



Annual Report
of the
Independent Monitoring Board
at
HMP Lewes

for reporting Year
1st February 2017 to 31st January 2018

Published
July 2018



Monitoring fairness and respect for people in custody

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1 STATUTORY ROLE OF THE BOARD

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

Introduction to this report

This report presents the findings of the Independent Monitoring Board (the Board) at HMP/YOI Lewes (HMP Lewes) for the period 1st February 2017 to 31 January 2018. Board evidence comes from observations made on visits; attendance at prison management and committee meetings; scrutiny of records and of data; informal contacts with prisoners, staff and volunteers; surveys; and through prisoners' applications.

Main judgements

During the period of this report, staff shortages had the greatest impact on delivering a safe and decent environment at HMP Lewes. The regime was very restricted and subject to unplanned alterations, personal officer duties were extremely constrained and the Mandatory Drug Testing (MDT) unit was regularly closed. The impact on prisoners was evident and the Board is concerned that there was an increase in violence, incidents of self-harm and the use of drugs. Over this period there were also multiple instances of the Induction and Pre-Release Centre (IP-RC) not being opened to prisoners, with knock on effects to prisoners preparing for their release or onward movement in the Prison system. Other impacts of the regime and staff shortages have included closures to the post room and a backlog in dealing with Offender Assessment System (OASys) reports.

Nationally incidents of self-harm have increased and this is reflected at HMP Lewes. The Board at HMP Lewes has become concerned seeing prisoners who are depressed, frightened and worried for their safety and wellbeing.

Lewes has an increasing population of older prisoners and prisoners with disabilities. The ability to provide suitable access and care to these prisoners is constricted by the Victorian buildings that make up the majority of buildings in HMP Lewes. Cleanliness is an ongoing issue, with dirty and dilapidated common areas, especially showers. The Board has previously highlighted the extremely poor in-cell toilet facilities, with unhygienic stained and pitted stainless steel bowls and often within a few feet of where prisoners eat their meals.

The Board has noted that there are staff who 'go the extra mile' to help prisoners. The number of experienced staff within HMP Lewes has diminished significantly over this reporting period, officers are increasingly being asked to 'act up' to a more senior level and new staff often find themselves without the guidance or leadership that comes from working alongside long-serving prison officers.

Are prisoners treated fairly?

The Board believes that prisoners are treated fairly by staff and management at HMP Lewes, except in respect of disabled prisoners, who are somewhat restricted in location and mobility within the establishment.

Are prisoners treated humanely?

The Board considers that some of the conditions and treatment that prisoners at HMP Lewes are subjected to are inhumane. The regime is overly restricted. The mainly Victorian infrastructure, continuing poor sanitary facilities in some cells, a widespread problem with rodents and pigeons and inadequate cleaning and maintenance of communal shower areas, all contribute to this overall theme.

Are prisoners prepared well for their release?

The Board believes that more could be done to better prepare prisoners for release. For much of this reporting year restrictions to the regime have prevented prisoners attending workshops or education and the IP-RC has regularly been closed due to a lack of available prison officers.

Main Areas for Development

TO THE MINISTER

The Board wish to put on record their concern at the number of prisoners seen over the past year with mental health problems or behavioural difficulties which make prison an entirely unsuitable environment for their care and rehabilitation. Prisons must not be used for containing the mentally unwell.

The Board is concerned about the Healthcare Department's inability to provide adequate care when they have been consistently understaffed.

TO THE PRISON SERVICE

Whilst staffing levels at HMP Lewes have improved since our report last year, issues remain. The Board acknowledges and commends the training of and retention of new officers on site at HMP Lewes.

Last year the Board highlighted that the Ministry of Justice website for HMP Lewes was out of date and this remained the same.

The Board is concerned by the high number of positive drug test results which are indicative of the large amount of drugs available within the prison.

The Board urges the Prison Service to take steps to deal with the well-publicised issues surrounding prisoners' property. The mishandling and loss of property is very distressing to prisoners.

TO THE GOVERNOR

The Board would appreciate knowing what steps are being taken towards an improved regime to allow greater hours of unlock for all prisoners and to provide a consistent regime enabling both MDT and IP-RC to operate effectively and for the continued increase in purposeful activity.

The Board would appreciate knowing what steps are being taken to address the deterioration and dilapidation of the prison infrastructure.

The Board would appreciate reporting that shows how effective the prison is in preparing prisoners for resettlement.

Improvements seen over the past year

Free-flow has been re-introduced by the new Governor to enable prisoners to access education and work and to have increased time out of cell.

HMP Lewes has a successful training programme and many of the Prison Officer Entry Level Training officers (POELTS), go on to join the establishment here.

There has been a significant improvement in the training of existing staff with the introduction of both Five Minute Intervention (FMI) and Suicide and Self-Harm (SASH) training. Additionally there has been a significant improvement in the relationship between the prison management and the Prison Officers Association.

Efforts have been made to improve the outside areas of the prison.

3 DESCRIPTION OF THE ESTABLISHMENT

HMP Lewes is a complex prison in Special Measures.

It has an operational capacity of 692, accommodating Sentenced, Un-sentenced, Un-convicted Category B and C Prisoners. Prisoners' ages are from 21 years and above as well as Young Prisoners aged 18 - 20. Recently a local Category B Prison, HMP Lewes is now a Resettlement prison, as part of the Government's 'Reforming Rehabilitation' agenda which focuses on resettlement planning for prisoners and endeavours to ensure that they return to a prison closest to their home approximately 12 weeks prior to their release.

The majority of the prison buildings are Victorian in origin (the main buildings were completed in 1853). There is a newer block, Sussex, which opened in 2008 and which consists of two wings holding up to 174 prisoners in single cells.

The Certified Normal Accommodation (CNA) for HMP Lewes is 617, the ideal maximum population of the prison. The Operational Capacity relates to 'population which could be accommodated without risk of disruption through overcrowding'. For HMP Lewes the Operational Capacity is 692.

At the end of January 2018 HMP Lewes held 630 prisoners (510 in January 2017). The total male population in Her Majesty's Prison Service at the end of January 2018 was 80,618.

The prison's residential areas consist of 10 wings:

- A wing Drug recovery capacity 134
- B wing Segregation Unit capacity 16
- C wing General Wing capacity 150
- G wing¹ Care and Support Unit (CASU) capacity 23
- F wing Mainly Vulnerable Prisoners capacity 147
- F1¹ First Night Centre capacity 30
- K wing Integrated Drug Treatment System (IDTS) capacity 22
- L wing Sentenced C and D category capacity 80
- M wing Sentenced B and C category capacity 94
- HCC Health Care Centre – Acute inpatient facility capacity 12

Notes:

1. In January 2018 the First Night Centre was moved from F1 to G Wing and F1 was reincorporated into F Wing. There is no longer a specialist CASU.

The main contractors to the prison are:

- GEO Amey (transport to and from the courts and local prisons)
- Serco (transport to and from prisons)
- Carillion, a Support Service Company (responsible for all works and stores); in January 2018, following Carillion Plc being placed into compulsory liquidation, workers onsite at HMP Lewes moved to being employed by a government owned company, Government Facility Services Limited
- Tascor (transport for Foreign Nationals for bail hearings and deportation/repatriation flights)
- DHL (ordering and delivery of prisoners' purchases from earnings)
- 3663 (supply of frozen, fresh and dry foods for prisoners' meals)
- Sussex Partnership NHS Foundation Trust (all inpatient and outpatient care, opticians)
- National Health Service England (NHSE) (dentist)
- Medco (GP Services)
- RAPt (The Rehabilitation for Addicted Prisoners trust, now known as the Forward Trust)
- NOVUS, part of The Manchester College (Education, Learning and Skills)
- KSS (Kent Surrey and Sussex), CRC (Community Rehabilitation Company)
- Tribal (careers advice)
- East Sussex County Council Library Service

All the above organisations and their services have been approved and appointed at a National Level.

In addition, a number of voluntary and other organisations provide significant services. These include Alcoholics Anonymous, Job Centre Plus, National Association of Official Prison Visitors, National Careers Service, SSAFA, The Prison Fellowship, The Samaritans, and The Shannon Trust.

Prisoners have access to a large, well-equipped gymnasium and to a second sports hall.

Evidence sections 4 – 11

4 SAFETY

4.1 Death in Custody (DIC) - There were 3 deaths in custody during our reporting year. The inquests for these are outstanding.

4.2 Family Liaison Officers have increased in number to 4.

4.3 Assessment Care in Custody Teamwork (ACCTs) - A case manager is now allocated to every ACCT that is opened. Effective reviews are held and ACCTs are audited for quality. The Board noted poor documentation early in the reporting year; this has improved but needs to improve further.

4.4 Samaritans - The Samaritans receive in the region of 30 -40 calls a month. There is evidence that access to a Samaritan trained listener directly correlates to the reduction of ACCT documents. The IMB are pleased that there is now a Samaritan phone available on all the main wings. The smaller wings have access to this phone.

4.5 Security – Body-worn cameras came into use in the latter part of the year. When used they appear highly effective as a tool to de-escalate incidents and provide evidence for adjudications. It is noteworthy that Security Analyst, Paul Boddy won a commendation from the Chief of Sussex Police, for his exceptional work, which resulted in ten individuals (including two HMP Lewes Prison Officers), being sentenced for conspiring to bring in drugs and mobile phones to the prison.

4.6 Violence - The Segregation unit is often full so officers are encouraged to deal with violent incidents on the wing. Any form of violence or bullying is challenged and in 2017 there were upwards of 300 uses of Violence Reduction (VR) Basic. There are 12 prisoner representatives across the residential wings who help prisoners dealing with violent issues. From April 2017 to January 2018 there were minimally 200 reported incidents of violence, 59 of which were prisoner-on-staff attacks and a further 137 prisoner-on-prisoner.

4.6 Self Harm - During this same period (April 2017 – January 2018), recorded incidents of self-harm continued to increase, from an average of 30 a month April to September, doubling to an average of 62.5 incidents per month for the period October to January 2018.

5 EQUALITY AND FAIRNESS

5.1 Having had only sporadic Equalities meetings in 2016 with little management overview, following the arrival of the new Governor, they were reinstated as quarterly meetings and three were held in 2017.

5.2 The number of discrimination incidents (DIRFs) decreased during 2017 to 33 from the previous year's total of 47. It was questioned whether the DIRF forms were readily available. Some prisoners stated that they had no confidence in the system and questioned their confidentiality. In view of this it was agreed to introduce a system whereby the DIRF forms are placed in coloured envelopes and put in special post-boxes on the wings. This should ensure confidentiality. The new system is in the course of implementation.

5.3 Disability statistics produced from the prisoners' self-assessment on an Equalities Questionnaire in December 2017 indicated that over a third of the HMP Lewes population has one or more forms of disability. The number of older prisoners has continued to increase during 2017 whereas the number of Foreign Nationals remains much the same

5.4. The ability to provide suitable access and care to prisoners with restricted mobility is constricted in particular by the Victorian buildings that make up the majority of buildings in HMP Lewes, for example 'standard' wheelchairs do not fit through cell doors. The Board has raised the issue of inadequate provision for these prisoners for many years now.

5.5 The curtailed regime during 2017 resulted in the cancellation of various religious services. The situation has improved and regular services have resumed. The Chaplaincy Team continues to be extremely proactive and must be commended for its efforts to provide a fair and equal service to all prisoners.

6 SEGREGATION UNIT

6.1 Despite the changes of management of this unit over the past 12 months there has been consistency in the officers staffing it who have demonstrated both skill and patience in running what is a very challenging working environment. It is unfortunate that to date there has still been no training undertaken by staff in dealing with mental health issues. This could only be beneficial for those officers caring for men in an environment known to be detrimental to mental health.

6.2 There are 16 cells, including two high risk and two special observation cells and there have been numerous occasions when the unit has been full.

6.3 Processes are understood and adhered to; the paperwork raised is up to date and of a very high standard. Reviews are done on time and generally well attended by those concerned, however there have been several occasions when Healthcare have not attended reviews, which has resulted in 8% (or 21), of the segregation review boards being invalid. Similarly, only 85.3 % of the safety algorithms were completed within the required timescales. This would appear to be as a result of failings of the Healthcare staff rather than the Segregation unit.

6.4 There has been a marked reduction in the use of Special Accommodation with paperwork being raised on only 5 occasions compared to 17 occasions during the previous reporting period and on only one occasion was Special Accommodation used inappropriately, for a short period of "cooling down", with no paperwork being raised.

6.5 It is concerning to note the number of prisoners on an open ACCT located to the unit over the reporting period totalled 33, with an additional 23 ACCTs being opened for men following their arrival.

6.6 Over this reporting period there were 9 men located on the segregation unit for a period in excess of 42 days and 2 men for a period in excess of 3 months. The problem of relocating difficult men to alternative locations persists, particularly in relation to secure mental health units. Additionally, moves to other establishments are difficult because of the lack of space across the estate generally.

6.7 The Board has a good relationship with the unit; all notifications of new arrivals are made in a timely manner, as are notifications of reviews. The Board sees every man on the unit on a weekly basis as well as at their reviews. It is pleasing to note the reinstatement of regular monthly Segregation monitoring and Review Group (SMARG) meetings, which are also attended by the Board.

7 ACCOMMODATION (including communication)

7.1 Residential and Regime – In January 2017 a new regime began which allowed for the reintroduction of free-flow for those going to purposeful activities in the morning or afternoon. All prisoners were unlocked in the morning at approximately 8am for domestics, again to collect their lunch and again between approximately 4pm and 5pm in the afternoon. This was a slight improvement on the previous year's regime, although it remained very restricted, with prisoners who did not engage in education or work accordingly locked up for between 21 and 22 hours a day. In addition, from September 2017, all purposeful activity was closed for two days per month to enable staff training.

7.2 The regime on First Night Centre (FNC) was very restricted, with no access to purposeful activity. There is often an inability to move prisoners on quickly from the FNC, particularly Vulnerable Prisoners, and so they remain with this restricted regime.

7.3 Generally the prison accommodation appears shabby and dirty and Board Rota reports show it to be variable in cleanliness, both by time and location. Rota reports highlight in particular the state of the shower areas and the cleanliness of the in-cell toilets. Outside areas vary in cleanliness with quantities of food, clothing and other detritus often seen outside residential wings, where it has been thrown from windows.

7.4 Due to limited unlock, access to phones at times when it is convenient to call people who work during the day, is limited.

7.5 The Visits waiting area is often overcrowded and hot, it is dilapidated and without any facilities for children. The waiting area is often unclean. The Visits Hall is poorly maintained, suffering from mould and plaster coming off the walls. The majority of visitors book through email however, the information provided to visitors on the Ministry of Justice website about visiting times is incorrect.

7.6 Post Room. During the reporting year the Board received numerous complaints regarding delayed post. In November there was a backlog of circa 6-7 weeks.

Kitchen

7.7 The catering budget is £2.02 per prisoner per day. Ad hoc complaints from prisoners about the food (quality and quantity) are frequent but only 4 formal complaints were made to the Board over reporting period. Food complaints books are on all wings but not always accessible to the prisoners.

7.8 Kitchen equipment is not repaired in a timely fashion.

Communication and Consultation

7.9 Information provided to newly arrived prisoners on the FNC is extremely basic; first-timers gain more knowledge about HMP Lewes from speaking to orderlies or from returning prisoners.

Property

7.10 The mishandling of prisoners' property remains a major issue throughout the prison estate. Property is frequently left behind when prisoners transfer between prisons and is sometimes mislaid or lost. Almost a fifth of prisoner applications to the Board are concerned with property.

8 HEALTHCARE (including mental health and social care)

8.1 Significant problems remain and the number of Healthcare related Applications (Apps) received by the Board in this reporting period was almost double the previous year's (50, versus 27). Prisoners typically complain about three topics: waiting times for clinics/GPs, cancelled hospital appointments, and a perceived failure to prescribe the specific drugs.

8.2 The number of "older" prisoners at HMP Lewes has increased and their healthcare needs have increased commensurately. Their conditions are now more complex, and there is a rising proportion of mental health referrals.

8.3 The increase in prisoners suffering severe reactions to illegal new psychoactive substances (NPS) has led to the development of a protocol whereby men can be nursed in the prison rather than being taken to hospital.

8.4 A Safer Prescribing Group has been set up and had a significant effect in reducing the number of prescriptions for Pregabalin and Gabapentin.

8.5 For most of the reporting year there were professionally unacceptable arrangements for administering a second dose of supervised medication. The patient in his cell was scarcely visible to the 'supervising' nurse whilst taking the drug. Currently an officer unlocks the cell door while a nurse observes, but this is not as secure as using the medical hatch.

8.6 There is a long waiting time for dental appointments.

8.7 Despite extra staffing, there are still times when outside appointments requiring escorts to hospital are cancelled. This can be because there are several prisoners already in hospital or because more urgent cases are already taking up all available prisoner officer escorts.

8.8 It is difficult to provide a good in-patient healthcare service in the Victorian buildings of HMP Lewes. Prisoners repeatedly complain about the lack of time out of their cells in Healthcare.

8.9 RAPt, now known as The Forward Trust, is the provider of drug and alcohol services in the prison. There has been significant disruption to the delivery of services since the changeover from the previous provider as a result of staff shortages and failure to maintain consistency at a senior level. Whilst all positions were filled by December 2017, some employees were still awaiting Disclosure and Barring Service (DBS) clearance. An average of 164 men are screened each month with an average of 33% of those screened being added to the case load. Access to these prisoners was curtailed as a result of regime curtailments over the reporting period.

9 EDUCATION AND OTHER PURPOSEFUL ACTIVITY

9.1 The current education provider is Novus. They are contracted to deliver a range of classes, from functional skills in English and Maths to Art classes and IT skills. Novus have introduced HMP3 courses, equivalent to the University of the Third Age (U3A), to meet the needs of the older demographic of prisoners.

9.2 The number of prisoners in education recorded as having a disability has increased since last year with 355 men self-reporting mental health issues, compared to 69 in the 2016/7 period, 65 reporting mobility issues compared to 21 previously and 100 self-reporting hearing difficulties compared to 3 in the previous period.

9.3 Novus did not have a manager in place from July 2017 until January 2018. There was a series of interim managers from other establishments who were not familiar with the needs of HMP Lewes. There were only two full time or permanent members of staff, the rest were either part time or fractional. The curriculum plan from August 2017 to 31 July 2018 is yet to be agreed. Novus delivery was 43% of what they were contracted to deliver. The introduction of an hourly rate back-dated to the beginning of the contract increased the delivery rate to a disputed 83%.

9.4 The library has continued to provide an excellent service to the prisoners.

9.5 The gym is well attended although there are no opportunities for prisoners to obtain vocational qualifications. On occasions the access to the gym has been limited due to either regime limitations, staff shortage, training or security shutdowns.

10 WORK, VOCATIONAL TRAINING and EMPLOYMENT

10.1 There are activity places for about 380 prisoners in HMP Lewes, some of which are part-time. Prisoners involved in industries number approximately 78, which is an improvement over the 49 at the beginning of the reporting. The Call Centre, run by Census Data and LMB textile recycling opened in 2017 injecting some much-needed industry work, however, HMP Lewes still offers limited places for valuable work experience.

10.2 A Call Centre finally started in HMP Lewes in September 2017, however it struggled and was closed after just four months. Over the period it was open it never employed more than 16 prisoners and it found it difficult to attract and retain prisoners, even with the incentive of the highest prisoner pay in the prison. There was a further incentive whereby Call Centre workers were allowed a 6-month hold at Lewes. The Board observed that the Call Centre suffered because it operated when many of the intended recipients of the calls were at work and would be unwilling to answer the long list of questions. Supervision by Census Data staff also appeared poor during the time the Call Centre operated and a number of prisoners were suspended after just a few days employment.

10.3 All prisoners are offered an Initial Skills assessment but there is often a small backlog e.g. 20 prisoners. There is an Activities Office centrally placed and new positions are advertised using Notices to Prisoners (NTPs). Prisoners are able to apply for jobs by completing an application form. Over the course of the year there is an average of approximately 50 prisoners who decline to engage in any employment and they receive no pay.

10.4 The Lobster Pots workshop employs up to 15 prisoners and produces about 25 pots a week. Painting and decorating offers valuable experience; however it was closed for more than half the reporting period and did not lead to any accredited qualifications. It successfully integrates Vulnerable Prisoners with other prisoners but attendance is low at around 4 when the capacity is 12.

10.5 LMB textiles is thriving producing 14,000kg a week. The work is very popular with the prisoners and many apply for this position.

10.6 The prison kitchen remains a popular workplace. The kitchen struggled to attract and maintain its full quota of full-time civilian staff members through the reporting period, but still managed to train prisoners and produce a variety of meals. There is a separate training kitchen, staffed and managed by Novus, which opened in the last quarter of the reporting period and which offers a range of foods for staff and visitors. To date this has been a successful enterprise and is a great asset to HMP Lewes in many ways, improving staff morale through the availability of fresh food and drinks.

10.7 Accreditation - Whilst the industry work is valuable the prison needs to offer more accredited courses to help prisoners prepare for release. The training kitchen is the only industry to offer NVQ qualifications. It would be beneficial if prisoners could complete their NVQs by doing the City and Guilds qualification unit by unit, so it can be carried over to other prisons to complete. The Board is pleased that prisoners are able to obtain a Construction Skills Certification Scheme (CSCS) card for the construction industry.

10.8 Pay - Attendance rates vary and range from 70p an hour for wing workers to £1.50. Call Centre workers were getting £1.50 a session with an added bonus of £2.50 if they completed 9 sessions.

10.9 Attendance - The activities office is unable to provide accurate figures on attendance. The Board's experience is that attendance tends to be about 80% because prisoners do not want to spend any longer in their cells. For example, LMB Textiles's capacity is 18 and attendance is about 15. The kitchen employs 30 prisoners with 25 normally attending. Lobster pots employs 15 with 12 normally attending.

11 RESETTLEMENT PREPARATION

11.1 Kent Surrey and Sussex Community Rehabilitation Company (KSSCRC) was appointed on May 1st 2015. They continue to work with The Job Centre, National Careers Service, Sussex Pathways and Healthcare. Although there has been some delay in implementing all the procedures required by KSSCRC, discussions continue with both the prison and other agencies to ensure that prisoner needs are appropriately met prior to and following their release from prison.

11.2 Accommodation and Employment continue to be an issue. Approximately 38% of those identified with an accommodation need were released as homeless in 2017. Similarly, 37% of those prisoners that had an employment need were released as unemployed in 2017. Staff redeployment resulted in the regular closure of the CRC. Additionally, the failure of the Offender Management Unit (OMU) to complete the Basic Custody Screening Tool (BCST) Part 1 (84.5% completed in 2017) resulted in the CRC being unable to complete the BCST Part 2.

11.3 OMU has been subject to staff shortages over the reporting period causing difficulties for prisoners. There has been a regular, significant backlog of OASYs reports making it difficult for prisoners lacking a Sentence Plan to progress, e.g. via transfer or re-categorisation. Multi-agency Public Protection Arrangements (MAPPAs) processes are prioritised and thus unaffected by staff shortages.

11.4 Family links are maintained via letters, phone calls and visits, and are facilitated via a range of support services available at HMP Lewes. Three family days were organized at HMP Lewes in 2017 and were available to those prisoners who met certain criteria.

B Section – Work of the Board

The Board's relationship with staff and prisoners remains good.

The Board has 2 training days per annum, makes regular visits to and receives visits from other establishments to enable peer review and achieve best practice. Additionally, the Board has specialist guest speakers at each Board meeting.

We aim to respond to Applications from prisoners (Apps) within 7 working days.

BOARD STATISTICS	2016/17	2017/18 (current year)
Recommended Complement of Board Members	17	17
Number of Board members at the start of the reporting period	12	14
Number of Board members at the end of the reporting period	14	9
Total number of visits to the Establishment	409	538
Total number of segregation reviews attended	147	270

C Section – Applications to the Board

Code	Subject	Current reporting year	Previous reporting year
A	Accommodation including laundry, clothing, ablutions	13	11
B	Discipline including adjudications, IEP, sanctions	5	6
C	Equality	4	7
D	Purposeful Activity including education, work, training, library, regime, time out of cell	18	13
E 1	Letters, visits, phones, public protection restrictions	43	32
E 2	Finance including pay, private monies, spends	6	8
F	Food and kitchens	4	6
G	Health including physical, mental, social care	50	27
H 1	Property within this establishment	22	24
H 2	Property during transfer or in another establishment or location	32	43
H 3	Canteen, facility list, catalogue(s)	5	4
I	Sentence management including HDC, ROTL, parole, release dates, re-categorisation	40	33
J	Staff/prisoner concerns including bullying	36	33
K	Transfers	10	9
	Total number of IMB applications	288	256