



**Annual Report**  
of the  
**Independent Monitoring Board**  
at

**HMP Bullingdon**

for reporting Year  
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*Monitoring fairness and respect for people in custody*

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## **A Sections 1 - 3**

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### **1 STATUTORY ROLE OF THE IMB**

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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.

The Board thanks the governor and his staff for their cooperation with the IMB in its production of this report.

### **Main judgements**

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#### **Are prisoners treated fairly?**

Generally, prisoners are treated fairly but limited resources inevitably have an impact on the management of prisoners.

Administrative backlogs in the use of the offender assessment system (OASys) mean that some prisoners are treated unfairly because these backlogs have an impact on the management of their sentence and their preparation for release (see paragraph 11.3).

A shortage of probation officers and other staff with particular responsibility for preparing prisoners for release (for example, offender supervisors and key workers) has also been unfair to prisoners (see section 3, and paragraphs 4.13 and 11.2).

This is the fourth year in which the Independent Monitoring Board has reported concerns about safety in the prison. Levels of violence and recorded drug misuse have increased significantly during the reporting year (see paragraph 4.7). This can lead to a hostile environment that is unfair for prisoners and staff alike.

Vulnerable prisoners (mainly prisoners who have committed sexual offences) are treated unfairly in reception because of inadequate facilities there (see paragraph 4.6; but note the improvement, point 11).

The Board is not confident that the prison has done all that it can to eliminate discrimination (see paragraphs 5.2 and 5.4).

Some older prisoners are treated unfairly when kept in the healthcare unit because of a lack of accommodation suitable for social care elsewhere in the prison (see paragraph 5.11).

The distribution of food at mealtimes has sometimes been unfair (see paragraph 7.12).

#### **Are prisoners treated humanely?**

Most prisoners are treated humanely.

The Board questions whether having many prisoners doubled up in cells designed for only one occupant is humane (see paragraph 7.1).

The Board has continuing concerns about the length of time that some prisoners remain in the separation, support and challenge unit (SSCU), where they are held in what amounts to solitary confinement (see paragraph 6.2), but there have been improvements since last year.

Failures to take proper care of prisoners' property have a bearing on whether they are treated humanely, as the loss of property of a personal nature can cause great distress (see paragraph 7.13).

### **Are prisoners prepared well for their release?**

Preparation concerned specifically with release is variable, and often under-resourced (see paragraphs 4.13 and 11.2).

The prison recognises the valuable contribution that the maintenance of family links makes to preparation for release. This is reflected in the organisation of family days, the invitation to family members to attend achievement ceremonies and the practical support provided by the visitors centre (see paragraph 5.13, 5.14 and 9.11).

Although the prison has improved its educational provision, further improvements are needed – for example, in matching curriculum to employment needs (see paragraphs 9.4 and 9.13) and raising success rates in functional skills (see paragraph 9.10). In particular, unless attendance at classes is not increased further, prisoners will not be able to benefit fully from the opportunities provided (see paragraph 9.2).

Administrative backlogs in the use of the OASys and a shortage of places on some programmes both have a negative impact on the management of some prisoners' sentences and impede their preparation for release (see paragraphs 11.3 and 11.5).

A wide range of opportunities for work experience is provided (see paragraphs 10.1–10.4).

Many prisoners are released without either stable accommodation (see paragraph 11.12) or employment (see paragraph 11.9). Such factors are usually beyond the control of prison staff but they increase the likelihood of further offending.

### **Main areas for development**

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#### **TO THE MINISTER**

1. The increased number of uniformed officers is very welcome, but it will take a long time to build up the amount of experience and knowledge that has been lost as a result of past staff cuts and subsequent attrition. How will the minister ensure that staff levels are maintained at an adequate level for the future, and what can he do to enhance the training that they receive?
2. What steps is the minister taking to ensure that probation services will have the number of staff that they need, both in prisons and in the community? How will he address the problems that have arisen because of the amount of experience and knowledge that has been lost as a result of past staff cuts and subsequent attrition?
3. What steps is the minister taking to ensure that the service provider now contracted to maintain the prison estate, including Bullingdon, will receive the resources that it needs to deal with the backlog of maintenance issues that it continues to face?

## **TO THE PRISON SERVICE**

1. The recent recruitment drive has been welcome, but the prison has lost many experienced officers, and many current members of uniformed staff have relatively little experience of working in a prison environment (see section 3). How will the Prison Service take steps to address the issue of retaining staff, both nationally and locally, recognising that many factors are outside the control of governors and staff in prisons such as Bullingdon? How will it ensure that they are able to receive the training and professional development that they need if they are to succeed in their role?
2. How will the Prison Service address the endemic and systemic losses of prisoners' property when they are moving between establishments, as well as within prisons (see paragraph 7.13)? For the past two years, the Prison Service has responded to questions about property by saying that work on a new framework for prisoners' property has been delayed. When will this change be introduced?
3. Will the Prison Service review the provision for older prisoners in the prison estate as a whole, bearing in mind their increasing numbers and the examples in this report (see paragraph 5.11) of unequal treatment for this group?

## **TO THE GOVERNOR**

1. How will the governor ensure that new officers and other staff receive the training and mentoring that they need to develop in their roles, especially when the proportion of experienced operational staff is so low? And what steps can he take to retain good recruits, recognising that many factors are outside his control?
2. How will the governor set out to address the changes in culture and practice that are required if assessment, care in custody and teamwork (ACCT) and associated procedures are to be used more effectively (see paragraphs 4.18–4.21)?
3. How will the governor ensure that the new offender management in custody (OMiC) model is fully implemented, and that key workers will have sustainable caseloads and the capacity to meet with prisoners for the required length of time (see paragraphs, 4.13 and 11.2)?

## **Improvements**

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The Board welcomes the following improvements:

1. An increase in the number of prison officers (see section 3; also noted as an improvement last year).
2. Moves towards the implementation of the OMiC model for working with prisoners, although much remains to be done before this is properly established (see paragraphs 4.13, 11.1 and 11.2).

3. The introduction of a new early days in custody booklet (see paragraph 4.5).
4. The establishment of a drug recovery unit on one residential wing (see paragraph 7.5).
5. The introduction of challenge, support and intervention plans (CSIPs) as a violence reduction tool (see paragraph 4.14).
6. The introduction of safety intervention meetings (SIMs) (see paragraph 4.15).
7. Increased use of a psychologist in supporting prisoners in the SSCU and working towards returning them to normal location (see paragraph 6.5).
8. Better communication and information sharing via noticeboards, especially in staff-facing areas (see paragraph 7.16).
9. Various improvements in education provision (see paragraph 9.1), although further improvement is needed, particularly in attendance (see paragraph 9.2).
10. Better access to language services when interpreting or translating is required (see paragraph 5.6).
11. Work (under way but not completed, as of 30 June 2019) to improve holding facilities for vulnerable prisoners in reception (see paragraph 4.6).
12. Work (under way but not completed, as of 30 June 2019) to increase the capacity of the prison's video-link suite, which allows prisoners to participate in court hearings while still in the prison (see section 3).
13. Work (under way but not completed, as of 30 June 2019) to construct a disabled access ramp at the entrance to reception.
14. The installation of new secure cell card holders (although they are not yet being used consistently on all wings) (see paragraph 7.6).
15. Preparation for the installation of in-cell telephones (see paragraph 7.15).
16. The removal of an ornamental fishpond and a consequent reduction in the prevalence of rats (see paragraph 7.4).
17. The continuing increase in the use of home detention curfew (HDC; also noted as an improvement last year) (see paragraph 11.5).
18. The introduction of evening association (see paragraph 7.8).

### **3 DESCRIPTION OF ESTABLISHMENT**

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HMP Bullingdon is a local and resettlement prison situated near Bicester in Oxfordshire. It serves Oxford, Reading and Swindon Crown Courts and the magistrates' courts in Oxfordshire and Berkshire. It also serves as a resettlement prison for the Thames Valley, Hampshire and the Isle of Wight. It holds sex offenders under treatment, and some young adults. These differing functions mean that it is a complex prison that faces a range of operational challenges. Work is under way to increase the capacity of the video-link facilities, which will allow the prison to serve a larger number of courts. It is expected that Bullingdon will increase its remand function in the future, while continuing to serve as a resettlement prison for the local area.

The prison's certified normal accommodation is 869, but it has an operational capacity of 1,114 and often accommodates in excess of 1,100 prisoners. In the 12 months of the reporting year, it operated with an average occupancy of 1,054 (compared with 1,109 in 2017/18, 1,109 in 2016/17, 1,095 in 2015/16, 1,100 in 2014/15, 1,093 in 2013/14 and 1,063 in 2012/13). This means that many prisoners share cells that were designed for only one occupant (see paragraph 7.1). Prisoners are often transferred in or out of the prison at short notice, and the large number of prisoner movements makes it difficult for the prison to engage effectively with many of those whom it holds (see paragraph 5.2, 9.7).

As of 31 May 2019, Bullingdon had 274 uniformed staff: prison officers, senior officers and custodial managers. On that date, 78 of these officers were in their probationary year, which means that they had less than one year of experience in service. There were 65 officers who had between one and two years of experience, and 131 officers (including senior officers and custodial managers) who had two or more years of experience. New officers have spoken to Board members about the good support and guidance that they have received from more experienced staff. However, it is not uncommon for new entrants to find themselves working alongside staff who are still in their probationary year; this limits opportunities for new officers to learn from more experienced colleagues.

Various awards were made to members of staff. Six High Sheriff's awards were made to individuals or to a team in recognition of their performance. Individuals were given awards for their commitment to security, for promoting safety, for reducing reoffending, for supporting people and for promoting decency. The psychology team was recognised as being outstanding. Three members of staff were nominated for awards from the Butler Trust, and one nominee was awarded a certificate. The security department was given the South West and South Central Group of HM Prison and Probation Service Staff Award for Team of the Year.

Between 1 July 2018 and 30 June 2019, 51 prison officers left Bullingdon. Thirty-one of those officers resigned their positions, and the others transferred to different establishments, retired or were dismissed.

There is a shortage of non-uniformed staff, including probation officers.

Information technology systems are slow and unreliable, and often make it very difficult for members of staff to carry out routine tasks.

### **4 SAFETY**

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#### **Overview**

4.1 The prison regards the safety of prisoners and staff as of the highest importance. The safety of prisoners is managed through the monthly safety strategy meeting, which is chaired by the Governor.

4.2 However, safety has been consistently challenged by the widespread availability and frequent use of drugs, the large proportion of new and inexperienced officers, the high turnover of prisoners and the many changes of safety personnel and procedures.

#### **Reception and induction**

4.3 The number of prisoners entering and leaving the prison has continued at a similarly high level to last year. On average, 300 new prisoners entered the prison each month; this is between a quarter and a third of the total monthly population, which has ranged from 1,021 to 1,088 men.

4.4 While the required screening procedures are routinely followed, the numbers involved and late arrivals in the evening increase the possibility of mistakes occurring.

4.5 An early days in custody booklet was introduced this year, drawing on good practice in other prisons. Its purpose is to identify and record potential risks and triggers for each prisoner, drawing on information gained through questions asked by staff, health screening and any external information available. A booklet should be opened when each prisoner arrives in reception. The booklet travels with the individual when he leaves reception and stays with him throughout his stay at Bullingdon. A sample of these booklets was reviewed by external audit and a number of inconsistencies in their completion were noted, but the basic structure was considered sound.

4.6 It is now more than five years since the Board raised with the prison the lack of a television in the small holding cell in reception for vulnerable prisoners (mainly prisoners who have committed sexual offences). Other newly arrived prisoners are able to occupy themselves by watching television, so it is not fair that newly arrived vulnerable prisoners cannot do the same, especially as arrival in prison is a period of heightened risk. As of 30 June 2019, construction work had begun, but was not yet complete, to provide a larger holding cell and a television for these prisoners.

## Violence reduction

4.7 Violence levels were shown to have increased significantly last year, 2017/18, compared with 2016/17. This trend has continued during 2018/19, with violence reaching higher than ever levels. The level peaked in November and December 2018, but has reduced since then.

The figures for the last three years are as follows:

	August 2016 – June 2017 [NB: 11 months]	July 2017 – June 2018	July 2018 – June 2019
No. of prisoner on prisoner assaults	123	184	225
No. of assaults on staff	86	126	141
No. of fights	67	101	126
No. of times officers used force	506	636	972
Drug finds	149	249	241
Mobile phone finds	59	153	182
Weapon finds	124	125	124

4.8 Much violence is attributable to drug-related debt. It is also driven by gang-based hostilities, mental health issues and the propensity of younger offenders to deploy violence more readily than older prisoners. In the four-month period from 1 April to 1 July 2019, there were 109 reported incidents of violence. In 42% of these incidents, the perpetrators were aged 18–24, although these younger men account for only 20% of the prison population.

4.9 The prison has drawn on better resources to combat this growing violence. Improved staffing numbers and the introduction of various initiatives and actions have contributed to containing violence and its related drivers. Body-worn video cameras are now routinely used throughout the prison; 25% more cameras were made available during the year, and the level of use has increased. During the year, closed-circuit television was installed on two wings. It is now present on three wings and on the upper walkways. However, it is unclear to what extent the more widespread use of these cameras has been an effective deterrent to violence.

4.10 Drug interceptions increase with the presence and use of sniffer dogs, but their availability is limited. A spate of drugs entering the prison in the form of drug-impregnated mail has been countered by photocopying mail and not passing on the original copies to prisoners.

4.11 In May 2018, a new way of working, known as OMiC (see also paragraph 11.1), was introduced on one unit, B wing. This improved way of working increases the number of officers per wing and allocates an officer as a key worker to each prisoner. This officer should meet the prisoner regularly and develop a working relationship. B wing was chosen because of the high rates of violence on that unit. After three months, the percentage of recorded incidents on this wing dropped from 40% of the total in Bullingdon to less than 10%.

4.12 The model has since been rolled out across all residential units. The same level of violence analysis that took place on B wing was not carried out elsewhere.

4.13 Further, in the latter part of the reporting year, the routine application of key working reduced because insufficient staff were deployed for this purpose. This was due, at least in part, to not enough staff being available for key working (for example, because they were in

training or were deployed for other duties), and there is evidence of some lack of consistency in implementation.

4.14 In February 2019, the prison introduced CSIP as a new violence reduction model. This is a national initiative that seeks to identify and support those prisoners posing a raised risk of violence. Via a case management approach, the prison works with these men by challenging their behaviour and by supporting positive change among these individuals with the construction and implementation of a personalised action plan.

4.15 The CSIP model is supported by the weekly, multidisciplinary SIM. This meeting focuses on residents of the SSCU who have spent over 15 days there; on prisoners identified through CSIP; and on the five individuals in the prison judged to be the most potentially violent at that particular time. The meeting draws up and reviews individual violence reduction action plans.

### **Supporting prisoners at known risk of self-harm and suicide**

4.16 Reported incidents of self-harm have increased by 6%, from 529 last year to 580 this year.

4.17 The ACCT procedure is the core means by which the prison identifies men at risk and tries to manage the risk they pose. The number of ACCTs opened is one measure of the incidence of prisoners judged at risk of self-harm, including suicide. The relevant figures across four reporting periods (all 12 months bar one) are:

2015/16	2016/17 (11 months)	2017/18	2018/19
656	570	743	944

The increasing trend is clear, and is a strong indicator of rising levels of perceived 'at risk' cases. It also reflects the degree of risk aversion adopted by staff at any point in time; for example, more ACCTs are often opened following a death in custody that may have been self-inflicted.

4.18 Concerns about the effectiveness of the prison's application of the ACCT procedures were raised in the last IMB Annual Report, as well as by HM Inspectorate of Prisons (HMIP) in 2017. Prison managers are aware of, and articulate, the critical importance of improving the use of these procedures in order to minimise the risks of self-harm. To this end, training has been undertaken by nearly all staff, but it is not clear how well this has translated into good practice.

4.19 The continuing variability in the quality of ACCT procedures may be attributed in part to the number of inexperienced staff and to the growing number of ACCTs opened.

4.20 An audit in May 2019 by the South Central Group of HM Prison and Probation Service revealed a number of concerns about the quality of ACCT implementation. The main points highlighted were: the continuity and quality of case management are inconsistent; there is a lack of overall accountability; attendance at multidisciplinary reviews is inconsistent; and there is a disproportionate focus on following procedures mechanically, rather than in a way that results in the critical care and in-depth risk assessment that ACCT procedures are intended to achieve.

4.21 The prison has recognised the lack of consistent quality monitoring and delivery in the ACCT process, and has introduced a new single case management system, whereby the case manager will 'follow' the prisoner around the prison, irrespective of location. It remains to be seen if these changes will be sufficient to address Bullingdon's longstanding difficulties in its use of ACCT procedures as a risk management tool.

### **Deaths in custody**

4.22 There were seven deaths in custody during the reporting year. (This figure includes the deaths of two men shortly after release, which the Prison Service recorded as deaths in custody.) Last year there were three deaths in custody, and there were two the year before.

4.23 Since June 2018, the Prisons and Probation Ombudsman (PPO) has published four reports into deaths that occurred in earlier years. One was found to be self-inflicted, the other the result of natural causes.

4.24 In each case, the PPO found certain failings in the prison's handling of these events. In the case of a man found hanged in his cell, the prison was criticised for its decision to reduce the frequency of observations (within the ACCT procedures), despite being in receipt of external information highlighting the high level of risk associated with this prisoner. The report also drew attention to the absence of a timely mental health assessment.

4.25 The remaining three cases all raised concerns over the medical/end-of-life care that was provided. In addition, concern was expressed about the use of undue restraint on transfer to hospital in one case. The same concern was raised in a separate report from the previous year.

## 5 EQUALITY AND FAIRNESS

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5.1 The Bullingdon equalities action team (BEAT) meets quarterly; a monthly equalities working group has recently been set up to support its work.

5.2 In the past, the BEAT organised regular forums covering 'protected characteristics' such as age, disability and race, involving men from across the prison. Forums have been held very infrequently over the last two years but steps are now being taken to restore forums and also to set up focus groups. There are now prisoner representatives, whose designated role is to support equalities work around the prison, although retention has been a struggle, due at least in part to the continual churn of prisoners.

5.3 The prison has reviewed its safer custody management structure. A custodial manager (CM) with a brief for equalities was appointed in April 2019. A revised equalities delivery plan was in final draft in June 2019.

5.4 A prisoner who feels he has experienced discrimination may submit in confidence a discrimination incident report form (DIRF). In April 2018 to March 2019, only 20 DIRFs were received, whereas this many could be received in a single quarter in 2017. The low number of DIRFs may not be an accurate reflection of the amount of discrimination experienced by prisoners. The prison recognises the need to revise policy and practice in this area.

5.5 Foreign national prisoners, comprising 39 nationalities in May 2019, make up about 11% of the population; the proportion that struggles with English fluctuates.

5.6 The telephone-based interpreting service, available in a range of languages, is now better publicised around the prison. All residential units have been issued with the appropriate equipment and guides to its use. The service was used on 230 occasions in 2018/19 (April to March); no data are currently available about the pattern of use.

5.7 A list of 19 languages in which members of staff have some expertise has now been compiled.

5.8 Library staff continue to be proactive in reviewing the range of publications held in languages other than English, in order to match the pattern of languages spoken by prisoners.

5.9 'Roll-on, roll-off' English for Speakers of Other Languages (ESOL) courses are available for prisoners whose English is limited. They may progress from ESOL to mainstream level 1 and level 2 English courses. Separate provision is made for vulnerable prisoners on E wing.

5.10 The number of 'young adults' (aged 18–20) fluctuates but was over 70 at the end of the reporting year; one factor for this was the temporary diversion of prisoners from HM Young Offender Institution (YOI) Aylesbury. Sentenced young adults comprised over half the total, although young adults held on remand are meant to be moved on to YOIs once they are sentenced.

5.11 About 11% of prisoners at Bullingdon are over the age of 50; they are defined as 'older' because they are more likely than men on the outside to suffer from poor health. At the end of the reporting year, 34 prisoners were aged 60–69 and 20 were aged over 70. The cells in the healthcare inpatient unit all have wide doorways, but only two cells on standard residential wings are designed for wheelchair access. This means that some older prisoners receiving social care have to remain on the healthcare inpatient unit instead of being accommodated on the residential wings.

5.12 In May 2019, nearly a third of prisoners (29%) had a stated disability of some kind; of these, 39% were recorded as having a mental illness and 35% as having learning difficulties. It is not clear how many prisoners fall into more than one category.

### **Visits**

5.13 The visits booking service has benefited from more stable staffing in recent months. The visitors centre continues to provide a welcome and support for families and other visitors.

### **Family days**

5.14 Seven family days are organised each year. The prisoners and their families value these opportunities, which provide much more time for them to spend together than on an ordinary visit (see also paragraph 9.11).

### **Chaplaincy**

5.15 There were a number of vacancies in the chaplaincy team for much of the year, so staff in post were sometimes unable to attempt much more than their statutory duties. All positions have now been filled, but some of those offered jobs were still awaiting security clearance at the end of the reporting year.

## 6 SEGREGATION/CARE AND SEPARATION UNIT

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6.1 The separation, support and challenge unit (segregation unit- SSCU) has been under the oversight of three different governors during the reporting year. This has led unavoidably to a degree of inconsistency in its management. Numbers remained stubbornly high for the first six months, but in January dropped significantly to four and remained in single figures for several weeks after the New Year. This welcome reduction in numbers was the result of careful management within the SSCU, combined with more effective and proactive use of prisoner compacts and the incentives and earned privileges (IEP) scheme on normal residential units. However, the number of occupants has returned to the high teens since March 2019, and there is now consistently a larger proportion of occupants placed in the SSCU on cellular confinement for a specified period rather than on good order or discipline (GOOD; a prison rule which allows prisoners to remain in the SSCU for indeterminate periods, subject to review at least once a fortnight).

6.2 The production and use of SSCU action plans was somewhat sporadic at the start of the year, as was also the case in some of the previous reporting year. These plans are for prisoners held in the SSCU for reasons other than for fixed periods of cellular confinement, and are intended to provide a framework to assist with returning prisoners (for example, those held there on GOOD) from the SSCU to other wings in the prison. Their use has improved, and by the end of the year they were being compiled and included in the paperwork for the weekly SIM, during which long-stay prisoners are discussed and pathways set out for their progression out of the unit. One prisoner was in the SSCU for more than a year, despite active attempts at both a local and regional level, to help him return to normal location either in Bullingdon or in another prison. Staff working in the SSCU are now more proactive in devising strategies intended to help prisoners move out of the SSCU and to prevent them from constantly returning to it.

6.3 The appearance of the unit has improved during the year, helped by the installation of long-awaited new flooring and by the employment of a long-term resident as a cell painter prior to his release.

6.4 The Board found it disappointing that during much of the year officers brought meals to cell doors, even when numbers in the SSCU were low. However, since late June, prisoners have begun to collect their evening meal personally from the servery, although the midday meal continues to be served at the cell door.

6.5 The Board attended 240 segregation reviews (also known as GOOD boards). Governors usually engaged effectively with the prisoner before them, but were sometimes hampered by the absence of paperwork recording what had been decided at previous boards, and what the prison or prisoner should have done in advance of the board that they were chairing. Increased attendance recently by staff from the offender categorisation and allocation department has been very helpful in moving prisoners out of the SSCU, in some cases on to other establishments. The involvement of the prison psychologist in working with individual prisoners in the SSCU is also a welcome development. However, the Board was disappointed by the move away from most boards being held on a regular day and at a regular time.

6.6 The use of special accommodation (a cell which is used only for the shortest time necessary, to hold a violent or non-compliant prisoner to prevent him from injuring himself or others, damaging property or creating a disturbance) was recorded 24 times during the year.

6.7 The number of adjudications (internal prison hearings in which alleged disciplinary offences are heard by a senior member of operational staff who has been trained to act as an adjudicator) has increased marginally. There were 4,067 adjudications in the current

reporting year, compared with 3,897 in the previous year. A total of 3,022 of the 4,067 alleged offences were found to have taken place, and a penalty was imposed.

6.8 An independent adjudicator conducted a further 251 adjudications, of which 181 were found to have taken place, and a penalty was imposed.

## **7 ACCOMMODATION (including communication)**

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### **Prison environment**

7.1 Bullingdon continues to be overcrowded. It was designed to hold 869 prisoners, but frequently comes near or reaches its permitted maximum ('operational capacity') of 1,114. There are 521 cells designed for single occupancy, of which about 80% are occupied by two prisoners. This chronic overcrowding has a detrimental effect on everything that the prison seeks to do and puts great pressure on communal spaces and facilities. It also has a particular impact on the fair and decent treatment of prisoners who are doubled up in cells designed for single use. Prisoners usually eat their meals in cells, and there is little or inadequate screening around the toilet in the cell.

7.2 Bullingdon opened in 1992. Its buildings and other facilities are in constant, heavy use and there are many signs of general dilapidation through wear and tear, as well as deliberate damage by prisoners, that are greater than the maintenance budget can address. There are frequent problems with electrical equipment and plumbing in areas such as wing serveries; repairs are often delayed and not effective for long.

7.3 Nevertheless, some improvements in facilities were noted. The addition of partitions in some shower blocks allows a greater degree of privacy for prisoners, and contributes to decency. Grab rails have been installed in the shower rooms on one wing that houses a number of older prisoners. However, there is a continuing problem with ventilation in shower blocks, which leads to damp and mould, and many fittings are old, rusty or shabby.

7.4 There has been significant improvement in tackling the problem of rats. The decision to deprive them of a constant supply of water by filling in an ornamental pool in the prison grounds and turning it into a flowerbed appears to have made a great difference.

7.5 The Board welcomes the establishment of a drug recovery unit on one spur on one wing. This provides a stable environment for prisoners who wish to be drug free and to sign up to comply with all prison rules and requirements.

7.6 Last year, the Board noted the absence of cell cards throughout most of the prison. These are important for security because they allow officers or others attending a cell to be sure that they know to whom they are speaking. New cell card holders have been fitted on four wings, but significant numbers of cell cards continue to be absent.

### **Regime**

7.7 Governors are committed to running a stable and consistent regime, and the Board has been present on different occasions when the regime has been maintained as far as possible, even when there has been an incident in progress.

7.8 The introduction of evening association is a welcome improvement, although there have been some difficulties around mealtimes (see paragraph 7.12).

### **Food**

7.9 There are frequently problems with kitchen equipment. Items that have been out of use include ovens, extractor fans and a boiler, and the kitchen has on occasion been without hot water or heating. Catering staff are quite resilient in the challenging circumstances that they often face.

7.10 The budget for food stands at £2.02 per prisoner per day, and has not been changed since 2014. This is not enough, and the prison often spends a higher sum. Special diets are catered for (vegetarian, vegan, gluten free, halal, etc.) but there is no additional budget for any extra costs associated with these diets.

7.11 The Board is concerned that, for much of the year, meals were served too early, especially at lunchtime. This has an impact on the regime in a number of negative ways. Prisoners spend longer in their cells, and there is less time for key working to take place. Prisoners returning to wings from education classes or activities have sometimes found that no lunch was left for them, and officers have had to obtain other food from the kitchen. This can cause frustration and volatility, with the risks that they bring, and discourages some prisoners from engaging in meaningful activity designed to help to prepare them for release.

7.12 The Board is also concerned about insufficient supervision and order at serveries during some meals, and notes that standards vary greatly between different wings. Prisoners working in serveries do not always wear the required protective clothing, and some prisoners receive much larger portions than others. This has a bearing on decency, and can lead to frustration.

## **Property**

7.13 Items of missing property, either within Bullingdon or while transferring from another prison, remain the subject of the highest number of applications to the Board (165 applications out of a total of 725). Lost property of a personal nature, such as family photographs and clothes, can cause prisoners a great deal of distress. Lost property of any kind can contribute to frustration, stress and violence within the prison.

## **Compensation**

7.14 Prison records for the amount of money paid out in compensation, and for associated legal fees, appear to be incomplete, so the Board could not determine a precise figure. However, the total recorded cost for Bullingdon appears to have been in excess of £210,000. This includes £4,191.30 paid to prisoners in compensation for lost or damaged property (similar to last year's figure of £4,288.43), approximately £103,000 paid to prisoners or their families in compensation for other losses or damages, approximately £37,000 paid as compensation to prison staff, and approximately £69,000 in legal fees.

## **Communications**

7.15 Preparatory work has been done for in-cell telephones. These telephones are intended primarily to enhance communication between prisoners and their families and friends, but may also enhance communication between prisoners and different departments in the prison. It is anticipated that the telephones will be made available early in the next reporting year.

7.16 There has been a significant improvement in the sharing of information via noticeboards in areas of the prison used by staff, and also an improvement in areas used by prisoners. Variability across the wings suggests that more could be done.

7.17 In-cell television also provides a means by which the prison can share information with prisoners, and advertise opportunities for work, programmes and other purposeful activity.

## **8 HEALTHCARE (including mental health and social care)**

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8.1 Healthcare services are offered by Care UK and sub-contractors. Cotswold Medicare Ltd provides GPs, South Staffordshire NHS Foundation Trust provides secondary mental health services, Time for Teeth provides dentistry services, and Global Technology provides ultrasound tests and some x-rays in the prison. A local delivery board oversees the work of these providers and is tasked with ensuring that healthcare services in the prison meet the standards required by the NHS commissioners.

8.2 A new head and assistant head of healthcare were each appointed during the reporting year and have built on the progress made by their predecessors. NHS England and the Care Quality Commission have both inspected the services provided. Their written reports are not yet available, but in informal comments each reported favourably on improvements in healthcare, as did the Care UK national medical director.

8.3 There are continuing difficulties in recruiting permanent staff, and healthcare provision depends on a number of long-serving agency staff.

8.4 A decrease in the number of healthcare complaints appears to reflect an improvement in this service. The Board has had concerns about the effectiveness and transparency of the healthcare complaints procedure, and welcomes the introduction in June 2019 of a much more user-friendly complaints form. This form requires the member of healthcare staff dealing with the complaint to give a written response to the prisoner who has complained, so a prisoner should now be in no doubt of the response that he has received. Previously prisoners often felt unheard, and were unable to obtain help or clarification from other people if they did not understand or could not remember the response to their complaints, or if they wished to challenge the response. Now a prisoner may, if he wishes, show the written response to other people who may be able to help him. He is also better placed to move to the next stage of the Healthcare complaints process, should he wish to do so.

8.5 The majority of healthcare-related complaints that the Board receives concern medication issues. Some prescription drugs that are available in the community are not permitted in prison. Healthcare staff are trying to communicate this more clearly to prisoners, who may have strong views about the nature and quantity of medication that they wish to be prescribed. Approximately half of arriving prisoners are opiate dependent.

8.6 The Board is aware of high did-not-attend rates for various medical services in the prison. Anecdotal evidence suggests that there are a number of reasons for this. For example, sometimes appointment slips sent by healthcare staff do not reach a prisoner in time for him to be allowed to leave his residential wing in time for his appointment. On other occasions, healthcare appointments may clash with times when prisoners have visitors, or prisoners may not wish to attend medication reviews in case their dosage is reduced. The prison has decided to work with healthcare staff to analyse the data, to determine why prisoners are missing appointments, and what steps can be taken to improve communication or to remove any other barriers that it reasonably can that have an impact on prisoners attending healthcare appointments.

### Adult learning

9.1 The provision of adult learning continues to improve and is rising quickly up the ranking of the prisons for which Milton Keynes College is the main education provider.

9.2 The attendance rate (that is, the proportion of enrolled learners who attend courses) has stabilised at about 72% over the last two years (it was 61% in 2017); the learner engagement team has had a considerable influence on this improvement. Further improvement is needed: the prison has been set an attendance target of 80%.

9.3 The allocation rate of prisoners to classes (that is, the proportion of available places that are filled by enrolled learners) has risen towards 90% (it was 74% in 2017); a target of 95% has been set for 2019/20.

9.4 Under the prison education framework (PEF), the new contract year runs from April to March; reporting and forward planning have been adjusted accordingly. Curriculum changes have been better matched to prisoner needs and the development of pathways. They also take into account the local difficulty in recruiting tutors for some trades (for example, paving). Vacancies on courses have reduced as a result of the changes. The Construction Skills Certification Scheme course was not re-commissioned for 2018/19 owing to funding reductions.

9.5 Management processes and procedures have been revised under the new head of adult learning (from September 2018). Clear targets for improvement have been set in all areas. Close monitoring resulted in a marked reduction in sickness absence rates in the six months to April 2019.

9.6 The learning environment in classrooms and corridors has become more attractive with improved quality displays including students' work; there are particularly good examples in individual classrooms.

9.7 About three-quarters of the prisoners at Bullingdon have a stay of under six months, and about half under three months. These circumstances constrain the range of provision that can be offered. There has been further progress towards offering more flexible provision: a prisoner may join a 'roll on, roll off' course at any time, rather than on a fixed date, and move on as soon as he has fulfilled the course requirements.

9.8 All teaching staff are observed by senior staff. Effective practice has been identified in 84% of observations; a target of 95% has been set. Support for individuals is put in place when it has been identified that the effectiveness of practice needs to be improved.

9.9 There was a purposeful and respectful atmosphere in the classes visited by the Board. Prisoners in the recently introduced art class were particularly well motivated, not least by the opportunity to produce artwork such as birthday cards for their children.

9.10 The overall success rate (that is, the proportion of learners starting courses who obtain a qualification) stood at 81% in March 2019, when it was projected to reach 92%. Success rates are uneven across subject areas; in particular, there is room for improvement in functional skills (that is, English and mathematics).

9.11 The ceremonies to celebrate educational and other achievements are a continuing source of motivation; they provide a valuable family experience for those relatives who are able to attend.

9.12 The number of prisoners in distance learning (64, including six Open University students) has stabilised following fluctuations over the last two years.

9.13 New vocational courses (such as pest control, and warehousing and storage) are being commissioned outside the PEF using the flexibility now allowed to governors under the dynamic purchasing system.

## **Library**

9.14 The library (operated by Oxfordshire County Council Library Services) holds a good selection of books, newspapers and CDs; it continues to provide a good service and a range of activities. Attendance has improved following changes in escorting arrangements. A book club, run by volunteers, meets regularly and is well attended. The range of reading activities with a family outreach, such as the 'Dads aloud' scheme, has been extended to meet an increased demand from fathers.

## **Gym**

9.15 Attendance is down from recent years. The target is 2.5 sessions per week but the current level is 2.42 (in contrast with 2.67 in 2016/17). The gym has had three vacancies for officer-instructors; recruitment filled two of these posts at the end of the reporting year.

9.16 A variety of PE provision is offered, including opportunities for prisoners to gain qualifications in health and fitness. Community links are being developed – for example, rugby training involving personnel from RAF Brize Norton; the all-weather artificial pitch reinstalled last year is a major asset for consolidating developments of this kind.

10.1 The 12 workshops, employing both full-time (4.75 hours per day) and part-time workers (2.25 or 2.5 hours per day), provide a wide range of work experience, including in the laundry, kitchen, and farms and gardens. Some – in particular, the laundry – generate a significant annual income for the prison.

10.2 Wing work is organised by officers on the wings and falls into three main categories: painting, cleaning and servery. Wing work is relatively popular with prisoners, so vacancies are usually filled quickly.

10.3 Some prisoners work as prison orderlies or as red bands. The former work within a single department, whereas the latter can move between different parts of the prison. Both orderlies and red bands are given significant levels of responsibility, which is useful preparation for employment on release.

10.4 Men are allocated to workshops, each of which has a maximum capacity, and their attendance is monitored. In the past, there have been too many unauthorised absences, but over the current reporting year an effort has been made to involve wing CMs more closely in getting the men from wings to workshops and there have been significant reductions in absences. In February 2019, there were around 200–220 absences a week, but the number had reduced to 108 a week in early July, just after the end of the reporting year.

10.5 The pay policy has been subject to frequent review, with adjustments in the pay structure in order to incentivise prisoners to undertake education courses and/or jobs providing vocational training, such as painting and decorating. At the end of the reporting year, another review of the pay structure was in progress.

10.6 The 2017 HMIP report pointed out that prisons should record competences for prisoners undertaking industrial work, so that they have a record to use as a reference when they are seeking work after release. In past years, skill tracking was not always seen as a priority, and its implementation remains variable. One area where it works well is in farms and gardens.

**Sentence management**

11.1    The new OMiC model had been introduced onto all wings by April 2019. This involves each prisoner being allocated a key worker, who meets with him on a regular basis. Training has been rolled out to introduce Check-in, Review, Implement, Summarise and Set tasks (CRISS) to all key workers. CRISS is a tool intended to give structure to the key working sessions and to how they are recorded on the National Offender Management Information System (NOMIS).

11.2    After an initial positive start during the reporting year, when the average caseload for a key worker was nine prisoners and each prisoner met his key worker once a week, there has been a significant decline in key working sessions in the past few months. At the end of May 2019, the sessions were taking place every two weeks.

11.3    There continues to be a backlog in the implementation of OASys. This is a risk and needs assessment that plays an important role in the management of a prisoner's progression during their sentence. The backlog has remained consistently high (at around 300) throughout the year. This is unfair on prisoners because this backlog has a negative impact on the management of their sentence and their preparation for release. Cases are prioritised on a risk management basis.

11.4    Initial sentence plans (ISPs) for low-risk prisoners with a sentence of under two years should be completed within eight weeks but this target is often missed. For prisoners with a sentence of over four years, these should be completed within 16 weeks; this target is also often missed. Missing these targets is unfair on prisoners because this can have a negative impact on the management of their sentence and their preparation for release.

**Programmes**

11.5    Bullingdon offers seven different programmes for prisoners that are intended to address and reduce offending behaviour. They are well attended, but the number of spaces is lower than needed and it can take a long time for prisoners to be allocated to a suitable programme.

**Resettlement**

11.6    HDC is working well following the mandatory review of prisoners refused HDC in 2018. There were 230 HDC releases in the current reporting year.

11.7    Many of the prisoners at Bullingdon are classified as low risk and are managed by the Thames Valley Community Rehabilitation Company (CRC). Prisoners who are classified as high risk are managed by the National Probation Service (NPS). The NPS also manages all care leavers, all prisoners on sentences of more than 12 months and all prisoners of interest to the Home Office.

11.8    Preparation for release is transferred to an offender manager in the community when a prisoner has 8–10 months left to serve.

## Employment

11.9 There has been a small improvement on last year's figure for the proportion of prisoners released into employment.

Number of prisoners released per month		Proportion of prisoners released into employment	
2017/18	2018/19	2017/18	2018/19
130	160	30%	35%

11.10 An employment fair, during the second half of 2018, attracted 14 employers and 100 prisoners. At least two prisoners who attended the fair gained offers of employment on release. Another fair is planned for 2019.

11.11 Between them, the RMF Construction and Training Academy and Milton Keynes College found employment for 34 men.

## Accommodation

11.12 There has been no change from last year's figure for the proportion of prisoners released into accommodation, although the number is higher.

Number of prisoners released per month		Proportion of prisoners released into accommodation	
2017/18	2018/19	2017/18	2018/19
130	160	67%	67%

11.13 The prison has made it easier for prisoners to contribute to plans for their own resettlement. When attending CV workshops, prisoners can now, under supervision, use the free-of-charge compassionate telephone facility to progress accommodation applications. This makes it easier for some prisoners to make arrangements and increases the likelihood of them having accommodation on release.

11.14 Two new housing managers are in post and working as part of the core CRC team in the prison.

11.15 The housing managers work with a number of agencies that can help prisoners find accommodation. One is Ixion (a not-for profit company that works with offenders), which has links with the Langley Housing Trust and some churches. Another is Trailblazers, which has provided two housing support workers from Connections Support, who come into Bullingdon on a weekly basis and work with prisoners on their housing needs; this will end in August 2019 but will be replaced by weekly attendance from an Oxford City Council housing officer. A third agency is New Roots, which offers accommodation in the Birmingham area to prisoners who are willing to relocate, provided that appropriate support is in place. Two Oxford churches also accept referrals for prisoners and offer them housing.

11.16 There is a shortage of spaces on the Bail Accommodation and Support Service.

## **Finance, benefits and debt**

11.17 Additional non-operational staff have been trained to help set up bank accounts for prisoners.

11.18 A debt workshop is waiting for security clearance for a new facilitator.

## C Section – The work of the IMB

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<b>BOARD STATISTICS</b>		
Recommended complement of Board members	16	
Number of Board members at the start of the reporting period *including two on sabbatical	17*	
Number of Board members at the end of the reporting period	14	
Total number of visits to the establishment	521	
Total number of segregation reviews attended	240	

## D Section – Applications to the IMB

Code	Subject	Current reporting year	Previous reporting year
A	Accommodation, including laundry, clothing, ablutions	16	17
B	Discipline, including adjudications, IEP, sanctions	8	22
C	Equality	21	13
D	Purposeful activity, including education, work, training, library, regime, time out of cell	40	26
E 1	Letters, visits, telephones, public protection restrictions	42	35
E 2	Finance, including pay, private monies, spends	41	25
F	Food and kitchens	14	22
G	Health, including physical, mental, social care	112	138
H 1	Property within this establishment	87	70
H 2	Property during transfer or in another establishment or location	78	82
H 3	Canteen, facility list, catalogue(s)	33	16
I	Sentence management, including HDC, release on temporary licence, parole, release dates, recategorisation	78	59
J	Staff/prisoner concerns, including bullying	51	38
K	Transfers	37	26
L	Miscellaneous, including complaints system and regime	67	48
	<b>Total number of IMB applications</b>	725	637