Annual Report of the
Independent Monitoring Board

HMP BURE

for reporting Year
1 August 2018 to 31 July 2019

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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.
2 EXECUTIVE SUMMARY

This report presents the findings of the Independent Monitoring Board at HMP Bure for the period 1 August 2018 to 31 July 2019. Evidence comes from observations made on visits, scrutiny of records and of data, informal contact with prisoners and staff, surveys and prisoner applications.

Main judgements

Are prisoners treated fairly?

Overall prisoners continue to receive fair treatment in the establishment. There are increased opportunities for elected resident representatives to meet with management to discuss and seek ways to resolve problems and identify areas for improvement. Violence is low and prisoners feel safe. With the support of the Prison Reform Trust the prison has started to run active citizenship panels. A residents council has been set up and is progressing well.

The issue of lost property has reduced but still remains a concern, with the loss of irreplaceable personal items and a lack of individual accountability and a lack of effective person to person communication between establishments.

Are prisoners treated humanely?

There has been a change of provider for healthcare. The new provider, CARE UK, has made significant changes with increased numbers of staff and an experienced manager in place. 47.8% of residents are over 50 years of age. Healthcare works closely with the safer custody team and relatives of those who are terminally ill, receiving palliative or end of life care. HMP Bure continues to rely at times on beds being available at HMP Norwich hospital wing and it is evident that HMP Bure needs better facilities in order to be able to provide this care on site to avoid the distress and concern of residents and their families. There has been no improvement in residential unit 7, where the double occupancy of 32 cells continues. The IMB believes these conditions continue to violate decent living conditions.

Are prisoners prepared well for their release?

Problems continue with regard to residents being prepared well for release. Every effort is being made by staff but we note the anxiety and frustration that exists due to both the staff and residents being unclear, particularly around accommodation, the resident’s future. We continue to see the distress of those who have served long sentences feeling vulnerable at the prospect of being released from a safe environment into the unknown. Homelessness is an increasing concern and the Government needs to take action rather than relying heavily on dedicated volunteers supporting ex-offenders so they do not re-offend or self-harm. The proposed introduction of OMiC (Offender Management in Custody) case management on 30th September 2019 may improve the situation but there is already a delay due to probation staff resources being unavailable.
Main Areas for Development

TO THE MINISTER

• Will the Minister continue to review the provision of pre-release resettlement facilities for men convicted of sexual offences?

• Will the Minister ensure that establishments such as HMP Bure operate at their certified normal accommodation level? Despite the Minister's response over the last three years, there has been no significant improvement or understanding of the unsuitable double occupancy of 32 cells on residential unit 7. Previous Ministers have failed to give a clear directive to ensure that this practice stops.

TO THE PRISON SERVICE

• Property being lost between prisons continues to be an issue which has failed to be addressed over a number of years. Volumetric control of property has been introduced which has helped the situation. However, residents are still arriving at the establishment with items missing and incomplete property record which leads to compensation claims.

• Will consideration be given to providing special accommodation and resources for palliative care at HMP Bure and developing a number of cells to provide better conditions for the disabled?

• Will the Prison Service acknowledge the changing demographics of the prisoner population and put in place a national strategy for older prisoners?

TO THE GOVERNOR

• The Board recognises efforts the Governor has made to improve the windows and ventilation in residences but resolving the long-term problems of the heating system, which has existed since the opening of the prison in 2009, is still an ongoing challenge.

• Continuing problems with lack of maintenance on washing machines and dryers need to be addressed.

Improvements

• Residences and offices have been redecorated with consultation, support and goodwill of staff and residents. There has been an introduction of hubs on each residence. These are manned by residents who provide information and advice to the prison community. This removes the need for notices on walls and has enabled artwork completed by residents, which is of a high standard and thought provoking, to be displayed.

• Following the introduction of benches around the site last year, conversations between staff and residents are able to be held in the open air, providing a more relaxed environment which is appreciated by both parties. In addition, these are used regularly by elderly residents thus removing isolation if confined to the wing through lack of mobility.
• Introduction of CAMEO (come and meet each other) has proved a success for the increasing elderly population with a wide range of activities including therapy dogs brought in by volunteers from the local community.

• Prison staff have supported change towards a rehabilitative culture, encouraging residents to take responsibility for their own progress towards resettlement.

**DESCRIPTION OF THE ESTABLISHMENT**

HMP Bure opened on 30 November 2009. The certified normal accommodation is 604 and the operational capacity, at the time of writing, is 656. 47.8% of residents are over the age of 50. 89 residents are over 70, seven over the age of 85, and the oldest resident 91.

**The site consists of:**

- Residential units 1-7.
- Healthcare department.
- Segregation unit.
- Multifunction building including gymnasium, programme delivery and the world faith room.
- Workshops.
- Learning resources centre.
- Administration block.

**Accommodation:**

Comprises mostly single cells; however, there are four cells in five of the residential units that are used as doubles, together with 32 cells on residential unit 7 that have been converted for double occupancy.

There is one easy access cell on both residential units 5 and 6.

All cells on residential unit 7 have integral sanitation and showers and one is wheelchair accessible.

Each cell on residential units 1-6 has integral sanitation with the use of communal showers.

**Reception Criteria:**

Normal reception arrangements apply. HMP Bure accepts category C adult men convicted of sexual offences, including a small group of those who identify as transgender. Priority is given to east of England prisoners, although this cannot be guaranteed.
Regime: -

The regime provides all those in the care of HMP Bure access to the following: -

Education: -

Education is provided through a well-managed external contract with People Plus. In April 2017, following an unannounced inspection by HM Inspectorate of Prisons, the overall rating by Ofsted was ‘good’. The education provision reflects an emphasis on basic skills (literacy and numeracy), key work skills, social and life skills and IT, all within the funding envelope of the new prison education framework arrangements. Improvements have resulted in continuing professional staff development taking place, followed by observations to assess impact.

Workshops and Programmes: -

External contracts are undertaken in three workshops. Accredited Offender Behavior Programmes are also run and these include programmes specific to the population of men convicted of sexual offences.

HMP Bure provides a number of vocational courses in workshops, waste management and horticulture. Training in bricklaying is now under way and the gardens continue to be diligently maintained to a high standard. The wild flowers attract butterflies and bees and there is a small harvest of honey.

Healthcare: -

HMP Bure has a healthcare centre open on seven days a week, Monday to Friday 8.00am to 19.00pm, and Saturday and Sunday 08.00am to 17.30pm. Out of hours service is not provided by CARE UK, and the prison uses the NHS 111 service. The GP visits on two days a week; however, a telephone service to a GP is now available to residents supported by healthcare staff. This is comparable to expectation in the community.

Gymnasium and Sports: -

HMP Bure has one gymnasium with programmes staffed by six physical education officers. The gymnasium offers a range of accredited and recreational programmes. Working alongside the education department they have successfully delivered ‘Turning Pages’ to improve reading and ‘One to One’ to improve maths.

CAMEO, for the older population, is a recent initiative for older men and is delivered with the help of gym staff. Gym staff are a dedicated team looking after both staff and residents by giving support and encouragement to all who wish to improve their own health and wellbeing. The gym is only closed when outside pressures dictate.
Faith and Religion:

There is one large multi-faith room which is located in the multifunction building.

The following groups have ministers/representation:

- Anglican
- Buddhist
- Free Church
- Hindu
- Jehovah's Witness
- Church of Jesus Christ of the Latter-Day Saints
- Muslim
- Pagan
- Rastafarian
- Roman Catholic
- Salvation Army
- Sikh

The chaplaincy is well run and supports both residents and staff. A range of festivals and events are held each year promoting tolerance and diversity.
4 SAFETY

On average reception receives ten residents each week. Arrivals at HMP Bure find the reception area is clean and well prepared. Induction folders provide information along with a number of leaflets to help new residents during their first 24 hours. Support from a Listener and/or the chaplain is offered. Residents are encouraged to telephone and contact family or friends on their first night.

The level of violence continues to be low, although records show there is a slight increase in assaults. This has not the affected safety of residents or staff.

There have been 127 assessment care in custody and teamwork (ACCT) procedures put in place in the reporting period. This is a process for supporting and monitoring prisoners at risk of harming themselves. This is a reduction of 40 from the previous reporting year. They continue to relate to a small number of individuals, some of whom have mental health or personality disorder problems.

Safety intervention meetings are held on a regular basis, with officers, healthcare staff, mental health workers, staff from the chaplaincy and when possible an IMB member present. Minutes are received by IMB after each meeting. Additional meetings are called to deal with residents in crisis. Constant watches are set up with more serious cases being transferred to the hospital wing at HMP Norwich to meet 24-hour clinical needs.

Safer custody and violence reduction meetings are held bi-monthly. They are attended by wing representatives, Samaritans from the local community, a member of the healthcare team, staff from the chaplaincy and an IMB member. The meetings are relaxed, informative and supportive. Minutes are produced for wider circulation.

Security meetings are held monthly with the IMB attending or receiving minutes. HMP Bure is a non-smoking establishment with residents being compliant. Mandatory drug testing (MDT), security intelligence and substance abuse services indicate very little availability of illegal drugs. There is a continuance of a few incidents of misuse of prescribed drugs. Spot checks are carried out by healthcare.

The dog handlers maintain security with regular random searches of cells. They provide elements of security training for all staff and assist other establishments when required. Visitors and in particular, child visitors, entering the prison continue to be dealt with sensitively and appropriately. Residents have provided artwork for display in areas where children are admitted enabling these areas to be more child friendly.
The equalities committee meets every three months with the IMB invited as observers. The prison demonstrates a clear and coordinated approach to eliminating discrimination throughout the establishment and fosters good relations. Black and ethnic minority prisoners make up 15.9% of the population. There are 52 foreign national prisoners from 29 different countries. The small transgender group continues to work well with support from staff and other residents.

The discrimination incident report form (DIRF) process works well. All residents and staff are encouraged to use the system. Events are organised to educate and promote greater understanding of national, cultural and religious beliefs, with each residential unit having an equality representative. There were 61 DIRFs submitted in the IMB reporting year. Recording of DIRFs is completed by the prison from January to December each year. Since January 2019 there have been 34 DIRFs compared to 69 for the same period last year. This significant drop reflects conduct IMB has observed through the introduction of the ‘rehabilitative culture’, which empowers residents and is supported, in the main, by all who live or work at HMP Bure.

Delays in implementing individual incentives and earned privileges (IEP) to residents have been unacceptable in the past. Action has been taken to address this, with custody managers taking personal responsibility for individual residences. IEP representatives meet on a regular basis and the IMB attends these meetings when possible.

Spurgeons charities gained the contract for the visitor centre on 2 October 2017, providing a service to families and visitors. There appeared to be a slow start, but with the return of an experienced, committed manager new staff were employed and there is a marked change in the facilities, particularly catering, in both the visitor centre and the visits hall. Families and residents feel they are well provided for and appreciate efforts from both staff and volunteers in recognising that many families travel long distances with small children and need support.

Prison officers, residents and Spurgeons staff have worked closely together to ensure visitors are not delayed in going into the visits hall. A small group of residents looked at ways to improve time spent with visitors, and, supported by the dog handlers, initiated a new system to reduce waiting time.

Parenting classes have been established for residents to help maintain close ties with children.

With a continuing increase in older residents, the Board remains vigilant in ensuring their social needs are met. CARE UK has a dedicated occupational therapist who works closely with social services to meet the ever-increasing social care needs of residents.

A number of residents have been trained to be wheelchair pushers for disabled residents, which has benefited both parties. A review is currently under way to ensure residents are encouraged to walk rather than spend too much time in wheelchairs.

The healthcare department has supported the training of prison officers to enable them to have better understanding of residents in the early stages of dementia.

Turning to membership of the IMB itself, the Board would welcome candidates from varying backgrounds to join IMB, however the proportion of those from an ethnic minority in the population of Norfolk is below the national average, which has an impact on recruitment.
Efforts in the community in raising awareness has resulted in interest from diverse groups and we look forward to their applications during our next period of recruitment.

6 CARE AND SEPARATION UNIT

The care and separation unit (CSU) has 10 cells and continues to take residents from HMP Norwich for short stays to support pressures experienced at that establishment. These resident from HMP Norwich can damage cells and have been challenging at times, but the officers are professional in their approach and the Board has observed behavioural change in these residents while at HMP Bure.

HMP Bure uses far less force used than in similar establishments. Special accommodation has not been used in the reporting year. There were two dirty protests. IMB members have observed officers receiving control and restraint training so that they gain a better understanding of techniques to safeguard both officers and residents.

The Board visits segregated residents frequently. Residents continue to feel they are treated fairly and with respect which is borne out. The more challenging residents are supported in a professional manner and officers work well together as a team alongside chaplaincy, health care, mental health and gym staff.

The CSU is extremely clean. The exercise yard has recently had murals painted by residents and staff along with the installation of exercise equipment. This has reduced anxiety and stress for those held in the CSU. One of the cells converts into a constant watch cell. There have been a small number of residents, some with mental health issues, who require constant watch and these tend to be the same residents on frequent basis.

During the reporting year there were 490 alleged breaches of prison rules, compared with 229 last year. The reason for the increase is due to a younger population now being held at HMP Bure displaying more problematic behaviour. There were 267 adjournments which is a drop from 331 adjournments last year. Delays are caused mainly by the availability of officers or for the resident to obtain legal advice. There has been an increase of 35% in the number of actual hearings and it is to the credit of all that adjournments are reduced thus ensuring speedy justice to the benefit of both prison officers and residents.

The Board monitors governors’ and independent adjudications and is satisfied that residents on adjudication have every opportunity for a fair hearing and sentencing is consistent. The independent adjudicator heard 21 cases in the reporting year, which again is a drop from last year. There were 12 appeals none of which were successful.

The chaplaincy has provided in CSU with an excellent support service. This has included an opportunity to understand the benefit of relaxation and meditation delivered by the Buddhist representative.
Following on from last year’s report all residential units are clean, bright and in a good state of repair. The staff and residents themselves have transformed the units with colour and art work. This collaboration between staff, residents, the education department and chaplaincy is bringing about a feeling of goodwill and co-operation.

There are continuing problems with some wings and/or cells not having heating during cold weather. Additional problems of windows not fitting properly causing drafts and affecting the wellbeing of residents. Staff try to manage this, but it has been an ongoing problem year on year. Seven new boilers have been installed but further work will be needed to rectify problems relating to the heating system in residential unit 7.

Government Facilities Services Ltd (GFSL) have now been in place since January 2017. Following a solution found by HMP Bure prison workshop, changes to the residential unit windows are in progress with an expected completion date of November 2019.

There continues to be undue delay in dealing with minor tasks, particularly repairing washing and drying machines. Many of the white goods are over 10 years old and are being used to capacity. Delays by outside contractors and shortage of maintenance staff has exacerbated the situation. GFSL are now considering resolving GFSL staff problems through a proposed apprenticeship scheme.

The doubling up of residents in 32 of the cells in residential unit 7 was a concern highlighted to Ministers in the last two years. With the exception of two weeks in July 2018, this has continued unabated. Residents in these cells have endured cramped conditions, with not enough space for property, only one chair and small table available. Residents and prison staff have raised their concerns on a number of occasions and the Board considers the lack of space a serious risk if required to give emergency treatment. The residents have shown understanding and patience but it remains that these are unacceptable and inhumane living conditions.

Residential unit 7 has good recreational areas and residents can eat communally. Many of the residents there are elderly and/or vulnerable, however staff work tirelessly to try to meet residents increasing physical and mental health needs. CARE UK is able to offer treatment for minor procedures which in the past required a visit to the local hospital.

The recreational areas in residential units 1-6 are small. These areas are used for serving meals and because there is no dining area, residents are required to go into their cells to eat their food. It has been identified that elderly residents in these areas often feel vulnerable and isolated. Residents who are trained as ‘Buddies’ support the elderly and through C.A.M.E.O (come and meet each other) bringing the elderly and vulnerable together, reducing isolation. There is no additional budget for this but the commitment and energy of staff and residents has made this a success.

Kitchen meetings are well attended by resident kitchen representatives and kitchen staff. These provide opportunities for discussion and sharing of information. The Board regularly monitors food preparation and service and is pleased to note that one member of the civilian kitchen staff is nearing completion of their apprenticeship. The kitchen manager, residents and staff work hard, not only providing three meals a day, but supporting all religious festivals and prison events by listening and budgeting in advance. Concern is raised about the delay, on occasions, of repairs and maintenance of essential equipment by outside contractors.
Property on transfer between establishments has improved. The Board has evidence that communication is poor between establishments with some prisons ignoring enquiries from administration staff and others not providing accurate information. There seems to be no continuity in ensuring property is following a prisoner and there is no robust audit trail.

A survey on reception was initiated after monitoring by the IMB and a marked increase in complaints. 229 residents completed the survey indicating there needs to be a change of attitude in dealing with residents when their property is being retained without proper explanation.

Residents are sometimes unclear about their property entitlements, due to their vulnerability or different rules regarding property between establishments. Residents require a clear explanation, particularly when returning to or receiving property from families, and there is evidence these items are being delayed. Some families travel long distances and have infrequent visits and this leads to unreasonable delay and anxiety to families trying to deliver or receive property from residents. Management has been made aware and seeking to resolve.
8 HEALTHCARE (including mental health and social care)

Since our last report there has been a marked improvement in staffing levels. There are issues around recruitment to HMP Bure due to the isolated site and potential candidates not wishing to work with our resident group. However, the manager has been creative in offering training to current healthcare assistants and pharmacy technicians to enable them to progress to more responsible roles. The newly appointed team, including a paramedic and occupational therapist, has made good progress with minimal use of bank/agency staff.

Discussions with the healthcare manager noted that the pharmacy had increased staffing levels. Prescriptions are now issued to each wing on an allocated day and set time for collection which seems to be avoiding the long queues in the open air. Following applications, acknowledgements are issued to residents with an appointment date and time. Improved arrangements have been made between prison and healthcare staff enabling residents to leave their normal place of work to collect delayed medication. However, this does disrupt lessons in education and activities in the workshop, therefore the Board will continue to monitor.

Dental treatment is provided with six sessions fortnightly. The Board had concerns about the complaint system which was not being managed and complaints were being ignored. This matter has now been resolved.

Complaints regarding healthcare are managed directly by staff and/or the healthcare manager and if they are not able to resolve them, residents are advised to write to NHS England and/or the Prisons and Probation Ombudsman. Resident healthcare representatives meet with a member of the healthcare team bi-monthly and up-skilling of staff reduces the need for residents to attend outside hospitals.

Random checks are made by the pharmacy technician twice weekly to ensure prescribed medication is not being abused or passed to other residents.

CARE UK has made contact with Norfolk and Norwich University Hospital and hopes to offer placements to students studying general nursing and occupational therapy.
9 EDUCATION AND OTHER ACTIVITIES

The Board’s observations of the education department, run by People Plus, shows a relaxed atmosphere with a motivated team leading to successful outcomes for residents. Education was last inspected by Ofsted in 2017 with a result of ‘Good’.

This year has continued with many changes utilising the skills and experience of residents and staff. In January the achievement and celebration of excellence (ACE) awards was held and certificates were presented by prominent members of the community, including Sir Michael Harrison of the Butler Trust.

At the time of writing an art exhibition is being held, with members of the community being invited along with families of the artists. A family day for staff is planned with the HMP Staff Choir of 25 preparing for their ‘debut’ along with the official opening of a memorial garden. Residents and staff work together in the preparation for these events which increases opportunities for residents and community members to meet in a relaxed safe environment.

Further development of projects within the prison for broadcast on Wayout TV continues, with governors and individuals being interviewed and areas around the prison being filmed to show daily life. The magazine ‘Wingspan’ has had a complete makeover with residents and staff contributing interesting articles. The budget has been limited but it is to the credit of all involved that a very professional standard is maintained.

There has been an upgrade in some of the IT systems with an improvement in providing IT in every classroom. HMP Bure continues to have residents showing interest in Open University degrees. There are currently 23 residents doing their degrees with others waiting to join. Assessments are now being completed online.

Norfolk County Council (NCC) provides staff and the library facility and 90% of residents attend the library. The library in HMP Bure is very small but staff are dedicated and respected. An initiative was set up by a member of the library staff together with resident reading representatives called Great British Library Challenge (GBLC) a few years ago. The GBLC is now used in both HMP Wayland and HMP Norwich. This has had great success and is now being piloted in Norfolk community libraries. At a recent library awards ceremony, 45 residents received certificates and medals. In addition, residents received certificates for completing courses in French, Spanish, Japanese, English as a second language, music and music theory.

The education department is a well-run team dedicated to ‘changing lives’ who involve themselves in Prison life and are respected by both residents and prison staff.
10 WORK, VOCATIONAL TRAINING and EMPLOYMENT

HMP Bure offers a wide range of vocational training leading to employment opportunities. There are currently 14 level 2 vocational qualifications on offer. Course retention rates remain at 99% and success rate at 98%. Recruitment of specialist vocational trainers has been a problem due to the isolation of HMP Bure but now seems to have been resolved.

Employment opportunities include gardening, light assembly work, welding, bricklaying, making camouflage nets for the MoD, waste disposal, cycle maintenance, kitchen and general orderly work around the establishment. On average there are 480 activity spaces available per session in a population of 652. This is an increase on last year.

Bearing in mind the increasing age of residents there has been considerable effort by management to seek work for them by increasing contacts with other establishments, local authority leaders, prison industries, business leaders and enterprise parks.

There is a limit to work on offer in the new workshops. Filing cabinets, catering equipment and other items are being produced for the prison estate but the lack of storage facilities restricts production. This continues to be frustrating to both staff and residents given the investment in machinery and the fact that residents see it as valuable training and a way to resettlement.

Although there has been an improvement in the number of work opportunities, some of the light assembly work continues to be repetitive and mundane. Some residents refuse to engage in work or education, while others are unable to work due to ill health or health and safety issues. A number of residents, past retirement age, wish to continue working either full or part time and this is accommodated, but those who have not reached retirement age are given priority.

Norfolk, with its dry climate, requires residents and staff to continue to work hard to maintain the gardens and polytunnels providing fresh vegetables and flowers for the prison community. Many residents recognise the value of being in the open air with an opportunity to gain guidance from the horticulturalists and look at the possibilities of work at the time of resettlement or simply as a hobby for their wellbeing.
11 RESettlement PreparAtion

HMP Bure is not designated a resettlement prison. However, it now shares provision from the community rehabilitation company (CRC) with HMP Norwich, and continues to release up to 20 residents a month directly into the community. Most residents should move to another prison in their release area for resettlement activity to take place, but this does not often happen. This year has seen the introduction of an independent information and guidance officer to support residents through their stay, looking at employment opportunities in the future. All residents are seen by the resettlement officer 15 weeks prior to release.

Some residents leaving HMP Bure find themselves with only temporary accommodation in bed and breakfast establishments. This causes great anxiety and impacts on the wellbeing of other residents. Staff at HMP Bure continue to look for ways of working with local authorities and charities to improve their knowledge in supporting residents who find themselves facing homelessness. This is an increasing national issue which needs action to avoid reoffending and to safeguard others.

Offender management unit (OMU) staff have worked hard, particularly with regard to indeterminate sentenced (IPP) residents. At the beginning of the reporting year there were 99 residents in this category and 35 have either been sent to category D prisons or released from prison.

This year saw the introduction of a group specifically for IPP residents with their own representatives. The IMB has attended these meetings, which are held in a relaxed manner and residents encouraged to share their concerns, which are mainly around resettlement. This is supported by prison/probation officers and offending behaviour psychologists. Prison staff have made contact with other similar establishments, looking at opportunities, with the help of the education department, to improve the skills of those who have been living in a safe and controlled environment for a number of years.

Key workers are now in place with responsibility for 6-7 residents each. Eight and a half probation officers are required to be in post with the introduction of OMiC case management in September 2019, but it is unlikely that they will all be in place until April 2020. Thirteen new prison officers were appointed in our reporting year. One has resigned while others are near completion of their probation period.
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## Applications to the IMB

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<td>H 3</td>
<td>Canteen, facility list, catalogue(s)</td>
<td>4</td>
<td>6</td>
</tr>
<tr>
<td>I</td>
<td>Sentence management including HDC, ROTL, parole, release dates, re-categorisation</td>
<td>9</td>
<td>15</td>
</tr>
<tr>
<td>J</td>
<td>Staff/resident concerns including bullying</td>
<td>18</td>
<td>20</td>
</tr>
<tr>
<td>K</td>
<td>Transfers</td>
<td>18</td>
<td>19</td>
</tr>
<tr>
<td></td>
<td><strong>Total number of IMB applications</strong></td>
<td><strong>205</strong></td>
<td><strong>238</strong></td>
</tr>
</tbody>
</table>