



Annual Report of the Independent Monitoring Board at HMP Send

**For reporting year
24 March 2020 to 31 March 2021**

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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

HMP Send is a closed prison for adult women and a few transgender prisoners. It had an operational capacity of 282 at the start of the reporting year and 196 at the end. The prison was full at the beginning of the reporting year and had 168 prisoners at the end, 62 of whom were serving life sentences. It is situated in the Surrey countryside with well-spaced residential wings and offices. There is no public transport to the prison.

Residential wings range from two ageing prefab blocks to a 1990s block. All wings in use during the reporting period have single cells with shower and toilet facilities. The two prefab blocks failed a fire safety check in March 2021 and were condemned. One of the main block wings was vacated for a short period and shower floors were replaced; the wing was then left empty as the prisoner population had reduced during the Covid-19 regime.

The prison has a variety of additional facilities which include a daytime healthcare centre, kitchen and dining hall, large horticultural area, gymnasium and sports hall, an education block, a multi-faith centre, two libraries (reduced to one in March 2021) and a hair and beauty salon. Access to all facilities was severely curtailed during the reporting period.

Send is the only women's prison to have a democratic therapeutic community (DTC). It also offers a preparation psychologically informed planned environment (Pre-PIPE) unit and a progression PIPE unit.

In this reporting year, Central & Northwest London (CNWL) Foundation Trust provided primary care services and mental health in-reach (MHIR), Med-Co Secure Healthcare Services provided GPs, Time for Teeth provided dental care and the Forward Trust provided an integrated substance misuse service. Surrey County Council provided services required by the Care Act. Weston College provided education services. Gov Facility Services Limited (GFSL) provided facilities management. London Community Rehabilitation Company (London CRC) provided pre- and post-release support for prisoners released into the London area. Kent Surrey and Sussex Community Rehabilitation Company (KSSCRC) provided pre- and post-release support for prisoners released into Kent, Surrey, and Sussex. Prisoners released into other areas of the country were supported by London CRC.

A large number of voluntary and community organisations with a wide variety of experience contribute to the wellbeing of prisoners at HMP Send although their activities were significantly reduced under the Covid-19 regime.

3. Executive summary

3.1 Background to the report

The report covers the last week of the previous reporting year, however, the prison statistics provided may not include figures from the last week of March 2020. Throughout this reporting year it has been difficult to make certain comparisons to previous years due to the national restrictions imposed by Her Majesty's Prison and Probation Service (HMPPS) and the decrease in prison population.

The reporting year has been entirely during the Covid-19 pandemic, and the prisoners were kept behind their doors for up to 23 hours a day. There was no face-to-face education, no release on temporary licence and fewer prisoners in work.

In early January 2021, the prison had a Covid-19 outbreak with 95 staff and 68 women (over one third of the population) testing positive, and one staff fatality. On 11 March the prison was declared Covid-19-free (on the basis that there had been no staff or prisoner with Covid-19 in the previous 28 days).

During the outbreak period there were serious staff shortages and many staff from other prisons were sent on detached duty to Send. The Board would like to commend the staff for their outstanding effort during the outbreak and the entire year of lockdown.

Because of Covid-19, the Board only made 66 visits to the prison in person during the reporting year compared to 509 last year and 489 the year before. This impacted on our ability to monitor effectively as we received fewer first-hand accounts of issues from the prisoners. Most rota visits were conducted remotely with daily calls to the orderly officer. We instigated two prisoner-to-IMB phone calls a week from December 2020 after the installation of in-cell phones.

3.2 Main judgements

How safe is the prison?

The Board considers that Send is a safe prison, and prison management is continually focusing on maintaining safety. A shielding wing was implemented quickly to keep clinically vulnerable prisoners safe from Covid-19 (4.4).

However, Covid-19 restrictions – though intended to protect the lives of people in custody – have compromised some elements of prisoner safety. The major risk to prisoner safety at Send is self-harm, levels of which seemed unaffected early on in the pandemic but climbed as the year progressed (4.2).

Despite limited social visits during the year and prisoners being kept in their cells for up to 23 hours per day, the Board is concerned that drugs continued to enter the prison (4.6).

How fairly and humanely are prisoners treated?

During the whole of the reporting year the prison has been subject to national restrictions imposed by HMPPS. The Board considers that under this very restricted national regime living conditions have been inhumane, and that a government decision to only allow vaccinations to be administered to prisoners and staff in line with the community meant the length of time restrictions were in place was unfair (6.2). Classroom education did not take place all year (7.1), nor did vocational training or ROTL (7.2). Group therapy (6.3), indoor gym (6.5) and faith groups (5.5) were stopped for most or all of the year, work opportunities were curtailed (7.2) and preparation for release was limited (7.3). Under the early release scheme set up on 4 April 2020, in which pregnant women and mothers of young children were to be a priority, of the four assessed by HMP Send as suitable only one was released. Visits from family and friends were only available from July to December 2020 (7.4). No association was permitted, time out of cell was limited and many prisoners were locked in their cells 23 hours a day for some periods during the year (6.5).

Throughout the reporting year staff acted with utmost professionalism and prisoners were treated humanely in the delivery of the regime at a local level; the Board has observed many instances of kindness and consideration from staff during the Covid-19 regime and commends this (5.3). Measures such as an 'open door policy' at the beginning of 2021 to allow prisoners social time, showed an understanding of the impact of confinement on mental health.

Living conditions for prisoners are generally decent, although two prefab blocks were declared unfit for use in January 2021 after failing fire safety regulation checks (5.1).

It is unfair that the two remaining imprisonment for public protection (IPP) prisoners at Send continue to be held for many years beyond their tariff dates, one by six years and one by 10 years (7.3).

Prisoners receive fair final responses to their complaints, and the prison has made a noticeable and largely successful effort to reduce the use of interim responses, which lengthen the permitted response time from five to 14 days (5.7).

There were long delays in exchanging clothing from stored property and receiving property and mail sent in (4.1) but there has been an improvement in the canteen service from DHL (5.1).

How well are prisoners' health and wellbeing needs met?

The Board is extremely concerned about the detrimental impact that the national restrictions imposed by HMPPS have had on prisoners' physical and mental health.

In addition to the matters referred to in the above section:

- The opportunities for physical exercise were limited (6.5) which could have contributed in part to a rise in obesity which is a significant problem at Send and has worsened over the last twelve months (6.3).
- During the majority of the reporting year therapeutic interventions including PIPE and DTC were severely curtailed (6.3).

- The waiting list for dental treatment lengthened (6.2).

The Board would nevertheless like to acknowledge the work carried out specifically to deal with Covid-19 to ensure prisoners' health needs were met and commend the efforts of staff to work quickly to isolate positive cases, set up a shielding wing, implement prisoner and staff testing, and arrange GP and hospital phone consultations, as well as start vaccinations in line with the community (6.2).

There was outstanding continued pastoral support from chaplaincy (5.5). The Board also recognises the work undertaken by staff in the provision of in-cell activities (6.7).

How well are prisoners progressed towards successful resettlement?

The Board regrets that, because of Covid-19 restrictions, the following areas essential to successful resettlement were curtailed for the whole reporting year:

- Classroom teaching was suspended under the first lockdown and had not resumed by the end of March. In-cell learning packs were provided but prior to the introduction of in-cell phones in November 2020 there was no one-to-one tutor input or support for prisoners with learning difficulties or disabilities (7.1).
- Rehabilitative programmes to help prisoners to address their personality disorders and addictions and help them learn to live cooperatively with others were run on a limited one-to-one basis only (6.3, 7.3).
- No prisoners were released on temporary licence (ROTL) to experience work in the community or had the opportunity to reconnect with their families before release (7.2, 7.5).

In addition to the work of the CRCs, Making Connections offers prisoners support as they approach release, including finding accommodation (5.5, 7.5). There were five 'no fixed abode' releases at Send in 2020, one being a foreign national (FN) offender who had no access to public funds.

The provision of IT is not adequate for some learning. Lack of technology training and access to IT to enable familiarisation is woefully insufficient for reintegration into a digital society (7.1).

3.3 Main areas for development

TO THE MINISTER

The Board continues to have concerns about the unjust detention of the two IPP prisoners, both of whom are many years past their original short tariff date (7.3).

The Board is concerned that the government plan for 500 new prison places for women contradicts the female offender strategy (June 2018) which sets out the vision that custody should be made a last resort, reserved for the most serious offences. The Board believes that reassigning these resources into areas such as technology provision would positively impact on prisoners (7.1).

The Board urges the Ministry of Justice to learn lessons from the last 12 months to develop a strategy for a future pandemic which ensures the humane treatment of prisoners (3.2).

The Board regrets the government decision not to allow prisoners and staff early access to vaccinations given the increased risks of transmission in a prison environment (6.2).

The Board is concerned that there is a lack of appropriate resettlement accommodation (7.5).

TO THE PRISON SERVICE

The Board is concerned that the Covid-19 restrictions have created barriers for some prisoners, making them unable to complete their sentence plans and progress towards release (7.3).

The Board is concerned that education was given a low priority in the restrictive HMPPS national regime requirements, and that a lack of digital infrastructure meant that resumption of education in the community could not be replicated (7.1).

The Board is concerned that the Prison Service is currently failing to provide prisoners with the skills required for life in a digital age (7.1).

The Board is concerned about the gaps in the care of vulnerable foreign national prisoners at risk of deportation and about the lack of clarity regarding ownership of responsibility on release (7.5).

The Board is concerned that national equality monitoring data is not current and does not allow for effective analysis of discrimination (5.4).

The Board hopes that the Purple Visits service will continue to be funded, with improved software to be more accommodating to children moving on screen (7.4).

TO THE GOVERNOR

The Board is concerned that drugs have continued to enter the prison throughout the reporting year. This is having a negative impact on the safety of prisoners (4.6).

The Board is concerned that the issues identified in the 2018 HM Prisons Inspectorate report for the development of learning, skills and work, have not been fully addressed (7.1).

The Board is concerned that discrimination incident report forms (DIRFs) where racist behaviour between prisoners was highlighted have had inconsistent outcomes, indicating staff have been unable to establish beyond doubt racist behaviours (5.4).

The Board would like to highlight that ventilation is an issue in cells particularly during the hot summer days and has had a negative impact on the health and wellbeing of prisoners (5.1).

The Board is concerned that there are still long delays in exchanging clothing from stored property and receiving property and mail sent in (4.1).

The Board has identified that complaints in March 2021 have been stamped in batches indicating that boxes on wings were not being emptied nightly: this delay would impact on true response times (5.7).

3.4 Progress since the last report

Since November 2021 prisoners have had in-cell phones which has meant easier access to support such as Samaritans and offender managers, to healthcare, and to family contact (4.2, 6.2, 7.3, 7.4). The Board considers this an extremely positive development.

The introduction of Purple Visits has facilitated visual family contact during lockdown when social visits were on hold (7.4.2).

Staff made increased efforts to provide activities for prisoners during the Covid-19 regime when they were locked in their cells for up to 23 hours a day (5.3).

Canteen has improved since the last reporting period with more timely refunds and a specified staff member overseeing the service. Prisoners stated in a safer custody survey that they preferred the delivery of canteen to cell doors (4.3, 5.1).

Passive and active drug dogs are now at Send two days per week, but there is not yet evidence that this has reduced the number of drugs entering the prison (4.6).

Three probation officers have been recruited so the team is fully staffed (7.3).

Evidence sections 4 – 7

4. Safety

The population at HMP Send has decreased by 40% over the reporting year from 282 at the beginning of April 2020 to 168 at the end of March 2021.

Prisoners have commented to Board members on the positive support they have received from staff, and in a 'safety and decency survey' sent out to women in April 2020, residents were again positive about staff, one prisoner commenting "*Safer Custody have gone above and beyond to support many of us. Asking us for ideas, listening to us & responding if they can.*" In the survey over two thirds of women agreed that staff had been good or excellent at one-to-one contact with them.

4.1 Reception and induction

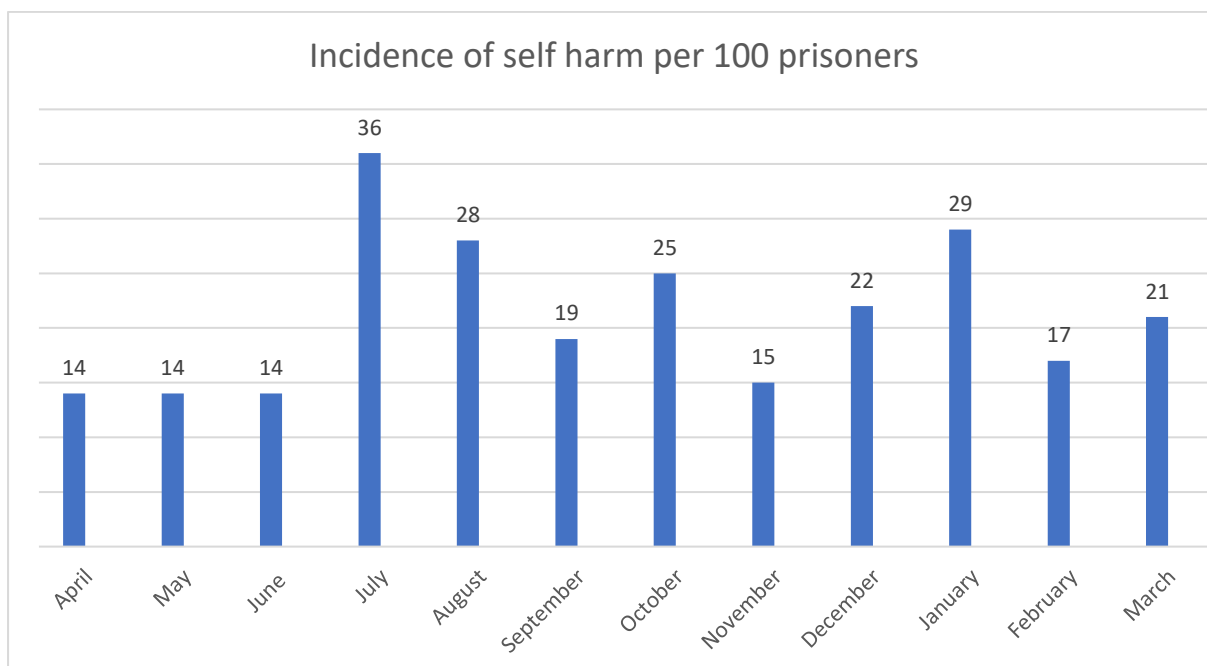
There were only 49 new receptions into the prison in the reporting year due to the significant restrictions on prisoner movements during the pandemic. Fewer reception staff were therefore needed to process transfers. Staff shortages throughout the prison, for health and related reasons, increased and there was frequent cross deployment of reception staff to higher priority tasks. This adversely affected the distribution of property to prisoners. On several occasions throughout the year prisoners suffered long delays in exchanging clothing from stored property and receiving property and mail sent in. This was reflected in a number of complaints to the prison and applications to the IMB.

Throughout the year the normal induction routine was severely disrupted. The dedicated induction wing, where two prisoners shared a room, was closed and the women were placed in available single rooms across the prison. The initial two-week induction period was stopped. New receptions received a single induction talk and were given an induction handbook which, for a large part of the year, made no reference to Covid-19. The women were "reverse cohorted" and isolated for 14 days before being released into the very restricted regime imposed on all the women. This was relaxed in January so that when a prisoner agreed to be tested and returned two negative tests, the prisoner could be moved to the general population after a minimum of seven days of reverse cohorting. Formal induction had not started again by the end of the reporting year.

4.2 Suicide and self-harm, deaths in custody

The number of self-harm incidents in the reporting year was 510 compared to 543 in the previous year. However, the population of the prison decreased over the year by 40% whereas self-harm incidents only decreased by 6% over the same period.

The number of women who self-harmed in any month varied from 5% to 11% of the prison population and was highest in July and August when Covid-19 restrictions had been relaxed in the community but were still in place in prisons. In January the number was high again when the prison was in the midst of a Covid-19 outbreak which may have caused increased anxiety leading to increased self-harm.



In July there were six prolific self-harmers (five or more incidents of self-harm in a month) who accounted for 64% of the incidents. In January there were five prolific self-harmers who accounted for 66% of the incidents. For seven months of the reporting year prolific self-harmers accounted for at least half of the self-harm incidents.

The number of self-harm incidents per month that required a visit to hospital increased to eight in July (the highest since records began in 2008) and remained high in August (six) and September (eight). It has since declined to a more usual number of one to two each month with another spike to five in January (when the prison had a Covid-19 outbreak). (See also 4.6).

Despite razors not being available for purchase on canteen for the whole reporting year, cutting was the most common method of self-harm each month until February and March when ligaturing became more common due to its use by a prolific self-harmer.

The number of ACCT documents opened each month varied from 10 in April and November to 25 in May with 186 opened over the year, an average of 16 per month. Looking at ACCTs opened per 100 prisoners, the average was seven opened per month with a low of four per hundred prisoners in April 2020 and a high of 10 per hundred prisoners the following month.

Due to long periods of remote monitoring Board members have not attended ACCT reviews systematically nor have they monitored ACCT documents regularly. The minutes of the weekly safety intervention meeting provide significant reassurance as to the level of knowledge, care, and concern from staff to those on ACCTs. The Board notes that when prison management identified that the completion of ACCT documents did not meet the required standard in January (during the Covid-19 outbreak), a notice to staff was sent reminding them of the importance of high

standards even in a time of crisis. For five months of the year over 80% of the self-harm incidents were carried out by women who were already on an ACCT.

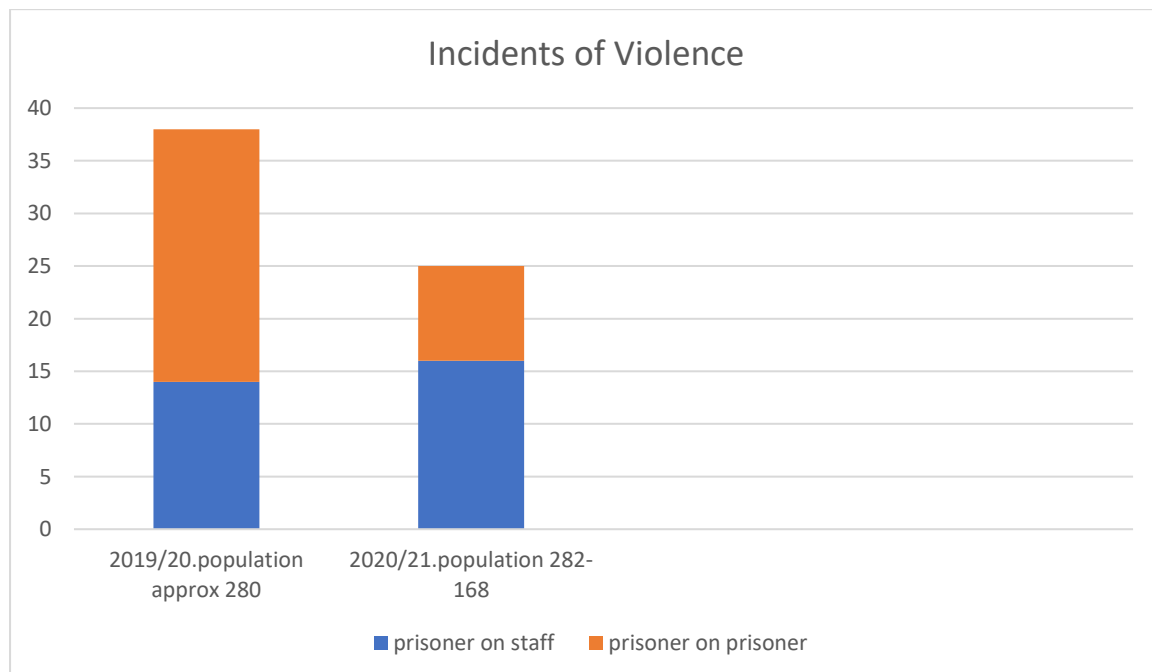
The Board commends the Listeners for continuing to provide a high level of support throughout a very challenging year. With a mid-year recruitment drive and training they were able to offer their service either in person or, during the Covid-19 outbreak, via phone, seven days a week from 10am-10pm as a minimum and sometimes 24 hours a day. Monthly calls to Listeners peaked in June 2020 at about 100 but were down to 13 in March 2021. The installation of in-cell telephones from November means that prisoners can now ring Samaritans from their cell 24/7 at no cost.

Distraction packs were offered to women in an attempt to keep them occupied and to alleviate mental health issues. (See also 6.7).

There were no deaths in custody during the reporting year, and none since 2010.

4.3 Violence and violence reduction, self-isolation

Send continues to be a prison with low levels of violence and one in which staff and prisoners respect one another. The chart below shows that assaults overall decreased from 38 in the previous reporting year to 25. Although this was seemingly in line with the population reduction over this period, the decrease was mainly in prisoner-on-prisoner assaults, which may have been expected given that the prisoners were locked up for so much of their time.



Friendship/relationship issues and bullying were the most common causes of violence between prisoners.

Challenge, support, and intervention plan (CSIP) numbers continue to be low with only three opened during the reporting year. There are no prisoners with a violence

in prisons estimator (VIPER) score of 5 or above: i.e., no prisoners who have been identified as being a serious risk to others.

Items purchased from canteen have been delivered to cell doors during lockdown. Prisoners say that this has reduced bullying, and some have expressed a preference for the distribution to continue in this way after lockdown finishes.

4.4 Vulnerable prisoners, safeguarding

Vulnerable prisoners, such as those convicted of sexual offences, those with a learning disability and those requiring significant social care support have mainly been grouped into one wing. One spur of this wing was also designated for shielding prisoners during lockdown of whom there were still eight in March 2021.

4.5 Use of force

	Reporting period 2019-2020	Reporting Period 2020-2021
Planned incidents	4	0
Spontaneous incidents	106	103
Incidents on Body Worn Camera footage	86	63

The use of force committee, chaired by the deputy governor, meets monthly to review the paperwork and camera footage of the incidents, as recommended by HM Inspectorate of Prisons in the 2018 inspection. Board members have not been able to attend regularly due to Covid-19 restrictions. Through reviewing prisoner debrief documents the Board believes that all force used during this reporting period has been proportionate. However, there is room for improvement in terms of cultural understanding: during a use of force debrief a black prisoner commented *“I think because they (Prisoner Officer) saw a group of black women in a heated argument, they thought it was worse than it was. Black women can be very animated without being violent or a threat to each other, but we do gesticulate and shout in these situations.”*

61% of incidents (compared to 78% last reporting year) were recorded on body worn cameras, which have shown to be effective in de-escalating situations. Training points have been identified from footage but no staff training involving physical hold techniques has been possible during this time. Lead trainers give verbal feedback to individual officers where necessary.

4.6 Substance misuse

Mandatory drug testing was suspended from early April 2020 and throughout the remainder of the reporting year in line with HMPPS Covid-19 guidelines.

In July there was a spike of seven overdoses that required a hospital visit and this was followed by another two abnormally high months of overdoses requiring hospital visits. The prison identified that hospital visits might be a way of bringing drugs into Send so, to try and mitigate this, women who require emergency hospitalisation are

now taken to a variety of local hospitals and when in the hospitals they use toilets on a number of different floors.

The Board is pleased to note that from September 2020 the prison has both a passive and an active drug dog shared with HMP Downview and that the dogs spend about two days a week at Send. However, we are concerned that drugs have continued to enter the prison during the reporting year despite prisoners not being permitted to have visitors and very limited opportunities for 'throwovers'. The Board would welcome measures to reduce the supply of drugs further and hopes that principal routes into the prison will be identified and action taken to counter these.

5. Fair and humane treatment

5.1 Accommodation, clothing, food

The Board continues to believe that most cells offer reasonable and safe accommodation. The exceptions are two wings which failed a fire safety test in January 2021 and were condemned, the women being rehoused in other wings. During the reporting year all women were in single occupancy cells with in-cell shower and toilet facilities. The Board was pleased that one wing, with shared bathrooms, was not in use as it does not consider shared facilities for women acceptable accommodation. Most prisoners take a pride in their cells and keep them clean and tidy.

The summer of 2020 saw some high temperatures. The situation was exacerbated by most women being in their cells for up to 23 hours per day. Ventilation was not satisfactory for the maintenance of the health and wellbeing of the prisoners and no fans were made available. This will be a recurring problem until addressed.

Maintenance work is carried out by Gov Facility Services Limited (GFSL). Owing to the age and condition of the infrastructure, heating and hot water systems have failed from time to time. All accommodation block heating boilers have now been replaced. Other boilers (i.e., gym and the hot water boilers) are being replaced currently. A new building management system was fitted so that control of these facilities is now automatically regulated. Most radiators do not have thermostatic controls meaning that rooms can become uncomfortably overheated with no means of individual control.

Cells were fitted with telephones in November 2020, significantly improving prisoner morale. One prisoner told a Board member *"The in-cell phones are a real bonus...this is the best thing that the prison has done for me. If I feel down, I can just ring somebody...it has also helped me in communicating with my solicitor"*. Initial use was limited to 2 hours per day; this increased to 3 hours from Christmas and at a reduced call rate. (See also 7.4.1).

Prisoner clothing can be obtained in a number of ways; prisoners are allowed two hand-ins of clothing a year, and they can purchase items from the prison clothes shop Senderellas; however it only opened for a few months during lockdown. Those who have no means of obtaining their own clothing can access free prison issue

clothing. Prisoners sometimes had to wait more than four weeks to receive hand-ins due to staff shortages and limited access to the drug dog.

The dining hall, where prisoners would normally eat together at tables for eight, was closed throughout the year, other than for some wings collecting lunch. Officers escorted prisoners from those wings, on an alternating basis, to collect their food. Otherwise, food was delivered to cells. Disposable polystyrene boxes were used, rather than special trays, as this method was better at ensuring that food arrived at the correct temperature, however these created a large amount of waste. Prisoners told Board members that the food was of a good standard with several daily choices. Fresh fruit, vegetables and salads have always been available, some from the horticultural area; home-grown produce has included eggs, chillies (fresh and powdered) and peppers.

Despite the restrictions, the celebration of key religious festivals continued. Ramadan, Eid, and Christmas were supported. The food provided was generally well received, particularly for themed or 'special' days such as during Black History Month.

Twice weekly snack packs were made available to the women throughout the year: healthy and standard. The ratio was on average 100 standard to 60 healthy. During the reporting year the Board was told by the prisoners that the quality of packs had improved.

Food supplies were satisfactory throughout the year. From March 2020, the kitchens operated a limited regime, with four chefs and the daily number of prisoners employed reduced from 12 to six/eight owing to the need for social distancing. Standards were maintained due to a massive team effort.

Receiving canteen is often quoted as the highlight of many prisoners' week. The service provided by DHL this year has significantly improved: one prison officer oversees this service, and DHL visits once or twice a year to clear up any refund backlog – the average is three to four refunds received per week, an improvement on previous reported performance. 2020/21 has seen a steep drop in applications concerning canteen and this is attributed in part to the Covid-19-driven decision to deliver canteen to cell doors rather than requiring prisoners to collect their purchases and the allocation of a dedicated staff member.

5.2 Segregation, special accommodation

HMP Send continues to operate without a segregation unit. Prisoners who are segregated for disciplinary reasons are confined to their cells. This punishment was awarded 56 times during the reporting year, usually for terms of 10 or 14 days.

There are two separate observation cells used for short periods for women who are considered to be at serious risk. These cells were used for 202 days in the reporting year, including 27 days for one prisoner in February 2021. The Board has had limited ability to visit these prisoners during the reporting period but received daily status reports from the orderly officer.

5.3 Staff-prisoner relationships, key workers

Board members regularly witness positive and friendly interaction between staff and prisoners. Wellbeing conversations were introduced on 1 December, but these were curtailed by staff shortages. The Board regrets that, due to the national delay in implementing offender management in custody (OMiC), prisoners have not had the support of key workers for yet another year, and there was a missed opportunity to have regular quality conversations with the women which in turn would have given a clearer picture of how individual prisoners were coping.

The Board commends the efforts made by staff during the Covid-19 regime to ensure good communication to prisoners about regime restrictions, including regular updates from the orderly officer with the message 'we are all in this together' for staff and prisoners. The staff showed compassion where appropriate. For example, a prisoner whose grandmother had died was offered an 'orderly officer phone call' of 20 minutes so she could talk to her family more, and another prisoner who had lost a family member was able to join the video call to the funeral. ACCT observations and reviews continued with social distancing. If the prisoner was shielding and could not attend, they provided a written contribution if they wished.

One prisoner submitted an IMB application to compliment staff, saying *"I would like to recognise the outstanding effort made by the staff...whilst I underwent my gender reassignment surgery. Each and every one of them were amazing...I was treated with the utmost respect and care"*.

5.4 Equality and diversity

Over the course of the reporting year, eight equality-related applications to the IMB were submitted. This represents 6% of total applications. 45 DIRFs concerning protected characteristics were submitted in the reporting year, compared with 26 in the previous year, of which 20% were upheld, compared with 38% the previous year.

Category of DIRF	Number Submitted	Number Upheld
Race	25	4
Religion	5	0
Disability	4	0
Age	3	0
Sexual Orientation	6	4
Gender Reassignment	2	1
TOTAL	45	9

The Board is concerned that the planned independent DIRF review by a University of Surrey academic was suspended for the entire year due to Covid-19. Two Board members reviewed all DIRFs in the reporting period. They found that similar offences received different sanctions, often with the 'victim' being moved to a new cell location. The Board understands the burden of proof on staff and attributes these inconsistent outcomes to a lack of evidence available to staff in being able to establish that reported behaviours are racist.

Some DIRFs remain open and unresolved for lengthy periods – one was incomplete eight months after the report was submitted. One prisoner waited 19 days before receiving an acknowledgement of the DIRF submission.

Progress with diversity initiatives has ground to a halt over the past 12 months as infection control was prioritised. The impact of the pandemic has been profound, with focus groups cancelled throughout 2020/21, and staffing challenges and remote monitoring combining to hamper effective oversight of equality and diversity.

Current data relating to prisoner population and protected characteristics have been unavailable throughout the reporting year, making it difficult for the Board to assess trends in discrimination, use of force, IEPs, active workforce, and wing population. The last equality information shared with the Board relates to late 2019 and so provides no basis for assessing current prisoner experience. It has not been possible to ascertain whether members of protected characteristic minorities experienced poorer lockdowns than white, British, able-bodied women. However, we are aware of apparent discrepancies in the operation of the IEP system (see 5.6).

Throughout the reporting period, there has been a nominated equalities lead at Send. The prison has endeavoured to provide a broad range of events celebrating diversity throughout the year, including an exhibition of prisoner artwork and special menus in response to Black Lives Matter. There were three equality action team (EAT) meetings in July, November and February.

The Board was pleased that the prison made adjustments for hearing-impaired prisoners. During a brief period when family visits resumed visitors were provided with appropriate face coverings to facilitate communication.

5.5 Faith and pastoral support

Prisoners have told Board members that the chaplaincy has provided a highly supportive service for women of all faiths and none during this unique and difficult reporting year. Chaplains have visited women on an individual basis for pastoral or faith-based conversations and small faith groups were able to resume in the faith centre for a period over the summer months.

The chaplaincy has produced a twice weekly newsletter for all prisoners to which prisoners and staff have contributed articles. A number of women have commented on its value to them. Communal worship was prohibited under Covid-19 restrictions so worship for different faiths was recorded and distributed to the women via CD. Art materials and puzzle books provided at low or no cost (subsidised by Nazareth Way) have been widely taken up. Chaplaincy volunteers came into the prison when restrictions permitted, to assist the chaplains to produce and deliver materials.

Making Connections offers prisoners support as they approach release, including finding accommodation.

5.6 Incentives and earned privileges

Although the new HMP Send incentives and earned privileges (IEP) policy was launched in early 2020, it was not embedded during the reporting year due to the pandemic. Between March 2020 and April 2021 no prisoners were downgraded to basic and only rarely were enhanced prisoners dropped to standard following proven adjudications. Although lockdown made it difficult to incentivise good behaviour the Board commends the prison on the decision not to deprive prisoners of their access to a television.

The Board observes that while the proportion of White prisoners on enhanced level (74%) closely reflected the prison average (73%), the proportion of Black prisoners on enhanced was lower (63%). It is also notable that only one of the six prisoners in the under 25 years age cohort was on enhanced. At 16% this was significantly below the prison average.

5.7 Complaints

During the reporting year the Board carried out four monthly checks of the responses to prisoners' formal complaints. The check in November 2020 showed significant delays in some responses. The check in March 2021 showed that the complaints were stamped in batches (four were received on 18 March, 15 on 23 March and eight on 26 March), indicating that boxes on wings were not being emptied nightly, which would then result in complaints being incorrectly dated on receipt and impact on response times.

Prisoners were almost always given courteous and considered responses. The prison has made a noticeable and largely successful effort to reduce the use of interim responses, which lengthen the permitted response time from five to 14 days. A very small number of persistent complainants had a significant impact on the prison's complaints statistics. These complainants still received courteous replies.

5.8 Property

There were 18 applications (7% of the total) during the reporting year concerning prisoner property, down from 36 in the 2019-20 year. Three-quarters of the applications related to within-establishment issues.

Delays in receiving hand-ins have been lengthy as a result of staffing and Covid-19 issues throughout the year, with the longest delays in the fourth quarter. Reception has been open only when staff can be spared. (See also 4.1).

6. Health and wellbeing

6.1 Healthcare general

In this reporting year, Central & Northwest London NHS Foundation Trust provided primary care and mental health services, the latter through the Mental Health In-Reach team (MHIR). Med-Co Secure Healthcare Services provided GPs, and Time for Teeth provided dental care.

6.2 Physical healthcare

The year has been dominated by managing the consequences of the Covid-19 virus. As the country went into lockdown in March 2020, the prison was quick to take appropriate measures to minimise the impact of the virus.

It is to the credit of all staff that there were no positive cases amongst prisoners until the beginning of January 2021. Over the course of the outbreak, 68 prisoners and 95 staff tested positive, and a further number of staff were away from duties following contact tracing. A small number of prisoners were taken to hospital with Covid-19 symptoms, but none was seriously ill. Very sadly, one member of staff died. The prison reacted quickly to take steps to contain the outbreak. The outbreak status was lifted on 11 March.

Weekly staff testing started in November, and by the beginning of February this had been extended to three times a week. By the end of March 2021 75% of staff were testing regularly.

By the end of the reporting year, the first dose of the AstraZeneca vaccine had been administered to 107 prisoners, some of whom have subsequently left. All fell into the vaccination cohorts two to nine and included those shielding. There were five prisoners aged over 50 who were still due to receive the vaccine, and 15 who had refused it. The Board regrets the government decision not to allow prisoners and staff early access to vaccinations given the increased risks of transmission in a prison environment, as shown by the Covid-19 outbreak in January 2021 at Send.

Since lockdown, the provision of some other healthcare services has inevitably suffered. While the GP has been available every day, only significant matters were handled face-to-face, and the remainder managed through phone consultations. Many hospital consultations were also handled by phone and healthcare staff reported that this had worked well. The recently installed in-cell phones have played a vital part in checking on the condition of each prisoner.

The waiting list for dental treatment increased, not helped by the length of time required to clean the room between each appointment. The most recent report shows improvement and additional sessions were arranged for March and April to address the backlog. Waiting lists for other clinics (e.g., optician, podiatrist, physiotherapist) varied during the course of the year. Following the outbreak of the virus in January, clinics were suspended. These have been gradually reintroduced and stepped up as more prisoners were vaccinated. At the end of the reporting year all screenings (e.g., bowel, breast, cervical) were running with only minor backlogs, helped by the smaller number of prisoners.

The Board is pleased to note that since November prisoners have been provided the opportunity to obtain, free of charge, supplies of vitamin D every three months via canteen deliveries.

The Board received 26 applications concerning healthcare, seven of which were from one individual. These applications were for a variety of matters.

6.3 Mental healthcare

The Board's conversations with prisoners have highlighted the stress and feelings of isolation that many have experienced from being locked in their cells most of the time.

The MHIR team provides both primary and secondary care. It provides early intervention and crisis management teams, and a community mental health (recovery) team. At the end of the reporting year, the total case load was 93, with a further 30 patients on the waiting list for one-to-one therapy, and 30 for group therapy.

Obesity is a significant problem at Send and has worsened over the last twelve months. A psychologist from MHIR is working closely with weight clinics and looking into ways of managing this.

The prison has two PIPE programmes for women with personality disorders. These programmes have been significantly affected by the impact of Covid-19. Most of the team and PIPE residents either tested positive or had to self-isolate in January 2021.

At the end of the reporting year, there were 17 women registered on Progression PIPE, seven on Preparation PIPE, and two in the outreach service.

The DTC programme was suspended in March 2020 due to Covid-19 and moved to an adapted service for the continuation of care and outreach support. Many staff were redeployed to assist in other parts of the prison. The adapted service offered a weekly two-to-one session (replacing the group sessions) and this has been the main activity through the year.

For the reporting year, there were 13 residents enrolled in the DTC programme; the age range and clinical characteristics of these prisoners were mixed. Three prisoners joined during the year, and three left.

6.4 Social care

At the end of the reporting year, 17 prisoners qualified for support for a mixture of reasons including mental health, learning disability, physical disability, and illness. There were 12 prisoners receiving support, one assessed and eligible, and four waiting for assessment.

6.5 Exercise, time out of cell, gym

The opportunity for prisoners to have time out of their cells has been significantly restricted during the lockdown regime. While the chance to be in the open air for short periods (30 to 45 minutes) each day was made available whenever possible, not all prisoners took up this option.

The gym has played an active and significant role over the last 12 months. It organised gym classes outside the wings and offered power walking and running

groups. Seven women trained alongside staff for a half marathon within the prison confines and completed it a week after the reporting year finished.

Under the tighter restrictions following the Covid-19 outbreak in January, the prisoners continued to be offered outdoor exercise. Two of the wings were able to collect their meals at lunchtime from the dining hall, but only urgent appointments with healthcare were possible. By 9 February, however, the regime had moved on: all wings (with two on alternate days) were able to collect hot meals, cell doors were open during the day to allow increased interaction (albeit on some wings this was for specific periods and required staff supervision), and the collection of medication resumed.

6.6 Drug rehabilitation

The Forward Trust delivers substance misuse and recovery programmes and has been working closely with healthcare regarding prisoners' access to Naloxone (assisting those at risk from opiate overdose giving them 'take home' training prior to release). The Trust continued to work closely with MHIR to develop care plans for dual diagnosis prisoners. The two group interventions which continued were 'Stepping Stones', a three week course looking at ways to stay safe and helping prisoners to develop better coping skills, increasing awareness and knowledge of drug risk, and 'Footsteps to Recovery' an accredited abstinence based programme. Sessions on relapse prevention and living safely are also continued.

The caseload was 74 at the end of the reporting year with 51 one-to-one sessions and 14 women engaged with family work (there was no group work).

6.7 Soft skills

The previously flourishing Women's Institute (WI) group was suspended during lockdown, as were most other visiting groups. Nevertheless, activities that were possible up to the point of the Covid-19 outbreak in the prison in January included knitting jumpers for abandoned lambs, a lockdown art competition, and Watts Gallery facilitating some prisoners painting in their cells. Organised wing activities such as bingo, which required staff supervision, received a mixed reception: some prisoners made positive comments, but others viewed it as "forced fun".

Prisoners were given an opportunity by the gardens to grow seedlings in their cells: this initiative was well received, as was the provision of a weekly newsletter from the gardens up until Christmas.

Distraction packs of varying types were provided to the women to help with the long hours locked in cells. Some women said that they would like more variety or more challenging materials (members of the Board saw children's colouring pages being offered) but those provided by the chaplaincy were particularly popular with many women; they included diamond art, paint by numbers, card making and crossword and sudoku books.

Some pieces of art that were created by the prisoners for the Koestler award were displayed in an exhibition created by DTC women and were also for sale.

7. Progression and resettlement

7.1 Education, library

7.1.1 Education

The provision of education at Send has been very badly affected by the Covid-19 pandemic and the Board is concerned that this has had a significant impact on prisoners' wellbeing and progression during the lockdown and will inevitably affect their prospects after release.

Most of the formal education at Send is, in normal times, delivered by tutors employed by Weston College under a regional prison education framework contract, though a number of courses are provided internally by the prison (notably by the chaplaincy, the catering department, the gym and the gardens) and by some outside organisations (including the Forward Trust and the Dogs Trust).

Classroom teaching was suspended under the first lockdown and had not resumed by the end of March. HMPPS guidance on the number of Weston College staff allowed onsite was restrictive and not open to local negotiation. Effort was made to provide women with in-cell learning resources, with variable success. The approach taken and the response rate varied over the year. Creative activities have been more popular than functional skills. Many women understandably found it difficult to motivate themselves to keep up their learning without direct tutor contact. Between October and March, 61 learners returned 206 completed educational packs.

The Board understands that it was necessary to make quick and clear decisions about priorities and access to the prison at the beginning of the lockdown, but regrets that education appeared to be given a relatively low priority in the national edict from HMPPS. Education tutors had more restricted access to the prison than directly employed staff, regardless of their role. In contrast the Board observes that small groups of prisoners were allowed to gather as faith groups but not for study, which appeared to indicate the poor attitude to learning in the Prison Service.

The focus on managing the pandemic, and the uncertainty about when, and how, classroom teaching might resume, has inevitably distracted the prison from addressing the issues identified in the 2018 [Inspectorate report](#). The Board would hope to see priority given to developing a full strategy for learning, skills, and work in the year ahead.

In our report last year, we regretted the HMPPS decision that prisoners on degree courses were no longer able to use laptops in their cells. This remains the case, and in addition this year they have had very little opportunity to use computers outside their cells. While prisoners were able to continue to study for degree courses using paper, the lack of digital access has wasted an opportunity for learning and purposeful activity during the lockdown. While we appreciate that digital access has a security risk that needs to be managed effectively, we are concerned that the Prison Service is currently failing to provide prisoners with the skills required for life in a digital age.

7.1.2 Library

The library is run by a committed, enthusiastic librarian who continued to run a limited service throughout the reporting year. The budget for new books is modest at £1600 and is augmented by Surrey Library warehouse stock.

Borrowing has been raised to five books (more for education resources), four DVDs, two CDs / audiobooks and five children's books for reading over the phone. The library has collaborated with a free scheme, 'Storybook mums', to provide a large selection of children's books available for bedtime reading over the phone. The five participants gave positive feedback on the importance of this service for family ties. In addition, nine Storybook DVD recordings were made during the Christmas period.

A book club, partnered with the Prison Reading Group, has been running remotely for the past year, sending books to new and regular members who return feedback forms to add their comments to a newsletter article each month.

7.2 Vocational training, work

At first, the prison gave priority to employing good and willing workers in the delivery of essential services – notably in the kitchens and gardens. The Board understands the rationale for this (and noted positive feedback from prisoners about improvements in the quality of food). As the pandemic continued, the prison increased the opportunities to work and spread them more evenly. The HMCIP report on the short scrutiny visit to Send and Downview in June 2020 reported that "Send had increased the pool of available work by sharing access to jobs. This meant that almost half of prisoners had, on average, 15 hours of work a week."

The Board remains concerned about the fair distribution of opportunities to work and the need to give purposeful activity to prisoners less enthusiastic about working, and/or those more demanding of staff input.

The Board emphasises the positive impact of employment. Women who have been in work have, understandably, reported a much more positive experience of lockdown than those who have spent most of the day alone in their cell.

A positive feature of Send is the amount of space that is used for horticultural production and raising chickens. The fresh produce is used in the kitchens at Send, supplied to the Clink restaurants, and sold to staff and visitors. Women have continued to be employed in the gardens during the lockdown and some have been able to continue to do training towards horticultural qualifications. The Board has been impressed by the enthusiasm of managers and staff in the gardens and the positive relations which exist between staff and prisoners there.

In our report last year, we regretted that very few prisoners were progressing to being released on temporary licence (ROTL) to experience work in the community. The opportunities to work outside the prison on ROTL have stopped entirely since the first lockdown (7.3).

7.3 Offender management, progression

The Board is concerned that the changing Covid-19 restrictions have created barriers for some prisoners to complete their sentence plans and progress towards release. Programmes have been cut back substantially, substance misuse group sessions and peer support cancelled, and education reduced to in-cell course packs which do not lead to qualifications. This and the lack of ROTL have made it difficult for prisoners to prove their commitment to rehabilitation and their reduction in risk of reoffending.

Most parole hearings have been delayed. OMU staff have worked to establish ways prisoners can evidence their progress through good behaviour and engagement with work opportunities, their wing record, in-cell work and discussions with offender managers and supervisors, but it is unlikely these can prove as convincing a reduction in risk for parole boards as meeting the requirements of a sentence plan.

The Board continues to believe that it is unfair and inhumane that two IPP prisoners still remain at Send many years after their tariff date. There were nine IPP prisoners at Send at the start of the reporting period; by the end four had been granted release and three moved to open conditions. The Board welcomes the efforts made by staff to contribute to this. However, of the two who remain, one has served nearly six years over the original tariff of under three years, and the other 10 years over the original tariff of two and a half years. The Board questions whether, given their complex needs, they are capable of fulfilling the requirements of parole boards. The Board shares the view of Lord Brown in the Prison Reform Trust publication 'No life, no freedom, no future' (2020): *"I have no hesitation in describing the continuing aftermath of the ill-starred IPP sentencing regime as the greatest single stain on our criminal justice system."*

Despite 47 prisoners being considered for the end of custody temporary release scheme, only one was actually released this way, with another released on a Covid-19 special purpose licence. Reasons given for prisoners not progressing were not meeting the criteria, outstanding adjudications, and poor custodial behaviour.

The Board is pleased to note that the number of probation staff has been increased to three permanent and one agency member of staff.

In recent reports the Board has regretted OMU's slowness in responding to prisoners' applications. While OMU no longer keeps a log of applications, the Board notes that it has not been receiving complaints from prisoners about this and OMU communications with prisoners have become easier since the installation of in-cell telephones.

7.4 Family contact

7.4.1 Telephones

The Covid-19 pandemic has impacted on the ability of prisoners to maintain contacts with their family and friends. Prison staff are aware of the importance of these

contacts in recovery and rehabilitation and have made efforts to enable contact to be maintained during the pandemic.

Last year the Board reported concern about the lack of in-cell telephones. During the lockdown in the first half of the year the prisoners' opportunities to use the wing phones were constrained, and some prisoners expressed frustration to the Board that working patterns of family members did not fit with when they were allowed to use the wing phones. The prison was supplied with mobile phones for family contact during lockdown but there were issues with signal quality because of Send's location. The installation of in-cell telephones in November was a very welcome development, enabling prisoners to have more frequent contact with their families and children in particular. This improvement in communications is welcomed by the Board and has been commented on by prisoners: *"I get more privacy. I can call my family at a good time. It's safer and in my control"* and *"If I feel down, I can just ring somebody."*

The allowance is three hours per day and two for those on public protection monitoring. A two-minute call to a mobile costs 15p. Prisoners throughout the prison estate have benefited from a £5 a week credit for phone calls, and in the women's estate an extra £5 on top of that. This has been a very welcome addition.

7.4.2 Video calls

"Purple Visits have been amazing. This is a super service."

Setting up Purple Visits, a video conferencing call service, was a priority to enable an alternative method of family contact during lockdown. Initially, there were considerable technical difficulties and some complaints. Families who experienced registration difficulties were contacted and offered assistance, but the system is not accessible for people without digital technology.

Use of the service has been free of charge during the pandemic. The official allowance is up to three half hourly slots per month, but it ran under capacity. Some women choose not to use them, finding it distressing when their children move around and the video freezes.

Families have had problems with visits supervised by social workers to find a workable time for all involved. Two women with children in foster care had to wait several months to establish a visit and some spent most of the year without one.

Three prisoners have attended funeral zoom calls and others have had video links with relatives nearing the end of life.

There have been no inter prison video links thus restricting contact with relatives in other prisons.

7.4.3 Visits

When visits were reintroduced in July, every effort was made to support the prisoners and inform them of the latest guidelines. Numbers continued to be low and with few children. Some prisoners preferred not to see their loved ones without hugging them and expressed concerns about the impact of social distancing.

Prohibitive factors for visitors included travel restrictions from some areas and, as the complimentary prison minibus service has been suspended, taxi fares from the local station. Prisoners complained to the Board about the restriction on the number of children allowed per visit and the limit to a single household.

There have been no family or adult visit days since the first lockdown.

7.4.4 Family support

There is no current waiting list for prisoners to access the new family engagement worker, an improvement on last year. She has mainly communicated through letters and has not been able to have conversations about the challenges the women face or issues with their children. She has helped with access to and communication with social services and getting pictures and letters to the women.

Lockdown has led to a lack of regular contact with families and professionals, resulting in cases taking longer to resolve. Some women have not received regular updates from their social workers or from their children's schools. Children go longer without seeing or speaking to their mothers.

With the Covid-19 outbreak at Send and Prison Advice and Care Trust (PACT) working from home, video meetings between prisoners and social workers have been problematic to organise. New social workers have not been able to meet and build rapport with the women which impacts negatively on their cases.

During the past year, no special purpose licences were granted for compassionate leave, resettlement overnight release or childcare resettlement leave.

Support from PACT is given through phone calls or emailprisoner.com. They have distributed in-cell family relationship courses and launched a new series of the family ties course for mothers and children to do separately.

7.4.5 Mail

The Board has received frequent complaints from prisoners that the photocopies of mail received were illegible and incomplete, sometimes causing distress. The Board received an application regarding the photo on the front of a funeral order of service that was so badly photocopied the family member was unrecognisable.

Typically, some types of original post and property are retained at reception until the prisoner's release. At the beginning of 2021 a new national directive initially required all post to be destroyed, causing some prisoners anxiety and upset. This was then

modified: photographs, artwork and greeting cards can be kept and put into stored property if there is no presence of illicit substances.

Emailprisoner.com has had positive feedback and is more widely used than the less popular prisoner voicemail.

7.5 Resettlement planning

During the reporting year 91 prisoners were released, of whom five were recorded as having no accommodation arranged prior to release. The Board acknowledges the efforts of OMU staff in this area, which gives Send a higher success rate than many other prisons, but strongly regrets the acute shortage of appropriate accommodation in the community and the policy of local councils who, while accepting their duty to house released prisoners, will not start the process until the day of release. This adds uncertainty at an already anxious time, particularly for prisoners whose offending was largely attributable to homelessness in the past. Without suitable accommodation released prisoners are put at an immediate disadvantage. Her Majesty's Inspectorate of Probation has highlighted a number of issues in this area and advocated a 'housing first' approach, recommending moving individuals into mainstream housing with security of tenure, rather than segregating them into hostel accommodation. Their research linked stable accommodation with reduced reoffending.

The Board commends the energy and commitment of staff who worked hard to find accommodation for a heavily pregnant foreign national prisoner when no agency would admit responsibility for her until the very last minute.

Significant support is given to prisoners before release by the chaplaincy-based programme Making Connections. Its mentors help prisoners approaching release to make practical preparations and sometimes support prisoners on the day of release by providing them with mobile phones and driving them to the station. The Nazareth Way charity provided an emergency grant of £150 to enable one released prisoner to check into a Premier Inn for the weekend and buy food.

8. The work of the IMB

This report represents the findings of the IMB at HMP Send for the period from 24 March 2020 to 31 March 2021. Our work during this period was severely affected by the Covid-19 pandemic. Monitoring was mainly carried out remotely by receipt of the daily briefing reports and telephone calls to governors and other staff, as well as calls to prisoners in their cells from December. Most Board meetings were held by conference call or zoom.

The facility for prisoners to make written applications has also continued and the Board embraced the new national 0800 helpline for applications.

We would like to take this opportunity to commend our Board clerk, who scanned all written applications received and coordinated all letters to prisoners in response to helpline and written applications received.

The Governor, her management team and senior staff have been accessible and helpful to the Board during this difficult time. We are confident that information provided remotely by the prison accurately reflects conditions at Send. Our enquiries are generally dealt with promptly, and satisfactory responses received. The Board is grateful to prison staff for their cooperation and accessibility.

The Board currently comprises nine female and two male members. There is one member from an ethnic minority. During the past 12 months three members resigned from the Board due to work and family commitments, and health issues.

Board statistics

Recommended complement of Board members	12
Number of Board members at the start of the reporting period	14
Number of Board members at the end of the reporting period	11
Total number of visits to the establishment	66
Total number of segregation reviews attended	Not applicable

Applications to the IMB

Code	Subject	Previous reporting year	Current reporting year
A	Accommodation, including laundry, clothing, ablutions	17	14
B	Discipline, including adjudications, IEP, sanctions	21	1
C	Equality	5	8
D	Purposeful activity, including education, work, training, library, regime, time out of cell	10	8
E1	Letters, visits, telephones, public protection restrictions	24	16
E2	Finance, including pay, private monies, spends	16	0
F	Food and kitchens	12	3
G	Health, including physical, mental, social care	35	26
H1	Property within this establishment	22	14
H2	Property during transfer or in another establishment or location	14	2
H3	Canteen, facility list, catalogue(s)	15	3
I	Sentence management, including HDC, release on temporary licence, parole, release dates, recategorization	22	9
J	Staff/prisoner concerns, including bullying	28	7
K	Transfers	3	1
L	Miscellaneous, including complaints system	10	13
	Total number of applications	254	125

Covid-19 specific applications are included in the Miscellaneous L category.

During the pandemic the Board had dealt remotely with applications collected from the prison and from the central 0800 call number (which was made accessible to prisoners by the installation of in-cell telephones in November). The 125 applications from this year compare to 254 for the previous year. Notwithstanding a drop in prisoner numbers by 40%, the reduction is significant.