



Annual Report of the Independent Monitoring Board at HMP & YOI Hull

**For reporting year
[April 2019 – March 2020]**

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Introductory sections 1 - 3

1. Statutory role of the IMB

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

Under the National Monitoring Framework agreed with ministers, the Board is required to:

- 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
- inform promptly the Secretary of State, or any official to whom authority has been delegated as it judges appropriate, any concern it has
- 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 Optional Protocol to the Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT) is an international human rights treaty designed to strengthen protection for people deprived of their liberty. The protocol recognises that such people are particularly vulnerable and aims to prevent their ill-treatment through establishing a system of visits or inspections to all places of detention. OPCAT requires that states designate a National Preventive Mechanism to carry out visits to places of detention, to monitor the treatment of and conditions for detainees and to make recommendations for the prevention of ill-treatment. The IMB is part of the United Kingdom's National Preventive Mechanism.

2. Description of the establishment

- 2.1 HMP & YOI Hull is a male local category B prison..
- 2.2 The original Victorian wings, which were refurbished after war damage, house up to 645 men, including around 100 or more on remand and around 40 young offenders.
- 2.3 In 2002, the prison population expanded, and the size of its site was also increased. The expansion included four new wings, one being the first night centre (with a mix of prisoners new to the prison and operating a non-collusive regime) the three others housing a similar number of vulnerable prisoners, including around 60 who are of pensionable age. The expansion also included a new healthcare centre, sports hall and multi-faith centre, and refurbishment of other parts of the prison, including the kitchen, education classrooms and workshops.
- 2.4 Hull is a national sex offender treatment programme resource and has a national psychologically informed planned environment unit (PIPE) housing 50 men convicted of sexual offences.
- 2.5 HMP & YOI Hull has an operational capacity of 1044, against a certified normal accommodation of 732.
- 2.6 Healthcare is provided by the City Healthcare Community Partnership (CHCP).
- 2.7 Education is provided by Novus, in-house and distance learning.
- 2.8 Resettlement and through the gate (TTG) services are provided by a resettlement unit at the prison, Humber Care, Jobcentre Plus and Shelter and other charities.
- 2.9 Maintenance is mainly provided by Amey, facilities management, and some in-house handyman provision.
- 2.10 There is input from specialist charities such as Alcoholics Anonymous, Narcotics Anonymous and Citizens Advice.

3. Executive summary

3.1 Background to the report

Board membership shrank from 50% of the recommended complement (20 members) to 25% during the year. The Chair and Vice-Chair reached the end of their tenure and four members resigned for a range of personal reasons. Some of the remaining members had limited availability at times. Consequently, most of the monitoring was restricted to statutory requirements and responding to applications.

3.2 Main judgements

How safe is the prison?

Though there have been eight deaths in custody (a combination of self-inflicted and natural causes) the prison is a safe place. It is difficult to import harmful substances. Threatening or dangerous behaviour is curtailed at an early stage. Attempts at self-harm are frequently prevented and there is extensive provision to protect a significant proportion of the men who find it hard to cope.

How fairly and humanely are prisoners treated?

The environment and daily routines are fair and supportive. There are some problems getting external contractors, through the facilities management provider, to maintain the environment to the standard that prison staff want to provide. But key workers, effective segregation and well-being units, and the officers and staff who interact with prisoners continuously provide really helpful support. There is a problem with property management (predominantly property missing when transferred from other prisons), which is difficult for some prisoners to cope with.

How well are prisoners' health and wellbeing needs met?

Healthcare is generally as good, and for some prisoners better, than they might experience outside prison.

How well are prisoners progressed towards successful resettlement?

There has been significant improvement in the collaboration between the prison and external resettlement providers, through the revised through the gate (TTG) service contract, but there is scope for even more. Workshops are popular and build skills. Education is well provided but the initial assessment process continues to confirm some men's disengagement from society. Family links are a priority and are well organised.

3.3 Main areas for development

TO THE MINISTER

Develop better feedback on prisoners' after release so that prisons can see whether their resettlement strategies are working.

TO THE PRISON SERVICE

Improving the consistency of property management within and between prisons.

Improving the initial education assessments to overcome the disengagement that leads some prisoners into reoffending.

TO THE GOVERNOR

Develop greater collaboration between the 'early days in custody' arrangements with the key worker scheme to better understand and deal with risk factors around harm to self and/or others.

Develop the key worker scheme to better understand the needs of young adults making use of, for example, the maturity screening toolkit.

3.4 Progress since the last report

The prison is a safer place with less violence, fewer incidents where prisoners have been under the influence, and a reducing trend in prisoner self-harm. Family links have improved, and there is a better collaboration with external resettlement providers.

Evidence sections 4 – 7

4. Safety

4.1 Reception and induction

Displayed around the establishment's notice boards, the prison's logos bear the words 'safe environment' and 'zero tolerance of bullying'. Observation of the reception process showed that prisoners were dealt with dignity and professionalism. The area was clean with a positive atmosphere.

Observation of officers preparing a prisoner for an outpatient appointment showed that he was treated respectfully, and restraints used in accordance with prison regulations. A full body scanner has been installed in the reception area (using funding from the 10 Prisons Project). This scanner is able to detect items secreted within the prisoner's body. During the year 689 secreted items were detected. This has been invaluable in reducing the amount of illegal substances and mobile phones entering the prison.

4.2 Suicide and self-harm, deaths in custody

During this reporting year there were 859 assessment in care, custody and treatment (ACCTs) opened for prisoners at risk of suicide or self-harm. The wellbeing unit was appropriately used to accommodate men at risk of very serious self-harm and mental health issues. Weekly observations recognised the quality of care and the progress made by individual prisoners here and in the segregation and care unit, including one seriously mentally ill man who was on a constant watch for three months.

There were eight deaths including three of apparently natural causes, one drug related and four apparently self-inflicted. One of these was out in the community after release. Two of the other victims had been monitored carefully either on the wing or in a previous establishment. The third had recently been recalled to prison. This compares with two self-inflicted deaths last year, and none in the previous three years. The board was informed of a death in custody promptly and within protocol guidelines. Support for family, other prisoners and staff was humane.

4.3 Violence and violence reduction, self-isolation

There have been 254 incidents of violence prisoner on prisoner and 44 prisoners on staff. The Board processed 38 applications alleging assault or bullying by staff, and in which prisoners feared for their safety, usually from other prisoners. An analysis of prison data indicates a 21% (66 incidents) drop in the numbers of violent incidents and injuries to prisoners involved in fights or forcibly restrained.

At the very end of the reporting year, during the COVID-19 pandemic, prisoners were restricted to their cells for most of the day but had access to a minimum of 45 minutes daily for domestics, showers and time in the open air, as well as meal times and medication. Staff support maintained a calm atmosphere on the wings.

It was noted in one rota report that three men had been found to conceal improvised weapons. Additionally, it was recorded that due to staff vigilance, a prisoner had been placed on the E list (at risk of escape) after a security incident in one of the workshops.

4.4 Vulnerable prisoners, safeguarding

HMP & YOI Hull has two wings for vulnerable prisoners (VPs), those convicted of sexual offences. A number of the men in the VP wing are elderly, some with disabilities, and they have expressed their appreciation of the support they receive. There is adapted accommodation for disabled prisoners. Most of the older age group are housed on ground floor cells. VPs attend exercise, gym (including an over-55s group) and chaplaincy at a separate time to the main wings, and movements around the prison are carefully managed to avoid abuse and maintain safety. The physical education (PE) team received a national Ministry of Justice award for their work on equalities and diversity.

4.5 Use of force

There were 373 reported use of force incidents, a reduction of 25% on the previous year. Some of these were observed by IMB members on rota visits, who judged them to be appropriate and well managed.

Officers are encouraged to use body worn video cameras (BWVC) to monitor any use of force. At the beginning of the year 40 of the 70 available cameras were being used. By the end of the year the weekly average usage was mid fifties, and on some days 60 cameras were drawn.

The prison was among the first to be equipped with PAVA spray. This was used seven times during the year, compared to nine times in the previous year. On one occasion a board member was able to speak to the prisoner shortly after the incident. The man was apologetic and acknowledged that he had put the officers in a difficult situation. This resource was part of a strategy which included Key Workers and Bobody Worn Video Cameras which contributed to a reduction in assaults on staff from 59 to 44 (25%).

4.6 Substance misuse

There were 373 incidents where men were found to be under the influence of illicit substances. This was a 27% reduction from last year.

5. Fair and humane treatment

5.1 Accommodation, clothing, food

Rota reports consistently describe the cleanliness of the accommodation as appropriate. Areas outside the Victorian wings, including exercise yards, have been littered for much of the year, though a recent initiative for staff to report this has led to improvements.

Showers in the Victorian wings and on G wing have been repeatedly reported as faulty and contractors Amey have been very slow to respond. A capital bid has been submitted to replace showers on both landings on C Wing, and The Governor believes this will be funded in 2020. BT were also slow to resolve problems with in-cell phones. Cell furnishings and occupation have not been identified as a significant problem. One concern about the availability of clean sheets was quickly rectified when IMB raised it in rota reports. A washing machine on J wing remained broken for several months and there have been concerns about the efficiency of dryers across the prison. However, a number of washers and dryers were replaced during the year, and the Governor has funded a number of white goods to back up available stock. Kitchen and servery hygiene are consistently good and prisoners generally say that the quality of food is fine. Queries about special diets were more related to the clarity of information than the provision.

5.2 Segregation, special accommodation

The segregation unit houses 10 men, and there is generally sufficient capacity for day-to-day needs. There is an additional wellbeing unit which provides accommodation for men with mental health issues. Men are often located there pending a transfer to a secure mental health unit. There have been several prisoners who have stayed in the segregation unit for longer than 42 days. These were carefully managed, and in most cases were delayed because it was difficult to find a location for individuals who needed to be transferred out of Hull. Longer stays in the wellbeing unit reflected complex needs. These men were well supported, and the focus was on enabling rehabilitation and reintegration rather than finding another external location.

The regimes in both units have been very well managed, to the extent that the IMB has seen significant improvements in behaviour, attitudes, and aspirations from a large number of prisoners. The Board has not been able to attend reviews and adjudications consistently because the timing has varied to match the length of each prisoner's stay. This issue has now been resolved and the Board is informed when a prisoner goes to either unit and when reviews are due. The reviews that the Board have attended have been fair and well managed, with appropriate input from officers and healthcare. There have been challenges on both units caused by violence, dirty protests, and extensive periods of self-abuse. Staff have responded well, and this was reflected by a recent comment from a prisoner that the segregation unit staff treat men much better than the wing staff.

5.3 Staff-prisoner/detainee relationships, key workers

Rota reports consistently refer to the good rapport between wing staff and prisoners, and the low key but effective observation of activities by the staff. When we have observed incidents or disruptive behaviour on a wing staff have managed it safely, fairly, and effectively. An influx of new and inexperienced staff does not appear to have been as disruptive as we

expected it to be. There was a 58% increase (14 cases) in complaints about bullying by staff towards the end of the year. The way prisoners discussed it suggested that this had become a popular topic whereas use of force data did not show any increase. The de-escalation of incidents and interventions with vulnerable and challenging prisoners witnessed by IMB have been carefully managed. The key worker initiative was carefully introduced and welcomed by prisoners. Once it had been established and the team who introduced it had moved on, there were a number of applications that suggested that not all of the staff were as committed to the role as the original team. The quantity and quality of key worker sessions and case notes is now routinely monitored by wing managers and the head of offender management services and this has driven improvements from 56% back to 70% compliance.

5.4 Equality and diversity

A change in staff roles (the head of equalities secured a different role, on promotion, with the MoJ) led to some delays in the response by the equalities team to allegations of racial discrimination in January. The Board has had few applications relating to discrimination, and when investigated, we have been satisfied with the prison's response.

The provision on K wing for older prisoners is supportive and well maintained. Residents appreciate the quieter space it provides. On other wings cells have been adapted to meet the needs of restricted individuals, including a funded Equality Act compliant cell on B Wing, not previously available for main location prisoners.

Dietary requirements are effectively catered for, though DHL canteen availability such as lactose-free supplements has been questioned.

Other applications about inequality focussed on unusual individual needs such as wider fitting shoes, and staff understanding of the impact of deafness or attention deficit hyperactivity disorder (ADHD). When the Board looked into this sort of issue, we generally found that the prison took a more generous approach than regulations require.

5.5 Faith and pastoral support

Generally, the prisoners' faiths and their need for pastoral support is well provided for in the busy multi-faith centre.

The Imam has raised questions about the right to wear prayer caps, and the availability of certain Muslim religious items on the canteen system.

The tension between vulnerable prisoners and those on the Victorian wings appeared to have reduced further at this year's multi faith Christmas service. A similar whole prison approach was planned for Easter services

5.6 Incentives and earned privileges

The Board has not recorded any observations about incentives and earned privileges.

5.7 Complaints

The number of applications increased at the start of autumn. There was a trend in prisoners submitting multiple applications and complaints at the same time. This may have been linked to an influx of new and younger staff who were less skilled in calming agitated newcomers.

The complaints team works hard to deal with all the issues that prisoners raise, but the system includes features which are likely to sustain the disengagement of some prisoners. A policy statement at the start of every written reply is aimed at responding staff who are compiling the answer. It is incomprehensible to a large number of prisoners. And one recent written reply that we checked had a reading age of 16-17, which is inaccessible to a significant proportion of the HMP Hull population.

5.8 Property

Property remains a significant issue. At one stage in the year there appeared to be a trend where prisoners were using property claims as a way to get compensation, and the Board used a standard response to most written applications about property. However, it was still obvious that there are some underlying property problems.

One is that the prisoner escort contractors are using vehicles that are not big enough to carry the property that prisoners are allowed to accrue.

The prisons are at fault because different establishments respond differently to HMPPS instructions about the sort of property prisoners can have in their cells.

In Hull prison staff have made the situation worse by trying to be helpful and supporting the prisoners' complaints against the system because they themselves don't understand the system.

Another flaw in the system is part of the induction process. At a time of high stress when men first come into the prison, they sign a document to say that they understand that they are responsible for property in their cell and what happens to it. A good many of them simply do not understand what they are signing. The 'early days in custody' arrangements are currently under review to address such concerns.

6. Health and wellbeing

6.1 Physical healthcare

Physical healthcare

The healthcare provision is provided by City Healthcare Community Partnership (CHCP). A full range of healthcare services is provided through the partnership and visiting specialists. These include an impressive unit for prisoners with serious mental and physical health conditions. There is also a dedicated palliative care suite on this unit.

On a twice-daily basis, prisoners are escorted to the healthcare centre for daily clinical appointments including drug and alcohol recovery team (DART), nurse-led and GP services. There are regular clinics for a wide range of ongoing medical conditions such as hypertension, diabetes, weight management and Hepatitis B. Visiting specialists include, dentistry, optical, psychiatry, podiatry, physiotherapy, occupational health. All newly-arrived prisoners are seen and undergo a medical and mental health assessment by nursing staff in the reception area as part of the induction process. Prisoners with medical conditions requiring prescriptions are noted and those details passed to GPs for speedy medication prescribing, prior to a full assessment when they move to a residential wing.

The healthcare centre has two separate waiting rooms. This facility is good as it maintains the safety of vulnerable prisoners. Both rooms have been unsuitable at times due to:

- Overcrowding
- Variable room temperatures
- Untidiness and damage to seating

None of the issues raised by prisoners caused concern for the IMB. The majority of complaints concerned prescribing issues and a range of issues relating to mental health services. In line with protocol, prisoners are advised that all healthcare-related applications must be referred to the Patient Advice and Liaison Service (PALS).

Prior to the lockdown during the COVID-19 pandemic, board members attended meetings with management and observed the steps taken to ensure safety of both prisoners and staff

The providers work to the same statistical expectations as practices in the community, and the quality of the treatment rooms and the range of practitioners who can be accessed seem equivalent.

6.2 Mental healthcare

A dedicated mental healthcare team is similarly provided by the CHCP. There is a head of mental health with a team of mental health nurses.

The wellbeing unit is located on the second floor of the healthcare unit and has 14 individual cells. As recorded in rota reports, this unit continues to promote a positive atmosphere and the officers are well-informed about the prisoners in their care. The unit is clean and well presented. A dormitory accommodates prisoners acting as cleaners and servery assistants. Those prisoners appreciate the value of their role on the unit through good communication with officers and in-patient prisoners alike.

During the year the unit has cared for many seriously unwell prisoners. There have been dirty protests and one prisoner was under constant observation for over three months whilst staff used graded exposure to gradually support him to behave in a way that was accepted by a secure mental health facility. Additionally, an elderly, frail and mentally unwell prisoner was cared for in the palliative care suite. He was admitted to Hull Royal Infirmary for medical tests and assessments. However, he returned to the wellbeing unit despite this being an inappropriate care facility for him. Nursing staff and officers continue to attend to this prisoner.

Additionally, there is the psychologically informed planned environments (PIPE) Unit. This unit works with prisoners to rehabilitate them since their mental disorder can predispose them to future criminal activity. We have observed a range of engaging workshop sessions, and the provision included a highly engaging “PIPE Has Got Talent” competition. Prisoners we have spoken to have made very positive comments about the way the unit has changed their way of thinking.

6.3 Social care

Social care

There are two dedicated wings for vulnerable prisoners, many of whom are elderly with ongoing medical conditions. Several ground floor cells have been adapted for prisoners with disabilities including wheelchair access and in-built shower facilities. Under the buddy carer system, a fellow prisoner is allocated to assist disabled and elderly prisoners with basic tasks such as cell cleaning, laundry and fetching meals. Prisoners have explained how this has supported their wellbeing. For those prisoners acting as buddy carers, this is an opportunity for them to acquire skills in simple caring procedures.

The prison’s equalities team, in conjunction with the local authority, carries out regular assessments on prisoners to ensure their specific and individuals are met where at all possible. The gym staff help to provide some basic physical activities for older and disabled prisoners, to match their mobility and mental wellbeing.

6.4 Exercise, time out of cell, gym

Exercise, time out of cell, gym

All prisoners are given opportunities for daily exercise. Those prisoners who are not employed in a workshop, the kitchen or education are given daily time out of their cells. At specific times during the morning and afternoon, prisoners are allowed out onto the wings.

The gym is well equipped with a full range of exercise apparatus. Prisoners have allocated gym periods and from observation by board members, enjoy the time taking exercise. The gym staff oversee exercise routines, promote healthy eating and mental wellbeing. Rota reports observations note that that the level of support and challenges offered to prisoners through the gym and gym staff is equal to that in a commercial gym. An outside space has a small football area and board members regular see matches being played between prisoners.

6.5 Drug rehabilitation

As with most establishments, the misuse of substances is an ongoing issue. The DART team work with prisoners to help reduce their addiction with the help of a team of dispensing technicians. Prisoners undergoing withdrawal of drug and alcohol dependent symptoms are prescribed medication. They are well supervised when accessing their medications by both healthcare dispensing staff and officers.

The prison has two dedicated voluntary substance free living (ISFL) landings (on B Wing and I Wing) for those prisoners who are drug free and/or want to remain drug free. The prison has yet to fully assess this initiative given its recent funding from the 10 Prisons Project

6.6 Soft skills

The chaplaincy provides highly engaging activities for most religions. These activities vary from religious based to meditation and peer support.

There are some murals painted by prisoners on the wings. For those prisoners with artistic talent this offered an opportunity to improve their mental wellbeing. A full room mural painted by prisoners on the wellbeing unit was an encouraging and proactive activity for the prisoners on this unit suffering from mental illness. On the stair way to the reception area there is a range of art work, which carries on into the waiting areas. Prisoners' artwork is also readily displayed within the main visits hall, having previously featured through the autumn in a 'Lessons Learnt Behind Bars' exhibition in the community.

On all wings at the prisoner information desks (PID) information and posters are displayed on current courses and pursuits that can be accessed above the normal regime activities.

The excellent gardens around the prison continue to provide a positive experience for prisoners. Additionally, vegetables are grown and used in the kitchens and donated to a local community food bank.

Another project providing constructive interest for prisoners is an outside area, adjacent to the VP wings, which has been converted into a chicken run with wooden protective houses for the chickens. The chickens have been rescued from caged farming. Prisoners care for the birds which in turn provides a constructive interest and it is pleasing to see on a rota round.

7. Progression and resettlement

7.1 Education, library

Education, provided by Novus, combines basic courses in numeracy, literacy and IT skills, with activities that prepare men for release. These include business management for aspiring entrepreneurs, and a challenging and highly engaging thinking skills module. There is also a short but popular home cooking course which provides a welcome eye opener for many participants. Prisoners are supported to undertake Open University courses,

There are 143 full time and 163 part time places available, and attendance is normally around 70%. The basic skills courses are relevant to the population in HMP & YOI Hull, many of whom left school with limited basic skills. They are, however, presented as an obligation to new arrivals, which can often confirm the disengagement from learning that originally led them towards offending. (They are also presented as an obligation to prisoners with no evidence of existing qualifications.)

Over the year the education provider has faced quite a few issues recruiting staff though mostly the classes have remained open. The only exception to this is the joinery workshop and the ICT class which were shut for some time.

The library, delivered through the local authority library services, is well stocked and popular. The librarian is working to provide materials which would be useful from a recreational point of view to add to the current books which have a more vocational theme. There is a selection of graphic novels for those who may not have advanced reading skills, but the librarian is finding it difficult to source publications suitable for men with limited literacy. She is currently working to liaise with education to ensure that texts reflect and support education initiatives.

7.2 Vocational training, work

There are 788 work activities available, including 135 in gardens, waste management and industries and 225 in education. These include a number of workshop activities which provide engaging work and are relevant for people seeking work after release. Some of these are quite creative, such as the print and design workshop which provides professional standard documents and displays for use in and outside the prison. Others have their own commercial value – for example a furniture refurbishing project for a local charity. Several include professional qualifications, though the number of these available has reduced in recent times. The gardening team gain significant satisfaction from their work and the awards they have received. There are some good links with local employers and examples of prisoners moving into employment on release.

Attendance at these workshops is good. Men find the work challenging and satisfying and some have told us they would like to be able to work longer hours.

7.3 Offender management, progression

The offender management unit (OMU) is well staffed and busy. When prisoners raise concerns with the Board the OMU is well informed and works to resolve the issues. There are some difficulties getting prisoners to the most appropriate location, both for training (particularly category B prisoners serving long sentences) and for release. These are caused by priorities and population details in other prisons. Offending behaviour programmes are

available for men convicted of sexual offences, and men involved are generally engaged and challenged.

7.4 Family contact

The prison provides a good range of activities for men to maintain family contact. The visitors' centre is welcoming, and sessions are discreetly organised. There are a range of clearly engaging family activities which are well publicised, popular, and supported by a wide range of prison staff. In cell phones have enhanced prisoners' opportunities to sustain contact. There are monthly extended 'family days' which are very popular. There is monthly two-day course organised by an external provider offering dads the opportunity to improve their parenting skills.

7.5 Resettlement planning

The prison has been working hard to develop its relationship with the organisations that support prisoners after release. The librarian is currently signposting a range of vocational activities and workshops offered by Hull City Council. Hull FC Rugby Community Foundation offers a 10 week "Inside Out" programme to develop life skills in a sporting setting. There has been an improvement in the level of collaboration over the last twelve months. However clear data on the number of prisoners who have avoided re-offending, have no fixed abode, or are in education or training after release is not routinely available from the CRC/TTG service providers, much to the frustration of the Governor and his team.

8. The work of the IMB

Board statistics

Recommended complement of Board members	20
Number of Board members at the start of the reporting period	9+1 dual boarder
Number of Board members at the end of the reporting period	5+1 dual boarder
Total number of visits to the establishment	143
Total number of segregation reviews attended	25

Applications to the IMB

Code	Subject	Previous reporting year	Current reporting year
A	Accommodation, including laundry, clothing, ablutions	12	8
B	Discipline, including adjudications, IEP, sanctions	4	5
C	Equality	7	10
D	Purposeful activity, including education, work, training, library, regime, time out of cell	17	8
E1	Letters, visits, telephones, public protection restrictions	10	24
E2	Finance, including pay, private monies, spends	0	0
F	Food and kitchens	1	3
G	Health, including physical, mental, social care	36	25
H1	Property within this establishment	11	23
H2	Property during transfer or in another establishment or location	12	24
H3	Canteen, facility list, catalogue(s)	2	2
I	Sentence management, including HDC, release on temporary licence, parole, release dates, recategorisation	8	14
J	Staff/prisoner concerns, including bullying	24	38
K	Transfers	10	11
L	Miscellaneous, including complaints system	26	50
	Total number of applications	195	243



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