



Annual Report
of the
Independent Monitoring Board
at

HMP Rye Hill

for reporting Year
April 2016 – March 2017

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Monitoring fairness and respect for people in custody

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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 or centre is situated.

The Board is specifically charged to:

- (1) 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.
- (2) inform promptly the Secretary of State, or any official to whom he has delegated authority as it judges appropriate, any concern it has.
- (3) **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.

2 EXECUTIVE SUMMARY

This report presents the findings of the Independent Monitoring Board at HMP Rye Hill for the period April 2016 to March 2017. IMB evidence comes from observations made on visits, scrutiny of records and of data, informal contact with prisoners and staff, attendance at prison meetings and prisoner applications.

These judgements represent the areas of concern only and do not represent a full judgement of the monitoring during the year.

Main judgements

In general the Board considers prisoners were treated fairly, however the following areas were of note in coming to this judgement.

The need for a rolling series of lock downs on the accommodation units to release staff for bed watches for seriously ill prisoners was a concern but was actually handled very fairly. The lock downs were spread evenly across the prison and policy of communicating the schedule of restriction of regimes to prisoners as early as possible was appreciated by the prisoners (see section 7).

There has been a marked reduction in the number of Discrimination Reports this year and all have been found unproven but the provision of disability and assisted living aids can take an unacceptably long period, in some cases more than 6 months (see section 5.5-5.7)

The discharge to court process, which is outside the control of HMP Rye Hill, has a disproportionate impact on sex offenders with some prisoners spending months awaiting return during which time they have no access to employment, programmes, or even their property other than a single change of clothes (See section 5.11).

Overall the library provision is barely adequate for a prison of this size both in terms of physical size and budget for books/DVD (see section 9.3).

The Board considers all prisoners were treated humanely with some areas of strength noted below however the situation with healthcare remains a key concern.

Staff and senior management have made determined efforts to ensure that the prison is a safe place for both staff and prisoners especially during times of staff shortages when a rolling programme of Unit lock downs have had to be scheduled. Safety, the management of prisoners with complex needs and violence reduction have been given priority (see section 4).

The work that has been carried out in CSU to move to normal location prisoners transferred in, after periods of up to 18 months in segregation at other prisons, is to be applauded. Such long stays in segregation and inconsistency of managing such prisoners across the prison estate is not humane and it is good to report that such long stays in CSU are not tolerated at HMP Rye Hill (see section 6).

Between 89.7% and 91% of the prisoner population are either employed or purposefully occupied during the reporting year with the target of 29 hours a week employment being met most of the year. This is indicative of the firm commitment that we have observed both in this and previous reporting years to maximizing purposeful activity (see section 10).

Healthcare Services remains a major cause for concern and unless the prisoner health profile changes the current service will need both further investment and improvement if it is to ensure it can give prisoners the same level of care they would receive in the community especially those with serious long term conditions and terminal diagnoses. The pressures in this area especially for bed watches and hospital escorts are now having an impact on the regimes for all prisoners despite the management teams best efforts (see section 8).

The Board has reservations about how well prisoners are prepared for their release for the following reasons.

Prisoners are allocated to HMP Rye Hill based on a range of criteria including their length of sentence not just their risk level, however there are no courses for low risk prisoners and they therefore have no means of improving their risk profile to assist in getting re-categorised. Efforts are made at HMP Rye Hill to find other courses they can attend but in some cases there are no options and although low risk to the public these prisoners face remaining Category B for extended periods. (see section 11.2).

As a Category B prison few direct releases should occur however 13 prisoners were released directly into the community as local prisons are not prepared to take Category B sex offenders. It was felt that, although their sentence periods were completed, these prisoners were not adequately prepared for release (see section 11.3).

Main Areas for Development

TO THE MINISTER

The reluctance of the Police/CPS to prosecute prisoners for crimes carried out in prison that would be punished in the community is sending prisoners, especially the most violent, the message that their behaviour in prison will not affect their criminal record or attract major sanctions (see sections 4.4-4.6). The Board believes the Minister should direct that crimes in prison should be prosecuted on the same basis, with the same punishments, as crimes in the community.

The Minister is asked to look at the discharge to court procedure and either direct priority for returning these prisoners at the end of their cases or to consider prioritising video links for sex offender prisons (see section 5.11).

TO THE PRISON SERVICE

The prison service does not appear to be rigorously applying the recommendations on limited stays in segregation. It is acknowledged that some prisoners are difficult to manage on normal location due to behavioural or mental health problems but the service should consider addressing the issue by providing more spaces on a specialised unit rather than holding them in segregation for months at a time (see section 6).

The provision for lower risk prisoners who are serving long sentences should be reviewed. Either appropriate programmes are needed for this group or consideration should be given to funding other courses that would allow them to demonstrate reduced risk to allow recategorisation. It is unfair that these prisoners have no specific support to progress (section 11).

Although the category B sex offender population is supposed to be part of the recent changes put in place to provide prisons places with specialist resettlement support, in practice it appears to be very difficult to get places for these prisoners at the nominated prisons. The prison service is asked to review the treatment of this group of prisoners and if they cannot be accommodated at the new Resettlement Prisons to consider funding additional resettlement services at sex offender prisons (see section 11).

TO THE DIRECTOR

There is an action plan to address the shortcomings in Healthcare but we believe this process has made little progress in the past year and should be treated as an urgent priority (see section 8).

The library building provision has been poor for a number of years and is difficult to address on the current site but the budget for books and DVDs has also affected the service and we believe a review of the budget allocation is justified (see section 9).

3 DESCRIPTION OF THE PRISON

- HMP Rye Hill opened in January 2001 and was operated by Group 4 Falck, which became Global Solutions Limited (GSL) in 2004, on a 25 year contract to the Home Office. In May 2008 GSL was bought by G4S who took over the running of the prison.
- The premises are purpose built with eight residential units with certified normal accommodation of 600, an operational capacity of 625 and a maximum capacity of 664. During the reporting year the prison was requested to provide an additional 39 prisoners places on a temporary basis taking it near maximum capacity. It is not known for how long these additional prisoner places will be needed.
- The prison is now a Category B Training Prison for sex offenders, having been re-roled in April 2014 to hold only Category B prisoners convicted of a sex offence making them eligible for the Sex Offenders Treatment Programme (SOTP).
- It held 659 prisoners at the end of the current reporting period.
- The prison held 75 prisoners under traditional life sentences with a further 56 held under Indeterminate Sentence for Public Protection (ISPP).
- There were 600 Category B, and 59 Category C prisoners.
- Based on Equality & Diversity statistics provided in April 2017, the average number of protected characteristic prisoners during the reporting period were:
 - Disabled – 189 (29% of total population)
 - Age 50 or over – 267 (41% of total population)
 - Age 65 or over – 72 (11% of total population)
 - LGBT – 24 (4% of total population)
 - Foreign Nationals – 50 (8% of total population)
- The ethnic breakdown has remained predominately white with approximately 83% White, 7% Black and 7% Asian and 3% others.
- Health care is provided by sub-contract to a division of G4S called G4S Medical Services.
- The Education provider is Novus previously City College Manchester.
- Catering is provided by Aramark.
- Links with Samaritans are established together with a Listeners Service.

B Evidence sections 4 – 11

4 SAFETY

1. The Safer Custody Team has undergone a number of changes during the course of the year including the position of Head of Safer Custody held on an interim basis by 2 temporarily promoted members of staff. A permanent appointment has now been made (May 2017).
2. HMP Rye Hill staff and senior management have made determined efforts to ensure that the prison is a safe place for both staff and prisoners especially during times of staff shortages when a rolling programme of Unit lock downs had to be scheduled. It was awarded a Moderate (Amber/Green) rating at a Safer Custody Audit in February 2017.
3. Safety and the management of prisoners with complex needs have been given priority. Staff meetings were held monthly to address violence reduction and use of force, with complex cases reviewed weekly. All meetings were well attended by staff as well as the senior managers involved.
4. Violence reduction has also received additional attention and there is a clear focus on decreasing both prisoner-on-prisoner violence and prisoner-on-staff violence. However, this year has seen an increase in incidents of violence from 5 incidents in April 2016 to 25 in February 2017 with an average of 13 incidents a month over a 10-month period. In the main it is the younger offenders who are involved and it is often the same few prisoners causing much of the violence. Increasing levels of violence remain a concern of the IMB.
5. This increased violence has contributed to a doubling of the number of adjudications during the year from 908 between April 2015 and March 2016, to 1,899 between April 2016 and March 2017.
6. It is with regret we report that the Police/CPS seem reluctant to prosecute for crimes carried out in prison on the same basis as they would in the community. During 2016 there were 128 referrals to the police for crimes that would attract punishment in the community but only 2 resulted in prosecutions with a further 29 receiving a summons. The IMB believe that this sends the wrong message to prisoners, particularly those who commit violent offences.
7. Self-harming incidents, the majority cutting, were highest amongst younger prisoners and ACCTs opened in any month varied from a high of 23 in July 2016 to 13 in February 2017, with an average of 18 a month. As in previous years there has been an attempt to involve a more multidisciplinary team in all ACCT reviews though this has not been entirely successful. The majority of reviews still involve only the Unit Manager, wing officers and the offender. IMB monitoring of ACCT reviews has been difficult due to the random timing of reviews or times being changed last minute to accommodate other priorities as they arise. However, the Board has been able to regularly and thoroughly scrutinise ACCT documentation and in the great majority of cases recording has been sound.
8. There have been an increased number of deaths in custody (7 for the 2016 calendar year and a further 2 up to May 2017, which compares to 14 for the whole period from 2000 – 2014 prior to the re-role). None of the deaths were self-inflicted and in most cases the Prisons and Probation Ombudsman (PPO) investigation has stated they were happy with the healthcare provided although on a number of occasions the PPO report has commented on the lack of 'joined up' management of prisoner's long term conditions reinforcing the Care Quality Commission (CQC) comments about lack of care plans being in place. Concerns were also raised by the PPO on use of restraints during hospitalisation in particular with patients who were comatose or extremely ill.
9. Use of Force procedures are clearly set out and meetings held monthly to review procedures and incidents. Not surprisingly, with levels of violence increasing, planned and spontaneous instances have all increased during 2016 – with an increase in spontaneous use of force rising steadily from 10 in June, 11 in July, 23 in August, 15 in September, 17 in October and 19 in November - though these instances reduced to just 8 in December 2016. The majority of instances were amongst prisoners aged 21-29 years, with those aged 40-49 years coming a close second. Where members were able to monitor use of force instances the processes were found to be properly and humanely adhered to.
10. Trained Listeners have increased in number during the year to 19. It is noteworthy that a problem of access has been raised by some prisoners in shared cells who wished to use the services of a Listener at night but who could not be given confidential access. This problem remains unresolved.

5 EQUALITY AND FAIRNESS

1. Of the IMB applications received this year only 6.71% related to equality and diversity issues. 44 discrimination incident reports (DIRFs) were submitted to the Prison this year, compared with 165 received in 2014, all of which were not proven.
2. Whilst the alternate monthly Equality Action Team (EAT) meetings were often postponed at short notice, 5 took place, which is an improvement over last year.
3. Monitoring the Protected Characteristic meetings has been difficult due to their sparsity, postponement at short notice, and lack of information as to when and where they were to take place. In the latter half of the year very few took place due to staffing pressures.
4. For a small number of disabled prisoners, mainly wheel chair users, access to the Education Department, which is located on the first floor, is prohibited. Alternative measures are being considered.
5. The provision of disability aids can be outstanding for an unacceptably long period. This includes a delay of more than 6 months in supplying approved equipment to a prisoner despite a written undertaking from the Director to the prisoner that the prison would purchase the equipment.
6. The supply of orthopaedic mattresses is also proving challenging, partly due to the size of the beds at Rye Hill, and compliance to attain CRIB 7 fire rating.
7. The longstanding need for dropdown seats and grab handles in the ground floor showers has not been met. A business plan has recently been submitted.
8. A transgender policy was published in June 2016 and 4 prisoners are on the pathway.
9. On a number of occasions IMB members have noted incidents where bullying and inappropriate use of language have been directed against members of the LGBT community both by prisoners and on occasion by staff. It has also been reported that some staff do not challenge this inappropriate behaviour by prisoners when it is occurring. The IMB can report that when these instances have been raised with the Director they have been dealt with quickly, however the complaints by members of this protected community continue and are a cause for concern.
10. Social Care is provided by Northamptonshire County Council. At the time of writing 7 prisoners are receiving Social Care, with a further 3 currently being assessed. Two fully trained and 2 (under training) care workers provide the care each day. In addition there are 2 prisoners trained as carers but more are needed. The IMB has been informed by staff that there is reluctance by some prisoners to receive Social Care, some even after positive assessment, due to stigma.
11. The discharge to court process, which is outside the control of Rye Hill, has a disproportionate impact on sex offenders. After appearing in court a prisoner is sent to the nearest local prison where they remain until after court proceedings are completed. They then have to wait until the local prison establishes that Rye Hill has sufficient beds and that transport is available. This may take months. During the year there were 21 discharges to court of which 10 were for less than one day. The remaining 11 were for between 2 and 35 weeks, an average of 8 weeks. At the time of writing one of these prisoners remains in limbo after 3.5 months. During this time the prisoner is allowed one bag of clothes, is unable to earn any money or easily access funds, their programmes are suspended and places on courses likely to be lost, and they are left with nothing to do in the often hostile environment of the mainstream estate. This does not seem fair treatment. The Minister is asked for these reasons to consider prioritising video links for sex offender prisons.

6 SEGREGATION/CARE AND SEPARATION UNIT

1. During the year regimes within the care and separation unit were tightened up under a new manager to better reflect existing policies at Rye Hill, and that the CSU is primarily a punishment unit rather than destination of choice by prisoners seeking a transfer or running up debts. This coincided with an increase of violence against staff which has now calmed down.
2. Last year's report expressed concern about the use of Cellular Confinement (CC). This has been addressed by encouraging the consideration of other options at adjudication and the numbers held on CC fell during the year.

3. Several prisoners have arrived at Rye Hill from the segregation unit of other prisons, one in particular, where CSU is seen by prisoners as a route to transfer out. In one instance the prisoner had spent 18 months in CSU and was intending to do the same at Rye Hill. In each case the staff have worked hard to challenge the prisoner's attitude and have managed to return them to normal location. Such inconsistency across the prison estate is not helpful for staff or prisoners.
4. Towards the end of the year the additional prisoner places resulted in the need for more cell sharing and a number of incidents of refusal to share resulted in several prisoners coming to CSU, and since January rates and length of occupation have been rising.

7 ACCOMMODATION (including communication)

1. The profile of the prison population necessitated bed watches numbering up to 5 on some days, as well as daily escorts for hospital appointments. The need for staff deployment for these resulted in restriction of regimes on some days when the prison deemed this absolutely necessary. There was therefore a coordinated series of shutdowns on Residence, involving for instance unavailability of showers after Gym, provision of a packed lunch instead of a hot meal, and locking up during the day of prisoners who (solely because they worked in the evening) were not engaged in activities. The prison's policy was to communicate its decisions on restriction of regimes to prisoners as early as possible. There were few occasions of protest or non-compliance, and those that did occur were minor such as prisoners refusing to lock up until they had showered after gym even though they had agreed that they were being allowed the gym session on the understanding shower time was not available.
2. The prison became non-smoking on 9 January 2017 for prisoners (5 December 2016 for staff) at the end of a process which began on 16 June 2016. This process was completed with little impact on behaviour within the prison.
3. The 8 residential wings were consistently found to be clean, tidy, orderly and with a calm and organised atmosphere. There were only sporadic and mostly minor issues with the fabric, fixtures and fittings. During the summer months, however, problems arose with ventilation of the wings through roof vents, and with cell vents being non-operational – these have been commented on by the Board in previous annual reports.
4. Almost without exception, staff on the residential wings engaged readily and fittingly with prisoners and with the Board. The Senior Management Team emphasised that it wished to be informed directly and immediately by the Board about any apparently inappropriate behaviour by staff.
5. The main kitchen provided a suitable variety and choice of food, the quality of which was testified to by the appreciative comments of the prisoners. However there was a delay of several months before screens to separate Halal and non-Halal food were fitted in the serveries.
6. Applications from prisoners to the Board regarding property and equipment revealed some lengthy delays before the resolution including property 'lost' at other prisons, property mistakenly destroyed by prison, and delaying in transferring property on transfers. The prison wide property management process continues to be problematic and unfit for purpose and the Board is concerned that such delays could engender poor behaviour out of frustration which might endanger the safety of the prisoner and the prison.
7. Family days, which are held once a month, have been successful. Twelve families attend each visit. The facilities for families in the Visits Hall are good.

8 HEALTHCARE (including mental health and social care)

1. Last year Healthcare Services were reported to be under pressure and a cause for concern. Unfortunately the situation has seen only moderate improvement during the year. The waiting area has been expanded reducing overcrowding for prisoners coming to collect in-possession medication. However the fabric changes needed to allow the long term solution of dispensing on each unit have still not been completed even though the budget for the change was approved in May 2016.
2. A clinical lead was recruited in January 2016 but by December was on long term absence and subsequently left. The Healthcare Team is therefore, again, being managed by an interim team

- brought in on a shared time basis. The challenge has been increased by the departure of almost all the former practice management team since January 2017. Recruitment is underway but will be subject to security clearance which can take some time.
3. The action plan to correct the failures identified by the CQC at their audit in June 2015 is still not fully completed. On a subsequent visit by CQC in January 2016 sufficient progress was judged to have been made in 2 areas and in May 2016 a further area (complaints) was signed off only for it to come to light that the figures provided to the CQC were inaccurate and in fact only 50% of complaints were being answered within time. One area (Governance) still remained below minimum standard at the end of the reporting period.
 4. The number of bed watches has continued to be very high; in the calendar year 2016 they averaged 22 nights a month and have not decreased in 2017. The resultant staffing demand has led to some regime curtailment in the prison although this is carefully managed to ensure Unit lockdowns are fairly spread across the population. With the current prisoner health profile this situation is likely to worsen rather than improve.
 5. The number of hospital appointments needed by this older population also remains high (during 2016 the average was 79 a month but some months were as high as 96). In addition to pre-booked appointments there has been an average of 8 emergency admissions each month. There is an agreed contractual level of 2 escorts a weekday which, if adhered to, would only cover 55% of the pre booked appointments excluding the demand for the emergency admissions. Although the Director makes as many escorts available as staffing demand permits this still leads to around 10% of scheduled appointments having to be cancelled due to lack of escorts. It should be noted that there are also an average of around 7 appointments a month where the prisoner declines to attend even when an escort is available. A combination of these pressures means there is a danger that NHS pathway targets will not be met for some prisoners although those on 2 week cancer referrals are prioritised. The Director has applied for additional resources for escorts but approval times for budget changes can be protracted.
 6. Regrettably this trend for increasing numbers of this population needing multiple hospital appointments and eventually end of life care seems unlikely to slow and at the moment there is no accommodation or staffing provision within the prison for palliative care of the seriously ill.
 7. Following an assault by a prisoner on a mental health specialist there was a long period when the Psychological Therapies (IAPT) service provided by Northamptonshire Healthcare NHS Foundation Trust (NHFT) was not available however this has now been resolved and a new integrated mental health team is in place. During that period prisoners were able to access both primary and secondary mental health services.
 8. Overall in-house Healthcare Services remains a major cause for concern and unless the prisoner health profile changes the current service will need both further investment and improvement if it is to ensure it can give prisoners the same level of care they would receive in the community especially those with serious long term conditions and terminal diagnoses.

9 EDUCATION AND OTHER ACTIVITIES

1. The use of 2 classrooms in the Education Department was affected by several episodes of flooding in 2016. No more incidents have occurred in 2017 so, hopefully, the problem has now been resolved.
2. At present, 50% of all prisoners are at or below Level 1 NVQ in English and 57% are at or below Level 1 in Mathematics.
3. Currently 225 prisoners or around 34% of the prison population are involved in full or part-time Education; of these, 38 are undertaking Open University or Distance Learning Courses, 29 are following work-based courses like carpentry or horticulture and 33 are completing in-cell Shannon Trust units.
4. The Library now offers evening sessions which has increased its accessibility to more prisoners. However the size of the Library Portakabin means there is no space for prisoners to sit, read or examine texts which is a Prison Service Instruction (PSI) requirement.
5. The Library monthly budget for buying all new books and DVDs has not been increased for at least 4 years following a reduction to £300.

6. Both the Library and the Gym have had to cancel sessions due to late roll call, staff shortages and bed watches. In the Library, this amounted to 13 lost sessions involving 208 prisoners during the month of January.

10 WORK, VOCATIONAL TRAINING and EMPLOYMENT

1. Prisoners at Rye Hill have access to a wide range of activities including woodwork, horticulture, component assembly, catering and working as orderlies in various sectors of the prison.
2. Of the population, after excluding those ineligible for work by virtue of age, infirmity, separation or other disciplinary measures, between 89.7% and 91% are either employed or purposefully occupied during the reporting year. This is indicative of the firm commitment that has been observed both in this and previous reporting years.
3. The prison has, for the most part, met its targets of 29 hours of employment per week for each eligible prisoner. However during the autumn and winter months there were periods when the target was not met; this was due primarily to the increase of bed watches and atypical staff sickness levels.
4. The prison makes adequate provisions to ensure that those who are beyond retirement age, or who for other reasons cannot enter mainstream employment, are also kept constructively occupied with activities such as art and crafts.
5. Although employment is provided for most prisoners the work areas are crowded as the physical space for workshops on the prison site is limited. The IMB understand that this issue has been risk-assessed, but it still represents an uncomfortable work environment and ought to be addressed in any future development.

11 RESETTLEMENT PREPARATION

1. As a Training Prison, Rye Hill continues to offer a variety of courses aimed at reducing the prisoners' risk to the public and preparing them for release. The withdrawal of the Sex Offender Treatment Programme (SOTP) and extended SOTP has left between 50 and 60 prisoners for whom SOTP would have been suitable and who are awaiting a suitable course. As yet it is unknown whether Kaizen will be offered at Rye Hill.
2. As a Category B prison, Rye Hill is allocated prisoners on the basis of a range of criteria including their length of sentence rather than their risk to the public. There are no accredited courses for low risk individuals and thus they have no means of improving their RM2000 score to help them get re-categorised. At the time of writing this affected 85 prisoners, some 13% of the population. The Offender Management Unit does its best to plan for the prisoner to do something to justify a reduction in risk, perhaps a drugs awareness course, or some means of increasing their employability. In some cases there are no options. These prisoners are left inappropriately categorised with no means of actively improving their risk score other than a long period of good behaviour. This means they remain Cat B for a large part of their long sentences through no fault of their own. This should be addressed.
3. There is an assumption that prisoners are unlikely to be released directly from a Category B prison, the expectation being that they will transfer to a local prison offering specialist resettlement services for the last 6 months of their sentence. This is frequently not happening and the Director has expressed frustration that these prisons are not prepared to take prisoners from Rye Hill for this period. As a result during the year 13 prisoners were released directly into the community. It was felt that, although their sentence periods were completed, these prisoners were not adequately prepared for release.

C Section – Work of Board

At the end of the reporting period there were only 8 members (including 1 trainee) out of a complement of 17. Monitoring of specific areas has been maintained throughout the period but there are not enough members to do ongoing targeted in-depth monitoring exercises. One long term member left at the end of her tenure and two recruitment campaigns have been run.

There was a slight increase in the number of applications received within the last 12 months with decreases in the areas of healthcare and accommodation but small increases in concerns re bullying, sentence management and supply of catalogue goods.

BOARD STATISTICS	
Recommended Complement of Board Members	17
Number of Board members at the start of the reporting period	10
Number of Board members at the end of the reporting period	8 (inc 1 trainee)
Total number of visits to the Establishment	446
Total number of segregation review sessions attended (NB each session can be up to 5 reviews)	156

D Section - Applications

Code	Subject	Current reporting year	Previous reporting year
A	Accommodation including laundry, clothing, ablutions	14	21
B	Discipline including adjudications, IEP, sanctions	5	5
C	Equality	19	16
D	Purposeful Activity including education, work, training, library, regime, time out of cell	47	41
E 1	Letters, visits, phones, public protection restrictions	17	10
E 2	Finance including pay, private monies, spends	11	11
F	Food and kitchens	10	3
G	Health including physical, mental, social care	28	41
H 1	Property within this establishment	40	37
H 2	Property during transfer or in another establishment or location	4	35
H 3	Canteen, facility list, catalogue(s)	11	1
I	Sentence management including HDC, ROTL, parole, release dates, re-categorisation	13	5
J	Staff/prisoner concerns including bullying	36	29
K	Transfers	8	1
L	Miscellaneous	20	16
	Total number of IMB applications	283	272