



Annual Report
of the
Independent Monitoring Board
at

HMP Maidstone

for reporting Year
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Monitoring fairness and respect for people in custody

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1 STATUTORY ROLE OF THE IMB

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

The Board is specifically charged to:

- (1) satisfy itself as to the humane and just treatment of those held in custody within its prison and the range and adequacy of the programmes preparing them for release.
- (2) inform promptly the Secretary of State, or any official to whom he has delegated authority as it judges appropriate, any concern it has.
- (3) **report annually to the Secretary of State on how well the prison has met the standards and requirements placed on it and what impact these have on those in its custody.**

To enable the Board to carry out these duties effectively, its members have right of access to every prisoner and every part of the prison and also to the prison's records.

Main judgements

Are prisoners treated fairly?

The prisoners in HMP Maidstone are treated fairly; however the continued imprisonment of foreign nationals who have completed their sentence but are still being held in prison is unacceptable.

The relationships between staff and prisoners continues to be good with positive interactions and outcomes.

Are prisoners treated humanely?

Overall the Board is content that prisoners are treated humanely. Nevertheless the lack of both laundry and sports facilities has a big impact on the practicalities of humane treatment. The fact that these two facilities are still unavailable, despite repeated reassurances, continues to give grave concern. The continued degradation of buildings and facilities makes it hard for both prisoners and staff to live and work in a humane way.

The backlog of dental needs continues to be an issue.

Are prisoners prepared well for their release?

The majority of prisoners in HMP Maidstone are deported either during or at the end of their sentence. This makes preparation for release difficult as the majority will be repatriated at short notice.

Main Areas for Development

TO THE MINISTER

The lack of capital investment in deteriorating buildings and equipment continues to put a major strain on prisoners, management and staff. In 2017 we requested replacement of the (condemned) sports hall before winter weather (section 3.6), and cessation of smoking within the establishment created tensions which could not then be alleviated by exercise. In the current year, further deterioration has occurred with (ss 3.6, 7.8) the loss of changing and showering facilities. Despite the best efforts of the senior management team (SMT), nothing is yet in place. Other projects have also apparently been mothballed or delayed.

Issues with the power supply to the boilers has resulted in frequent loss of heating and hot water. The Board is aware of competing priorities across the estate. However, the worsening state of the prison fabric (s3.6,9.5), and consequent loss of facilities has a demoralising effect, compromising health and safety. Time better spent on staff training and rehabilitation is wasted in crisis management.

HMIP inspection continually highlights the inadequacy of CSU accommodation (s6.6) but again, nothing is done.

Ensure there is more than one person in the Ministry able to approve the appointment of IMB members. (s5.7)

TO THE PRISON SERVICE

- To work with Home Office Immigration Enforcement Service (HOIES) to smooth the removal process, to ensure this is carried out in a timely manner and prisoners are kept informed. The reduction of the OASys backlog (s11.2) is also essential for this process.
- To expedite the transfer of prisoners, most of whom are accommodated in the Segregation Unit, who are recategorised (s6.2)) or whose needs cannot be met within HMP Maidstone.
- Improve the transfer of property from prison to prison (s7.5), particularly important to foreign national prisoners.
- Support the management team in their efforts to improve the buildings and facilities (s7.8).

TO THE GOVERNOR

- Maintain the good relationships between staff and prisoners by ensuring that the new OMiC system is rolled out effectively (s7.7).
- Offer more on-wing information in a user-friendly format for foreign national prisoners. (s5.4).
- Focus on developing more purposeful workshop activities (s10.1).
- Many initiatives are discussed and planned (s9.1); however these need to be translated into concrete actions and outcomes in a timely manner.
- Reduce the build-up of rubbish on site (s3.7. 10.2)

Improvements

The mandatory drugs testing (MDT) shows rates of misuse are reducing (s4.5). The overall trend is positive.

3 DESCRIPTION OF THE PRISON

3.1 During the period of this report there has been an HMIP inspection including Ofsted (education and workshops) and CQC (Healthcare). There was an improved outcome from the previous report under the category of 'respect' and a decline under 'purposeful activity'. The Chief Inspector of Borders and Immigration also carried out an inspection focused on adults at risk, the findings from which have not yet been published.

3.2 HMP Maidstone, originally built in 1819 underwent a re-role in 2013 and is now one of two foreign national only establishments catering for category C adult males. There are 17 professed religions in the prison population together with 91 different nationalities and an even bigger number of languages and dialects spoken. Almost all the population are of interest to HOIES, who are based in the prison, and can expect to be removed from the UK at the end of their sentence. Approximately 16% have been released within the UK. The average stay is approximately seven months.

3.3 Operational capacity is 600 and the certified normal accommodation is 565. Most prisoners are in single cell accommodation with in-cell toilets; some 40 cells are doubles, most of which are cramped and not fit for purpose.

3.4 Oxleas NHS Foundation Trust is the healthcare provider. The learning and skills provider is Novus and workshop contracts are provided by PSPI, 131, Coppermill and Floplast. Maintenance is provided by the Government Facilities Services Ltd (GFSL). The substance abuse courses are provided by the Forward Trust; Spurgeons provide family support and Hibiscus helps with release. Other bodies include: Citizens Advice Bureau, Samaritans, User Voice and Restorative Justice Solutions. Escort contractors are GeoAmey, Serco, Mitie Care and Custody.

3.5 Accommodation consists of four blocks with some double cells in one of the blocks: Kent, built in 1850, houses 178 prisoners in single cells; Medway, built in 1966, holds 101 prisoners in single cells; Thanet, built in 1909 and extended in the 1970s, houses 174 prisoners in single cells and Weald, built in 2009, holds 149 prisoners in single and double cells. Other prison buildings, many of which are listed (hampering both use and repair), are on a site which is poorly planned and almost impossible to maintain to a standard that would be considered humane and decent. They include a church repurposed as a multi-faith centre, an education unit and library, the healthcare clinic, a staff cafeteria (run by prisoners), gym, virtual campus, four workshops and a large recycling unit. The gardens are extensive and well maintained.

3.6 As identified in the previous Annual Report: "The state of repair generally at Maidstone gives serious cause for concern; SMT have a continual battle to ensure that the basics of heating, lighting and water are available on a daily basis and staff and financial resources are under constant pressure. The loss of the in-house laundry, Sports Hall and showering facilities have added to the problem of low morale for both staff and prisoners." Compounded by a lack of investment, this state of affairs has not changed

3.7 Despite the above, the prison is clean and well-kept and prisoners are anxious to live in a decent environment and strive to achieve this. From time to time, there is an accumulation of rubbish outside the accommodation wings and this does not help with the rodent infestation, which is ongoing and endemic despite serious efforts from prison management to keep it under control: an impossible task in buildings of this decrepit standard.

B Evidence sections 4 - 11

4 SAFETY

4.1 Through discussion with prisoners and a prisoner survey, the latest HMIP report identified that prisoners felt safe and generally free from violence. Instances of bullying and violence are swiftly addressed with perpetrators charged and often removed from the prison. Currently the new Challenge Support Intervention Plan (CSIP) is being rolled out to replace the SAFE process.

4.2 Since refurbishment, allowing more space and facilities for prisoner assessment, the reception process for new prisoners is greatly improved.

4.3 A process of checks by custodial managers and weekly by the duty governor is supported by IMB members also reviewing ACCT documents on their visits. Concerted provision of SASH training to all staff and volunteers this year has seen an increase of awareness and a concomitant growth of ACCT documents from 116 last year to 155 this year.

4.4 In addition to Samaritans, whose freephone telephone number is automatically added to prisoners' PINS, there are 12 Listeners and at least 12 peer support workers available to prisoners.

4.5 MDT rates are reducing as effective intelligence tracking and interception are in place with one failure during December and one in November. However, being a town centre prison, there is always the risk of 'throw overs', partly tackled by installation of further internal gates limiting access to under wall areas: 6-8 packages a month in October-December, more recently reduced to 3-4 a month. The prison is proactive in attempting to stem the flow of drugs, phones and other illegal items.

5.1 Being a foreign national prison, HMP Maidstone has the challenge of maintaining fairness and equality across a wide and frequently changing range of nationalities, languages, religious faiths and dietary requirements in addition to the other protected characteristics of age, disability, sexual orientation, gender/gender reassignment and marital/partnership status. The prison has appointed a non-operational manager with specific responsibility for equality and there are bi-monthly meetings of an Equality Action Team, alternating their focus between staff and prisoners. During the year, the DIRF, PEEP and equalities policies have been reviewed and rewritten.

5.2 Equalities peer workers (4) have been appointed to co-ordinate the work and all new arrivals (staff and prisoners) are asked to complete a questionnaire to build up a database of information on the protected characteristics. The statistics are as accurate as is feasible given individual concerns about confidentiality, but openness is being encouraged. The way the statistics can be beneficially used is continuing to be explored in addition to ensuring a balanced distribution of religions and nationalities in the wings and industries.

5.3 Cultural awareness is being promoted by celebrating or commemorating different ethnicities and religious events in which all prisoners are invited to participate such as a Roma day, a Holocaust Memorial Day, Black History month, readings in different languages at the Christmas carol service etc. A comprehensive cultural awareness document has been written to raise officers' understanding and a similar brief is being compiled as guidance for transgender issues. It is hoped these will have a wider (national) distribution within the prison service since no POELT (trainee prison officers) equalities training packs are available to cover foreign nationals.

5.4 Forms and information in a range of languages are sometimes available on the wings and in the library and multi-faith centre and wing officers have computer access to print copies if necessary. Translation services are available for adjudication and reviews but there can be delays when prisoners' incoming post needs translation. A wide range of diets are catered for. Access to religious services is prioritised even when staff levels are reduced and most faiths are adequately catered for. There has been no specific provision for Orthodox Christians but this is being addressed. Family days are held on a regular basis.

5.5 Personal Emergency Evacuation Plan (PEEP) documents are completed and available in wing offices. Disabled cells are adequate, however there can be friction with healthcare regarding differing assessments of needs and the speed of providing concessions.

5.6 31 DIRFs were completed during the year: 20 racial, seven religious, two sexual orientation, one disability and one age related discrimination; the statistics reflect the foreign national status of the prison. More forms have been submitted since awareness of diversity issues has been raised. A feedback form, signed by a governor, is used to quality-check each response.

5.7 During the reporting period, the IMB member recruitment process has improved; however there is only one person in the Ministry appointed to sign off successful candidates and this has resulted in unacceptable delays and is hard to justify. The Board diversity is limited by the range of applicants but nevertheless represents a range of personalities, skills and working backgrounds.

5 Segregation/Care and Separation Unit

6.1 There are nine cells. Most prisoners are held on cellular confinement following adjudication on charges. There has been a slight increase in prisoners who are unable to be accommodated on the wings for safety and security reasons.

6.2 Due to a lack of cells, on occasion prisoners have been returned to a wing before the date agreed in their adjudication. This diminishes the impact of the sentence and, as a result, sends the wrong message to the prison population. Further problems occur due to the fact that category B prisoners and others who are eligible have to wait too long for transfer to other establishments. Three prisoners have spent longer than 40 days in the unit.

6.3 Staff treat the prisoners with dignity and respect and this helps maintain a good working relationship. Staff not familiar with the unit have been used and this has resulted in a lowering of standards, for example documentation has not always been up to date. This has recently been addressed although there is still room for improvement.

6.4 Those adjudications monitored have been carried out appropriately, although the use of translation services can be problematic due to standards of the service and time constraints. GOOD reviews are less effective, with many of the key players i.e. healthcare, chaplaincy and IMB, not always attending. There is now a set time for these reviews, which will help ensure that attendance is possible.

6.5 The unit is clean and, although old, well cared for. It is being upgraded by the staff and has been repainted. Areas are being provided to allow more time out of cell. It is hoped that Education will also be more involved with offering in cell/unit activities. Currently there are few enhanced activities or interventions for prisoners.

6.6 Two cells are identified for use for close supervision. Being part of the segregation unit, they are not well sited. As in previous reports, suitability for prisoners who may be emotionally and mentally unwell in that environment has been questioned.

6.7 There is no dedicated cell for those requiring special accommodation.

6.8 There is currently no provision for educational facilities in the unit.

7 ACCOMMODATION (including communication)

7.1 At the latter end of the reporting year, staff shortages exacerbated by compulsory training (including OMiC which took eight officers out at a time) resulted in increased pressure on experienced staff and trainees alike. This resulted in frequent periods of lockdown. The consequences of lockdown include problems for prisoners needing to make phone calls at certain times and also reduced association. There are clear and timely communications of regime changes, reducing prisoner dissatisfaction.

7.2 Food continues to be good and prepared to high standards of hygiene with few complaints. All appropriate religious/ethnic dietary requirements are catered for. Faulty refrigeration has resulted in the hiring of portable units for at least 16 months at a cost of £4,000 per week. It is not possible to see how this is cost-effective either for the prison or the wider estate.

7.3 The closure of the in-house laundry facility was reported in 2017. All laundry is outsourced to Elmley prison approximately 20 miles away. Issues around personal laundry going astray (requiring additional staff resources which can be ill-spared) have caused mistrust and discontent among prisoners. One consequence has been prisoners washing and drying clothes in cells which, in Weald wing in particular, results in damp conditions and the development of mould. The demise of Carillion lengthened the time taken to solve the problem even further. New washing machines were purchased in early 2018. A laundry site for prisoners is planned to open in March.

7.4 The 2017 report referred to a programme to upgrade shower facilities. Problems with sub-contractors and poor management of the project by Carillion caused major delays and numerous problems with the standard of work and materials which is still ongoing.

7.5 There is a continual problem with property not being sent from other prisons and retrieval can be extremely difficult. Lost property is particularly stressful for foreign national prisoners being deported. Time constraints mean many prisoners leave without all their documents and personal possessions. Much time is wasted by staff pursuing property lost in transit, with complaints meeting a poor response from other prisons. Citizens Advice Bureau have taken on the work, with dedicated resource, of tracking property mislaid by the police.

7.6 Delivery of food and personal items for weekly purchase by prisoners is outsourced. There continue to be problems with supply resulting in routine and pre-ordered items being missing and delays in crediting prisoners' accounts. Prisoners have limited access to such items and so inability to obtain what they need can cause great discontent.

7.7 Prisoners new to the prison have a designated 'personal officer' to advise and assist with understanding and conforming to the regime. Staffing pressures have had an adverse effect on this. The offender management in custody (OMiC) system (highlighted in last year's report) of key workers having 45 minutes weekly per prisoner to fulfil this role has only just commenced.

7.8 The Sports Hall, frequently mentioned in earlier reports, has been condemned and is beyond repair. There is now a serious lack of recreational facilities available, with only an outside sports area and gym in use. Both have been closed from time to time, due to the problems associated with the fabric of the building and essential services. The latest information available suggests that an indoor sports facility will not be available for two years.

Continued deterioration of sports facilities subsequently resulted in the loss of shower and changing facilities. Exercise for prisoners has physical and mental benefits and is an essential tool in maintaining a stable and calm environment.

7.9 The relationship between staff and prisoners is on the whole good. Staff spend time and effort in dealing with prisoners' requests and build good relationships with them. Over the past year the Prison Council, consisting of prisoner representatives, has encountered problems. The prison management has invested time and energy ensuring that this valuable group is supported and meetings have once again been held on a regular basis with a bi-monthly meeting with senior staff and elected prisoners. Communication regarding changes in regime are on the whole well communicated but notices tend to be in English only. More could be done with specific information on areas such as categorisation, sentence planning and immigration.

7.10 There have been problems with prison complaints being dealt with within the statutory time limit, due to staff shortages. The situation has improved but there is still an unacceptable wait for concrete information, rather than simply sending a holding letter whilst the complaint is investigated.

8 HEALTHCARE (including mental health and social care)

8.1 Oxleas NHS Foundation Trust is the healthcare provider. The extended shift pattern, negotiated in the new contract award last year, continues and provides additional cover: 07:30 to 19:30 on weekdays and 09:00 to 18:00 at weekends. There is no in-patient care. The conditions and fabric of the building need to be improved.

8.2 The routine waiting list for dentistry is currently 54. The pressures on the services remain, with significant dental needs as prisoners wish to address their dental problems before deportation or repatriation. The triage system (assessed on the basis of pain) has been effective in evaluating who is most in need of treatment. A member of staff employed in the care and management of dentures has further helped to reduce the waiting list time.

8.3 The specialist in-house clinics (hepatitis C, HIV, genito-urinary/sexual health) as well as optician, podiatrist and physiotherapist surgeries continue to be successful and well attended. The waiting time to see a GP currently sits at seven days.

8.4 The smoking ban has been successful, however, the nicotine replacement service has highlighted concerns that nicotine patches are being used as 'currency'. The clinic now asks that any prisoners using this service present a sheet on a weekly basis with the used and intact nicotine patches. Failure to do so results in the prisoner being withdrawn from the service and a warning issued.

8.5 Blue/red cards used by staff to determine the appropriate response to sudden illness are strategically placed around the prison buildings and the system has been effective.

8.6 Prisoners are now seen twice on arrival. The initial screen is performed in Reception by a senior healthcare nurse who will assess if the prisoner is considered 'safe' for the next 72 hours and will also include a prescription screen. The prisoner is then booked in for a secondary screen where more information is gathered and, anticipating that the do not attend (DNA) rate will reduce, appointments are entered onto the prison database.

8.7 Coinciding with national campaigns every month, facilitated by the discharge facility nurse, a new health topic will be covered: prostate cancer, bowel cancer, diabetes, mental health etc. Feedback from prisoners is positive. The media channel is also being used to promote health.

8.8 Although no care plans are evident, social care needs for prisoners with mobility problems are provided on an individual needs basis (for example grab rails and a heightened toilet seat) and are assessed by Kent County Council.

8.9 The healthcare complaints procedure was not being used and prisoner complaints were processed through the general complaints system and lacked confidentiality. The Board is pleased to see that this is now being addressed and complaint forms are being placed with the healthcare application form so that the prisoners have access to them on each wing.

9 EDUCATION AND OTHER ACTIVITIES

9.1 At the time of writing, Novus is the main education supplier; however this is due to change in April when Western College will take over. All prisoners complete the basic skills assessment for maths and English and this is used by the activities allocation board. Given the churn of prisoners, course module duration is six weeks to try and ensure completion and progression. Functional skills in both English and maths have an almost uniformly high 100% forecast success rate.

The recent HMIP report was critical of both provision and quality of outcomes. The prison's quality improvement group is in the process of developing carefully tailored appropriate training and vocational courses for the population in order for them to realise potential and enhance resettlement opportunities upon release. Provision is now being more closely monitored and considered alongside prisoner needs and requests via prisoner surveys. The overall forecast success rate for courses is 93%. The retention rate is at 99% and indicates most prisoners are fully engaged.

9.2 There are a range of basic skills courses including ESOL, English, maths and ICT. Currently running at lower levels, there are plans to meet the demand for higher level qualifications. Budget restraints do, however, impact on the delivery of courses. There have been problems employing tutors which has had a negative impact on some of the classes. Retaining suitably qualified staff is a prerequisite to develop and improve the education provision, which was criticized in the HMIP report. Surveys have shown prisoners are receiving qualifications in areas of need including catering, multi-skills, brick laying, barista and peer mentoring. As part of a pilot, the prison has been able to spend 10% of the education budget dynamically, introducing qualifications in business enterprise, courses in media studies and wellbeing activities such as singing and drama.

9.3 The Virtual Campus offers over 250 courses including health and safety and driving theory. Distance learning courses currently have approximately 20 learners with a dedicated tutor. A Level 1 and 2 ICT course is being undertaken whilst a Level 3 business enterprise course is also being taught by Rocketeer Enterprise. Presently, 14 prisoners are on the course with two recently released prisoners returning as ambassadors to continue their business ideas. There is an engagement and enrichment curriculum: Skills for Life Challenge and art therapy classes have started as a bridge to other courses, with drama, media, Tai Chi and meditation as part of the varied provision on offer. There are a number of Level 1 and 2 NVQ practical courses, for example catering hospitality run as a business.

9.4 The Shannon Trust peer mentors help support and improve the literacy of 28 prisoners.

9.5 As the Sports Hall has been condemned due to being structurally unsafe, currently only weights and cardiovascular sessions are provided in a small gym along with limited showering and changing facilities. Good use is made of the all-weather pitch with running, football, rugby and cricket taking place. In addition the army has promoted positive behaviour with football competitions, participants being chosen by dint of good behaviour merits rather than footballing prowess.

9.6 The library is well used with attendance timetabled for half an hour during working sessions. There is a regular book club in the library and a reasonable range of stock for most foreign nationals. In addition, there is a small range of books kept in the Segregation Unit.

10 WORK, VOCATIONAL TRAINING and EMPLOYMENT

10.1 The prison attempts to provide appropriate qualifications for prisoners. However, given the large number of nationalities housed in Maidstone and the fact that the majority of prisoners will be repatriated at the end of their sentence, it is difficult for the prison to source and develop training and work that will assist prisoners in assimilating into their home society.

The average term served in Maidstone is approximately seven months and, as many courses have a minimum number of hours requirement, this impacts on the education and training offered. The transferability of vocational qualifications offered is taken into consideration. The type and range of work is currently limited, partly due to language difficulties impacting on the level and type of activities offered eg. tailoring is not available to prisoners with a poor grasp of English because of the health and safety requirements. A newly refurbished portakabin houses the vocational training centre, delivering qualifications: horticulture Level 1; recycling and waste management.

The IMB has regularly reported concerns about prisoners not being engaged in purposeful print shop activity, partly due to a lack of contracted work. There are presently 75 prisoners employed in the print shop.

10.2 At the time of writing, attendance at work was on average over 80%.

Purposeful activity (using live labour boards):

- 74% of the population in full time activity
- 5% on Induction
- 3% awaiting labour board
- 9% unemployed
- 3% removed from or refusing to work
- 6% part time employed

Some work sessions have needed to be cancelled during this reporting year because of staff training/up-skilling (planned) and poor heating in workshop buildings and build-ups of rubbish causing a fire hazard (in the print shop).

10.3 Prisoners are only added to waiting lists for activities once they meet the criteria for that activity. Bricklaying and catering classes/workshops are very popular and the waiting lists for those activities are oversubscribed.

10.4 The prison is working to help prisoners improve their 'soft skills' (eg. punctuality, following instructions, work ethic) with certificates to be awarded. This initiative is welcomed by the IMB as it will develop prisoners' employability skills.

11. RESETTLEMENT PREPARATION

11.1 Despite being a challenging area due to the churn of prisoners, in 2018/19 the HMIP purposeful activity score improved to 2. The 'Steps to the Gate' assessment mentioned in last years' report has been replaced with 'Preparation for Release' which is gradually being introduced.

11.2 At present there is a backlog of 50% on the OASys system which impacts on sentences and sentence planning.

11.3 A trial is in place for key workers to use 'Preparation for Release'(see 11.1 above) in their conversations with prisoners who are soon to leave the prison.

11.4 In 2018/19, 75 prisoners were released from HMP Maidstone, and 450 were deported outside the UK. Since January 2019, Hibiscus is providing support for prisoners.

11.5 Applications for both release on temporary licence (ROTL) and home detention curfew (HDC) are made but rarely granted because of concerns raised by either the Immigration Service or the Home Office.

11.6 20% of prisoners do not access family visits. Improvements have been made in the decoration and state of the areas families use. Family days are held regularly for eligible prisoners. The system to email a prisoner is well used and successful in maintaining outside contact.

11.7 At the time of writing, 13 prisoners are detained under Immigration Act powers only, as they have completed their prison sentence. The Board does not consider it appropriate that once sentence is served, the prisoners continue to be located in a Category C closed prison.

11.8 As a foreign national prison, prisoners being deported have to be taken to airports. An unavoidable problem concerns the motorways leading out of Kent to airports and the delays that often occur, meaning that flights can be missed. In such circumstances, prisoners are returned to HMP Maidstone and the process of deportation, tickets etc, has to be recommenced. Removals and transfers are carried out on a daily basis.

B Section – Work of Board

BOARD STATISTICS	
Recommended Complement of Board Members	12
Number of Board members at the start of the reporting period	8
Number of Board members at the end of the reporting period	9
Total number of visits to the Establishment	320
Total number of segregation reviews attended	22

Section - Applications

Code	Subject	Current reporting year	Previous reporting year
A	Accommodation including laundry, clothing, ablutions	10	9
B	Discipline including adjudications, IEP, sanctions	18	18
C	Equality	9	3
D	Purposeful Activity including education, work, training, library, regime, time out of cell	9	9
E 1	Letters, visits, phones, public protection restrictions	20	14
E 2	Finance including pay, private monies, spends	18	25
F	Food and kitchens	5	4
G	Health including physical, mental, social care	34	21
H 1	Property within this establishment	26	22
H 2	Property during transfer or in another establishment or location	37	38
H 3	Canteen, facility list, catalogue(s)	9	7
I	Sentence management including HDC, ROTL, parole, release dates, re-categorisation	53	40
J	Staff/prisoner concerns including bullying	14	12
K	Transfers	20	16
	Total number of IMB applications	282	238