



Annual Report
of the
Independent Monitoring Board

at

HMP Long Lartin

for reporting Year
1 February 2017- 31 January 2018

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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 to the prison's records.

2. EXECUTIVE SUMMARY

MAIN JUDGEMENTS

Are prisoners treated fairly?

In the experience of the Board members of staff are fair and consistent towards prisoners. We see at close range that officers and others go to great lengths to ensure a fair outcome to complaints; we are satisfied that prisoners are treated fairly within the law. When something does go wrong we observe that it is usually put right without recourse beyond the establishment.

The Board notes that the number of Prisoner Equality Representatives has fallen and welcomes the recruitment of men for the work.

A high proportion of the men are accommodated in old cells which are very small and lack running water and sanitation. The more modern parts of the prison have these facilities. There is therefore a built-in unfairness from the moment prisoners are allocated to a wing. The Board notes that vulnerable prisoners are invariably housed in these wings.

Are prisoners treated humanely?

The Board is impressed with the standard of humanity of staff towards men in often trying circumstances.

The lack of in-cell sanitation fails to meet modern standards of decency for about half of all prisoners accommodated in Long Lartin. Only radical action on the part of central Government can ameliorate this.

There are outstanding building maintenance problems which leave showers and toilets in the older wings in an unsatisfactory state.

Staff shortages have adversely affected the hours prisoners can be out of their cells.

A feature of the establishment's Segregation Unit has been the tendency for men to remain there for extended periods for lack of better alternatives. The Board considers that what amounts to warehousing these men is unsatisfactory and welcomes the provision now under way of accommodation geared to the varied needs of some of the most damaged men in the prison system.

Are prisoners prepared well for their release?

Most men in custody at HMP Long Lartin will serve many years and many will be beyond – in some cases well beyond – retirement age on release. HM Prison and Probation Service has taken the pragmatic view that the priority for vocational training should be to offer vocational skills to men who are most likely to benefit; that is men on shorter sentences and men nearing the end of their sentences. The latter are moved progressively to lower category establishments or for local release. A very few – one or two in a typical year – are released at the gate.

Main Areas for Development

TO THE MINISTER

The Board wishes to emphasise again that the cells in the oldest wings are still without sanitation or running water. Successive Ministers have been informed of the situation in Annual Reports ever since the official end of 'slopping out' in 1996. The arrangements in place – 'Nightsan' – are inadequate and no substitute for proper sanitation. The Board points out again that the practicalities of the 'Nightsan' system do not consistently meet the needs of prisoners or conform to modern standards of decency. Even when the system works it is degrading and insanitary. **[Section 7.2]**

The Board wishes to bring to the attention of the Minister the poor level of service offered by the maintenance contractor Amey. The list of repairs which are not being addressed or completed on time or in a satisfactory way is unacceptable. **[Section 7.4]**

The Board notes with concern that the education contractor (Milton Keynes College) did not meet its obligation to provide opportunities for men in the Segregation Unit and Health Care Unit to take part in educational programmes. **[Sections 6.5, 8.8, 9.4]**

Security Clearance can take an extremely long time. **[Sections 8.1, 8.2, 9.3]**

TO THE PRISON AND PROBATION SERVICE

The Board has been concerned for some time that reductions in staff numbers could impinge on the quality of service. Over the reporting year unfilled vacancies have resulted in difficulties maintaining the regime. In particular there is a shortfall of Support Grade Staff. The shortage of staff is felt throughout the prison. The overarching imperative must always be to maintain the security of the prison but maintaining this priority has tended to draw staff from other valuable work, affecting the quality of the regime. **[Sections 4.7, 6.8, 8.4, 11.2]**

The Board recognises the need for a variety of accommodation for men with complex needs, currently held in Segregation Units. The Board welcomes the establishment of the Preparation Psychologically Informed Planned Environment initiative (Pre-PIPE) and the work to establish a Progressive Intervention Unit (PIU) for centrally managed MCB men and to provide a similar number of places to enable men within the 'Progressive Segregation' scheme to make a staged return to normal location. The Board notes the planned provision of more psychologically trained staff to augment the 'Progressive Segregation' initiative. **[Sections 7.5, 7.6]**

The Board is aware of difficulties experienced in maintaining P-NOMIS in the reporting year and encouraged by the steps taken to ameliorate this. **[Section 5.1]**

TO THE GOVERNOR

The Board is concerned that long waits for the assessment of segregated prisoners may have led to delays in some men's progress to more appropriate accommodation. **[Section 6.6]**

The Board regrets that the Pre-PIPE Unit holds men who are not part of the Unit, and is concerned that their presence could hinder the work done in the Unit. **[Sections 7.5]**

There remains the issue of finding fulfilling work for men long serving sentences. Such work would in itself be a preparation for life in retirement and could well have the effect of improving disciplinary and health issues within prison.

While some available work is challenging and leads to qualifications the Board notes that some is dull and repetitive. The Board would like to see an increase in the quality of labour. The Board believes that giving men a sense of purpose will have a positive influence on behaviour and health issues. **[Sections 10.2, 10.8]**

TO THE PROVIDERS (of Healthcare/Education/Maintenance etc)

Maintenance Contractor: The Board has been frustrated by the poor standard of repairs; long waits for work to be completed; the wrong materials being used; and the lack of available parts. Every part of the prison the board has visited has its own tale of woe. The Board hopes that this situation will be urgently addressed.

Building works contractor: On completion of upgrading work one wing was left in an unsatisfactory state.

Education: The Board is concerned at the low priority given to education in the Segregation Unit and Health Care Department. The Board is pleased to note that the Education Department has achieved a good report from OFSTED and has at last brought its teaching staff up to strength.

Health Care Contractor: The Board is concerned that there is still no psychologist in the team and that the staff has not been up to its full complement during the reporting year.

3. DESCRIPTION OF THE ESTABLISHMENT

HMP Long Lartin is a dispersal prison within the Long Term and High Security Estate, situated in the Vale of Evesham. The original premises date from the early 1970s although they have been modified by successive programmes of adaption and improvement.

The prison has a Certified Normal Accommodation of 625 adult males. About a quarter are Category A including some High Risk prisoners with the remainder Category B. From time to time there may also be a small number of remand prisoners, all of them provisionally Category A.

Prisoners are accommodated in single cells, in five mainstream wings and two support wings. The four oldest wings lack in-cell sanitation and running water.

The education contract is with Milton Keynes College. The health care contract is held by Care UK, subcontracting mental health services to the South Staffordshire and Shropshire NHS Foundation Trust Mental Health Team. DHL holds the canteen contract; Amey the buildings maintenance contract and the buildings contract through the Ministry of Justice.

4. SAFETY

- 4.1. In June a prisoner died in custody. Two prisoners admitted responsibility for his death and were subsequently convicted of murder. The Board is unable to comment further until the inquest has been concluded.
- 4.2. During the reporting year the Board has observed that the normally settled atmosphere of the prison has been disturbed by periods of tension, including raised levels of violence against both fellow prisoners and staff.
- 4.3. Some violent incidents occurred on two mainstream wings in October. A concerted indiscipline on a third wing was brought under control with the deployment of the National Tornado Team without injury to prisoners or staff. The wing suffered extensive damage and was out of use for several weeks. The Board is reassured to observe that the prison has returned to an atmosphere of relative safety and order.
- 4.4. The Board has been made aware that towards the end of the reporting year incidents of self-harm and prisoner on prisoner assaults have shown downward trends. The Board notes an interesting correlation in the Safer Prisons Department's analysis of the incidence of self-harm and the deployment of Listeners. The number of Assessment Care in Custody Teamwork processes (ACCTs) undertaken has increased while Listeners have been called upon less. The Department infers that the prison has become better at spotting and handling prisoners' crises, leading to a reduction in destructive behaviour requiring the intervention of Listeners.
- 4.5. The Board notes with approval the increased focus on the so-called 'trigger points' in managing potential crises in the lives of prisoners
- 4.6. The Board observed that the transition to a non-smoking environment was well planned and completed smoothly. The Board received little in the way of comment from prisoners about the ban either in prospect or once in place.
- 4.7. During the reporting year the time prisoners are out of their cells has fallen short of the expectations of HMPPS. The time unlocked reduces when staff shortages, security or other issues interrupt the daily routine. The Board understands that time spent out of cell in education, work and skills training, rehabilitative programmes, exercise and association can have an influence on safety by reducing tension, violence and bad behaviour.

5. EQUALITY AND FAIRNESS

- 5.1. The Board is concerned that the prison fell significantly behind with its data collection, recording and reporting on the Prison National Offender Management Information System (P-NOMIS) resulting in a significant number of Amber and Red ratings on the system. P-NOMIS is a valuable mechanism for the collection, interrogation and interpretation of prison population data and very useful in informing prison policies and procedures. The Board welcomes the decision in January to move to a system of monthly exception reports rather than quarterly reports to ensure the system is more accurate and user-friendly.
- 5.2. The prison is actively recruiting more Equality Representatives from amongst the prison population as numbers have declined following prisoner transfers.
- 5.3. The prison has a very diverse population. 48% of the prison population register an ethnicity other than White British, increased from the 41% recorded in the last Annual Report. There were 86 prisoners registered as Foreign Nationals, a decline of 18 during the year, the majority housed on mainstream wings.
- 5.4. Catering for the considerable diversity of religious dietary requirements places additional demands on the prison kitchen staff. Dietary needs are well catered for and the kitchen management works to ensure that religious festivals are properly celebrated, despite the food budget remaining very low.
- 5.5. As in previous reporting years, the three main religious groups remain the same. 31% of prisoners are recorded as Muslim, 15% are Roman Catholic and 13% Church of England.
- 5.6. Though 35 men changed their religious registration during the year across a range of faiths the Chaplaincy team confirms the Board's impression that prisoners are not being pressed to convert to any of the faith groups.
- 5.7. There are currently 116 offenders over the age of 50, a slight reduction on the previous year. The prison management has been exploring ways in which the establishment can more effectively meet the needs of this population. Work under way to reclaim a disused courtyard garden has been slow. The intention is to provide an activity area for older prisoners and some light gardening work as a way of encouraging activity for them. However, the Board continues to question whether every single one of these older prisoners requires a place in a high security establishment.
- 5.8. 132 prisoners have disclosed disabilities in various forms with a further 23 men refusing to disclose information.

6. SEGREGATION UNIT AND USE OF FORCE

- 6.1. The work of the Unit has followed a now familiar pattern: coping with a population of long-staying men, typically with complex psychological problems or mental health needs, who often come on transfer from other segregation units within the dispersal system – and some of whom circulate for years within it. Alongside them are men placed in segregation because of local security concerns, or personal crises which prevent them from coping with the pressures of normal location, or because of incidents of indiscipline sometimes fed by drug abuse or illicit alcohol.
- 6.2. Several men were segregated as a result of the incident of concerted indiscipline on E Wing in October 2017. To accommodate them some long-staying men were hurriedly transferred from the Unit to other prisons, thereby disrupting and putting at risk months of patient work towards their progressive movement out of segregation.
- 6.3. The positive initiatives introduced by HMP Long Lartin's participation in the pilot phase of the multi-disciplinary Progressive Segregation scheme with HMP Belmarsh and HMP Wakefield have continued. The six month trial period ended in May, although there has been no formal feedback from that. However the Psychology Department has had the resources to maintain the 'Barriers to Change' and 'Know Your Prisoner' reviews to inform 'Prisoner Care and Management Plans' – and to introduce the 'Motivation and Engagement' and 'Timewise' programmes, which are also given to prisoners individually. There are encouraging signs that the scheme can produce positive results, but this is necessarily slow and patient work with no guarantees of success. Moreover the Board is still concerned that successful delivery of the scheme is vulnerable to the continued failure to provide the Psychology Department with additional resources for this and other much needed work within the Unit.
- 6.4. The Board once again expresses concern that men have been segregated while subject to open Assessment Care in Custody Teamwork (ACCT) documents, although the numbers have remained small. The Board is satisfied that there has been no reasonable alternative to segregation for these men, and that there are robust procedures in place to assess risk when they are initially segregated and to monitor their condition while they remain in segregation.
- 6.5. The Board has remained concerned by the failure in formal educational provision for men in segregation.
- 6.6. The work of the Segregation Review Boards (Rule 45 Reviews) has been assisted during the year by the regular attendance of the senior psychologist working with men within the Progressive Segregation scheme. On the other hand the Boards have regularly been frustrated by delays in the provision of both internal risk assessments for the return of men to normal location and reviews by the Deputy Director or Director of Custody for men segregated beyond 42 days.
- 6.7. The Board is pleased to report that the dedicated staff group in the Unit has continued to work in an exemplary manner despite the daily pressures from disturbed, demanding, and violent men, whose behaviour has included persistent noise, damage to cells, dirty protests and aggression. Equally the management and leadership of the Unit and its staff have remained consistently good. The Board again commends the professionalism, humanity, and remarkable good humour of the officers working in this difficult environment.

- 6.8. The Board observes with concern that the Unit is not immune from the pressures felt throughout the prison resulting from staff shortages. Staff including supervising officers are regularly deployed to the Unit to fill gaps on shifts. This inevitably compromises the continuity of staffing by the dedicated group which is so important in managing the population of the Unit effectively.
- 6.9. The number of incidents of the use of force has remained consistently low in recent years averaging two or less per week. However there was a significant increase in the reporting year. This was caused in part by two incidents in October; a disturbance on a wing and the episode of concerted indiscipline. The reconfiguration of one of the three support wings to take mainstream prisoners brought a number of younger men, some of whom were aggressive and disruptive, into the population. In addition a number of individuals held in the Segregation Unit used levels of violence which necessitated physical restraint even to facilitate the daily routine. The Board is therefore satisfied that there are identifiable reasons for the increase in the use of force. Nevertheless it is an unwelcome development which the Board will monitor closely.
- 6.10. The Board remains confident that the use of force has been limited and appropriate, and that staff have dealt with incidents of violence with discipline and restraint. The Board again pays tribute to their skill in de-escalating potentially violent incidents where anger and aggression have been displayed.

7. ACCOMMODATION AND COMMUNICATION

- 7.1. During the reporting year there has been a significant programme of work on all the residential wings to upgrade the fire and alarm systems. This work is on-going.
- 7.2. The older wings at Long Lartin have an automated queuing system, Nightsan, which allows one man at a time the opportunity to leave his cell for 15 minutes to use the toilet and washing facilities. Nightsan is unsatisfactory from the point of view of decency and poses a considerable risk to health. The prisoners share their cell with a non-airtight lidded pail for use in emergencies. Necessity sometimes constrains them to use this rather than waiting their turn. Their contents are sometimes disposed of outside the cell windows, where they remain on the flat roofs and the ground outside the wing until they can be cleared.
- 7.3. This reporting year has seen pleasing initiatives in Rehabilitation Culture and Engagement on the wings to improve the living environment within the prison. Colour schemes and imagery and some new gym equipment are being introduced. Other initiatives to improve the living environment are wing competitions and the introduction of PAT dogs (Pets as Therapy). The Board notes that this innovation is particularly helpful for older prisoners. The Board recognises the work which has been put into improving the living environment.
- 7.4. The Board is concerned that this work is being seriously undermined by the poor performance of the maintenance contractor Amey. On one wing rehung toilet doors have been left in such a condition that the prisoners are denied privacy and decency; essential repairs are outstanding in every residential area.
- 7.5. A Pre-PIPE Unit has opened to work with prisoners with complex needs. The Board notes with approval that the Unit staff has embraced its culture and aims. The Board welcomes this excellent initiative but has concerns about the effect on the Unit of other prisoners accommodated there for want of suitable accommodation elsewhere. Their presence has a considerable impact; the Unit is in effect managing two regimes. These prisoners can be disruptive to the therapeutic regime and there is a risk of their presence undermining its effectiveness.
- 7.6. One wing has been closed in preparation and planning for a new Progressive Intervention Unit [PIU] to facilitate progressive moves from the Segregation Unit.
- 7.7. The Board appreciates the efforts of staff to make visiting prisoners a positive experience for all. Staff shortages have resulted in searches of visitors taking too long, cutting into the time visitors can spend with prisoners. Seven family visits sessions, available to men who have demonstrated good behaviour, have taken place. The visits to men held in the Segregation Unit have been held in the closed visits suite to maintain the safety of the main hall.

8. HEALTHCARE (including mental health and social care)

- 8.1. Care UK continued to provide general health care services during the reporting year, with mental health and substance abuse services subcontracted to Inclusion, South Staffordshire and Shropshire NHS Trust. Staff shortages due to an inability to recruit and long-term sickness have continued to be a significant issue with many posts covered by agency staff. There is still no psychologist within the team and permanent staffing has remained below agreed service levels in both mental health and general nursing for much of the year. This is compounded by the length of time taken for security clearances.
- 8.2. When the Head of Healthcare retired in October his replacement did not take up her post until January, placing an additional burden on the team.
- 8.3. The clinics run well throughout the week. General practice, general healthcare and mental health and substance abuse services are provided to the Segregation Unit. The lack of information provided to the Rule 45 Reviews about the mental health of men has been an ongoing issue, but improved by the end of the reporting year with information being provided by the Inclusion Team to Healthcare representatives attending these Boards.
- 8.4. The board is concerned that a shortage of staff for escorts has led to hospital appointments being cancelled.
- 8.5. In-patients are held in the oldest part of the establishment which lacks facilities for association and support group work. The Board is aware that the Custody Performance Tool takes no account of such provision within Health Care and questions its usefulness in this respect.
- 8.6. The noted increase in use of so-called New Psychoactive Substances continues to be a challenge in relation to general behaviour and violence on the wings.
- 8.7. The Inpatient Unit is often full and on occasion is used to house men not needing healthcare services. A number of men have had a lengthy wait on the Inpatient Unit prior to a move to a secure mental health hospital; the Board believes this has had an adverse effect on their mental health.
- 8.8. The Board regrets that there has been no education and little in-cell work provision on the Unit.
- 8.9. Repair to the constant watch cell was delayed leading to men having inadequate privacy. The cell was out of use for some months.
- 8.10. The Healthcare team provided good support to the men in the run-up to the prison becoming smoke free, in the form of clinics and individual support.
- 8.11. During a recent HMIP audit the Care Quality Council gave a good interim report of the Healthcare Unit, but highlighted the lack of a daily regime for inpatients.
- 8.12. The prison now caters for an increasing number of elderly and disabled men, with very limited facilities. Work with the Safer Prisons team has led to an improved understanding of the needs of the men and the involvement of local Social Services in assessments and support. This is likely to be a growing area of need.

9. EDUCATION AND OTHER ACTIVITIES

- 9.1. The Board has been impressed with the engagement, enthusiasm and sense of purpose in classroom based learning with positive interaction between staff and prisoners. The recent OFSTED inspection rated the work of the department as 'Good'. The art work has received national recognition.
- 9.2. The Board notes the valuable contribution of peer mentors in the classroom particularly with eastern European prisoners supporting English language courses for foreign nationals. This is a practical way of addressing the shortage of language staff.
- 9.3. Previous reports have commented on the impact of the time taken for staff security clearance checks to be completed. This has impacted on the continuity of education provision. Despite this the Department has established and maintained a consistent staff team. As a result they were able to access funds from elsewhere in the region. This is a significant improvement.
- 9.4. The Board again notes the lack of provision of education in the Segregation and healthcare Units.

10. WORK, VOCATIONAL TRAINING AND EMPLOYMENT

- 10.1. The workshops are generally well and punctually attended. A system is in place to ensure that any vacancies can be filled the same day. Nevertheless unemployment in the establishment is a perennial problem with sporadic closures for lack of orders. One workshop has remained unused for years. Work too often is impeded by problems of shipping raw materials and finished items in and out of the prison.
- 10.2. There has been increased attention in this area during the reporting year which has produced some improvements to the quality of work on offer. Painting of furnishing items was introduced with some success though dropped because there was not enough work available and replaced with a contract to sew prison garments. The manufacture of military camouflage netting has continued, as has packing of small components. Neither of these tasks is altogether engaging, though the men seem to do them well.
- 10.3. Woodwork manufacturing in two workshops continues. The Board believes that the atmosphere in these shops is purposeful because there is an end product of which the men can be proud. Men working here are able to gain certification for their levels of skill.
- 10.4. Work in the DHL workshop has remained popular with prisoners who pack canteen items to order from prisoners in the High Security Estate. There is generally a bustle about this shop. The laundry has been helped by the replacement of old machinery with machines from a recently demolished prison. This has allowed sufficient capacity to undertake substantial new contracts, laundering many tonnes of towels and bed-linen. There is now a useful link with a commercial enterprise which has contracts with hotels. Men working here are able to gain certification for their levels of skill.
- 10.5. The Prisons Information Communication Technology Academy (PICTA) has expanded and generates a good degree of engagement among the men who attend. Men working in this shop are able to gain certification.
- 10.6. General and wing cleaners gain a qualification through a training scheme enabling them to begin their work around the prison.
- 10.7. Some painting of the fabric within residential wings has been done by prisoners. The Board notes that this work could be expanded.
- 10.8. A workshop was opened during the reporting year for Category A men whose movements within the prison are restricted for security reasons. The Board considered that the work was insufficiently taxing. The workshop has temporarily closed.

11. RESETTLEMENT PREPARATION

- 11.1. The men held in the establishment serve long and very long sentences. Rehabilitative programmes are offered in accordance with sentence plans. When prisoners have completed relevant available programmes there is an expectation that they will transfer within the High Security Estate or progress to a Category B establishment to enrol in suitable programmes or to prepare for release as they approach the end of their sentence.
- 11.2. The work of the Offender Management Unit (OMU) has been hindered by the diversion of staff to other areas.

12. CHAPLAINCY

- 12.1. A full time Church of England chaplain has been appointed but is awaiting security clearance. In the meantime two sessional Church of England chaplains from other prisons are providing cover.
- 12.2. A comprehensive range of religious services and faith study groups are running well. The department runs bereavement courses. A music group meets weekly.
- 12.3. The Board notes with admiration that Chaplains have attended 80-90 ACCT reviews each month.
- 12.4. Seventy Christmas presents donated by local churches were sent to children of prisoners of this establishment coordinated by the Chaplaincy and the Prison Fellowship Angels Tree Project. Gifts were delivered to children in the UK and abroad and arrived as if coming directly from their fathers complete with gift tags written by them.
- 12.5. The Ramadan charity collection from prisoners raised more than £1,750.
- 12.6. The Board applauds the contributions the Chaplaincy makes to the life of the prison, beyond their statutory obligations.

THE WORK OF THE BOARD

The Board has responded to 204 applications from prisoners, a reduction on the previous year. This may be accounted for by a reduction in the population of vulnerable prisoners who have in past years sought the most help from members. Property issues remain the most frequently encountered. The Board has observed that applications about Equality have doubled while applications relating to letters, visits, phones, public protection restrictions have almost halved.

Following the Annual Team Performance Review held in October the Board spent a useful day away from the prison addressing the issues raised.

The Board has enjoyed a fruitful and cordially correct relationship with the prison staff. The Board acknowledges their cooperation and support without which its work would be impossible.

Ivan Harrison
Chair
IMB Long Lartin

BOARD STATISTICS	
Recommended Complement of Board Members	18
Number of Board members at the start of the reporting period	12
Number of Board members at the end of the reporting period	10
Total number of visits to the Establishment	512
Total number of segregation reviews attended. (This represents the number of attendances; several reviews are normally monitored at every attendance.)	151

APPLICATIONS

Code	Subject	Current reporting year	Previous reporting year
A	Accommodation including laundry, clothing, ablutions	6	4
B	Discipline including adjudications, IEP, sanctions	7	0
C	Equality	22	10
D	Purposeful Activity including education, work, training, library, regime, time out of cell	20	25
E 1	Letters, visits, phones, public protection restrictions	19	25
E 2	Finance including pay, private monies, spends	8	15
F	Food and kitchens	8	6
G	Health including physical, mental, social care	17	26
H 1	Property within this establishment	27	41
H 2	Property during transfer or in another establishment or location	16	31
H 3	Canteen, facility list, catalogue(s)	1	2
I	Sentence management including HDC, ROTL, parole, release dates, re-categorisation	17	14
J	Staff/prisoner concerns including bullying	25	22
K	Transfers	6	2

Note: Another 56 applications were dealt with under confidential access. This number includes some general applications to the Board which were treated in confidence.