incidents are well managed.
- The presence of women with complex needs, challenging behaviour, serious offending profiles or serious mental illness leads to management problems in an environment with limited cellular accommodation. These challenges are exacerbated by shortages of staff.
- During this reporting period several women who often displayed very challenging behaviour have been supported in the CSU (care and support unit), where some have caused damage to cells. Staff must be commended for the way they have supported these individuals.

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

- Members of the Board regularly observe constructive and positive relationships between staff and prisoners and so believe that the women are generally treated in a fair and humane manner.
- There are some problems around accommodation that reflect the structure and design of the estate. The Plymouth and Richmond house blocks are not fit for purpose.
- The continued placement of women in the CSU due to acute and severe mental illness is an increasing problem. The prison has no alternative but to locate such women in this facility as there is no safe alternative.
- Property continues to be an issue, particularly following transfer from another establishment. This remains a systemic issue across the prison estate.

## **Health and wellbeing**

- A high number of women transferring into the prison have complex physical and mental health care needs. Some women are disabled by their symptoms and incidents such as collapse or seizure are a regular occurrence. Women are regularly sent out to hospital as a result.
- An increasing number of women are experiencing acute mental illness characterised by psychotic symptoms and requiring transfer to hospital. Delays in transfer are the norm.
- The healthcare team provides regular updates to the women regarding services available and waiting times. These are displayed in the health care waiting area.
- The administration of medicine has been an ongoing challenge for the prison, both clinically and operationally. The work to resolve these problems is to be commended.
- The Board continues to receive a high number of applications relating to healthcare and some women speak in very negative terms about the service provided.
- Some progress has been made in increasing access to fresh air but opportunities for meaningful exercise remain a challenge, often due to staffing and operational pressures.

## **Progression and resettlement**

- The provision of education is essential to effective rehabilitation and is a priority for the prison. However, budgetary restrictions are impacting on the provision of educational opportunities.
- Opportunities to work are available and the facilities available offer excellent opportunities for employment following release.
- Population pressures and high turnover mean that many women stay on average between a month and a year, making it increasingly difficult to focus on rehabilitation, reducing reoffending and preparation for release.
- Historically, all women leaving Drake Hall had accommodation to go to. This is becoming increasingly difficult, and some women leave without suitable accommodation or to temporary arrangements.
- The number of women subject to release on temporary licence (ROTL) remains low.
- The impact of changes in policy around sentencing has led to a significant increase in the work of the offender management unit (OMU).

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

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

- In relation to Richmond and Plymouth, the Board asks what the plan is for these buildings – keep them going at any cost, some form of replacement programme or is there no plan in place? Despite excellent work by the prison to maintain the standard of accommodation, major structural issues remain.
- Across the female estate an increasing number of women are experiencing crisis associated with serious mental illness. They need treatment in a

specialist hospital setting. The Board again raises this issue and asks the Minister to set out a plan and timescale for its resolution

- An increasingly complex group of women with more serious risk profiles are being transferred to a prison with no cellular accommodation. The absence of cellular accommodation outside the CSU is increasingly problematic; when will the Minister introduce such accommodation?

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

- The staffing establishment was set at a time when the prison was very different than today. This situation needs to be addressed at a strategic level.
- Property is a systemic problem across the prison services: digital solutions have proved effective in improving this situation. Are there any plans to introduce a digital solution across the wider prison estate?

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

- The Board is interested in the plan to increase the number and quality of keywork sessions.
- ROTL remains low and the changing nature of the prison population is appreciated. However, the Board asks whether there are any measures that could be introduced to increase the number of women on ROTL, particularly associated with child resettlement.
- Reduced exercise is an issue raised by the women. The Board is interested in plans to ensure minimum levels are maintained.
- The Board is interested in why referrals to challenge, support and intervention plans (CSIPs) are so high, while the number of women who have a CSIP implemented remains relatively low.

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

In last year's report, several issues were raised. Many of these issues remain unresolved reflecting long-term problems both nationally and locally.

- The condition of Richmond and Plymouth remains unacceptable.
- The Board remains concerned about the use of segregation to manage individuals with severe mental illness.
- The turnover associated with population pressures is a deteriorating situation.
- Property remains an ongoing difficulty particularly on transfer.
- The use of ROTL remains low.
- The benefits of keywork are yet to be fully realised.
- Access to exercise off the houses (residential units) remains a challenge.

## **Evidence sections 4 – 7**

### **4. Safety**

#### **4.1 Reception and Induction**

During the reporting period, 235 women arrived at Drake Hall, an average of 20 per month. This is a significant increase on 2023/4, when 125 women were transferred. This increase is part of a noticeable increase in turnover with many of the women arriving on recall, subject to short sentences or near to the end of their sentence.

Most women are transferred from HMP/YOI Styal or HMP/YOI Foston Hall, which are local prisons taking individuals on remand. A number also arrive from HMP/YOI New Hall and are sometimes transferred from prisons further afield. Late arrivals can be difficult, given staff shortages and the absence of a 24 hour healthcare service.

The reception area itself is clean, tidy and well-kept with a comfortable seating area where hot and cold drinks are provided, and women can order canteen and arrange phone credit. This reduces the possibility of debt. Toiletries and sanitary items are provided.

The formal admissions process is dealt with in a secure area where all necessary checks, including a health screen, take place. Peer support is provided to help women settle into the prison regime.

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

The increase in arrivals has meant that the induction house has been moved to Plymouth from Keele. The former has more capacity, although the standard of accommodation is poor.

The induction process is increasingly challenging, given the level of turnover. This is a problem as the establishment is normally very different from prisons with which the women are familiar.

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

There has been one death in custody during this reporting period. The death had a marked impact on both the women and staff in the establishment. In the Board's view, the situation was dealt with in a professional and compassionate manner. Support was provided to both staff and the women, while the regime was able to continue in an appropriate and effective way at a particularly challenging time of year. The family was able to visit the prison and a memorial service was held. The Prison Ombudsman is investigating and is yet to report.

Last year's report noted that a woman died within 14 days of release and the Prisons and Probation Ombudsman (PPO) was investigating. The ombudsman has now reported and did not identify any significant learning relating to the pre-release planning or post release supervision. No recommendations were made.

In previous reports, reference has been made to a death due to natural causes which took place in 2021. The prison ombudsman's report was published in 2025. Actions relating to this women's care had been taken in response to an action plan implemented in 2022. It is not clear why publication of the PPO report was delayed.

Levels of self-harm remain high, with 716 incidents, compared with 782 in the last reporting period and 546 the year before. Figures for the last seven years are noted in table 1 below.

Table 1	2024/25	2023/24	2022/23	2021/22	2020/21	2019/20	2018/19
Self-harm incidents	716	782	546	180	278	226	337

Incidents of self-harm are now a daily occurrence, often with multiple incidents in any 24 hour period. Table 2 provides a breakdown of incidents over the reporting period. Many of these incidents are due to the actions of a small number of women who use self-harm as a means of coping with emotional distress. Most women do not self-harm.

Table 2

Month and Year	Number of incidents	Number of individuals
November 2024	69	18
December 2024	88	24
January 2025	57	21
February 2025	56	22
March 2025	36	11
April 2025	42	15
May 2025	67	18
June 2025	77	16
July 2025	40	20
August 2025	67	20
September 2025	57	17
October 2025	60	20
	Total – 716	

The reasons underlying self-harm are many, with triggers specific to the individual, reflecting a range of complex contributory factors.

- The assessment, care in custody and teamwork (ACCT) process, used to support prisoners who are at risk of self-harm and suicide, is a fundamental part of supporting women at risk of self-harm and appears to function effectively. The last report noted an increase in ACCTs and this increase has continued. The figures over a seven-year period are described below in table 3.

Table 3	2024/25	2023/24	2022/23	2021/22	2020/21	2019/20	2018/19
ACCTS	289	255	188	147	107	156	263

Women continue to be transferred on open ACCTs, meaning they are subject to ongoing monitoring and care planning due to the continued risk to their safety; the disruption of transfer increases risks to them and is not an acceptable practice.

All women subject to an ACCT are reviewed regularly and a small number of women are subject to the ACCT process for long periods of time due to continuing risks. Members of the Board continue to attend ACCT reviews as part of its monitoring and the process is kept under constant review. Observations suggest a professional, informed and compassionate approach.

Use of the constant supervision suite supports women at significant risk of self-harm. During monitoring visits, 15 women were visited who were subject to continuous observation. It was concerning that one woman was subject to such measures for several months during the reporting period, for a total of 77 days. This was a highly restricted regime for a woman awaiting transfer to a hospital due to serious mental health problems.

The overall approach to managing risk is a multidisciplinary process that appears to work effectively. The approach aims to be trauma informed, individualised and to ensure appropriate management and support for women with complex needs. The evidence available suggests that vulnerable women are well supported, although the ability to provide sufficient Listeners to offer support remains a concern. Listeners are specially trained women who provide emotional and confidential help to women in distress. They are trained and supported by the Samaritans.

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

As Drake Hall is a closed prison, it is accepting an increasingly demanding population with a propensity to bullying, drug use, intimidation and other challenging behaviours. Some of these women have risk profiles associated with violence and harm to others.

This increasingly complex prisoner population, combined with a relatively open environment, means that the potential for violence must be managed in a dynamic way, focusing on relational rather than structural security.

Bullying is a concern and results from a combination of factors, including vulnerability, debt, type of offence and relationships. Some of the women are prone to developing unhealthy relationships, which may result in interpersonal conflict and violence. This can be hidden and is often exploitative. Drugs might be a contributing factor. Some women may choose to manage this situation by isolating themselves in their rooms. Several houses have experienced some degree of conflict over the last twelve months, requiring active management of the situation by staff.

As the level of risk posed by the women is higher, levels of violence are increasing. However, the generally low levels of violence compared with similar prisons, suggest that staff are managing these challenges effectively.

The risk profile of the women raises concerns about the absence of cellular accommodation outside the CSU. This type of accommodation would seem to be a prerequisite in the management of some women now coming to Drake Hall.

The Board does remain perplexed by the implementation of challenge, support and intervention plans (CSIP). This is a case management model designed to work with complex prisoners, some who may be potentially violent. The process identifies the individual's needs and provides help to support positive behaviour change. The Board has noted high numbers of referrals, but low numbers of plans implemented. It remains unclear why this is the case.

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

The total number of use of force (UoF) incidents has increased by approximately 53% (from 74 to 113) during this reporting year. Use of force is a term that encompasses the control and restraint techniques used by staff, one of which involves the use of guiding holds. Over half of this year's incidents, 62, involved the use of guiding holds, i.e. taking the individual by the arm and leading her to the CSU.

The most common location where UoF techniques are applied is in the CSU in situations where prisoners resist relocation to one of the cells or they become violent and/or aggressive towards staff.

The increase in UoF incidents can possibly be attributed to the current trend of women being transferred into Drake Hall before they have had time to acclimatise to a prison environment. Additionally, more women with complex mental health needs are being transferred into Drake Hall. It is the view of the Board that that these factors have resulted in an increase in non-compliance and aggressive behaviour - leading to an increase in the situations where staff have had to use control and restraint techniques.

It should be noted that staff are very cautious in the application of control and restraint techniques, on account of the number of prisoners who have mental health problems; from the Board's observations, staff are careful to adopt a sensitive approach that demonstrates decency and respect.

In the past year, an incident involved two prisoners barricading themselves in a room and refusing to be transferred to another prison. This incident was resolved with assistance from the national tactical response group, which used PAVA spray (an incapacitant, similar to pepper spray) to gain access to the barricaded room. This is the first time PAVA spray has been used at Drake Hall.

Despite the increase in the use of control and restraint techniques, no prisoner or member of staff has sustained serious injuries as a result. Additionally, there have been no formal prisoner complaints against staff regarding the way in which control and restraint techniques have been applied.

UoF data is regularly reviewed and, overwhelmingly, the women involved are recorded as white British.

Every incident that involves UoF, no matter what level of control and restraint is used, is reviewed weekly. At this weekly review, body worn camera footage and officer accounts are critically analysed. Additionally, a quarterly management meeting is held for the purpose of reviewing data trends. A Board member attends as an observer.

Based on its observations and attendance at review meetings, the IMB has no criticism of the application of control and restraint techniques at Drake Hall.

However, there is some concern about prisoners being restrained within sight and/or earshot of other prisoners, many of whom suffer from severe mental trauma. It is hard to see how this fits with a trauma informed approach.

#### **4.5 Preventing illicit items**

Preventing the ingress of drugs is a constant challenge and takes up a considerable amount of staff time. It is necessary as there is a link between the level of illicit substances and the incidence of bullying behaviour, drug debt and violence. Intelligence led searches are a regular occurrence and drug-detection dogs are deployed to support this process. Mail is checked using a drug-trace detection device, which enables incoming mail to be tested for the possible presence of illicit substances. Mandatory drug testing (MDT) through urine tests is used to detect drug misuse; these are both random and targeted. Positive results that are proven result in an adjudication, a disciplinary hearing when prison rules have been broken.

There has been no significant increase in either illicit drug taking or the number of drug finds within the prison; this is despite the prison operating at, or near, full capacity in the reporting year and the fact that many short-term prisoners are being transferred towards the end of their sentences. As has been noted in previous annual reports, the drug situation appears under control. However, it seems that the trading of prescription medications is a bigger problem than illicit drugs coming into the prison, although some regularly prescribed medications might enter the prison illegally. Trading of drugs by the women gives rise to other related, serious issues: prescription medications are sometimes used by individuals as a means of acquiring vapes. It seems that the widespread use of vapes in the prison has underpinned the development of a trading culture where a tablet is, possibly, exchanged for a vape, a practice which is enforced by bullying.

An additional, related concern is that of women risking their health by consuming medication that has not been prescribed for them. This is dangerous and it seems that many women do not understand the risks they are taking. It is not clear what information is available to the women which highlights these risks.

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

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

Accommodation is provided in units housing a combination of single and double rooms. The accommodation is of a reasonable standard on most houses. It is pleasing to note that an audit is being undertaken by the residential staff to identify any discrepancies in either standards or facilities across the site. In some areas furnishings need replacement. A decency audit resulted in a 'green' result, which was positive.

Regular attention to the décor and equipment is important to ensure that standards do not slip, as the structure of the residential facilities on site does have limitations, and this was illustrated by excessive heat during the summer.

The design of the buildings means that toilet and showering facilities are shared, which is not ideal for privacy nor dignity.

The need for repainting is sometimes raised by the women at the prisoners' council and concerns have been raised about the absence of handrails in the showers.

Applications received relating to accommodation have concerned the need for replacement furniture, mould on the open unit, a long wait for a mattress and, on one occasion, bed bugs. A particular problem during the hot weather was the number of ants, wasps, flies and insects. This was a significant problem on Richmond and Plymouth.

The major area of concern continues to be two specific residential units. There is complete agreement that the wartime temporary accommodation units Plymouth and Richmond are a disgrace, and this view is supported by his majesty's inspector of prisons (HMIP) in an inspection report dated July/August 2024 in which the inspectorate called for the units to be replaced. A recurring theme in reports over the last twenty years, they represent poor accommodation, health and safety challenges and are a fire risk. As long ago as 2018, the Board was assured that the replacement building work had been added to the Prison Service plan for 2019. Feedback from the National Service Estates Team states this project is currently held in the pipeline of works and will be considered for funding in future financial years.

Since no plans for the replacement of these units have been published, there is no way of understanding the 'value for money' concept put forward by Lord Timpson in his letter dated 22 September 2025 in response to the 2023/4 annual report. Nor can the Board appreciate why it might be necessary to take existing prison places 'off-line' whilst new accommodation is constructed.

Despite many detailed representations to various ministers over the years, there still has not been any movement to replace Plymouth and Richmond. Seemingly huge costs have been attributed to replacing the units, and prison population pressures, have also been used to justify no action, while all the time the prison's management and its building maintenance team continue with their efforts to mitigate the worst aspects of this unacceptable, and potentially dangerous, accommodation.

Wearing their own clothes is the norm for women at Drake Hall and this is not usually a problem, apart from for those women whose property goes astray, leaving them with little to wear. Women can purchase clothing and other items through the catalogues available, and parcels can be sent in if the woman is eligible. Access to the charity shop is a necessity for some, while others may have limited funds and then clothing can also be accessed via the donated prisoner attire (DPA) system. Washing machines are provided on all houses so that women can wash their clothes.

The kitchens provide an excellent service. Consistent leadership and staffing mean that previous high standards in the provision of food on offer are maintained. This is despite inflation and budget constraints.

Feedback provided by the women indicates that the majority find the menus easy to understand and, generally, the food is described as tasty with good portion sizes. They are often complimentary about its quality, particularly in comparison with other establishments. The catering manager regularly undertakes surveys regarding the service provided.

The Board rarely receives applications about food, receiving none in this reporting period, although some women have made comments about limited access to fresh fruit via the canteen.

The women continue to prefer eating on the houses rather than dining communally and an effective and efficient system is in place to support the distribution of food.

In addition to the meals provided, women can access extra food items via the canteen system but these must be paid for and are considered expensive.

## **5.2 Segregation**

There are only six cells in the prison, and these are all located within the CSU. The cells are used for disciplinary reasons, as well as for housing women segregated for their own safety, mental health or personal protection. Women are in the CSU pending adjudication, following an adjudication or for reasons of good order and discipline (GOoD). Board members are routinely informed when women are moved to the CSU and regular visits to the unit are undertaken as part of weekly monitoring activity.

In the past reporting year, there has been a 31% reduction in the number of days prisoners have spent segregated in the CSU following decisions taken at adjudication hearings held for various infractions of prison rules; there has also been an overall 7% reduction in the number of adjudications held. This is due, in part, to a more trauma-informed approach being adopted by the prison when dealing with prisoners displaying challenging behaviours.

Additionally, there has been a big drop in the use of rule 45 (the legal power that allow for a prisoner to be segregated) where a prisoner is kept in cellular confinement in the CSU, either for her own protection or in order to avoid disruptive or dangerous behaviour in the prison; 34% of the total number of days spent in segregation were under rule 45, compared to 52% in the previous year. A few of the women in the CSU were supported by ACCTs.

The above rule 45 figures include those prisoners who were segregated for mental health issues. The CSU is increasingly being used as a location of last resort for those women who are experiencing mental trauma of various kinds. While the six cells in the CSU are intended mainly for relatively short stays, there have been occasions when decisions have been taken to extend the length of stays, usually in situations where women have exhibited severe mental health symptoms. These decisions have been necessary in order that women can have constant supervision and medical care prior to them being transferred to a secure mental health facility. Unfortunately, this has led to examples of women remaining in the CSU beyond 42 days, on one occasion for 53 days prior to transfer to hospital. If this occurs, external authorisation is required.

The number of prisoners displaying challenging behaviour being transferred to Drake Hall is rising and this creates a challenging situation which, coupled with the rise in the number of mental health issues, puts increased pressure on prison management and the CSU staff who must manage disruptive behaviour. On occasions, this behaviour has resulted in significant damage to the fabric of the environment. At times the unit has been noisy and volatile, with staff requiring protective clothing and equipment when gaining entry to a cell when use of force is required. Incidents of self-harm and the risk of violence and challenging behaviour are much increased.

The reduction in the number of days that prisoners are segregated, together with the reduction in the use of rule 45, are testament to the sensitive approach taken by staff to those prisoners who infringe prison rules or are generally disruptive. Attendance at both adjudications and rule 45 reviews has provided evidence of a fair, balanced and professional approach by the prison. Board members have attended 78 reviews during the reporting period.

The Board has witnessed CSU staff doing an outstanding job in caring and supporting all women located in the CSU and, on occasions, they must withstand considerable pressure from some of the women held in their care. But it must be borne in mind that prison staff, no matter how caring and committed, are not a substitute for the help that would be provided in a properly resourced secure mental health facility.

Several women have been released directly from the CSU, at the end of their sentence, as they could not be returned to normal location without the availability of some form of cellular accommodation.

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

The overall atmosphere in the prison is calm and relationships between staff and the women are generally positive. Board members regularly observe interactions that are respectful, helpful and appropriate. In challenging situations staff respond with both care and sensitivity.

Staff aim to promote a decent environment that encourages appropriate social behaviour and positive communal living. Such an environment requires effective regime management and appropriate structures and boundaries. The relatively open environment means this is not easy: challenging issues such as unhealthy relationships and bullying behaviour requires skilled intervention and resilience.

It is the development of positive and professional relationships that support the effective management of some complex women in an environment that has limited recourse to structural solutions. Good order and discipline is maintained and the low number of serious incidents and acts of violence supports this view.

Unfortunately, some inappropriate behaviour and language have been observed by the Board, coming from staff, but this is very much the exception and reflects the issues identified in complaints from the women. They raise concerns about attitude, tone of conversation and behaviour.

Low staffing levels may explain some of the difficulties encountered. A review undertaken during the reporting period identified several deficits based on a staffing establishment set prior to Drake Hall becoming a closed prison. Baseline numbers are minimal and this is exacerbated by staff allocated to restricted duties, sickness, absence and turnover.

Low staffing impacts on the regime and the delivery of keywork. This might explain the view often voiced to Board members by the women that communication is poor and sometimes things do not get done.

General communication within the prison is not helped by the absence of laptops and other digital solutions found in many other prisons. An almost total reliance on paper-based systems can be inefficient. Recent work to improve the applications process, often a cause of frustration, must be commended, as must the voicemail pilot, whereby messages can be left on the women's PIN phone accounts to further improve communication.

Keywork remains a challenge, with national targets of 45 minutes per week not being met. Operational demands often result in cancellation of sessions and there is some evidence, given concerns raised by the prison management, that the quality of interactions is inconsistent.

The prison, as is a requirement of all prisons, monitors the provision of keywork and this is subject to national reporting requirements. A total of 1813 keywork sessions took place during the reporting period and a total of 314 women had a key worker allocated (99.29%). The average time for allocation of a keyworker was 5 days, and the average number of high complex cases was 41.

The prison management has taken a proactive approach to improving keywork and an action plan to facilitate this is in place and monitored daily. Checks around the quality of interventions are supported by training, supervision and audit. There is a list of women for whom keywork is a priority.

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

Overall, the submission of discrimination incident report forms (DIRFs) has been at a low level for many years and, despite encouragement from prison staff to submit DIRFs to highlight their concerns and issues, the number of submissions shows no sign of increasing. 52 DIRFs were submitted during the reporting year - the same number as in the previous year. Of these, 29 were under the protected characteristic of race, an increase from the 19 submitted in 2023/4.

Generally, these complaints centre around the use of racist language by prisoners; this is an ongoing problem, possibly because prisoners tend to carry the attitudes and the language of their own backgrounds and communities with them.

However, the significance of race complaints as a proportion of the admittedly small overall total of 52 DIRFs may indicate that there is an underlying problem, given that prisoners are generally very reluctant to complain about others. Some women have spoken to Board members about experiencing racism within the prison. In this context, it is reassuring to note that Drake Hall is working to identify a training package for those prisoners who are proven to have carried out a racist act.

In the reporting year, 21 of the 52 DIRFS submitted were upheld; 27 were not upheld and four were withdrawn by the complainants. An independent scrutiny panel met regularly during the year to give an additional level of scrutiny and quality control regarding the conduct of the investigations carried out and the conclusions reached.

However, feedback from the prison council indicates that women are concerned about the lack of information regarding the DIRF process and have a lack of confidence in the system which is perceived as taking too long and being unresponsive.

It should be noted that a wide range of celebratory events to mark different religions' festivals have taken place throughout the year, although on occasions these have been affected by staffing shortages.

During the reporting period, the Board did raise some concerns about support for women who were deaf and had complex communication difficulties.

## **5.5 Faith and pastoral support**

The prison has a chapel and a team of chaplains representing multiple faiths, with leadership provided by the managing chaplain. The chapel itself is an impressive building which is well used and of an excellent standard, providing a welcoming and spacious environment for people of all faiths and none.

Many women attend the chapel on a regular basis and there is a structured timetable of services covering a range of denominations.

The prison population is predominantly Christian and just under 10% of the population is Muslim. Other faiths are represented, while many women declare they are of no faith.

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

The chaplaincy has a strong and regular presence in all areas of the establishment and, in addition to providing spiritual support, it has a critical role in supporting women who may be vulnerable or in distress, working closely with other staff to ensure that such women are safe and their needs are met.

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

The work of the chaplains is challenging yet undertaken diligently, with compassion and kindness. At all times pastoral care and individual support is provided to women

in distress or crisis. The chaplains regularly attend ACCT reviews, visit the CSU routinely and provide bereavement support when required.

The service they provide to the women, often in the face of challenging staffing constraints, is exceptional, and must again be commended.

## **5.6 Incentives scheme**

The incentives scheme, referred to at Drake hall as the local incentive policy, is a means of rewarding positive behaviour and providing disincentives for poor behaviour. This is a nationally mandated approach and there are three categories: basic, standard and enhanced. Women are assigned to one of these categories depending on their behaviour. Most women are either standard or enhanced. The allocation has important financial and sentence related implications.

At the end of the reporting period 170 women were enhanced, 138 were standard and 7 were basic. During the reporting period, on average, 176 of women were enhanced, 117 were standard and 10 were basic.

It is not immediately obvious to the Board what the difference between standard and enhanced is in practical terms, with the actual benefits associated with the latter unclear. This is a perception shared by some of the women.

Very few women are on basic and, while the low numbers are positive in one sense, they are also surprising given the complex population, adjudication and disciplinary awards and levels of challenging behaviour more generally.

Feedback from the women suggests a perception among some that the system is unfair due to a lack of consistency in the application of prison rules. There is also the perception among some women that poor behaviour can go unchallenged and positive behaviour is not incentivised.

The incentives system should form part of a graduated approach to dealing with disciplinary matters that avoids premature use of the adjudications process or the CSU. Reductions in figures associated with both might suggest progress is being made.

The high level of enhanced women may also point to the fact that most of the women behave well, with disruptive behaviour caused by a small minority.

## **5.7 Complaints**

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

The complaints policy gives guidance on timeframes for responses and access to the independent prisoner complaints investigations (IPCI).

The normal process for submitting a complaint is a comp 1 form and a response should be received within five days. If the woman remains concerned, she may submit a comp 1a form and a more senior officer will review the complaint. Women may also write directly to the governor. Where a complaint remains unresolved the woman can contact the IPCI.

Procedural arrangements for processing, responding to and auditing complaints are well established. All complaints are logged centrally and response times are monitored. The overall process is efficient and well managed. A 10% sample of replies to all complaints are audited monthly and there is a focus on outstanding complaints at the daily management meeting.

At each Board meeting, statistics regarding complaints are reviewed. This includes information regarding the type of complaint, the outcome, location and information regarding the age, ethnicity and protected characteristics of the complainant. The Board also reviews the number of complaints outstanding during each monitoring period.

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

During the reporting period, there were a total of 981 complaints with an average of 79 per month. This is a reduction compared with the last two reporting periods and figures for the last seven reporting periods are noted below in table 5.

Table 5	2024/5	2023/24	2022/23	2021/22	2020/21	2019/20	2018/19
Complaints	981	1184	1070	696	432	566	1076

Issues raised in complaints include:

- bullying
- property (particularly on transfer)
- employment
- staff
- administrative processes
- ROTL and sentence management.

The Board's main concerns around complaints are threefold:

- the ability of women with poor literacy skills to participate effectively in the process
- some responses seen by the IMB are rudimentary and even dismissive
- complaints often reflect problems around communication, administrative follow through and women's understanding of relevant policy and procedure.

## 5.8 Property

Property is important to the women and they have a right to expect it is properly looked after. The effects of it being lost are well documented. Unfortunately, despite a policy framework suggesting the opposite, there is no systematic approach to the management of property across the prison system. Complaints to the prison and applications to the Board often relate to lost property and attempts to resolve the problem are often unsuccessful. Property loss, and particularly problems around the loss of property on transfer, have been highlighted in previous annual reports.

Locally, three specific issues arise on a regular basis:

- loss of property on transfer is sometimes made more difficult by poor record keeping and documentation

- the time taken to process a parcel sent into the prison, which is often complicated by a poor understanding of what can be sent in
- delays in accessing stored property.

Management of property is undertaken in the reception area of the prison and the Board has always found staff to be helpful and proactive in dealing with issues raised. However, operational pressures mean the reception may be closed at short notice, with an impact on routine work.

## 6. Health and wellbeing

### 6.1 Healthcare general

The women detained at Drake Hall exhibit more severe health problems, both physical and psychological, than would be found in the general population. Incidents associated with this occur frequently and women often need to attend hospital as a result.

This level of need impacts on the level of service that can be provided and the available resources are often stretched, particularly around medical appointments and prescribing. Services are provided Monday to Friday, with reduced cover at weekends and bank holidays.

It is increasingly clear to the Board that the available resources are outstripped by demand. This may explain, at least in part, the frustration expressed by women about the service provided.

A high number of applications received by the Board are related to healthcare and the number of applications received over the last seven years are noted in table 6 below.

Table 6	2024/5	2023/4	2022/3	2021/2	2020/21	2019/20	2018/19
Applications	61	54	58	19	7	15	21

In addition, an average of eight complaints per month received by the prison are forwarded to the healthcare provider as they relate to healthcare issues.

Many of the concerns express a general dissatisfaction with the services provided and are broadly similar to those found outside prison. It is difficult to ascertain if it is unrealistic expectations or the reality of service provision that drives these concerns. They must be seen in the context of visits from the care quality commission (CQC) as part of last year's HMIP inspection, and a more recent visit from the National Health Service England (NHSE) commissioners, both of which provided positive feedback. The service also receives compliments from women following treatment or support.

Issues raised with the Board include access, responsiveness and the quality of treatment provided. Specific issues include:

- pain management
- access to dentistry and mental health services
- treatment delays
- continuity of care following transfer from another prison or treatment at an NHS hospital.

Medication is a particular area of concern with issues raised around the prescribing of certain medications and changes of prescription on transfer. Concerns are often about medications associated with pain management, particularly pregabalin and gabapentin. Both are prescribed within strict clinical guidelines, due to the associated high risk of addiction and trading.

Part of the problem appears to relate to strict implementation of relevant clinical protocols and prescribing guidelines and the refusal of some women to accept this.

Where prescriptions are clinically inappropriate or even dangerous, they are stopped. Some women are very unhappy when this occurs. As a result, clinical appointments and medication administration can be a focal point for conflict and healthcare staff have been subject to verbal abuse and physical assault. The constant movement of women around the female estate does not help the situation, with different prescribing practices between prisons, delays in provision when prescribed medications are not in stock or changes in prescriptions that have not been communicated by the transferring prison or, on occasion, the treating hospital.

Historically, the administration of medication has been a problem, with delays and subsequent tensions between clinical and operational staff. It is a pressurised process which has been characterised by errors, incidents, conflict and diversionary tactics by the women to promote trading of medication. Joint working between the prison and the healthcare provider has resulted in considerable improvements.

Procedural changes have streamlined the process and made it more efficient and effective while changes to the dispensary, supported through capital funding, will facilitate a safer and more manageable process that will have clinical and operational benefits. Meanwhile, the introduction of a TRAKKA system and better storage in the women's rooms for medication held by them, has reduced pressure on the dispensary. Women can access medication at the appropriate time in a more convenient way. The system is in the dining area; it is loaded daily and accessed via fingerprint recognition.

Medication administration is now more timely, safer, confidential and provides less opportunity for trading.

## **6.2 Physical healthcare**

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

The University Hospitals of North Midlands NHS Trust provides more specialist secondary health care services at the Stafford or Royal Stoke hospitals. Staffing pressures may lead to planned hospital appointments being cancelled. This is monitored closely, as cancellations do occur. In addition, escorts and bed watches can be resource intensive and impact on the wider prison regime. While an out of hours service is operational, with a doctor available at the end of a phone line. Anecdotal evidence suggests that, often the advice is to take the woman to an accident and emergency department. This can be operationally demanding and clinically inappropriate. Attempts are being made to address this situation.

Waiting times for each service within the prison continue to be monitored and information is available on the noticeboard in the healthcare facility. Women may be subject to long waits associated with secondary services, over which the prison has no control.

Demand for services is high and an average of around two thousand interventions per month are recorded. The did not attend (DNA) rate is around 10% and waiting times are similar to those found in the wider community.

The rapid turnover of women and the number arriving close to release impacts on continuity of care for women with long-term conditions.

Positive initiatives worthy of note include:

- a health summit which took place and was designed to bring together relevant partners in pursuit of improved services
- the continued availability of social prescribing
- a health promotion action group, which promotes better physical and mental health
- the development of a women's hub to support improved advice and support around menopause, sexual health and long-term contraception
- health champions who help with basic assessments and provide lifestyle advice based on agreed protocols. These also signpost women to appropriate services and help the healthcare facility to work effectively.

### **6.3 Mental health**

Around two thirds of the women have complex mental health issues often associated with trauma and emotional fragility. As a result, both primary and secondary care services are available, and referrals and caseloads are high and increasing.

The service has access to a psychiatrist and both urgent and non-urgent referrals are seen quickly. However, the increasing need for this service has lengthened the waiting list and wait times. A range of therapeutic activities is provided on a one-to-one and group basis.

Increasing numbers of women have a diagnosis of a severe mental illness and are acutely ill. The numbers of women requiring transfer to an appropriate hospital have increased by over 200%. Transfer should be within 28 days but is much longer.

Several women with a severe mental illness have been unable to live on normal prison accommodation. The design and structure of the environment is not conducive to providing specialist mental health care, as the individual requires a secure health care facility. They needed to be in the CSU under rule 45 or subject to continuous supervision for their own safety and/or the safety of others. These are the only options in a prison that has minimal cellular confinement and as such, it is the least harmful option.

Because of this lack of appropriate accommodation, several women have remained in segregation for prolonged periods of time, on one occasion over 52 days, awaiting a bed in a mental health facility. They were well looked after by a committed and skilled staff team who ensured they were safe and well cared for. Unfortunately, from a mental health perspective, these women could only receive minimal treatment, if any. This makes longer term treatment more difficult and impacts on the overall prognosis. Another woman was subject to a lengthy period of continuous observation prior to transfer to hospital.

Increases in the number of women with serious mental illness also means that some women are extremely unwell prior to release. This leads to problems for the prison if community mental health services fail to respond effectively. The law does not allow a woman to be detained beyond her day of release. In these circumstances, the prison cannot operate as a place of safety as there is no legal jurisdiction to support further detention and the woman must be released. On occasions this has resulted in

assessments at the gate where the woman is assessed on release and, if necessary, detained under the Mental Health Act and moved to hospital.

#### **6.4 Social care**

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

Social care assessments take place quickly and result in the development of a plan of care to support the individual concerned. Where equipment is required, it is delivered promptly. The number of women requiring social care interventions is generally low, but increasing.

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

Compared to other closed prisons, Drake Hall is unique in that prisoners are in single or double rooms in residential houses and are not isolated in cells for lengthy periods. In the houses, the women have constant access to showers, an association room, a small kitchen, the house telephone and in-cell telephony. They go to the dining area to collect their meals and leave their houses to collect medication, attend healthcare appointments or collect their canteen. The prison regime offers women access to purposeful activity, work and education.

Regular exercise and association off the house are in place for an hour per day and at times this is reduced due to staffing levels. Reduced or cancelled exercise is often raised as a concern by the women. Previous reports from both the IMB and HMIP have raised this issue. This remains a concern and it may reflect comments by woman employed in DHL or the kitchens whose working times coincide with exercise; alternatively it may reflect a process hindered by staffing levels and operational pressures. Women also have access to the gym and an external sports facility located adjacent to the gym.

#### **6.6 Drug and alcohol rehabilitation**

Many women have complex health needs associated with the use of illicit drugs. The overall strategy in the prison reflects the national framework and aims to restrict and reduce the demand for drugs as well as providing interventions that enhance recovery.

As noted in previous reports, Drake Hall has a well-established clinical substance misuse service which provides the full range of prescribing options available in the community. These are tailored to a prison environment and are patient centred. Women are seen on induction and support is provided based on that assessment. Given the level of need, caseloads are high.

The women are offered the opportunity to participate in therapeutic programmes to support abstinence or the management of their addiction. There is access to clinical staff and recovery practitioners who provide treatment, such as methadone maintenance and prescribing of buprenorphine and buvidal (both used for opioid addiction to reduce cravings and withdrawal symptoms). A range of psychological and educational interventions based on harm reduction are available.

An incentivised substance free living unit (ISFL), introduced in October 2024, is now well established; this approach is a positive and welcome development.

Risk of overdose is always a possibility when drugs are misused, and for this reason nasal naloxone (an opioid antagonist used to reverse or reduce the effects of opioids, particularly in cases of overdose) is strategically placed across the site in case of emergency. Where a woman is suspected to be under the influence of drugs, she is placed on an ACCT.

## **7. Progression and resettlement**

### **7.1 Education, library**

In the last report the Board noted the problems associated with the education budget: it had not increased over a ten-year period and in an economic environment marked by high levels of inflation, this constituted a de facto cut. This situation has continued and the financial situation has further deteriorated.

Government actions to manage the prison population have also had a further deleterious effect. During the reporting period there was a 47% increase in the number of receptions into the prison, with many staying for a short period prior to release while others had their release date brought forward. This flux in the population meant some women were released before completing courses. Also, as an example, in September 2025, 77 arrivals were recorded and, clearly, others had to leave to enable their reception. Given that the population is usually around 310, this indicates a huge upheaval with concomitant difficulties for the delivery of education and for the prison in general: establishing routines and relationships underpins attendance at all activities, but these can take time to establish. However, systems around absence from education are robust and this, and improvements in the dispensing of medication, have both had a beneficial effect on attendance.

However, in light of the overall situation, the prison has had to review and adapt its educational offer. The result is that the primary focus is now on ensuring that basic maths and English courses are completed. More expensive courses, such as those associated with beauty, have been discontinued, despite their offering a clear pathway to employment post release.

Given the prior attainment profile of the prisoner group, targeted use is made of outreach, where prisoners are taught one-on-one in less threatening surroundings. This is used as a gateway to moving women into more formal educational settings. Alternative education delivery (AED) is where education is delivered in the workplace and much care and effort has been put into ensuring that workbooks are accessible but challenging: indeed, one woman graduated from the warehouse course to joining Writers In Residence. Through the work parties, additional qualifications are offered such as the Halford's bike technician course and Level 2 mowing and strimming, delivered by the garden's team. The physical education instructors (PSIs) also deliver the Level 2 Gym Instructor course and Level 1 healthy eating and living course.

Analysis of the jobs market that the women will be entering ensures that, as far as possible, women are prepared for employment. For example, although a hospitality qualification through People Plus was offered in partnership with Costa Coffee, a new qualification which will focus on aspects such as stocktaking and finance, rather than just front of house, is being sought. This will be facilitated through the opening of a new staff restaurant in conjunction with The Right Course, New Future's Network and Hilton Hotel. In the meantime, a cooking with confidence course is addressing some retail elements. Despite the difficulties of sourcing a qualification for cleaning, the prison has done so.

However, difficulties presented by the fluid nature of the population were further exacerbated by the number of women with specific educational needs arriving: in October 40% of residents had neurodiverse needs, while 52% were below Entry

Level 3 (EL3) for English and 78% were below EL3 in Maths. By November these figures for English and Maths had increased to 71% and 83%, hence the focus on improving basic literacy and numeracy.

It is generally acknowledged that the physical and mental health wellbeing of prisoners can have a detrimental effect on their ability to fulfil educational opportunities and employment. In view of this, there continues to be an effective support system for those women with neurodiverse needs, in the form of two inclusion support coordinators working in education and industries, and the neurodiversity manager, who focuses on the operational aspect of their care so that, despite these challenges, in November 2024, the average success rate for those with learning difficulties and disabilities (LDD) was 90.53% while it was 93.95% for non LDD learners.

To further support learners, the prison has successfully procured a contract with Shannon Trust, paid for by the dynamic purchasing system (DPS) budget. A facilitator works two days a week onsite. They are supported by a newly trained civilian volunteer who helps organise the mentors. Reflecting the needs assessed on entry, in June 2025 the trust had five reading mentees and 13 for numeracy, with 93 sessions being held. Prior to this, in February 2025 the Trust had two full-time purple bands (prisoners authorised to move around the establishment to carry out designated support roles.) but, partly because of the churn in population, by November 2025 there were no purple bands and only five mentors in training.

Concern for the women is also evident in the approach to supporting those who find failure, sometimes repeated, at academic subjects demoralising and a more holistic approach is adopted with talents other than the academic being developed. Self-esteem is bolstered by direction towards activities such as art, pottery and music. The artwork of some prisoners is now on permanent display at the courts in Stoke on Trent, while an entry in the original singer/ songwriter category at the Koestler Awards gained the Outstanding Debut Award. In total, 15 women won Koestler awards while collage and pottery are the most popular of the activities, which help develop learners' artistic skills while contributing to improved mental health.

The prison remains an outlier around IT and so promoting improved computer literacy remains a problem. All 15 available Coracle laptops are in almost permanent use and there is no immediate prospect of this changing despite computer literacy being a requirement of many jobs and, it could be argued, a fundamental of life today. In one case, lack of access to software led to a woman being unable to continue onto the second year of her degree. This learner commenced this course at a private reception prison; the change in setting and level of technology was unfortunately not considered when this learner was transferred from the reception prison to Drake Hall.

Despite these difficulties, it is the view of the board that the prison works well to educate the women in its care and higher achievers are also well catered for through distance learning for higher and further education and the Open University. These opportunities are promoted at induction, with some success: as a snapshot, in November, under the aegis of a motivated facilitator, one prisoner was studying A level maths, two were taking Level 5 Management and Leadership, one was doing a degree in Criminology and Psychology and another in Business Management, while others were doing certificates in bookkeeping and mental health.

Women who take advantage of the opportunities on offer are well supported by the relevant staff and their achievements in a range of areas are celebrated, but it can be difficult to continuously create exciting incentives and enticing rewards. However, displays showcase their achievements and celebration evenings continue to be well attended as is participation in the Koestler Awards: 15 learners were winners in this year's awards.

## **Library**

A wide, attractively displayed range of books is available in the prison library and in February 2025 there were 276 visits and 2011 issues. In September 2025 this had fallen to 1,594 issues from 279 visits, possibly because the increasing numbers of short stay prisoners were not enrolled onto the library system but catered for with a special supply of books.

The thoughtful care put into this initiative and the desire to get the women reading is also evidenced in the gift at Christmas of a box of books to each house after generous donations from the staff, the library and, especially, the chapel.

To improve access due to limited opening times, a timetable is in place to ensure all work parties have access to designated slots at the library and attend regularly. A library session is also part of the induction process for all new arrivals.

As well as providing a wide range of books, the library is a centre for a host of enriching activities: it is the venue for weekly music events, has hosted a talk by a visiting author, had a combined author visit and writing workshop with Kerry Hadley Price in June 2025 and a therapeutic writing session with Leonie Rowland the following month. Women were also encouraged to take part in the Ten by Ten challenge: to write a story in 100 words.

In addition to this, Storybook Mum videos are recorded in the library. In fact, this year Drake Hall was the top producing prison of these videos and, as a result of this, the library was asked to be a part of the Storybook Mum annual review. However, sadly, this enriching, positive experience had to be suspended in October because of lack of staff, but restarted in December, enabling women to make recordings for Christmas.

The Board has previously noted the reduced library space due to the encroachment of the coffee shop and a multi-use pod. Despite this, engagement with other areas of prison life has been facilitated, enriching the lives of prisoners and their families: every Tuesday a computer session for women on Open University (OU) courses is held to enable them to complete their assignments while links with the Prisoner Advice and Care Trust (PACT) ensure women who do not have direct access to their children can still complete a Storybook Mum recording (if authorised by the prison). Additionally, at Easter, PACT was provided with World Book Day children's books for the Family Day visit, enabling the women to give their child/children a gift if they wished to. The library also took part in Raising Readers – an initiative of the Give a Book charity whereby the women could choose an age-appropriate book. They were given two copies, one for their child/children and one to keep for themselves. This helps sustain the bond with their child through reading.

The library space is also used to facilitate Shannon Trust sessions between mentor and student, to advertise the service and be a point of reference for any women

wishing to register for the service. Additionally, and to help engage those who might be antipathetic to reading, the library contains a stock of donated Digital Versatile Discs (DVDs) which, as a non-core service supported by Staffordshire County Council (SCC), is currently being processed and will soon be available to the women.

In conclusion, the library continues to champion reading for its own and related benefits while promoting activities which enable some women to gain higher educational qualifications and others to develop and maintain positive relationships with their families. It is the view of the board that, under the aegis of an enthusiastic and energetic librarian, the library continues to deliver an enriching and supportive experience for many women.

## **7.2 Vocational training, work**

All women undertake an induction period on transfer to the prison. One of the outcomes of this process is the allocation of both work and educational opportunities. All women, except those of retirement age, are expected to undertake some form of employment or education.

A range of work opportunities are available and include Halfords, DHL, Timpsons, waste management, horticulture, catering, cleaning, charity shop, laundry and general maintenance such as painting. Unfortunately, due to various issues, the coffee shop and the beauty salon have both closed. Most areas of work offer the opportunity to complete qualifications, and the aim is to promote behaviours and attitudes conducive to work on release.

Despite the opportunities available, when visiting residential areas there is a surprising number of women on the houses who would be expected to be in work or education. The prison is working to address this situation.

Working outside the prison is now primarily for women from the open unit who work in jobs in the local area.

There is a commitment from prison management to getting more employment activities and, to this end, regular employment events take place to develop increased employment opportunities in the prison and following release. The prison has seen a decline in available employment opportunities in recent years and an ongoing commitment to the development of quality workplaces in the prison is welcomed.

## **7.3 Offender management, progression**

The offender management unit (OMU) works to progress women through the prison system. Many women arrive with complex issues associated with offending behaviour such as drug misuse, homelessness, trauma and mental health problems. These problems need to be addressed to reduce reoffending.

The OMU is the driving force behind a woman's sentence progression and ensures a clear pathway going forward. It is also responsible for home detention curfew (HDC) processes and release on temporary licence (ROTL).

Each prisoner is allocated a prison offender manager (POM) and women are also supported through key work. Women assessed as having the most need receive additional time with their POM in place of key work with a band 3 officer. This

support helps guide women through their sentence. The POMs and community offender managers (COMs) employed by the probation service work together. The former produce assessments, sentence plans and interventions supporting a woman's move to community probation services.

The OMU is accessible to the women via applications and drop-in sessions. Information is available in each house and regular surgeries are held. Some women have raised concerns to the Board about their understanding of HDC and ROTL and felt they had to be proactive in moving things forward. However, in following up issues for women, the Board has found OMU staff both helpful and well versed in the relevant issues around a particular situation. Sometimes, the Board has observed that women seem confused regarding the process of recategorisation.

The open unit provides up to twenty-five women with the opportunity to live independently before release, while also being employed in the local community or accessing higher education. This facility remains below capacity despite efforts to increase its use and a few of the women are not employed. This lack of employment means women are unable to take full advantage of the opportunities offered by open status.

A critical component of the work of the OMU is the management of the ROTL process. This assists resettlement by enabling women to participate in activities outside the prison aimed at assisting resettlement.

In the past, the prison made extensive use of ROTLs, but numbers have declined rapidly. Table 7 below notes the number of ROTLs over the last seven years.

Table 7	2024/5	2023/4	2022/3	2021/2	2020/1	2019/20	2018/19
ROTLs	61	44	59	48	8	67	197

A noticeable decrease is observed in 2018/19 and if the figures for the previous three years are considered, the decline is more remarkable. The average number of ROTLs between 2015 and 2018 was 230. Previous reports have noted reasons for the decrease, and these include the changing profile of the prisoner population, the tightening of criteria, women who are in prison for only a brief period and the changing policy agenda. The Board remains concerned about the low level of ROTLs and particularly the lack of childcare resettlement ROTLs.

It is important that ROTL is promoted and the application criteria are clear. There is a definite need to consider ways of enabling the women to better utilise access to childcare resettlement licences given the numerous benefits.

Policy changes initiated more recently have increased the work of the OMU and continue to do so. In last year's report, the impact of changes around fixed term recalls (FTR), the home detention curfew (HDC) process and standard determinate sentence 40% (SDS40) were noted. These increased the level of work undertaken by the OMU significantly and this has not changed. The policy agenda around prisons continues to change quickly, often reactively, with subsequent increases in workload.

#### **7.4 Family contact**

The importance of maintaining family contact is now well understood, as is the damaging impact on both children and mothers of parental imprisonment. It is

important, therefore, that women who have close ties with family are supported to maintain them.

The prison tries to ameliorate barriers to contact but is sometime inhibited due to its location. Situated in rural Staffordshire, it has poor public transport links, and many visitors must travel long distances, which may discourage some and be unaffordable for others.

The facilities for visiting are well managed, clean and well maintained as well as child friendly. A local voluntary organisation provides refreshments.

Where social visits are not an option, the women are able to access family via the video calling system. Other than this, women have in-cell telephony and can call the numbers on an approved list, so many contact their families in this way. Updating of the PIN numbers which allow phone access is sometimes a concern for the women. Unfortunately, some women have no family or minimal social support.

PACT remains fundamental to maintaining family links. It organises family days which cater for different cohorts of women, children and wider families, where they can spend quality time together. Private visits for families are facilitated outside the usual visiting times as are some for children with diverse needs.

PACT also works with women where there are care arrangements in place. An example would be linking women and the local authorities that are caring for their children to try and improve these relationships by encouraging and supporting positive communication. This may also include involvement in care plan meetings, meetings around adoption and facilitating legal support.

Helping women to engage with those who care for their children helps to improve relationships whilst they are in custody and promotes a more positive and less intimidating relationship when they are released. Involving women when a child is having problems at school can be helpful in promoting positive outcomes.

Having noted the emotional distress caused by imprisonment and how behaviours associated with this may impede women's access to family contact, the Board continues to be concerned that ROTL for the purpose of childcare remains underused. It is not clear whether this is because women are unaware of their entitlement or the level of need is not there.

More generally, the work undertaken by the prison to ensure women can send photographs to their children where this is appropriate and the success of the story book mums initiative are to be welcomed. A more enhanced official prison visitor scheme (OPV) would provide additional benefits.

## **7.5 Resettlement planning**

Drake Hall aims to provide a rehabilitative environment where women are supported to achieve their potential. The aim is to ensure that each woman undertakes a structured programme designed to improve their health, wellbeing and level of education while ensuring they are provided with suitable accommodation and employment on release.

In previous reports, the Board has noted the complex policy framework surrounding individuals leaving prison. Multiple agencies and organisations are involved, and services vary across geographical areas which is a problem for prisons such as

Drake Hall where women come from all over the country. Roles and responsibilities can be confused and communication between pre- and post-release teams challenging. This is often exacerbated by staffing shortages particularly amongst probation officers.

On occasion, Board members have spoken to women close to release and some appear unsure about the arrangements in place. More positively, the Board has also followed up concerns and found that suitable planning, sometimes exceptional, and support is in evidence. Staff work hard to ensure appropriate arrangements are in place prior to release. Accommodation is increasingly challenging due to the shortage of accommodation generally and approved premises and commissioned rehabilitative services (CRS) specifically. Moreover, some approved premises (APs) are unsuitable for women, which can set them up to fail. Add to this different approaches in different areas and the risks of homelessness are increased and, consequently, the risk of reoffending.

Drake Hall is a resettlement prison, and its aim is to promote rehabilitation and resettlement. Unfortunately, this rehabilitative ethos is challenged by the operational demands of the prison system. Facilities for assisting women during the period leading up to their release are available at Drake Hall and many women take advantage of the education or work opportunities available. However, the increasing level of turnover, the number of women on short sentences or transferred close to release and the high percentage subject to recall make it increasingly difficult for women to take full advantage of opportunities available. Arbitrary transfers due to population pressures disrupt sentence progression.

If a woman arrives at Drake Hall close to release, then opportunities to address offending behaviours and reduce the chances of reoffending are limited. Meaningful work, education and addressing complex issues associated with trauma, substance misuse and offending behaviour require time. Moreover, where women are reluctant to engage in what the prison can offer, this makes the situation even more difficult. Add to this cuts to the education budget, then the prison is facing an uphill struggle in maintaining the ambitious standards it has set and which are recorded in previous annual reports.

Despite this, the Board's view is that much excellent work is undertaken, and some women leave prison with employment and a plan that will reduce the chances of reoffending. A particular area of good practice in the prison is the Hamlet Project. Mentioned in last year's report, this facility continues to thrive. Providing both staff and a structured programme of additional support to particularly complex women, the initiative has considerable benefits for women who struggle to engage with the prison regime. An official celebration event was held to illustrate the benefits of this approach, and a business case has been submitted to replicate the initiative elsewhere in the prison.

## 8. The work of the IMB

### Board statistics

Recommended complement of Board members	12
Number of Board members at the start of the reporting period	11
Number of Board members at the end of the reporting period	11
Total number of visits to the establishment	328 (this includes attendance for Board meetings and direct monitoring)

### Applications to the IMB

Code	Subject	Previous reporting year	Current reporting year
A	Accommodation, including laundry, clothing, ablutions	4	10
B	Discipline, including adjudications, incentives scheme, sanctions	8	6
C	Equality	7	3
D	Purposeful activity, including education, work, training, time out of cell	7	9
E1	Letters, visits, telephones, public protection, restrictions	5	8
E2	Finance, including pay, private monies, spends	10	12
F	Food and kitchens	1	0
G	Health, including physical, mental, social care	54	61
H1	Property within the establishment	4	9
H2	Property during transfer or in another facility	11	2
H3	Canteen, facility list, catalogues	0	1
I	Sentence management, including HDC, ROTL, parole, release dates, re-categorisation	22	21
J	Staff/prisoner concerns, including bullying	20	13
K	Transfers	4	2
L	Miscellaneous	18	7
	Total number of applications	175	164



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