Annual Report
of the
Independent Monitoring Board
at
HMP/YOI Brinsford
for reporting Year
(1 July 2017 to 30 June 2018)
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Monitoring fairness and respect for people in custody
# TABLE OF CONTENTS

## Introductory Sections

<table>
<thead>
<tr>
<th>Section</th>
<th>Topic</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Statutory Role</td>
<td>3</td>
</tr>
<tr>
<td>2</td>
<td>Executive Summary</td>
<td>4</td>
</tr>
<tr>
<td>3</td>
<td>Description of Establishment</td>
<td>7</td>
</tr>
</tbody>
</table>

## Evidence Sections

<table>
<thead>
<tr>
<th>Section</th>
<th>Topic</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td>Safety</td>
<td>8</td>
</tr>
<tr>
<td>5</td>
<td>Equality and Fairness</td>
<td>9</td>
</tr>
<tr>
<td>6</td>
<td>Segregation/Care and Separation Unit</td>
<td>10</td>
</tr>
<tr>
<td>7</td>
<td>Accommodation (including communication)</td>
<td>11</td>
</tr>
<tr>
<td>8</td>
<td>Healthcare (including mental health and social care)</td>
<td>12</td>
</tr>
<tr>
<td>9</td>
<td>Education and Other Purposeful Activity</td>
<td>13</td>
</tr>
<tr>
<td>10</td>
<td>Work, Vocational Training and Employment</td>
<td>13</td>
</tr>
<tr>
<td>11</td>
<td>Resettlement Preparation</td>
<td>14</td>
</tr>
</tbody>
</table>

| The Work of the IMB | 15 |
| Applications to the IMB | 16 |
A Sections 1 - 3

1. STATUTORY ROLE OF THE IMB

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

Main judgements

- At the beginning of January Brinsford had a change of Governor who has ensured that the prison has kept its standards high and has introduced new and improved ways of working with, and supporting, the young adults.

- Despite the efforts of the new Governor and the reduction we saw at the end of the reporting period, there remains a worryingly high number of incidents of self-harm.

- The number of incidents requiring the use of force is high; senior managers recognise this and are setting up regular meetings to review each case.

- Staff numbers have increased to full complement but the newly appointed staff can lack the maturity and experience needed when working with troubled youngsters.

- However, the Board believe that the staff are managing to run a successful and safe prison and that overall the residents are treated fairly. Every effort is made by the staff to ensure that the dignity and respect of the residents is maintained.

- There are ongoing problems with violence and substance misuse. Despite many successful ‘finds’, there are still some prohibited items successfully reaching residents.

- The training of the residents is very good but it needs the introduction of more varied courses and the expansion of those already working well within Brinsford, such as the cleaning academy. Milton Keynes College does not always provide the courses they are meant to be running or a full complement of staff to deliver the existing courses. A fuller explanation can be found later in section 9.

- There was an issue with the breakfast packs being small but that has been solved by the introduction of toasters on the wings for inmates to supplement the cereal provided. The hot food served is very good; it is nutritious and well balanced, especially considering how little money is spent on each prisoner for their meals. One observation is that residents were given breakfast packs in the evening and ate the food straight away, thus leaving them without a meal before transport to court appearances. This has subsequently been addressed by providing breakfast packs in the morning.

- There are concerns that some difficult Category B residents are spending long periods in Brinsford, despite efforts to relocate them to a more suitable environment. This is often due to the reluctance of other establishments to take them. These difficult residents can spend a long time in CSU because of issues that render them unsuitable to mix with others on a normal regime. The Board believes that the People Management Unit should accept responsibility for these transfers.

- Drugs and other contraband remain a problem for the prison. It is suspected that a lot of these substances enter through visits and some visitors have been apprehended. There has been no evidence to date of the use of drones at Brinsford.
• The working relationship between the IMB and senior managers is very good.

• We are sad to have to report that a resident died at HMYOI Brinsford after he was found hanged in his cell on 25th March 2018. He was 19 years old. We are waiting for the Coroner’s inquest.

• The Offender Management Unit is always busy and there is sometimes difficulty placing residents in appropriate accommodation on their release. This was often the responsibility of the Community Rehabilitation Company (CRC) and that contract is being reviewed.

• Brinsford received an unannounced inspection from Her Majesty’s Inspectorate of Prisons in November 2017 and the outcome was generally satisfactory and many of their concerns about levels of violence and self harm have been addressed and are now reducing.

Main Areas for Development

TO THE MINISTER

The Board are pleased that since our last annual report there has been an improvement in the timeliness of repairs by maintenance contractor Amey, who now have an office within the prison. We shall however continue to closely monitor the resolution of maintenance issues.

2. Residents’ personal property is still a big area of concern, with problems often occurring when property is transferred between establishments and to/from courts. This area of the GeoAmey contract requires review and further oversight.

3. The level of staffing has improved but time is needed for new staff to settle into their roles and responsibilities in order to ascertain the effectiveness of the recruitment and training regimes.

4. Recently Brinsford has highlighted issues concerning the location of residents who should not be at this facility. Several residents have been kept in the CSU because no other facility could, or would, accommodate them. This is not acceptable. Other, more suitable, establishments are refusing to take these residents because of their complex needs.

TO THE PRISON SERVICE

1. Staffing shortages led to a reduced regime for residents from October 2016 to July 2017; this resulted in education and other activities being severely reduced in the mornings and residents being kept in their cells for long periods, when they should otherwise have been in class or work. At the end of the reporting period this has now been rectified and there has been no significant loss of regime but it will still need to be monitored as short term staffing problems related to staff sickness has had an impact.

2. The improvements made to the CCTV system and the introduction of “Body Worn Cameras” has been successful. This has made investigations of incidents easier to manage.
3. Residents with mental health problems continue to be a concern as it often takes too long to transfer those with severe mental health problems to suitable specialist establishments. Assessments are completed fairly quickly but there are insufficient places in specialist establishments. This results in residents staying far too long at Brinsford, often with deteriorating mental health as a consequence.

4. A number of residents are outside the criteria for Brinsford. It is traditionally a local prison for those with sentences of less than four years and many residents do not fit this profile. Although the prison needs to accept residents with longer sentences from elsewhere, due to pressure on the prison population, the removal to a more suitable prison is slow and difficult. The Board considers that transfer of residents is an issue that should be addressed by the People Management Unit and not by intra-governor action.

TO THE GOVERNOR

1. Milton Keynes College does not always deliver the courses that have been agreed and classes are cancelled at short notice far too often. They need to be held accountable for the service they provide. The Board also believes that new, more relevant, courses would attract a better uptake. We raised these concerns in our last annual report and, although some improvement has been made, there are still concerns about education provision. A new education framework is being developed which hopefully will give Brinsford more direct access for providing education and training, but it will need to be carefully monitored. The number of residents in some classes is far too low.

2. The Board appreciates that change is always going to occur within an establishment. However, it is felt that Brinsford now needs a period of stability in order to go forward.

3. Vocational training is a success and the Board looks forward to a review of this area, with the possibility of expansion, to include more vocational and life training subjects for the residents.

4. The high number of incidents of self-harm remains a concern that still needs addressing, but we acknowledge that the situation has improved. More suitable activities for vulnerable residents have made a big difference to some troubled young men.
3. DESCRIPTION OF THE PRISON

3.1 HMP Brinsford is situated north of Wolverhampton in the West Midlands.

The prison establishment holds both remand and sentenced young men, mainly between 18 and 21 years of age. From July 2016 Brinsford has taken in adult male Category C prisoners, who are transferred from other local prisons. Those transferred are not put on a dedicated wing but are housed with the young adults on the general wings. Plenty of notice was given for the change in role and so planning was able to be carried out.

Residents are housed within five, two-story residential blocks with two wings on each block. Each wing has some single and some double cells. All cells have in-cell sanitation, but shower facilities are provided separately elsewhere on the wing hub (other than in Residential Block 5, which has in-cell showers).

There have been significant changes to the residential blocks in the last three years and the accommodation now consists of:

First Night Centre
This is a 15-bed facility for newly imprisoned men. On arrival at the unit their needs are identified, an integration programme is initiated and consideration given to the best environment for the resident to be allocated to, once they have completed their induction programme. Also on the First Night Centre is an Inclusion Unit, to help any residents with substance addiction problems, which is comprised of 4 beds.

Residential Block 1
One wing of this is a Supportive Living Unit (now called the Development and Progression Unit) for residents who require extra help.

Residential Block 3
This is comprised of those on remand as well as accommodation for new residents, transferring from the First Night Centre, who are undergoing assessment and an induction programme.

Residential Blocks 2 and 4
These are for sentenced and remand residents.

Residential Block 5
This is mainly for enhanced residents.

Care and Separation Unit
This is a 16-bed unit in a separate block.

Healthcare
This has 11 beds.

The establishment is fully operational and is able to accommodate 577 prisoners when all cells are able to be used. This was not the case for most of the year as cells were awaiting repair, but the situation has improved as mentioned previously.
3.2 Historically, the catchment area for HMP Brinsford YOI was generally the West Midlands, Staffordshire and surrounding counties. However, this is no longer the case and many residents are transferred from other establishments and courts from across England and Wales. Inevitably, because of the distances involved, some residents have few, or no, visits from family and friends. During the year a number of residents were taken from other establishments, such as HMP Nottingham, at the direction of the Prison Service, following an inspection report at Nottingham; this caused a few issues around gang culture which was managed very well.

3.3 The contract for supplying healthcare is held by Care UK and they have provided reasonably good service throughout the period. General practitioner services are provided on a contract basis and include an out of hours service. Some residents have serious mental and behavioural issues, requiring both psychiatric and psychological support, which is provided by the healthcare trust.

3.4 Education and training are provided by Milton Keynes College.

3.5 Facilities management is contracted out to Amey and, after a number of problems, things are improving following some good work by the Governor.

B Evidence sections 4 – 11

4 SAFETY

There continues to be a proactive approach taken towards identifying the causes of self-harm and violent behaviour towards other residents or officers.

Self-harm continues to be a cause for concern, but careful consideration of the underlying issues and attempts to resolve the reason for the self-harm of each individual have uncovered a number of issues which need to be resolved to successfully change the damaging behaviour. This process is ongoing and reflects the causes and actions required to bring about change.

Over the reporting period, the number of violent assaults has been variable and, on occasions, where there was an increase in violent behaviour, CSRA reviews were undertaken promptly to initiate interventionist measures. A proactive approach is taken towards the causes of the violence and the issues are dealt with promptly and efficiently, with positive results. Compared to other establishments across the prison estate the rate of violence is lower than the national trend. Good conflict resolution programmes are in place.

Recent consideration of adverse childhood experiences has given some further insight into why violent behaviour occurs; this forms part of the assessment of the individuals who resort to such behaviour, with a view to introducing interventionist measures to bring about behaviourtal change.

Notwithstanding this, many violent incidents continue to give cause for concern, but these are dealt with robustly when they occur.

When a serious assault takes place the matter is thoroughly investigated and, where appropriate, prosecution takes place. The visiting judge adjudicates on matters which the police do not deal with.
The CPS rarely prosecutes offenders who are resident in Brinsford. This is often said to be not in the public interest or it can be, on occasions, the lack of evidence from officers and victims within the establishment. Evidence from Brinsford shows they rarely wish to proceed with what they see as victimless crimes, which seems to be unjust.

The use of illegal drugs continues to be a cause for concern, and every effort continues to be made to curtail the importation of drugs and other illegal items into the prison.

5 EQUALITY AND FAIRNESS

The Equality and Fairness Group is chaired by one of the governors and consists of senior service managers, support service personnel and prisoner representatives. Training for Listeners is appropriately given and Samaritan support is available when a resident is found to be particularly vulnerable. There has also been a re-introduction of the key worker system, allowing residents to develop a more positive relationship with prison staff.

Training
The Equality and Safety Induction Training Programme has continued for directly and non-directly employed staff.

Safety and Fairness

This year there has been further development of the previous year’s significant efforts to improve equality and fairness in the prison. There has been a more holistic approach when considering the effectiveness of this area and the overall provision of service. For example, parents are invited to be part of a meeting with some of the more vulnerable residents, especially with disciplinary matters (e.g. GOOD reviews and ACCT reviews). This has allowed the prison to gain additional information and greater understanding of learning and support needs. Consequently this has seen an improvement in the success of rehabilitation from drugs and/or self-harm for some residents.

Throughout the year there has been an improvement in the safety of prisoners and visitors by improving the management and ownership of safer custody. This is a strategy for reducing violence, involving more proactive case management together with closer scrutiny of procedures and record keeping, with the aim of reducing self-harm and/or reduction in the number of assaults. There continue to be concerns over the use of drugs in the prison, but the prison continues to work hard to find sources both inside and from outside the prison. Self-harm is significantly higher than similar establishments and this was identified as the number one priority for the new Governor in January. There have been additional initiatives and support put in place by the prison and this has meant that cases of self-harm have greatly reduced.

The ACCT documents’ process and procedure are carefully considered on an ongoing basis, trends are noted and incidents of self-harm are carefully scrutinised, ensuring that the quality of documentation and the recording of information is accurately completed. During the year there has been an improvement in staff recruitment, which has ensured all prisoners have equal access to regimes and facilities, particularly where special needs are evident.

The Board continues to be concerned about how transgender prisoners who remain at Brinsford are supported. The board considers that wider issues in the placement of such prisoners mean that trans prisoners at Brinsford find it difficult to access the right educational and professional support that is offered to other prisoners. The IMB is aware of individual cases
where trans prisoners have been disadvantaged because other, more suitable establishments will not accept transfer. Despite the challenging circumstances of providing support in an inadequate environment, the board found that staff at Brinsford have gone above and beyond in their efforts and should be commended for their progress in supporting transgender residents.

**DIRFs & Investigations**
Discrimination Incident Reporting Forms (DIRFs) and complaints data is carefully considered and monitored regularly. The prison continues to discuss matters with the complainant in a timely manner and in many instances these incidents can be resolved effectively prior to action being taken.

**Complaints**
Complaints are dealt with quickly, where possible, and residents' concerns are able to be communicated directly to both duty governors and the Governor. Concerns are also communicated to the Governor during monthly IMB meetings. When concerns are raised in weekly IMB rota reports, the Governor endeavours to provide an action plan and feedback from senior managers who are responsible for the area of concern.

### 6 SEGREGATION/CARE AND SEPARATION UNIT

There are 16 cells in the unit.

At the start of the year cell maintenance was a problem due to the way the contractor, Amey was contracted. Recently, staff from Amey were given office space and are now working on site. This has resulted in the repairs being made in a timely fashion and some cell painting has been completed by residents.

The CSU is staffed by three officers in the morning, due to adjudications, and two officers in the afternoon. The regime is controlled, but fair, and the officers on the whole have a good relationship with the residents.

Recently a number of radios were introduced and are lent to the residents to give them some distraction from the boredom of being in the unit. In addition, everyone is given the opportunity for ablutions and exercise.

The Board is satisfied that it is informed, in a timely manner, when a resident is taken to CSU and board members attend the majority of Good Order or Discipline (GOOD) reviews.

The board is aware of the difficulties experienced by the establishment in ensuring the rights of transgender prisoners are maintained. Despite huge efforts from the senior management team, the offender management unit and Governor to Governor conversations, difficulties have been experienced with the 'gateway' process for referral of trans prisoners to appropriate facilities. In particular, referrals to secure hospitals have been compounded by varying opinions which contributed to delays which mean that transgender residents remain at Brinsford, and end up in a cycle of alternating between healthcare and CSU. This pattern concerns the board given that during the time of their incarceration, trans prisoners are unable to attend courses which would enable them to work towards rehabilitation and eventual release. This is not equitable and borders on possible abuse of human rights.

This concern should not be seen as criticism of the staff at Brinsford but, rather of the general management and protocols of the Prison Service. Staff do all that they can for long term
residents, providing work or education and, indeed, working with their families, to encourage rehabilitation and early release. However, the Prison Service system does not appear to support the residents, nor HMP Brinsford.

Adjudications held by the duty governor and by the visiting judge are held regularly and fairly. GOOD reviews for residents in the Care and Separation Unit are carried out professionally and, over the year, there has been greater consideration given to preventing further incidents of self-harm and violence, ensuring residents return to wings as soon as possible. It should be noted that, on some occasions, residents have spent a prolonged period of time in the CSU and this cannot be positive for their emotional or mental wellbeing.

7 ACCOMMODATION (including communication)

In residential units 1-4, the First Night Centre, Healthcare and the Care and Separation Unit (CSU) the WCs are located in the cells, but the showers are in separate blocks on the wing.

The First Night Centre has curtains around the WC, for residents who share cells. However, more recently, curtains have not been available so residents are having to improvise with other materials, such as sheets, in order to protect their privacy.

Residential Unit 5 has in-cell showers.

In double cells on the wings privacy is provided by having the WC in a separate section.

The accommodation and recreational areas of the prison are satisfactory. However cleanliness is often affected by overloaded rubbish bags being left at the entrance to wings. This change in procedure with rubbish was put into place as a result of a fire risk.

The cleanliness of the showers is variable across all residential units and throughout the prison.

Healthcare has a shower that is accessible for wheelchair users. There is only one cell in the prison with a wider door suitable for wheelchair access; this may need review in the future.

Staff use all the wing offices, which provides greater contact with residents who are on the wings. If staff are not in their offices, they will be found somewhere on the wing so they are readily available.

Contact between residents and staff has improved significantly throughout the year and the introduction of officers taking on the role of key worker has contributed to better relationships being formed between the two. A minimum of 45 minutes contact time, per resident per week, currently takes place as we have been reliably informed.

Staff sickness rates have caused some problems, particularly with regard to regime.

Each residential unit has four laundry rooms, one on each wing, and residents are given access to the laundry once a week.
Maintenance of the equipment has been a big problem in the past but, with Amey contractors now being based on site at Brinsford, this has improved, although there are still long waits for common repairs, such as washing machines.

Property is dealt with by the staff on reception. On entering the prison, all property is entered on a property card. All valuables are stored in a safe in the administration block.

Whilst on remand residents wear their own clothes, which can cause a storage problem. Visitors can bring in items of clothing but they cannot bring in trainers as they constitute a security issue.

There is an ongoing problem with property being transferred between prisons. GeoAmey will sometimes only take one bag of property in the van when transferring residents between prisons and, as a result, property is separated from its owner. It then often takes weeks before the property is returned to the appropriate resident.

A new computerised system has been introduced to record property being brought in; this is in order to eliminate property going missing. However, from the old system, which was merely carbonated copied receipts, residents' property is still missing. This can cause distress and frustration to residents, which results in a number of compensation claims. There can then be a long wait while it is established who is responsible for paying the compensation.

There is a further problem with property going missing on the wings. This particularly occurs when a resident is suddenly moved to another location. However, the system for clearing and logging property has been tightened to avoid such issues.

8 HEALTHCARE (including mental health and social care)

Healthcare is under the control of Care UK, who have maintained an adequate standard of care this reporting year. The Outpatients Unit continues to give good service, though the number of "DNAs" (did not attend) whether through refusal, lack of officers or maladministration, remains high, to the detriment of efficiency and cost. It is pleasing that the authorities, acting together, are trying to solve this problem.

As reported last year, the number of inpatients with mental health problems continues to give cause for concern. Despite admirable efforts by the trained staff to attend to these patients, the Board continues to be concerned about the number of patients who are retained for long periods of time in Brinsford’s facilities, when they really need to be transferred to institutions better suited to cope with their needs. Despite senior management’s huge efforts to progress things the process of transfer is far too slow, to the considerable detriment of those who are required to remain too long in this facility.

We are also anxious that Healthcare is used occasionally to ‘park’ non-clinical residents who cannot be fitted in elsewhere in the prison. We understand the reasons for this in most cases, but it is far from ideal.

One change this year has caused us some alarm. The trained nursing staff have been withdrawn from the main part of the inpatients unit. This was described as being to allow their talents to be more efficiently utilised within the whole facility. However, this has put more responsibility for the minute by minute care on the prison officers in the unit, few of whom are experienced enough, or have had proper training, to deal with what are often very difficult patients.
Although this has not led, so far, to any major issue, the Board is anxious that these officers do not know how to react to patients’ needs in the short term. In particular they are often very reluctant to open cell doors because, given the mental and often belligerent state of the relevant residents, they are not sure what they will find or be faced with on the other side or indeed know how to deal with it. This is often exacerbated by a shortage of staff.

Another consequence of this is that the cells are inspected on fewer occasions than would be expected with the result that the Board (and indeed the healthcare authorities) are not at all satisfied with the cleanliness of an area which, of course, should be pristine.

The Board recommends, and indeed the prison authorities agree, that a specially chosen group of ring-fenced officers, who are trained solely for the purpose of staffing this part of the prison, should be established. CSU already has such a team with considerable success, and it may be an option to build a new team in Healthcare, in conjunction with the one in CSU. Certainly the Board would be far happier if this were done. They could then work alongside nursing staff in Healthcare.

In conclusion, the Board feels that this part of the prison is reasonably run and protocols continue to be constantly reviewed.

9 EDUCATION AND OTHER ACTIVITIES
The Education Department is looking to improve the induction process, so that residents are more able to digest the importance of learning and skills at an appropriate time.

Training such as the café, cleaning academy, car maintenance and cleaning, ground works and gardening are real successes at Brinsford which, at times, include some classroom based work.

The department’s focus at this stage is about promoting the positive aspects of education, improving induction and making prison-resident-education links stronger.

Of concern is the reluctance of young residents to engage with education, following perhaps years of avoiding schooling. The Board considers that education needs to include more active educational methodologies and perhaps to concentrate on vocational style subjects that can be seen to be of practical use by the residents.

10 WORK, VOCATIONAL TRAINING and EMPLOYMENT
Brinsford is predominantly a young offender institution and there are currently only a few adults. Because of this the training has been restricted to “classroom, educational based” subjects covering maths and English, before the opportunity is given for attendance at vocational training.

Although there are a number of the young offenders who want formal education qualifications many stay in these classes reluctantly.

It is noted that some offenders are given in house tasks such as wing cleaning and, once they have shown some responsibility, are selected to attend other specific vocational training to suit their particular needs.
There is a very successful British Institute of Cleaning Science (BICS) course where participants can, if needed, spend the mornings in classroom based study and the afternoon in practical training. The course offers 27 modules which, on successful completion, can lead to job opportunities on their release.

Other opportunities are in waste management, the popular catering academy, joinery, horticulture, amenities and conservation.

Successful and popular as these courses are, we feel that there is still room for expansion. There is a lack of space, staffing and money to address some issues but the benefit for this age group, if the training is in place, is that successful participants could leave Brinsford rehabilitated, with an academic qualification and the opportunity for work on release.

The Board believes that the number of places, and the variety of courses, could be extended. For example, the cleaning academy could be expanded to include window cleaning, health and safety courses, first aid and manual handling.

Whilst suggesting this progression the Board is aware of the difficulties in appointing qualified tradespeople and retaining them.

Consideration should also be given to the young offenders being required to attend a course as part of their rehabilitation. This could be supported by rewards for attendance and sanctions for failure to attend.

**11 RESETTLEMENT PREPARATION**

During the reporting period, resettlement at Brinsford has improved considerably, which has been helped by the Resettlement team working closer with Offender Management.

Resettlement begins when residents arrive at Brinsford and they are assessed within 72 hours.

During their stay, issues such as accommodation, debt etc., can be addressed together with training needs for employment on release. This is a continual programme but, as their release date gets nearer and, in an effort to obtain accommodation, if required, and employment, the focus is increased with several outside agencies becoming more involved.

The contract with the Community Rehabilitation Company (CRC) came to an end during the reporting period and this work is being undertaken by prison staff.

Staff from Resettlement visit the wings and the introduction of the key worker scheme in May has helped considerably.

Brinsford is now meeting its target for finding accommodation and, with the help of sections of the education programme – such as the catering and cleaning academy - several residents have found immediate employment.

It would appear that a major problem upon release is trying to obtain a bank account; historically the Halifax Building Society has been helpful but their new application form is not resident-friendly.
C Section – Work of Board

The IMB at Brinsford carries out its role in the followings ways:

1. Two members are on rota every week of the year and they will visit all areas of the prison as often as they can during that week. A written rota report is then produced.

2. Board members aim to attend every segregation review that must take place within 72 hours of a prisoner being segregated and any decisions taken, that are not within the agreed framework, will be challenged.

3. There are eight boxes around the prison where prisoners can post a written application to see an IMB member, who will then visit the prisoner and follow up any issues that arise from their enquiries. We always do our best to resolve the difficulty.

4. IMB members attend meetings as observers and report back to the rest of the Board at monthly meetings.

5. IMB members have a good working relationship with the Senior Managers and can approach members of staff for information when required.

6. Monthly Board meetings take place and are attended by the Governing Governor or, in his/her absence, another governor, so that issues of concern can be discussed and information on future developments can be shared.

7. The Board has a good mix of experienced members and some recently appointed members. New members shadow the more experienced members until it is felt that they are able to complete the task on their own. Training is provided at meetings and can be given by experienced members or other prison staff.

8. The Board endeavours to visit other prisons and other IMBs; two of those visits took place during this reporting period.

<table>
<thead>
<tr>
<th>BOARD STATISTICS</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Recommended Complement of Board Members</td>
<td>16</td>
</tr>
<tr>
<td>Number of Board members at the start of the reporting period</td>
<td>9</td>
</tr>
<tr>
<td>Number of Board members at the end of the reporting period</td>
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</tr>
<tr>
<td>Total number of visits to the establishment</td>
<td>308</td>
</tr>
<tr>
<td>Total number of segregation reviews attended</td>
<td>243</td>
</tr>
</tbody>
</table>
## D  Section - Applications

<table>
<thead>
<tr>
<th>CODE</th>
<th>SUBJECT</th>
<th>CURRENT REPORTING YEAR 2017/2018</th>
<th>PREVIOUS REPORTING YEAR 2016/2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>ACCOMMODATION INCLUDING LAUNDRY, CLOTHING, ABLUTIONS</td>
<td>14</td>
<td>4</td>
</tr>
<tr>
<td>B</td>
<td>DISCIPLINE INCLUDING ADJUDICATIONS, IEP, SANCTIONS</td>
<td>14</td>
<td>11</td>
</tr>
<tr>
<td>C</td>
<td>EQUALITY</td>
<td>4</td>
<td>7</td>
</tr>
<tr>
<td>D</td>
<td>PURPOSEFUL ACTIVITY INCLUDING EDUCATION, WORK, TRAINING, LIBRARY, REGIME, TIME OUT OF CELL</td>
<td>2</td>
<td>14</td>
</tr>
<tr>
<td>E 1</td>
<td>LETTERS, VISITS, PHONES, PUBLIC PROTECTION RESTRICTIONS</td>
<td>9</td>
<td>11</td>
</tr>
<tr>
<td>E 2</td>
<td>FINANCE INCLUDING PAY, PRIVATE MONIES, SPENDS</td>
<td>4</td>
<td>8</td>
</tr>
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<td>F</td>
<td>FOOD AND KITCHENS</td>
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<td>G</td>
<td>HEALTH INCLUDING PHYSICAL, MENTAL, SOCIAL CARE</td>
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<tr>
<td>H 1</td>
<td>PROPERTY WITHIN THIS ESTABLISHMENT</td>
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<td>H 2</td>
<td>PROPERTY DURING TRANSFER OR IN ANOTHER ESTABLISHMENT OR LOCATION</td>
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<tr>
<td>H 3</td>
<td>CANTEEN, FACILITY LIST, CATALOGUE(S)</td>
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<td>I</td>
<td>SENTENCE MANAGEMENT INCLUDING HDC, ROTL, PAROLE, RELEASE DATES, RE-CATEGORISATION</td>
<td>20</td>
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<td>J</td>
<td>STAFF/PRISONER CONCERNS INCLUDING BULLYING</td>
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<td>K</td>
<td>TRANSFERS</td>
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<td>TOTAL NUMBER OF IMBICATIONS</td>
<td>APPLICATIONS</td>
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