



Annual Report
of the
Independent Monitoring Board
at

HMP/YOI Drake Hall

for reporting Year
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Monitoring fairness and respect for people in custody

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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, every part of the prison and also to the prison's records.

2 EXECUTIVE SUMMARY

Introduction to the report

While the Board continues to believe that Drake Hall provides a safe and secure environment for prisoners and that they are treated decently and with humanity, it has some concerns that there is a perception amongst a high percentage of prisoners, who completed a recent survey, that the prison is less safe than previously. (See Section 4)

This last 12 months has been challenging for the prison. During the year the prison was downgraded to a Performance Rating of 2. The Board understands the statistical evidence on which these ratings are based, and it notes that there is a Performance Improvement Plan (PIP) in place to improve the performance rating. The Board considers that, with the improvements made, the prison offers a safe environment for the prisoners.

The recent decision to remove the replacement of the WWII accommodation units, Plymouth and Richmond, from the Estates Programme completely is very disappointing given that the interim improvements outlined in last year's Minister's response have not yet been started. The units are damp, mouldy and unfit for habitation.

The allocation of women unsuited to the open physical layout and free flow regime of the prison has continued to contribute to an increase in bullying and assaults. Consequently, there is an increase in adjudications.

High standards and good relationships are found between the majority of staff and prisoners, although industrial relations between staff and management have been challenging throughout the year.

Despite these difficulties, the Board can report that the prison continues to work towards the positive preparation of the women for resettlement and reintegration into the community.

Main Judgments

Are prisoners treated fairly?

Prisoners are treated fairly within the prison.

Are prisoners treated humanely?

The prisoners are treated humanely. The Board is aware that more prisoners with complex needs are being accommodated at Drake Hall. This continues to provide a challenge to the leadership team to ensure that the staff are properly equipped to cope with these prisoners.

Whilst the Board welcomes the cosmetic improvements to the accommodation in Richmond and Plymouth, it remains concerned that the blocks still fall below minimum standards.

The introduction of a female General Practitioner (GP) is welcomed, however there have been prolonged periods when she has not been available nor has a female locum been provided. This situation continues to provide concern to the Board particularly in respect of vulnerable women.

Are prisoners prepared well for their release?

The prison continues to provide a coordinated and positive regime to equip the women for a productive life after release. There is a wide range of educational and training opportunities being offered to the women to prepare them for life on release. 366 women were released from Drake Hall this year of whom 362 had accommodation provided. 4 women were released without, but arrangements were in place for them to meet with a local housing support officer. There is an effective use of the system with over 4700 approved this year with no failures.

Main Areas for Development

TO THE MINISTER

The IMB asks the Minister to review the decision to cancel the renewal of Richmond and Plymouth accommodation blocks as they now fall well below an acceptable standard. New accommodation could also provide additional lockable cells. Currently there are only 6 lockable cells in the prison and more resilience would be welcomed. (See Section 7).

TO THE PRISON SERVICE

Although Drake Hall is a Closed Prison and as such is required to accept all types of closed condition prisoners, the Board is concerned that a small group of women struggle with the open environment and put a strain on the current limited facilities for segregation. (See Section 4 and 6).

In last year's report the Board stated that prisoners' personal property was frequently delayed or lost on transfer to and from Drake Hall. There has been no improvement, causing unnecessary distress to prisoners. The Board asks the Prison Service to instigate a review to solve this problem as soon as possible. (See Section 7).

The Board is concerned that external specialist medical appointments are regularly cancelled due to the unavailability of prison escorts. Whilst the Board understands that urgent appointments are prioritised, the cancellations cause distress to the prisoners and may potentially have medical implications. (See Section 8)

The Board considers that an education and training plan should be used when prisoners are transferred. It would ensure that women are given the best opportunity to gain useful skills. (See Section 9)

TO THE GOVERNOR

The facility known as 'Signpost' provided a useful and confidential service to the women. Since its relocation to the Equalities Hub the Board is concerned that there is a lack of confidentiality resulting in women being less likely to use the service. The Board asks the Governor to monitor the situation and to consider moving the facility back to its previous location. (See Section 4)

The IMB is concerned over an apparent lack of a transparent, coordinated plan managing all facets of Health and Safety within the prison. (See Section 4).

The IMB is also concerned that during this year there have been 3 'long stays' in the CSU. This situation can cause stress for the women and difficulties for the CSU staff. The IMB would welcome an assurance that long stays will be avoided as far as possible. (See Section 6).

The Board continues to be concerned that the current Personal Officer system is not satisfactory. The Board is aware that a new system, Offender Management in Custody, (OMiC) is being introduced from the end of November 2018. The Board hopes that the implementation will be carefully managed. (See Section 7).

The IMB asks the Governor to consider reviewing the process of allocation of work to new prisoners. There are regularly unnecessary periods of time between completion of induction and a prisoner starting a job. (See Section 9).

Improvements

There continue to be improvements in the effectiveness of the Community Rehabilitation Companies (CRC) over the last year.

The dentist's chair has been replaced and is usually operational.

There was a considerable delay in the recruitment of a female GP. Currently there is a post holder. However, there have been prolonged periods when she has not been available.

The Board understands that Counselling Services have now been agreed. The Board looks forward to the imminent implementation of these services.

The Board welcomes the fact that CSU Staff can now request additional support from the Orderly Officer if the need arises. However, there are still occasions due to lack of staff when prisoners in CSU have delays in getting their personal items and are not offered exercise.

3. DESCRIPTION OF THE PRISON

Drake Hall is situated in rural Staffordshire, about a mile from the town of Eccleshall and 10 miles from Stafford and the nearest railway station. Although designated as a closed prison, the layout at Drake Hall provides significant freedom of movement for prisoners within the perimeter fence. The women and young offenders are accommodated in 15 individual houses spaced around the grounds, each with around 20 rooms. Most are single rooms, with a small number of doubles. An average of 9 Young Offenders was accommodated during the year alongside adult prisoners. The Closed element of the prison has a certified normal holding capacity of 315.

An additional house lies beyond the perimeter fence of the prison and this 'Open Unit' provides a notional additional capacity for 25 women, bringing the total Drake Hall prison capacity to 340.

The capacity of the Open Unit cannot always be fully utilised as strict criteria for admission are rigorously applied. The unit aims to provide those in residence, and of working age, with employment in the community. It also aims to prepare all residents as fully as possible for a productive life in the community after release.

The population of the prison averaged over 96% of capacity this year.

B Evidence Sections 4 – 11

Section 4: SAFETY

The aim of Safer Custody is to identify, manage and support prisoners who are at risk of self-harm, harm to others and harm from others.

Drake Hall remains a reasonably safe place for the majority of prisoners. This can be said with some confidence despite an increase in adjudications. However, the continued allocation of women unsuited for the open physical layout and free flow regime of the prison has contributed to a perception amongst some of the prisoners that the prison is less safe than previously with the result that in a recent Safer Custody survey, only 37% of the women questioned (43/117) stated that they felt safe.

The prison is listening to the women's concerns and is putting measures in place to address them. The Board will continue to monitor progress in this area.

Measures have also recently been put in place to ensure better consistency from officers when reprimanding the women. This should result in a reduction of adjudications.

There has been a substantial drop in the number of women on ACCTs. However, there were 36 occasions where women on ACCTs were held in the CSU in the last 12 months.

There is an increase in prisoner assaults in the current year, with a small number of prisoners disproportionately accounting for many of them. There was a slight increase in use of force (see table below), again caused by one particular prisoner.

Regrettably there has been an increase in the number of incidents of self-harm (see table below), though the figures are still well below every recent year except for 2016/17.

Measures have been put in place at weekends to ensure there are more activities for women and therefore less opportunity for them to engage in anti-social behaviour. This initiative is having positive results.

The ingress of drugs continues to be problematic. The situation recently improved after the transfer out of a few prisoners. There is also improved screening of incoming mail.

There have been 3 deaths in custody, all of whom died in hospital from natural causes. During the year covered by this report, the Inquest took place into a Death in Custody covered by last year's report and important lessons were learned from this.

Important improvements in the Care Suite are planned. These improvements should mean that the suite will become fit for purpose. The accommodation will provide suitable accommodation for vulnerable women and supervising staff. It will also be available for Listeners to use.

The Board understands that Drake Hall is a medium risk establishment from a Health & Safety standpoint. The Board is concerned, however, that there may be insufficient strategic overview of how the various work strands integrate to ensure that H&S is managed effectively throughout the prison.

Safer Custody Statistics

	2016/17	2017/18
Average CSU occupancy	Average of 140 days per month	Average of 135 days per month
Average monthly adjudications	151	183
No of adjudications related to safer custody	109 (fight/assault)	173
Average % population on drug rehabilitation	20%	23%
% of women who feel safe. Prison survey	85%	37%*
Use of force	52	57

**only 117 women completed this year's survey. 43 said they felt safe, which equals 37%*

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
Average Population	299	266	309	309	327	334	328
No of Adjudications	719	609	609	1029	997	1812	2194
No held in CSU	199	133	142	279	288	228	214
No of ACCTs opened	152	143	171	231	228	285	281
Self-harm incidents	326	182	178	166	189	104	126
No of R&C	693	444	531	474	510	843	918
No of ASBOs	N/R	12	43	99	109	N/R	Replaced by CABs and CSIPs
No of UBRFs/CABs	96	67	235	125	76	337	Replaced by CABs and CSIPs

No of DIRFs/CABs/CSIPs	19	36	N/R	14	19	22	218 (increase due to change in reporting arrangements = combined total)
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Section 5: EQUALITY AND FAIRNESS

The Equalities Committee continues to meet monthly and the meetings are well attended by both senior staff and prisoner representatives. However, attendance at the related Protected Characteristic Forums is poor.

Whilst the equalities process is robust there is no evidence to show that the women's attitude to equality and racism is significantly modified in the period between entering and leaving the prison. The Board considers that the women's awareness of equality and racism issues could be improved by some wider training initiatives.

There has been an improvement in the number of inter-prison visits processed since last year and a programme is now in place to meet all requests.

Drake Hall staff have dealt well with accommodating the needs of the transgender prisoners who have been transferred to the prison. The sensitive way these transfers have been handled and the prisoners' subsequent integration is praiseworthy.

Until recently one of the most popular features of the prison was a small building set on its own and called 'Signpost'. Staffed by prisoners, this was a place where women could collect forms, information, DVDs and socialise. Socialising was perhaps the most important activity. 'Signpost' provided a safe space where women could chat in confidence to fellow prisoners. A decision was taken to move 'Signpost' and incorporate it into the Equalities hub which is staffed by prison officers. The Equalities hub is not open at weekends or evenings. Consequently, the women have less access to the information they require and less opportunity for friendly interaction. The IMB asks that consideration should be given to 'Signpost' reverting to its former site.

Section 6: SEGREGATION / CARE AND SEGREGATION UNIT *

Drake Hall is a closed prison. However, within the perimeter fence it is an open environment allowing free movement of prisoners during the day in accordance with a timetable issued to them each week. For most prisoners this represents an introduction to assuming responsibility for their own actions sometimes for the first time. For some other prisoners, who have transferred from fully closed establishments, it offers opportunities to indulge in unacceptable and frequently aggressive behaviour.

As a result, adjudications have risen to an average of 183 per month, a significant and worrying increase from 151 last year. The average number of individual prisoners segregated each month has fallen slightly (17 this year, 18 last year) and the average number of total days per month for which prisoners were segregated has also fallen slightly to 135 as opposed to 140 last year.

The IMB is concerned that during this year there have been 3 “long stays” in the Unit. This can cause stress to the specific women and difficulties for the staff.

There have been 36 women on ACCT documents in the CSU this year. However, their welfare has always been closely monitored during their stay in the CSU.

The increase in adjudications has inevitably placed even greater pressure on the staff who have nonetheless continued to work in commendable and compassionate fashion to try to return women to normal location as soon as appropriate.

Board members are notified routinely within 24 hours of all prisoners being located and the Board has attended almost every Segregation Review during the year. Overall therefore, the Board commends the working of the CSU and its staff. Our concerns expressed in last year’s report about staffing levels in the CSU have been addressed to some degree by the introduction of a mechanism whereby the Oscar 1 (Orderly Officer) can divert extra staff to the CSU when needed.

** Locally referred to as the Care & Support Unit (CSU) at Drake Hall.*

Section 7: ACCOMMODATION (including communication)

The Board considers that the prison provides reasonable accommodation in most of the residential blocks except for Richmond. It is noted that Plymouth has benefitted from a recent internal cosmetic refurbishment carried out as a joint initiative between Staff and prisoners.

It has long been acknowledged that both World War II buildings (Richmond and Plymouth) should be replaced. However, having been assured that the building work had been added to the Prison Service Plan for 2019 it was with great disappointment that the Board recently learned it had been removed from the Plan. This was contrary to previous communications received by the Governor.

Living conditions in Richmond continue to be a major concern despite money having been spent on CCTV and some re-decoration. Damp and mould are major issues in many of the rooms and the shower room is well below acceptable standards.

Disappointingly, despite the problem being highlighted for over a decade, finance has not been made available for a refurbishment of this area.

The new CCTV system recently installed in Richmond has improved safety for the women. In previous reports the IMB has stated that the poor building design with lack of lighting and narrow corridors makes the house an intimidating and negative place in which to live. This remains the case.

In contrast, the Open Unit provides a pleasant environment for prisoners near the end of their sentences. It is frequently underutilised due to the strict criteria that must be met before places are allocated.

The Personal Officer scheme is about to be replaced by a key worker system which the IMB hope will improve interaction between the women and officers.

Yet again, there have been many issues throughout the year with the transfer of personal property between prisons. This appears to be a systemic problem throughout the prison system. These difficulties can be very distressing and cause severe hardship for transferred prisoners. Again, the IMB would recommend that a review be undertaken to solve this problem expeditiously.

Section 8: HEALTHCARE (including mental health and social care)

The Prison Service, in partnership with the NHS, is required to ensure that prisoners have access to health services equivalent to those in the wider community. Care UK is the lead for health services in the prison. The Midlands Partnership NHS Foundation Trust provides mental health services.

All women are subject to a health screening on admission to the prison. They have access to a range of health services (including mental health and substance misuse) and where necessary obtain more specialist secondary care services provided at either the Stafford or Royal Stoke Hospitals. The mental health service provides primary and secondary care interventions for women with mental health problems. A range of support for women who have issues with substance misuse is also in place. Drake Hall has no inpatient healthcare facility. In the region of one third of the women admitted to the prison have complex health care needs. A significant number of the women have problems relating to drug and alcohol dependency.

In last year's report the IMB noted two issues requiring further monitoring. Firstly, the number of cancelled medical appointments at hospitals due to insufficient escorts. This problem remains. On a regular basis the number of appointments required is in excess of the number of escorts available, thus resulting in some appointments being cancelled and having to be rearranged. The Board understands that escorts are always provided where urgent access to external healthcare services is required.

The second issue relates to the time it takes for some of the women to receive prescribed medication. This occurs when either insufficient medication is transferred with the woman when she is moved from another establishment, or when there are delays in the medication being dispensed by the pharmacy on arrival at Drake Hall. The IMB has been assured that when medication is not transferred the issue is raised with the transferring prison. In addition, delays in the dispensing of medication are kept to a minimum. The Healthcare centre keeps a supply of the most generally used medications in order to prevent the occurrence of unnecessary delays.

The Board is concerned at the high levels of DNA (Did Not Attend) rates. These rates are often in excess of 20% and for some types of treatment have been as high as 50%. In addition, there have sometimes been problems over Healthcare staff attendance at ACCT and segregation reviews.

During the year one women required transfer to a secure mental health unit. The time taken for this to be arranged was, in the Board's view, unsatisfactory. Hopefully, lessons have been learned and this should not re-occur. The IMB will continue to monitor.

Despite a low rate of formal complaints and only a small number of applications to the IMB, members are often approached by women who express concerns about the service provided by Healthcare. The Board follows up these issues when they arise but due to confidentiality, rely on Healthcare responses. The Board is assured that there is an agreed complaints process in place and women are seen by a member of the Healthcare team in order to respond to their concerns. The Board is also assured that all formal complaints are responded to in writing.

Section 9: EDUCATION AND OTHER ACTIVITIES

The Adult Learning Centre is an important facility at Drake Hall. It is tasked with improving the women's educational standards and employability during a limited length of stay. Approximately 61% of women reside at Drake Hall for a period of 6 months or less and therefore Learning Centre staff face the challenge of raising a woman's low skill and educational levels 'to standard' in a very short time. Considering the limited time available, it is notable that the overall success rate for learners is 97% (98% in 2017). The Board commends the Learning Centre staff for this.

The IMB suggests that the overall quality of education and training would be greatly improved for prisoners if they were given a personal education and training plan upon first entering prison. Currently there is a loss of momentum and some frustration for women at having to repeat programmes whenever they transfer.

Most women due for discharge attend an 8-week x 3 sessions per week Employability Course where they are shown how to complete job application forms, write CVs and develop interview skills etc. This programme of support is a cornerstone of Drake Hall and the Learning Centre's work in preparing women for life outside prison. In conjunction with work placements both within and outside the prison this forms a coordinated approach to reducing reoffending.

The work placements are generally orientated towards the lower end of work skills; as a result, the women's wage rates after leaving the prison and entering employment are likely to be correspondingly low. The IMB suggests that consideration should be given to providing a range of skills training that offers better paid job opportunities, resulting in an improvement of income and opportunity for women on release.

The Board considers that the time taken from completion of Induction to the offer of a job seems excessive for some women. It can take between 9 and 15 days before a woman starts work. Currently, little meaningful activity takes place during this time giving opportunity for boredom and indiscipline. The Governor may wish to review this process.

Section 10: WORK, VOCATIONAL TRAINING & EMPLOYMENT

There is a range of activities available to prepare the women for release and resettlement. The Activities Team continue to provide opportunities for paid work placements for all prisoners who are able and willing to work (97.6% work, 0.6% are medically unable to work and 0.6% are retired and 1.2% are unable to be allocated to work due to non-compliance of the regime). There continues to be a close working relationship between the Activities Team and the Education Provider ensuring a complementary and joined up approach. There are currently 33 purposeful activity work placements providing over 300 jobs.

Work is available in a range of areas including the Kitchens, Gardens, Laundry, Hair and Beauty, Remade With Hope (RMH), Gym, Waste Management Unit and Cleaning and Peer Support roles. There are also industry-led activities provided by DHL, a Call Centre by Data Census, Halfords

and Greggs. The last two provide job opportunities for the women who are successful in meeting their recruitment criteria and pass the training programme. The IMB notes that all the women who accepted jobs with Halfords on release are still in Halfords employment and one has been promoted into a management role. It is a similar situation with Greggs, where one woman has been promoted to assistant manager.

The Outwork Department continues to provide positive opportunities and now has 16 women in paid employment and 7 in volunteer placements.

The introduction of RMH to Drake Hall offering paid employment by recycling clothes for sale is an exciting addition. To date, over £1,500.00 has been raised for Staffordshire Women's Aid. Recently, RMH have allowed women to box up cleavage boosters and breast form lingerie to supply a local hospital caring for women undergoing breast cancer treatment and surgery. The IMB note that the Women's Institute (WI) continues to be involved in the prison and recently hosted a party to celebrate their second anniversary. They are now self-sufficient as an organisation within the prison. The relationship has continued to grow, providing benefits to the local community with donations to local causes such as Water Aid, Dementia UK and Breast Cancer. In addition, Drake Hall gymnasium has received new equipment and gym clothes have also been provided for women without financial means.

Section 11: RESETTLEMENT PREPARATION

Preparation for release and resettlement continues to be a strength at Drake Hall. The open environment within Drake Hall provides a supportive environment for women to prepare for release as well as offering exposure to community living. There is an emphasis on self-reliance and personal discipline; this, together with providing the opportunity to work, encourages the development of a work ethic. The women therefore have the building blocks in place to lead a productive life on release.

The Offender Management Team is well organised and benefits from the collocation with the Community Rehabilitation Company. A one team approach is engendered, and this enhances the service provided to the women. There are effective monthly Inter Departmental Risk Management Team (IRMT) meetings which review women being considered for Release on Temporary License (ROTL) or coming to the end of their sentence. There is evidence that these meetings result in effective management of the preparation for release and that the women's individual needs are catered for. Care is taken to ensure that family contacts are maintained and considered in the individual plans. This year there were 4707 ROTLs approved and there were no failures.

During the year there were 366 women released from Drake Hall of whom 362 had accommodation. 4 women were released without accommodation but with a requirement to meet with a local housing support officer on release. Accommodation through the Stonham BASS (Bail and Support Services) project continues to be difficult to secure, as there are so few places available for women. There has been a promise that accommodation houses could be re-designated for women. As yet there is no evidence that this has happened. As a result, provision of safe accommodation for women on release is becoming an area of concern.

The Open Unit is an excellent facility and continues to provide opportunities for 25 women to gain employment skills and improve their independent life skills. 94 women have been discharged from the Open Unit with only 2 recalls noted. There is also a low incidence of women being returned to the main prison. However, due to the change in the prison population and pressure to transfer women to other Open Prisons, it is becoming more difficult to identify

enough women to meet the requirement to use the unit; consequently, the unit has only averaged around 80% of capacity this year.

The IMB notes that there continues to be a very low take-up of the on-site family accommodation which has not been used since August 2017.

C Section – Work of the Board

The Board has had a successful recruitment campaign this year recruiting 4 new female members. The Board currently consists of 10 members against a complement of 12. The Board meets monthly and most Board meetings have an element of training delivered by one of the specialist areas within the prison. The Board has hosted IMBs from 3 other prisons as part of its training programme. The Board has also had a reciprocal training visit to HMP Eastwood Park.

The Board has changed the way it operates to facilitate the induction and training of the new recruits. There are now two members on rota each week who visit the prison on two or more occasions during the duty week. The areas monitored always include the communications hub, kitchens, CSU and Healthcare. Further monitoring each week is decided on the requirements at the time or the length of time between visits to that facility. This ensures that all facilities are monitored within the reporting period.

Members on duty normally attend reviews and sometimes attend prison and judicial adjudications and ACCT reviews.

The IMB is directly approached by prisoners during their rota visits and these enquiries are normally dealt with immediately. However, the member will get the prisoner to sign a written application form if appropriate. Applications are dealt with by the rota members and a close watch is kept on complaints made through the prison system to ensure that they are being managed within the guidelines. The IMB has noted that complaints raised by prisoners relating to other establishments often take much longer than the guidelines to be answered.

Board members take areas of special responsibility which generally cover the areas in Section 4 of this report. This involves attending the meetings relating to their specialist areas and keeping a watching brief. Members report to the monthly Board meeting on significant issues in their specialist areas.

BOARD STATISTICS	
Recommended Complement of Board Members	12
Number of Board members at the start of the reporting period	6
Number of Board members at the end of the reporting period	10

Total number of visits to the Establishment	276
Total number of segregation reviews attended	82

D Section - Applications

Code	Subject	Previous reporting year	Current reporting year
A	Accommodation including laundry, clothing, ablutions	6	11
B	Discipline including adjudications, IEP, sanctions	2	4
C	Equality	0	3
D	Purposeful Activity including education, work, training, library, regime, time out of cell	6	10
E 1	Letters, visits, phones, public protection restrictions	5	9
E 2	Finance including pay, private monies, spends	5	14
F	Food and kitchens	0	2
G	Health including physical, mental, social care	20	21
H 1	Property within this establishment	2	6
H 2	Property during transfer or in another establishment or location	14	11
H 3	Canteen, facility list, catalogue(s)	1	3

I	Sentence management including HDC, ROTL, parole, release dates, re-categorisation	6	13
J	Staff/prisoner concerns including bullying	14	9
K	Transfers	6	2
	Total number of IMB applications	87	118