



Annual Report
of the
Independent Monitoring Board
at

HMP/YOI Drake Hall

For reporting Year
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Monitoring fairness and respect for people in custody

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A) Sections 1 - 3

1 STATUTORY ROLE

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

The Board is specifically charged to:

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

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

2 EXECUTIVE SUMMARY

The Independent Monitoring Board continues to believe that HMP Drake Hall provides a safe and secure environment for prisoners and that they are treated decently and with humanity. Overall, the evidence available to the Board suggests that the prison is well managed and the services provided to the women are of an appropriate standard. We noted in last year's report that the prison was downgraded to a performance rating of 2 and that a performance improvement plan (PIP) was in place. The improvements needed have been implemented and the prison now has the highest possible rating of 4. The PIP has been discontinued.

In the run-up to the last annual report, the prison had been fairly unsettled. We raised concerns about the difficulties associated with a small group of women who presented challenges, given the relatively open environment at Drake Hall. The last 12 months have been more settled, although, as will be reported, some challenges remain.

Our primary concern in this report is about accommodation; the decision not to replace the World War II accommodation units, Plymouth and Richmond, remains, in our view, ill-conceived and difficult to defend. We note the considerable efforts made by the local management team to make improvements to these units, and accept that these initiatives have had some success. Unfortunately, fundamental structural difficulties remain, which means that any interim improvements are likely to be a short-term solution.

We continue to be concerned about the transfer of property. Women arrive at the prison without all their belongings, and attempts to rectify this situation through the prison complaints process are often frustrating and drawn out. This is a national issue that urgently needs resolution.

It is, again, pleasing to be able to report that the prison continues to work towards the positive preparation of the women for resettlement and reintegration into the community.

MAIN JUDGEMENTS

ARE PRISONERS TREATED FAIRLY?

Prisoners are treated fairly within the prison.

There appears to be a consistent approach to the women, with prison staff applying the prison rules in a balanced way that reduces the possibility of discrimination. A clear and well-resourced framework is in place, to ensure that the nine protected characteristics (PCs), as defined by the Equality Act 2010, are understood and supported (section 5).

Our overall impression is that the relationship between staff and prisoners is good. We regularly see examples of staff working with the women in a compassionate and caring way, providing the right level of support. We are, however, concerned about the small but persistent number of complaints raised about officers and in particular complaints concerning their attitude. We are assured that these individual cases are dealt with by the prison management.

On the whole, complaints are replied to promptly, but we do remain concerned about the length of time it takes to obtain a full response from other prisons. These complaints are often about property and are a source of worry and distress to the women.

ARE PRISONERS TREATED HUMANELY?

It is the view of the Board that prisoners are treated humanely.

Overall, staff/prisoner relationships are good, and discipline is used appropriately. The provision of healthcare, both physical and mental, is good. The women are also offered a balanced and varied diet. There is an excellent chaplaincy service available, for all religions and none. The long-awaited appointment of a female general practitioner (GP) is particularly welcome (section 8). The standard of accommodation throughout the prison is reasonable overall. However, while the Board welcomes the cosmetic improvements made to Richmond and Plymouth houses, and particularly the installation of new showers in Richmond, we remain concerned that these two houses still fall below minimum standards (section 7).

ARE PRISONERS PREPARED WELL FOR THEIR RELEASE?

The prison has a good record for the resettlement of prisoners, and this has been noted in previous reports.

The prison continues to provide a coordinated and positive regime to equip the women for a productive life when they leave. In addition, a wide range of educational, training and work opportunities are offered, to prepare the women for release. The offender management team works effectively, and generally provides an excellent service to the women. A total of 326 women were released from Drake Hall in this reporting year, and the vast majority had accommodation arranged with only 15 (4.6%) of the women leaving the prison without agreed accommodation.

MAIN AREAS FOR DEVELOPMENT

TO THE MINISTER

The Board again draws attention to the condition of Richmond and Plymouth houses. In response to last year's report, the minister emphasised the work to be undertaken to improve the houses. The Board accepts that some cosmetic improvements have been made, and comments on this elsewhere in the report. We remain concerned, however, that these two houses are not fit for purpose. Any improvements made cannot address underlying structural problems associated with age and construction. We again ask the minister to review the decision to cancel the renewal/replacement of Richmond and Plymouth. Allowing women to continue to live in sub-standard accommodation is detrimental to their physical and mental wellbeing. New accommodation, with additional lockable cells, would also vastly improve the prison's ability to deal humanely with its prisoners (section 6).

TO THE PRISON SERVICE

In its last two reports, the Board has drawn attention to the fact that prisoners' personal property was frequently delayed or lost on transfer to Drake Hall. This remains a significant problem and causes unnecessary distress to prisoners. This is a systemic issue, and the Board again asks the Prison Service to take action to solve this problem as soon as possible. We are particularly concerned about the transfer of prisoners' monies. Unacceptable delays often occur when women move to Drake Hall from a private establishment (section 7).

In the reporting period, the number of mental healthcare staff has increased. Consequently, there is now the potential to increase the range of therapeutic interventions available to the women. However, there is a lack of private space available in the prison for

such interventions, thus restricting development in this area. We understand that business cases have been submitted to support the development of more space, and hope that these will be considered favourably (section 8).

The Board is concerned that during the current reporting period there has been an increase in the number of women transferred to Drake Hall shortly before their release date. These women are therefore unable to participate fully in the educational and employment opportunities available in the prison. This has the potential to harm their successful transition from prison (section 11).

We are disappointed that there is a delay in the rollout of the Offender Management in Custody (OMiC) system across the female estate. Drake Hall has currently trained the majority of its officers in the system. The Board is aware that OMiC has been successfully rolled out in the male estate and would urge the Prison Service to make it, and its obvious benefits, available to the female estate in the immediate future (section 7).

TO THE GOVERNOR

The Board has observed sustained attempts to reduce the number of 'did not attends' (DNA) for healthcare appointments; however, this remains a problem. The Board will continue to monitor this issue (section 8).

Healthcare attendance at assessment, care in custody and teamwork (ACCT) reviews has been a challenge. The Board notes that efforts have been made to improve the level of healthcare representation. Some improvement has been noted, but problems remain. We will continue to monitor this issue (section 4).

The Board is pleased that the women in the open unit have been provided with lockable facilities in which to secure their possessions. We do, however, feel that consideration should also be given to providing the women with a facility to lock their rooms, to ensure privacy and security (section 7).

The Board continues to be concerned that not all prisoners have a bank account on release. This is likely to prevent them from claiming benefits within prescribed timescales. The delays in setting up bank accounts appear to be an administrative issue, and, in our view, this needs to be resolved as a matter of urgency (section 11).

MONITORING CONCERNS REPOPRTED IN LAST YEAR'S REPORT

Area of concern	Addressed to	Concern in last year's report (2018)	Current assessment (October 2019)
Accommodation	The Minister	The Board asks the minister to review the decision to cancel the replacement of the Richmond and Plymouth accommodation blocks	Although improvements have been made, this remains a significant concern (section 7)
Safety	The Prison Service	Drake Hall is a closed prison but within the perimeter fence there is considerable freedom of movement. The Board was concerned that a small group of women struggled with the open environment, and put a strain on the limited segregation facilities	The prison has worked hard to manage some difficult women. Where successful integration failed, a small number of women were moved to more suitable accommodation elsewhere. Women for whom the open conditions pose challenges continue to be transferred to Drake Hall. However, the level of disruption currently appears to be managed more effectively. This can be seen from the reduced use of the care and support unit (CSU) and fewer adjudications (section 4)
Prisoners' property	The Prison Service	In the 2017 and 2018 Board reports, it was stated that prisoners' property was frequently delayed or lost on transfer to Drake Hall	There has been no improvement, and this issue is again raised in this year's report (section 4)

Healthcare	The Prison Service	Concern was raised about the number of specialist medical appointments cancelled owing to the unavailability of escorts	This remains a challenge as prison staff can only support two escorts per day. We understand the logistical difficulties, and are assured that all possible is done to manage this situation. Appointments are assessed based on clinical risks, and we are not aware of any women being denied an emergency or urgent appointment (section 8)
Education	The Prison Service	An education and training plan should be used when prisoners are transferred. This would ensure that the women are given the best opportunity to gain useful skills	All women are now issued with personal learning plans (section 9)
Accommodation	The governor	The 'signpost' facility was relocated to the equality hub, and the Board was concerned that the service was less confidential and uptake less likely. The governor was asked to monitor the situation and consider moving the facility back to its previous location	The facility is now permanently housed in the equality hub. The problems outlined in last year's report remain a source of concern, and the current location is not ideal. However, the old 'signpost' building is now used as an advice centre, where women are able to access information from peer mentors relating to health and wellbeing,

			debt, housing, education and outwork. This is a welcome initiative and has obvious benefits for the women
Health and safety	The governor	The Board noted its concern about the lack of a transparent, coordinated plan for managing health and safety in the prison	The Board notes two developments that provide assurance that this situation has improved: (1) the permanent appointment of a health, safety and fire adviser; and (2) fortnightly visits from the health, safety and fire cluster lead
Segregation/Care and support unit	The governor	In the last report, concern was expressed about three 'long stays' in the CSU	This has not occurred in the current reporting period, during which there has also been a reduction in the use of the CSU (section 4)
Offender management	The governor	The Board made reference to the personal officer system, which was not operating to a satisfactory level. The plan to resolve this situation was based on the implementation of the OMiC system. This was due in November 2018	The Board is assured that considerable work has been undertaken locally in preparation for the implementation of the OMiC system. This initiative has only been introduced into the male estate (apparently with some success). The delay needs national, rather than local, action to resolve. We comment on

			this issue elsewhere in the report (section 7)
Work, vocational training and employment	The governor	The Board asked the governor to consider reviewing the process of allocation of work to new prisoners. There appeared to be unnecessary delays between completion of induction and prisoners starting work	This has now been improved, with women being allocated to a workplace within four days of completing induction in the adult learning centre (ALC) (section 10)

OTHER IMPROVEMENTS NOTED DURING THE REPORTING PERIOD

The Board has previously raised concerns about the lack of a female GP. We are pleased to report that a female GP has now been recruited (section 8).

In previous reports, the Board has raised concerns about the absence of a counselling service. The previous service was withdrawn following a decision by the clinical commissioning group. In the last report, the Board noted that the reintroduction of the counselling service had been agreed. The Board is pleased to report that this service is again available to the women. The counselling is provided by the Dove service and the sexual assault referral centre, the latter specialising in issues relating to sexual abuse (section 8).

The Board welcomes the refurbishment of what was previously the continuous observation suite. This facility has now been refurbished as a 'safer cell' and meets the standards required by the Prison Service. This enhances the facilities available within the prison to support any women who may be actively suicidal. We are pleased to note that this facility is used only as a last resort.

We are pleased to report that the use of the CSU has reduced. In addition, the unit has been subject to some refurbishment, and this is to be welcomed (section 4). During the

reporting period, new furniture specifically designed to meet the needs of women subject to segregation was ordered. We are pleased to note that this has now been delivered.

Although we are critical of the overall structural condition of Plymouth and Richmond, the Board has noted the work undertaken by the prison management to improve the physical environment of these houses, to make them more comfortable. New furniture has been purchased and attention has been paid to the décor, and, most importantly, the showers in Richmond have been replaced.

We want to comment on the interdepartmental risk management team meeting, which is attended by a member of the Board regularly. We have been impressed by the professional and multi-agency approach taken, to try to resolve complex and challenging problems presented by some of the women.

During the reporting period, outdoor gym equipment has been purchased, and this has been located in the prison grounds. This facility is welcome and supports the broader emphasis on improving the women's health. The Board also commends the use of the mobile breast-screening unit, the health promotion work to improve the take-up of cervical smears, and the recent successful health fair.¹

¹ This was an educational and interactive event with a range of exhibitors. The aim was to educate women about aspects of health, wellness, fitness and lifestyle improvements.

3. DESCRIPTION OF THE PRISON

Drake Hall is situated in rural Staffordshire, about a mile from the town of Eccleshall and 10 miles from Stafford and the nearest railway station. Although designated as a closed prison, the layout provides significant freedom of movement for prisoners within the perimeter fence. The women and young offenders are accommodated in 15 individual houses spaced around the grounds, each with around 20 rooms. Most are single rooms, with a small number of doubles. An average of six young offenders (aged 18–20 years) was accommodated during the reporting year, alongside adult prisoners. The closed element of the prison has a capacity of 315.

An additional house lies beyond the perimeter fence of the prison. This open unit provides additional capacity for 25 women, bringing the total Drake Hall prison capacity to 340. The capacity of the open unit cannot always be fully utilised as strict criteria for admission are rigorously applied. The unit aims to provide those in residence, and of working age, with employment in the community. It also aims to prepare all residents as adequately as possible for a productive life in the community after release. The unit was full at the end of this reporting period.

The prison also has a CSU, which contains six cells and is used in situations where a prisoner has to be segregated from the main population for disciplinary or safety reasons.

The prison is accredited as an enabling environment by the Royal College of Psychiatrists. The College describes an enabling environment as a place where there is a focus on creating a positive and effective social environment where healthy relationships are seen as the key to success. This fits with the prison's rehabilitation and resettlement ethos. The process of reaccreditation will take place in February 2020.

The population of the prison averaged over 97% capacity in this reporting year. The women come from a wide geographical area across England and Wales, with some coming from as far away as Devon and Cornwall. The prison does not take remand prisoners. The prisoners at Drake Hall are serving a variety of sentences, ranging in length from a few months to life. Drake Hall admits mostly adult prisoners, but there is also a small number of young offenders. The age of the women ranges from 18 to over 70 years. Many of these women have complex needs that are associated with their mental and physical health, substance misuse, and a history of trauma and/or abuse. Just under 30% of the current population have experience of the care system.

B EVIDENCE SECTIONS 4 – 11

SECTION 4: SAFETY

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

For seven weeks in 2019, the CSU underwent fire safety improvement, with the installation of new smoke extractor units, during which time the women on the unit were located elsewhere. The number of women being located in the CSU dropped during this period.

Since the reopening of the CSU in late July 2019, the occupancy has remained encouragingly low. The Board welcomes this. The average CSU occupancy (days per month) has dropped, from approximately 135 prisoners in 2017/18 to 89 in 2018/19. The number of adjudications has also dropped, from a monthly average of 183 in 2017/18 to 138 in 2018/19. The prison population has remained relatively static over the same period. The reductions can be attributed to improved staff/prisoner communication.

The number of ACCTs remains relatively high, although there is a slight reduction from the previous year. The average population on an ACCT is 6.37%. The prison has seen an increase in levels of self-harm, although these remain much lower than in comparable establishments. Since June 2019, there has been a reduction in the number of such incidents. The prison works hard to reduce the levels of self-harm, and the ACCT process is a fundamental part of supporting women who deal with their distress in this way. We note, and have raised with the governor, our concerns over the attendance of healthcare professionals at ACCT reviews.

In February 2019, the managing challenging behaviour strategy was replaced by the use of challenge, support and intervention plans (CSIPs). This is a multidisciplinary approach which targets those who pose a risk of violence. It focuses on the specific needs of the individual and aims to support them to change their behaviour. Over the reporting period, 25 CSIPs were raised, and 30 discrimination incident report forms (DIRFs) were submitted.

While there continue to be women placed at Drake Hall for whom the open conditions are challenging, it is noted that there is less disruption from them, evidenced by the reduction in the number of adjudications.

In the last reporting year (2017/18), the Board noted that, according to the safer custody survey, only 37% of the women felt safe at the prison. However, a new and more accurate survey on the women’s perception of their own safety has been initiated for 2019/20. This research will be too late for the current report but is welcomed by the Board.

Self-harm incidents remain a matter of concern. A more accurate method of reporting self-harm is now being used, showing an increase in the number of recorded self-harm incidents for 2018/19, but it is noted that many incidents are caused by a small number of women. The chart below shows the total number of self-harm incidents to be 337, of which 212 are attributable to women on ACCTs.

Improved scanning processes have significantly reduced the ingress of drugs. The use of the ‘Rapiscan’ detector over approximately the last six months of the current reporting period has shown 177 positive indications at level 3 or over.

There have been no deaths in custody during the current reporting period, although an inquest took place about a woman who died of natural causes in 2018. It concluded that she received a standard of clinical care equivalent to that available in the wider community.

The Board welcomes the recent refurbishment of the old care suite and the development of a ‘safer cell’. The new facilities are excellent. They afford safe, humane accommodation for vulnerable women and improved conditions for supervising staff.

Many of the women at Drake Hall have complex health needs, often associated with the use of illicit drugs. Approximately 25% of the population are receiving treatment for substance misuse and approximately 50% of the population are receiving psychosocial support for drug misuse.

Safer custody statistics

	2017/18	2018/19
Average CSU occupancy (days per month)	135	89 (<i>Note 1</i>)
Average number of monthly adjudications	183	138

Number of adjudications related to safer custody	2,194	1,650
Average percentage of the population on an ACCT	7.01%	6.6%
Average percentage of the population on drug rehabilitation	23%	25%
Percentage of women who feel safe (prison survey)	37%	Not available
Number of uses of force	57	74 (Note 2)

Note 1: See comments in section 6.

Note 2: Of the 74 incidents reported under 'use of force', in only 43 was full control and restraint applied.

	2016/17	2017/18	2018/19
Average population	334	328	330
Number of adjudications	1,812	2,194	1,650
Number held in CSU	228	214	163
Number of ACCTs opened	285	276	263
Total number of self-harm incidents	Not reported	308	337

Number of self-harm incidents on ACCTs	104	126	212
Number of requests and complaints	843	918	1,076
Number of DIRFs/CSIPs	22	218	30 DIRFs/ 25 CSIPs

SECTION 5: EQUALITY AND FAIRNESS

All functions and activities within Drake Hall must comply with the provisions of the Equality Act 2010. There exists, therefore, a clear and well-resourced framework for ensuring that the nine protected characteristics (PCs) (as defined by the Act) are fully understood and respected. This helps to ensure that women in the prison feel that there is a good awareness of their statutory rights and protections. Prisoners are involved in the introduction of new initiatives, as well as monitoring how effectively existing policies are applied.

The purpose of the equalities committee is to provide a focus for the comprehensive equality work undertaken throughout the establishment. During the past year, the head of safety and equalities has realigned the PC lead structure by giving responsibility for each strand to a member of the senior management team. There is now clear ownership of all aspects of equality at the highest management levels of the prison. PC lead forums involving prisoner representatives are now well attended, by up to 20 women, and take place monthly.

Drake Hall recognises the importance of taking a holistic approach to the care of women in custody, and the aim is to ensure that women are in a safe environment from the time they arrive at the prison to their departure. A prisoner equality representative meets all new arrivals and makes them aware of the support, both formal and informal, that is available to them.

On release, women are encouraged to complete a discharge questionnaire. Any equality issues that are highlighted are then referred to the appropriate PC lead forum, to establish their validity. If necessary, remedial action is proposed. This is particularly important when allegations of race discrimination are made. A review of DIRFs notes that 72% relate to such allegations. Most of these arise from situations where prisoners use racist language in the context of an argument. The process for investigating DIRFs is robust and involves a three-level review that culminates in each complaint and response/action being checked by an outside independent scrutiny panel. The panel focuses on timeliness, fairness, PC lead and the conclusion.

The Board recognises that the well-resourced equality processes in place at Drake Hall are expensive to maintain – in both staff and management time. It is hoped that the effort and commitment taken to achieve a high level of performance is not diluted in future years as other priorities arise.

SECTION 6: SEGREGATION / CARE AND SUPPORT UNIT (CSU)

Although Drake Hall is a closed prison, the open nature of the grounds and the free movement regime continue to present difficulties in adjustment for some women transferred from fully closed establishments. However, these conditions also offer opportunities for some women to indulge in unacceptable and aggressive behaviour.

In last year's report, the Board raised concerns about this matter, but we are pleased to note some improvements during the current reporting period. The number of adjudications this year has fallen to an average of 138 per month, which represents a 24% reduction from last year.

The average number of prisoners segregated each month was 13 this year (18 last year) and the average number of days per month for which prisoners were segregated was 89, as opposed to 135 last year.

The CSU was closed from 23 March to 2 May 2019, to enable the smoke extractor/ventilation equipment to be installed. During this period, three rooms in one of the residential units (Bristol) were used for segregation purposes. During this time, the number of occasions when segregation was needed dropped significantly. As noted above, this trend has continued. This appears to be the result of a combination of factors, including the

current prisoner population, the active encouragement by prison managers to resolve issues without referral to the CSU, and the enhancement of staff skills through training, such as that associated with the OMiC initiative.

There have been 34 women on ACCT documents while in the CSU this year. All justifiable decision paperwork has been completed and the women's welfare has been closely monitored during their stay.

Board members are routinely notified within 24 hours of all prisoners being located in the CSU, and we have attended nearly every review during the reporting year. On the rare occasions when a member has been unable to participate in a review, all the appropriate paperwork and decisions are reviewed retrospectively as soon as possible thereafter.

Overall, the Board has no concerns about the operation of the CSU. We commend the CSU staff for their work and for the way they care for the women. The staff make every effort to try to return women to their normal location as soon as appropriate.

SECTION 7: ACCOMMODATION (INCLUDING COMMUNICATION)

The Board considers that the prison generally provides reasonable accommodation. The exception to this is the standard of accommodation on the Richmond and Plymouth accommodation blocks, referred to below.

Work has been undertaken to improve the overall standard of the accommodation. An accredited painting programme, focused on living environments that are clean, enabling, rehabilitative and decent, involving prisoners and also staff from Amey, has recently started. This should help to improve the communal areas and the individual rooms. New curtains and furniture have also been provided for many of the communal lounges.

It has long been acknowledged that both World War II buildings (Richmond and Plymouth) are beyond their economic life and should be replaced, but no funding has been made available yet. However, the Board is very pleased to note some refurbishments in Richmond, particularly the replacement of the shower block.

The open unit is a real asset to the prison, providing an opportunity for the women to develop the skills needed to leave prison and make a new start. The unit continues to

provide a conducive environment for prisoners near the end of their sentence. It provides a good standard of accommodation, although not all the accommodation is in single rooms. All prisoners are provided with a lockable space for valuables, but we comment elsewhere in the report on the fact that the doors to the rooms cannot be locked. Although we appreciate that there may be practical difficulties in providing a solution to this problem, it does not appear to fit with the overall ethos of the unit.

Yet again, throughout the year, there have been many issues with the transfer of personal property and monies between prisons. As reported previously, these issues cause much distress and hardship for the women. It is noted that a national solution is being looked at.

The personal officer scheme was supposed to be replaced with a key worker system (as part of OMiC) later this year, and improved interaction between the women and officers was anticipated. Owing to some national issues, the scheme has had to be postponed. The Board hopes that these issues can be resolved, and the scheme started as soon as possible, for the benefit of the women. The Board will continue to monitor ongoing progress with the introduction of this scheme.

SECTION 8: HEALTHCARE (INCLUDING MENTAL HEALTH AND SOCIAL CARE)

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

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

As reported in previous years, some medical appointments outside the prison have been cancelled because of insufficient escorts, and this problem remains. The number of appointments needed is more than the number of escorts available, thus resulting in some appointments being cancelled and having to be rearranged. Escorts are always provided when urgent access to external healthcare services is needed, and we have no evidence of a severe deterioration in any women's health as a result of these delays.

The Board remains concerned at the high levels of DNA (did not attend) rates, which are in the region of 25% for some appointments. This is an ongoing issue and, in spite of considerable efforts to resolve the problem, it remains a challenge.

We are pleased to note the expansion of the mental health and recovery service, but we are also aware that there are challenges associated with providing accommodation for therapeutic interventions. We are aware that a business case has been submitted to try to resolve this difficulty, and we comment on this elsewhere in the report.

During the year, several developments have taken place that are worthy of note:

- a female GP has been recruited and is working in the prison
- overall staffing levels appear satisfactory, and the vacancy rate seems low when compared with that at other prisons
- a very successful health fair took place, with many of the women attending
- the mobile breast-screening facility has, again, been used in the prison, and will continue to be available regularly
- a proactive health promotion scheme has been undertaken, to increase the level of uptake for cervical smears
- a patient participation group has been introduced. This aims to obtain the views of a range of women, from across the prison, about the services provided
- a counselling service has been reintroduced into the prison. This is a positive addition to the services available.

SECTION 9: EDUCATION AND OTHER ACTIVITIES

The learning centre (ALC) is an important facility, tasked with improving the women's educational standards and employability during their limited length of stay. Unfortunately, an increasing number of women stay at Drake Hall for six months or less before their

release;² and therefore ALC staff face the challenge of raising a woman's low skill and educational levels to 'standard' in a very short time. Considering the limited time available, it is notable that the overall success rate for learners who completed their course in 2018/19 is 97%. (97% in 2017/18). The Board commends the ALC staff for this.

The Board is pleased to report that all women are now issued with a personal learning plan, and this governs their progress. Currently, there is still a loss of momentum, and some frustration for women at having to repeat programmes when they transfer into the establishment as they are not allowed to join mid-course.

For women transferring from Drake Hall to another establishment, the ALC staff liaise with the offender management unit, to avoid, where possible, women leaving in the middle of a course.

It was hoped to start a living skills course, to help women further on their return to life after prison. These have had to be postponed in the medium term, as the area earmarked for this purpose has had to be used as temporary accommodation for the library, pending repairs to the library's permanent building.

There is an employability course (an eight-week course, with three sessions per week) for women due for discharge, where they are shown how to complete job application forms, write CVs and phrase disclosure letters, which is often a sensitive and difficult area. Interview skills are worked on and mock interviews are held, to help the women develop their confidence. This programme of support, in conjunction with work placements both within and outside the prison, is a cornerstone of the ALC and Drake Hall's work in preparing women for life outside prison.

During this reporting year, the education provider changed from Milton Keynes College to People Plus. Although this resulted in considerable changes within the department, the Board is pleased to note that the impact of the change on the women has been minimal or non-existent. One further change, which has had an impact on the learners, has been the introduction, at a national level, of higher-level functional skills (English and mathematics), which has meant that any woman with low entry skills has to spend more time on these disciplines.

² Unfortunately, we have not been able to collate statistics on this during this reporting period, but this will be rectified in 2019/20.

The Board is pleased to report that changes to the induction system mean that women are now offered a job only four days after the completion of induction in the ALC – that is, on either the Monday or Wednesday following their arrival. This represents a significant improvement on last year.

SECTION 10: WORK, VOCATIONAL TRAINING AND EMPLOYMENT

There is a range of activities available to prepare the women for release and resettlement. The activities team continues to provide opportunities for paid work placements for all prisoners who are able and willing to work.

	2018	2019
Percentage who are currently in work	97.6%	87.93% ³
Percentage who are medically unable to work	0.6%	2.86%
Percentage who are retired	0.6%	0.64%
Percentage who are unemployed/refuse to work	1.2%	0.64%
Percentage in outwork	Not reported	7.93%

There continues to be a close working relationship between the activities team and the education provider, ensuring a complementary and joined-up approach. Work is available in a range of areas, including the kitchens, gardens, laundry, hair and beauty, Remade With Hope (RWH), gym, waste management, and in cleaning and peer support roles. There are also industry-led activities provided by DHL, Halfords and Greggs, and a call centre run by Data Census. The last three offer job opportunities for women who are successful in meeting their recruitment criteria and who pass the training programme. Furthermore, they provide opportunities for employment following release. The outwork department continues to provide positive opportunities. In last year's report, we noted the introduction of RWH, which offers paid employment by recycling clothes for resale. Unfortunately, the amount of work

³ This is a big reduction, which may be explained by an increase in the number of women who are medically unfit for work, and also the fact that outwork was included in the overall 'in work' figure last year.

available for the women employed in RWH has reduced, and they are sometimes left with insufficient work to fill the day.

SECTION 11: RESETTLEMENT PREPARATION

There are effective systems to support resettlement preparation, with many opportunities available for the women to assist preparation for release. All women are encouraged to develop the skills needed to lead a productive life following completion of their sentence. The offender management team is working well, and generally provides a good and consistent service to the prisoners. The monthly multi-agency interdepartmental risk management team meetings review women being considered for release on temporary licence (ROTL) or those women coming to the end of their sentence.

There have been 6,063 release days on ROTL, with few failures, as well as a further 1,878 movements from the open unit.⁴ This averages just over 500 ROTLs per month from the main prison, with a range between 353 and 925. The corresponding figure for the open unit is 376, with a range between 307 and 493. The latter figures are based on the last five months of the reporting period. Before this, these figures were not recorded. Also welcomed is an increase in ROTL for women with childcare responsibilities. The prison also provides support to women returning to family units during their resettlement period.

The open unit continues to provide an excellent facility for 25 women who are approaching their discharge. They are eligible to be housed in the unit if they meet prison criteria, such as having regular paid or voluntary employment.

Sentence planning is of good quality but, at the time of writing, 27 reviews are outstanding. We are assured that management action is in place to reduce this number, and the Board has seen evidence that this is happening.

There is a good working relationship between the Probation Service and the community rehabilitation company (CRC), resulting in a coordinated plan for prisoners on release. The Board is concerned that, owing to the announced probation reforms, the responsibility for resettlement currently undertaken by the CRC will become the responsibility of outside offender managers, and the team will disappear from Drake Hall. The Board will monitor this change, to see if the current level of service is maintained.

⁴ The ROTL numbers may appear high but these are explained by the number of women who are released temporarily, on a short-term basis, for purposes such as employment and the maintenance of family ties.

The CRC at Drake Hall meets its target of 97% of women having resettlement plans on release, and, in reality, the figure is nearer to 100%. In the last year, the position on accommodation on release was as follows:

Month	Number of women released	Number with No Fixed Accommodation NFA
November 2018	21	0
December 2018	26	2
January 2019	29	0
February 2019	22	1
March 2019	27	2
April 2019	30	1
May 2019	32	1
June 2019	32	3
July 2019	35	2
August 2019	22	0
September 2019	27	1
October 2019	23	2

While it is disappointing to see that there are some women still being released who do not have fixed accommodation, we note that the majority of the women released with NFA have appointments arranged with housing teams or are registered under the Homeless Reduction Act.

A new probation contract sees Drake Hall working collaboratively with others to support women identified as victims of domestic and sexual abuse. There is also an inclusive strategy which supports both drug and mental health interventions, where needed. The Board is also aware of outside agencies that are actively encouraged to assist in supporting women with initiatives such as crisis management, debt resolution and counselling, and accessing universal credit on release.

A particularly good innovation in this reporting year was the resettlement fair, which was held on 27 March 2019. This offered information from potential employers, probation, careers advisers and housing representatives. It was well attended by the women and ran very successfully. It is also noted that a new pre-release living skills course is planned to become part of resettlement sentence planning before release. We continue to be

concerned that not all prisoners have a bank account on release; this is likely to prevent women from claiming benefits within prescribed timescales. The delays in setting up bank accounts appears to be an administrative issue, which needs to be resolved.

In spite of the many positive aspects of the resettlement programme, we are concerned about the number of women who are transferred to the establishment very close to their release date. This means that they are unable to engage in the educational and training opportunities available at Drake Hall, and may be forced to leave prison without the chance for adequate resettlement preparation.

SECTION C – THE WORK OF THE IMB

In last year's report, it was noted that the Board had undertaken a successful recruitment campaign and been able to recruit four new members. Unfortunately, one new member had to resign for personal reasons, but the other three have now completed their probationary period, and the Board now has nine full members, out of an agreed allocation of 12. We intend to undertake a further recruitment campaign in 2020.

The Board meetings take place each month and consider all aspects of its remit. This meeting involves the opportunity to meet the governor, who provides an update on current issues in the prison and responds to any questions or concerns raised by Board members. In addition, the Board meetings have an element of training, delivered by one of the specialist areas within the prison or by experienced Board members. During this reporting year, the subjects covered included:

- healthcare
- catering and promoting healthy eating
- prisoners' monies
- equality and diversity
- routine monitoring
- role of the prison Listeners
- business assurance within the prison

The Board had an 'away day' in September 2019, during which we completed the annual performance review and planned the approach to completing the annual report.

The Board's approach is focused on whether the prison is getting the basics right, in terms of standards associated with humanity, dignity and fairness. We are particularly interested in:

- the quality of the regime
- overall safety
- levels of violence and self-harm
- the impact of drugs on the prison regime
- prisoners' health and wellbeing
- equality and diversity
- access to work and education
- preparation for release

To undertake its required duties, the Board has two members on rota each week who visit the prison on two or more occasions during the week. The areas monitored always include the communications hub, kitchens, CSU and healthcare department. Further monitoring each week is decided on the requirements at the time or the length of time between visits to a particular facility. This ensures that all facilities are monitored within the reporting period. Members on duty normally attend reviews, and sometimes attend prison and judicial adjudications and ACCT reviews.

Prisoners directly approach Board members during their rota visits. These enquiries are usually dealt with immediately. However, the members will get the prisoner to sign a written application form if appropriate. The rota members handle applications, and a close watch is kept on complaints made through the prison system, to ensure that they are being managed within the guidelines.

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

Analysis of the number of applications in the reporting year indicates a decrease from 122 to 118. This followed an increase last year from 87 to 122 applications. The types of applications received by the Board remain consistent, although we have noted a steady increase in the previous three years in category I, which deals with sentence management, including home detention curfew (HDC), ROTL, parole, release dates and recategorisation.

Board statistics

Recommended complement of Board members	12
Number of Board members at the start of the reporting period	10
Number of Board members at the end of the reporting period	9
Total number of visits to the establishment	323
Total number of segregation reviews attended	55

SECTION D – APPLICATIONS TO THE IMB

Code	Subject	Previous reporting period	Current reporting period
A	Accommodation, including laundry, clothing, ablutions	11	7
B	Discipline, including adjudications, incentives and earned privileges, sanctions	4	3
C	Equality	3	6
D	Purposeful activity, including education, work, training, library, regime, time out of cell	10	11
E1	Letters, visits, telephones, public protection restrictions	9	9
E2	Finance, including pay, private monies, spends	14	11

F	Foods and kitchens	2	0
G	Health, including physical, mental, social care	21	13
H1	Property within this establishment	6	5
H2	Property during transfer or in another establishment or location	11	15
H3	Canteen, facility list, catalogue	3	5
I	Sentence management, including HDC, ROTL, parole, release dates, recategorisation	13	18
J	Staff/prisoner concerns, including bullying	9	6
K	Transfers	2	5
	Confidential applications to the Chair	4	4
	Total number of IMB applications	122	118

Section 8

GLOSSARY OF PRISON-RELATED ABBREVIATIONS USED

ACCT Assessment, care in custody and teamwork

ALC Adult learning centre

CERD clean, enabling, rehabilitative and decent

CRC Community rehabilitation company

CSIP Challenge, support and intervention plan (formerly anti-bullying programme)

CSU Care and support unit

DIRF Discrimination incident report form

DNA Did not attend

HDC Home detention curfew (the 'tag')

IEP Incentives and Earned Privileges – Prisoners can be on Basic, Standard or Enhanced

IMB Independent Monitoring Board

OMiC Offender Management in Custody

OMU Offender Management Unit

PC Protected characteristic

PIP Performance improvement plan

ROTL Release on temporary licence (e.g. to work, town visits, home leave)

RWH Remade With Hope

SARC Sexual assault referral centre

SMT Senior Management Team