



**Annual Report**  
of the  
**Independent Monitoring Board**  
At

**HMP Swansea**

for reporting Year  
1 June 2016 – 31 May 2017

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*Monitoring fairness and respect for people in custody*

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### 1 STATUTORY ROLE OF THE IMB

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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**

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### **2.1 SAFETY**

2.1.1. It has yet again been a difficult year for HMP Swansea with two deaths in custody during this reporting period. Deaths in custody cause great sadness and concern for all involved. Although Prison and Probation Ombudsman Action Plans and Recommendations are discussed in Safer Custody meetings recommendations are not always implemented in a timely manner.

2.1.2 Body worn cameras have recently been introduced in Swansea for staff who have completed the FMI training. The initial feedback on this has been very positive.

2.1.3 The Board is in no doubt that financial constraints and economic stringency continue to have a negative impact on the service provided.

### **2.2 EQUALITY AND FAIRNESS**

2.2.1 The Board is pleased to note that good progress has been maintained over the year by the Equalities Team.

2.2.2 The lack of an independent immigration officer in the establishment continues to be a source of problems with the release of foreign nationals.

### **2.3 SEGREGATION/CARE AND SEPARATION UNIT**

2.3.1. Although there has been some improvement in Board members being notified about reviews this has not been consistent. The Board will continue to highlight this as an issue.

2.3.2 Board members are not always informed within 24 hours of moves to segregation. Board members are able to see and speak to each prisoner freely.

2.3.3 Board members are not always informed when Adjudications are due to take place.

### **2.4 ACCOMMODATION (including communications)**

2.4.1 The Board continues to be concerned about the overcrowding of the prison and the standard of basic facilities in the majority of cells, which include decoration and the lack of privacy curtains around toilets.

2.4.2 The Catering Department is well organised and well run, providing varied and appropriate selections of food.

2.4.3 The performance by the Maintenance Contractors in relation to the renewal of the Kitchen Floor and Shower Facilities has been poor. Work is of an unacceptable standard and not fit for purpose. There is apparently no method for scrutiny or redress available to prison staff in this regard.

### **2.5 HEALTHCARE (including mental health and social care)**

2.5.1 The Health Care Department has again been subject to a period of change with Abertawe Bro Morgannwg UHB taking responsibility for the provision of these services.

2.5.2 Whilst the men have access to dentists, podiatrists, opticians and psychiatric services, it is disappointing that once again there are lengthy waiting periods for dental and eye care.

2.5.3 Health care issues remain a significant source of applications to the Board.

2.5.4 Excellent links continue to be provided with the Homeless Nurse, the Mental Health and Vulnerable Housed Persons Outreach and local GPs.

2.5.5. Swansea Prison became a smoke free establishment from March 2016. As predicted the implementation of the policy has been a considerable challenge. The illicit smoking of manufactured “cigarettes” is a major problem for the health of both staff and men. More acceptable smoking alternatives need to be introduced.

## **2.6 EDUCATION AND OTHER ACTIVITIES**

2.6.1 The Department continues to provide a good and valuable service and ten of twelve Welsh Government targets were exceeded.

2.6.2 The Department continues to be an integral and valuable part of the prison regime with a number of innovative and stimulating initiatives being introduced during the year. The men are acquiring a range of skills which will be useful in the outside workplace.

2.6.3 It is disappointing that Library attendance has been very poor over the year despite the library staff working on Wings to increase access.

## **2.7 WORK, VOCATIONAL TRAINING and EMPLOYMENT**

2.7.1 Continuous effort are being made to ensure there is gainful and purposeful activity for men and the efforts made by the prison is recognised by the Board.

## **2.8 RESETTLEMENT PREPERATION**

2.8.1 The Board is very pleased that PACT has been awarded the contract to provide courses and to introduce a number of innovative and beneficial projects. The Board would wish to see a seamless transition from the previous contract held by PACT Cymru.

2.8.2 The Board is concerned that a lack of accommodation for prisoners post release is a major problem for the Resettlement Team. The Welsh Government’s Housing [Wales] Act 2014 implemented in April 2015 is having an exceptionally adverse effect on the support provided for prisoners post release.

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## **Main judgements**

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Overall men receive fair treatment in HMP Swansea.

Overall men are treated humanely, although waiting times for health care services could be improved.

Preparation for release is not at a level of provision that is satisfactory and could be improved.

### **3 DESCRIPTION OF THE PRISON**

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**3.1** Her Majesty's Prison Swansea is a Category B local Prison, holding adult males and young adults. It is a traditional Victorian prison in an inner city location. Adult prisoners have either been remanded into custody from the courts while they await trial, or are convicted prisoners generally serving less than two years. The young adults are all remand prisoners.

**3.2** HMP Swansea was built in 1861 to accommodate 219 prisoners and the residential block is structurally unchanged although modernisation and upgrading has taken place. A new Wing, G Wing was opened in September 2015, adding another 60 places. However, due to the ever increasing prison population, the current operational capacity of Swansea is 515. Most cells accommodate two prisoners, however there are a few cells accommodating three along with a small number of single cells.

**3.3** Respect for individuals is paramount. Relationships between staff and prisoners are central to the wellbeing of the prison. All members of staff play a vital role in maintaining a stable and above all, safe environment. The aim of the prison, through the varied and positive programmes and activities available, is to enable prisoners to address and thus reduce their offending and to assist with resettlement. This is achieved through effective partnerships with a wide range of statutory, private and voluntary organisations.

### **4 SAFETY**

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**4.1** The work of the Safer Custody Team continues to be a priority and representatives of the relevant departments are now attending meetings more regularly. There have been, yet again, several changes of senior personnel since the last reporting period which inevitably impacts on continuity. The team has been reorganised into two groups; Safer Custody and Violence Reduction with each led by a custodial manager. This is to ensure a more focused approach. Both groups work very closely together to ensure optimum outcomes for both prisoners and staff.

**4.2** Although the quality of observations and recordings in ACCT documents has improved it continues to be a work in progress. Quality assurance checks as part of the monitoring process are carried out by a custodial manager. This should ultimately ensure that all documentation is of the required standard. Concerns still remain around post closure reviews. Frequent training for all staff involved in assessing and case managing is ongoing.

**4.3** Complex cases are managed by the Governor for Safer Custody. Where that is not practical a Custodial Manager or a Governor grade manages the document.

**4.4** As a result of increased funding, targeted to improve safety in prisons, a temporary counsellor was appointed. Indications are that this has been extremely successful and has had a positive impact on safety and wellbeing. As numbers wishing to access this service are high the counsellor has a heavy caseload and the service is limited. Increased funding would mean that this work could be developed with greater numbers of prisoners being able to access this very valuable service.

**4.5** The Cell Risk Sharing Policy has been reviewed and all changes have been implemented.

**4.6** The Violence Reduction team has two part time officers who investigate all incidents involving violence including verbal assaults.

**4.7** There has been an improvement in the recording of incidents using the Information Reporting System [IRS] which generates a safer custody diagnostic tool. Staff utilise a national violence diagnostic tool which highlights patterns and trends. The data is then used to increase staffing levels as required and so ensure more effective intervention.

**4.8** The Five Minute Intervention [FMI], “it’s ok to talk” which encourages staff to engage with prisoners has been rolled out and seems to be working effectively.

**4.9** Body worn cameras have recently been introduced in Swansea for staff who have completed the FMI training. The initial feedback on this has been very positive.

**4.10** The Board continues to express concerns around the lack of private interviewing space on the Induction Wing. Although there is now a shell it is still unfurnished and therefore not fit for purpose. It is wholly unacceptable for prisoners to be asked personal questions on the wing landing where other prisoners are milling about. It cannot be compatible with the decency agenda.

**4.11** It has yet again been a difficult year for HMP Swansea with two deaths in custody during this reporting period. Deaths in custody cause great sadness and concern for all involved. Although Prison and Probation Ombudsman Action Plans and Recommendations are discussed in Safer Custody meetings recommendations are not always implemented in a timely manner.

**4.12** There are currently 7 trained Listeners available, however, the transient nature of the population means that Listeners are frequently transferred shortly after training. Efforts are made to ensure that Listeners remain at Swansea as the Samaritans can only provide training twice yearly. The location of the Listeners continues to cause difficulties with too many located on one wing. This can impact negatively on their availability to carry out their role particularly when the prison is in patrol state. It is recognised that there is a real need for Listeners to be located at Reception but there is no consistency with this. The Board recognises the valuable contribution the Listeners make often having to carry out their work in challenging circumstances.

**4.13** Issues around the lack of accommodation for the Listeners on the Induction Wing remain. This is a matter which is discussed at virtually every safer custody meeting yet no progress is made. Action points are now being addressed although some issues still remain unresolved since the last reporting period.

**4.14** The Board is in no doubt that financial constraints and economic stringency continue to have a negative impact on the service provided.

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## **5 EQUALITY AND FAIRNESS**

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**5.1.** The Equality and Diversity Group meets every six to eight weeks. There has been a change in the format of meetings with Senior Officers now chairing all meetings.

**5.2.** All meetings are well attended with representatives from men from all wings together with departmental representation from Health Care, Learning and Skills, Catering, Security, Equalities, Reducing Offending and IMB.

**5.3** A new Equalities Officer has been appointed and he is supported by a Custodial Manager.

**5.4** Training for Equality Representatives has been held and is well thought of.

**5.5** Equalities information/data is compiled and regularly published as a Monitoring Report and includes the numbers men with additional learning needs such as, dyslexia, visual impairment and hearing difficulties and foreign nationals. An Action Plan identifying action to be taken and those responsible for that action has been devised.

**5.6** There has been discussion regarding the introduction of a Hate Crime/Racism LGBT Help line but this has not yet materialised.

**5.7** Ensuring adherence to the Smoking Cessation Policy has proved a challenge. The introduction of e-cigarettes has been a significant step forward in combatting the rise of “manufactured” cigarettes.

**5.8** Foreign nationals and other prisoners who need assistance continue to be visited by immigration officers and officers from UK Border Agency and assistance is available at other times on email. However, there is no independent immigration officer in the establishment and this has led to significant problems with the release/transfer of a foreign national from this prison.

**5.9** Attendance at the Library has been varied and in relation to some Wings, particularly A Wing, poor. This has been partly due to shortage of officers and partly lack of motivation. Men continue to be encouraged by Library Staff to use this valuable and beneficial facility.

**5.10** The Custodial Manager has held a number of focus groups with Wing Representatives. There has been a number of developments which have stemmed from these, including “publicity” posters with photographs of representatives displayed on all Wings.

**5.11** Good progress has been made in maintaining a good quality of life for the men.

## **6 SEGREGATION/CARE AND SEPARATION UNIT**

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**6.1** The Care and Segregation Unit continues to be the part of the establishment that is most visited and monitored by Board members. Each Board member will make a visit to this area of the Prison on each occasion that they attend HMP Swansea.

**6.2** The staff are highly experienced and ensure that Board members have access to segregated prisoners upon demand. The paperwork and prisoner records are readily available to Board members upon request.

**6.3** In previous years the Board has highlighted concerns that members were not being regularly informed about reviews. Although there has been some improvement, this has not been consistent. Consequently, the Board will continue to monitor accordingly. We feel it is vital in our role as truly Independent Monitors of this Establishment that we are informed about reviews.

**6.4** Adjudications are also heard in this area of the establishment and it is noted that there has sadly been another increase in the number of adjudications, use of force and use of the segregation cells. In part, this could be down to better intelligence being utilised within the establishment which is leading to more offences being detected.

**6.5** All Board Members take the opportunity to sit in and observe Governors` Adjudications during their rota visits whenever possible. However, notification of members of Adjudications is also inconsistent. The Board monitors and verifies that the hearings are carried out in a fair and concise manner with the offender understanding all aspects of the proceedings and that hearings are conducted by Governor Grades.

## **7 ACCOMMODATION (including communication)**

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**7.1** The majority of the cells are double occupied and there is a lack of Privacy Curtains around the toilet in a great number of cells. Whilst the prison strives to ensure basic privacy and dignity is maintained the condition of cells is not conducive to this in all cases.

**7.2** Men's property continues to be a regular feature of applications to the Board. Although there is guidance on volumetric control, far too often men arrive either without any, or only part of their property and a great deal of time and effort is spent in attempting to resolve the situation.

**7.3** The catering facilities are clean and reliable with very few complaints concerning the quality of food. Meals are varied and the department caters for ethnic diversity, those with allergies, vegetarian and vegan requirements. Food arrives on time on the wings and there is very little waste. The serveries are cleaned daily before and after use and the Board samples the food at the server in the presence of the men. Staff work hard to ensure religious observances are ensured with respect to meals and meal times

**7.4** The Catering Department has organised theme meals with a variety of Chinese and Indian food. Serving spoons and utensils have been kept in accordance with the religious beliefs of those who eat Halal food.

**7.5** The kitchens are exceptionally well managed, food is despatched to the wings on time, where appropriate, in heated trolleys and the standard of cleanliness within the premises is checked on daily visits and appears to be good.

**7.6** The poor state of the recently replaced kitchen flooring continues to cause concern and in this condition could pose a future health risk and maintenance problem. The Board expressed concern that the repair work to the floor was not signed off by either the Governor, Catering Manager or anyone within the Prison and that the decision to accept a floor that was not fit for purpose was taken outside the prison.

**7.7** There is an ongoing problem with the functionality of the shower facilities with them not working on many occasions. The Imam has expressed concern as there seems to be a high incidence of the showers not working on Friday mornings.

## **8 HEALTHCARE (including mental health and social care)**

**8.1** The Health Care Department has again gone through a period of change with the Abertawe Bro Morgannwg UHB taking direct responsibility for the prison health care service from 1<sup>st</sup> July 2016.

**8.3** There is no inpatient facility at H.M.P. Swansea. Men requiring hospital treatment attend local Hospitals. There is a daily visit by a general practitioner.

**8.4** Although men have access to dentists, podiatrists, opticians and psychiatric services, there can be lengthy waiting periods for dental and eye care. The optician's visits continue to be irregular and unfortunately, this has been the case for several years, and appear to be determined by the number of prisoners on the waiting list.

**8.5** Due to the unfortunate death of the prison Dentist waiting times increased, and although ABMUHB made every effort to recruit a replacement dentist, at the time of writing their efforts had not been successful.

**8.6** The Health Care Team are seeing an increase in workload, with a large number of the prison population on medication, involvement with health care screening on arrival and their involvement with ACCT documents and responding to medical emergencies within the prison.

**8.7** Waiting times, particularly those for dental care are still a cause for concern.

**8.8** Issues relating to health care remains a significant cause of applications to the Board. Although the majority are quickly resolved with explanation of where people are in the referral chain, and what they can expect. Health Care staff continue to be very helpful in resolving issues brought to them by the Board.

**8.9** The Health Care Team have excellent links with the Homeless Nurse, and the Mental Health and Vulnerable Housed Persons Outreach, and to the doctors at the High St Surgery, Swansea where prisoners of NFA can attend on release.

**8.10** The Prison also has one In-reach Mental Health Nurse, providing the link between psychiatric & forensic psychiatric services to those whom need this service. Regular attendance at the prison by forensic psychiatrists is arranged through them.

**8.11** The Mental Health Homeless and Vulnerable Housed Persons Outreach Nurse sits on the Prison Health Partnership Board. Health Care staff will liaise with the homeless team prior to release, informing them of treatments, and medication of the released prisoner, this has proven to be a very positive step in the majority of cases.

**8.12** There is also access to the GP out of hour's service. There are regular visits from sexual health specialist.

**8.13** At certain times the prison experiences severe problems relating to the availability of drugs, particularly so called "legal highs" and SPICE. However, detection rates are improving with the increased use of dogs and vigilance of staff.

**8.14** Swansea Prison became smoke free in March 2016. As predicted, adherence to the policy has been a great challenge. Although smoking alternatives such as patches and "vaping" have been introduced the Prison has experienced significant issues with men illegally manufacturing "cigarettes" using seemingly whatever materials available to them. This has caused considerable problems with air quality on wings being hazardous to both staff and men. Alternative solutions are being sought and air quality is being monitored.

## **9 EDUCATION AND OTHER ACTIVITIES**

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**9.1** Ten out of the twelve targets set down by the Welsh Government for 2016-17 were exceeded. The number of course started in that year were 2,987.

**9.2** The Co-commissioning team and representatives from Welsh Government visit the department twice per year to review performance and delivery and quality assure a number of learner files. The visits overall were very successful.

**9.3** Library attendance over the last year was very poor with only 315 visits from the main residential wings. The library staff have worked with the wings to increase the access. They are very pro-active and set up an outreach service. The workshops are visited weekly with requests for books. However, this still does not answer the lack of access for the majority of men in the prison.

**9.4** A new revised Learning and Skills Induction assessment is being planned to commence in June 2017. This will be a 2 day process and involves a more robust and holistic assessment of the men. It gives a clearer understanding of their learning needs. The assessment now includes the 'Do It Profiler'. This computer based assessment is a Learning Disability and Difficulty assessment which can identify indicators of various disabilities and difficulties and creates an action tailored to their individual learning needs. It highlights any potential issues such as being excluded from school, mental health conditions, general health and mobility and psychological wellbeing. These results will be analysed over time and shared with prison staff.

**9.5** To compliment the new induction process a new Pathways Curriculum has been developed. The men are able to select one of five pathways along their 'Learner Journey'. The five pathways include Vocational, Essential Skills, ICT and Multi Media, Vocational and Industries. It is an exciting development and the success of the Pathway model depends on developing closer links with various internal and external partners not only in custody but through the gate after release. Links are now being formed and further established with the Princes Trust, Changing Tunes, Gower College, Careers Wales, N-ergy and the BOSS Project (Building Opportunities, Skills and Success) which is a lottery funded project.

**9.6** The BOSS project provides a tutor to deliver employability skills to men in their last two months of sentence. The Princes Trust will also provide tutors to work with the men to deliver enterprise and business courses.

**9.7** There are excellent working relationships with the N-ergy group training company. They have increased the delivery and range of qualifications that the men can achieve. The assessment is in workplace across the prison and covers full qualifications in Cleaning and Support Services, Customer Service, Food and Beverage Services, Performing Manufacturing Operations and Sustainable Recycling.

**9.8** A Well Being Centre is due to open in August 2017. This will deliver a range of supportive learning programmes including Tools for Change, Art for Well Being and Positive Parenting. This is a new initiative for the department and shows a recognition of the need to support the prison in offering programmes to those identified men where an enabling, positive environment is needed. The Tools for Change is already being delivered and deals with issues such as anger management, mental health, self-esteem and healthy living.

**9.9** The Prisoner Education Trust (PET) continues to provide funding for higher level learning. A PET Welsh Prisons Pilot Project has improved the access for the men to a variety of distance learning courses including, Counselling, Art, Business and Health and Social Care. Courses from the Open University are popular

**9.10** The Virtual Campus now supports the new Do It Profiler assessment. Although there is now more learning content on the VC improved access remains difficult. The

system is used for the daily Induction Assessments. However, teachers in the main department are utilising in the classrooms.

**9.11** The lack of a comprehensive Management Information System (MIS) was highlighted at the last ESTYN visit. The department is now the lead for a MIS Pilot Project which should commence in August. This will enable staff and the Head of Learning and Skills to analyse the provision and its effectiveness much more efficiently.

**9.12** There are currently seven Shannon Trust mentors including a mentor co-ordinator. The scheme is looking to recruit an operations lead officer to maintain the work on the sings. The scheme relies on volunteers to maintain the day to day running of the scheme.

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## **10 WORK, VOCATIONAL TRAINING and EMPLOYMENT**

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**10.1** To complement the learning and skills initiatives, men are presented with the opportunity to carry out purposeful work in various areas.

The prison is averaging approximately 120 off wing workers plus a further 70 who attend Education.

### **10.2 Work Areas**

#### **10.3 Workshop 1**

This workshop was undertaking Bicycle repairs. However, this activity has been stopped due to problems being experienced in sourcing Bicycles for repair as Swansea Council have proved to be rather erratic with supplies. The Workshop has been converted to undertake the recycling of TVs.

The TV workshop employs on average 15 people who dismantle TVs into component parts before passing on for recycling. The operation is overseen by a specialist TV engineer.

#### **10.4 Workshop 2**

As a sewing shop Workshop 2 currently employs 22 workers but has capacity for 25. Men are engaged in the manufacture of jeans at the moment but there are plans to also make Duvets in the near future.

#### **10.5 Workshop 3**

Also a sewing shop, currently making Green Uniforms for Work Parties, employing 25 people but has a capacity to hold 28.

#### **10.6 Workshop 7**

A £30k grant has been obtained to revamp this workshop. The revamp is at the planning stage at the moment.

#### **10.7 Kitchen, Waste Management and Laundry**

In total 60 people are employed in these areas and the opportunity to gain NVQs levels 1 and 2 are open to them.

The nature of these jobs necessitates full time employees and this is causing some concerns in other areas.

For example, in shops 2 & 3. Sewing a zip into trousers does take a high level of skill. Training associated with this role can be protracted to ensure that the work is done correctly. The new prison Part Time Work Ethic means that the crews manning the workshops are different in the mornings and afternoons. For example, men from A wing attend a morning shift and B wing the afternoon. This results in twice the number of key operatives having to be trained to sew zips into trousers which does put a strain on departmental resources.

If Day people worked in these slots resources could be better utilised in other areas.

**10.8** Whilst efforts are made by HMP Swansea to ensure that gainful and purposeful activity is available the Prison does have a number of drawbacks:-

HMP Swansea has a 7.5 tonne weight restriction on Lorries coming into the prison. This restricts the size and weight of work coming in and going out of the prison.

Access into the workshops is also limited, in some cases by stairs and others by door width.

There is very limited storage space for bulk, large item storage.  
It's location being further west than Cardiff and Bridgend.

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## 11 RESETTLEMENT PREPARATION

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**11.1** The lack of accommodation for prisoners post release is a major problem for the Resettlement Team. The Welsh Government's Housing [Wales] Act 2014 implemented in April 2015 is having an exceptionally adverse effect on the support provided for prisoners post release. The removal of priority status from prison leavers has impacted to such an extent that only an average of 45% leave prison with accommodation issues resolved. The team are working closely with Healthcare to prove that some men who are especially vulnerable have their needs met by the local authority. No standard acknowledgement or outcomes are fed back to the Resettlement Team. It is hoped that closer partnership with the local authority in the future may resolve some of these issues. The team are developing innovative ways of building links with local agencies to try to develop greater housing options. One such group is The Emmaus Project which provides accommodation for those who commit to working forty hours per week.

**11.2** The Resettlement Team have six registered peer advisers who deal with a large number of enquiries on the wings. They sign a confidentiality agreement and complete the NVQ Level 3 in Advice and Guidance as part of the role. These men enhance the service and the work of the team and it is an initiative which is well supported by prison staff. This team is the only Transforming Rehabilitation organisation which has peer advisers in its contract.

**11.3** Funding for PACT Cymru finishes on August 3<sup>rd</sup> 2017, PACT has been awarded the contract for HMP Swansea and although the details of that contract are unknown it is hoped that the excellent work done by the team to date will continue and be further developed. The new contract is due to commence in October 2017 and it is envisaged that the transition will be seamless. The Family Days, Baby Groups and Toddler Groups have involved 152 families and 304 children. They are open to all prisoners deemed suitable following multi agency risk assessments. The Storybook Dads initiative has involved 35 men and continues to be very successful. The team has an average caseload of 45 men and they continue to build links with outside agencies e.g. Team Around the Family, The Play Team. They also facilitate final contact meetings for children prior to adoption.

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## B Section – Work of Board

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<b>BOARD STATISTICS</b>	
Recommended Complement of Board Members	12
Number of Board members at the start of the reporting period	8
Number of Board members at the end of the reporting period	7
Total number of visits to the Establishment	266

## C Section - Applications

Code	Subject	Current reporting year	Previous reporting year
A	Accommodation including laundry, clothing, ablutions	23	2
B	Discipline including adjudications, IEP, sanctions	3	1
C	Equality	2	11
D	Purposeful Activity including education, work, training, library, regime, time out of cell	8	8
E 1	Letters, visits, phones, public protection restrictions	7	17
E 2	Finance including pay, private monies, spends	24	2
F	Food and kitchens	0	3
G	Health including physical, mental, social care	30	35
H 1	Property within this establishment	8	11
H 2	Property during transfer or in another establishment or location	15	11
H 3	Canteen, facility list, catalogue(s)	6	8
I	Sentence management including HDC, ROTL, parole, release dates, re-categorisation	24	37
J	Staff/prisoner concerns including bullying	12	14
K	Transfers	9	7
L	Miscellaneous	21	27
	<b>Total number of IMB applications</b>	192	194