

# Annual Report of the Independent Monitoring Board at HMP/YOI Stoke Heath

For reporting year
1 May 2020 – 30 April 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/YOI Stoke Heath, in Market Drayton, Shropshire, is a closed category C adult male and young adult training and resettlement prison holding adults aged 21 and over, and sentenced young adults (aged 18 to 21). The prison has a baseline certified normal accommodation of 662, with an operational capacity for 782 adult men, of whom, at the close of the reporting period, 69% were from Staffordshire and the West Midlands area; 20% had a release date within three months and 56% within 12 months. The average length of stay was 13.59 months; licence recalls accounted for 35% of prisoners and 54 prisoners were foreign nationals.

The prison has a variety of accommodation, much of it added over the years to the older original prison, built in the early 1960s. There are eight residential wings, one designated for drug treatment, one for induction and longer-term prisoners, and one as a progression unit for release on temporary licence (ROTL). The function of some wings changed, temporarily, to meet the needs of control measures during Covid-19.

Each wing has in-cell sanitation and a shower block. Single cell accommodation is provided in 446 cells, and two-prisoner accommodation in 168 cells. The segregation unit has 16 cells, two holding cells and two further cells to store kit and to hold evidence and property. The Clive unit, with capacity for 16 prisoners, sits just outside the prison and offers resettlement opportunities for a small number of category D prisoners who are in full-time employment or attending further education.

The prison has two gyms, a healthcare department, kitchen, education department, library, chaplaincy, reception and visits hall. A large manufacturing workshop, other significant workshop spaces, and horticultural and recycling areas provide employment and learning opportunities, and interventions to meet the needs of rehabilitation.

Key service providers are:

- Physical healthcare: Shropshire Community Health NHS Trust
- Mental healthcare: North Staffordshire Combined Healthcare NHS Trust (NSCHT); Mind
- Learning and skills: Novus
- Substance misuse and wellbeing: The Forward Trust; NSCHT; Prison Advice and Care Trust (PACT)
- Estates and facilities management: Amey
- Prison escort service: GEOAmey
- Community and Rehabilitation Company (CRC): Wales Probation Services; St Giles Trust.
- Library services: Shropshire County Council
- Visitors' centre, children and families' work: Barnardo's
- Samaritans

Charitable organisations and other services provide a wide range of additional training, support and advice, and a number of local businesses provide employment for the category D prisoners who reside in the Clive unit.

#### 3. Executive summary

# 3.1 Background to the report: the impact of Covid-19

- 3.1.1 The Covid-19 outbreak has had a significant impact on the Board's ability to gather information for this annual report but we have tried to cover as much ground as possible in these difficult circumstances. Inevitably there is less supporting evidence than usual but Ministers are aware of these constraints. Regular information is being collected specifically on the prison's response to the pandemic and that is being collated nationally.
- 3.1.2 Covid-19 and the consequent change to the prison regime has presented many challenges for prisoners, prison staff, and the way in which the Board has had to work. Necessary changes were made to the prison regime to manage infection rates, but at the expense of meaningful activity. Whilst prisoners have said that they appreciated the efforts of prison staff to keep them safe, the impact on prisoners' physical and mental wellbeing of being locked in their cells for 23 hours a day is less clear.
- 3.1.3 Despite the enormous efforts made to keep prisoners safe from catching Covid-19, during the second wave HMP Stoke Heath reported one of the most serious outbreaks in the prison service. Whilst difficult to pinpoint the source of the outbreak, it was considered highly likely that it was imported mainly from the community via prison staff. Public Health England considered Stoke Heath's response to the outbreak to have been managed exceptionally well. However, the IMB questions why prisoners were still being transferred into Stoke Heath during times of major outbreak in the prison and in the general community.
- 3.1.4 The IMB hopes that reviewing the lessons learned from the prison service's response to Covid-19 will support planning going forward.
- 3.1.5 The Board would like to place on record its appreciation of the business hub team at Stoke Heath for their outstanding work in supporting the Board during this very challenging time of remote working.

# 3.2 Main judgements

# How safe is the prison?

3.2.1 The Board is satisfied that the prison is safe. However, sadly, there were three deaths in custody during the reporting year, two from Covid-19. The ability to speak directly to prisoners has been severely restricted due to the pandemic and as a result the IMB is much less able to reflect the lived experience of the prisoners than in than previous years. Applications received show a minimal number of safety related concerns and where appropriate have been taken up directly with the deputy governor. Where investigation has been required on site or remotely the Board has found an open approach from governors and staff.

# How fairly and humanely are prisoners treated?

3.2.2 Covid-19 regime restrictions have been very challenging for prisoners. The Board considers that the impact of these restrictions on prisoners will be far-reaching for some time in terms of successful resettlement, mental health and general wellbeing.

- 3.2.3 Outside the restricted regime, the Board remains satisfied that prisoners are treated fairly and humanely and is pleased that, despite the challenges faced, prisoner/staff relationships remain positive (see paragraph 5.3.2).
- 3.2.4 A longstanding issue remains regarding the inadequate national system for managing prisoners' property on transfer. The loss of personal items causes prisoners a great deal of distress and has a negative impact on their wellbeing (see paragraphs 5.8.1 and 5.8.2).

#### How well are prisoners' health and wellbeing needs met?

3.2.5 Given the extremely challenging and unprecedented circumstances, the opinion of the Board is that healthcare services have been well led and responsive. The excellent relationship and involvement between the prison senior management and healthcare ensures that health services are seen as a shared priority (see paragraphs 6.1.1 and 6.1.6).

# How well are prisoners progressed towards successful resettlement?

3.2.6 The Board questions whether Stoke Heath can deliver the prison objective of rehabilitation with the resources at its disposal. Funding cuts over the past three years have had a profound impact on vocational training and the potential rehabilitation of prisoners. The impact of these cuts has resulted in the loss of 102 full-time activity spaces. Whilst the prison has been able to retain some purposeful activity, when Covid-19 restrictions have allowed, it is questionable how much of this work will translate into gainful employment opportunities upon release. It is important that the prison continues to work with the private sector to sponsor key vocational skills such as in building, infrastructure and manufacture (see paragraphs 7.1.6, 7.2.1 and 7.2.3).

# 3.3 Main areas for development

#### TO THE MINISTER

3.3.1 Stoke Heath is unable to meet HMIP and Ofsted inspection requirements as a 32% cut to its education budget, over three years from April 2019, has resulted in the loss of all prisoner qualifications in engineering, tailoring, horticulture, gardens, waste management and gym. The negative impact on vocational training and meaningful activity leads us to question Stoke Heath's ability to meet its objective for the rehabilitation of prisoners (see paragraphs 7.1.6, 7.2.1 and 7.2.2).

#### TO THE PRISON SERVICE

- 3.3.2 Prisoners should be encouraged to take up and work toward the achievement of maths and English qualifications at an earlier stage in their sentence, before coming to Stoke Heath, to allow more focus on their vocational training (see paragraph 7.1.3).
- 3.3.3 Only in exceptional circumstances should a prisoner come to Stoke Heath without an appropriate OASys (offender assessment). Currently, about 10% of prisoners who transfer into Stoke Heath have no OASys or OMiC (offender management in custody) plan and whilst this is an improvement compared with last year, it puts pressure on resources at Stoke Heath (see paragraph 7.3.1).

#### TO THE GOVERNOR

- 3.3.4 The heating and hot water system at HMP Stoke Heath is not fit for purpose. The Board has been made aware that funding has been secured from the Ministry of Justice to replace the system and that the work is planned for next year. However, the Board sees replacement of the system as a priority and urges the Governor to start the work as a matter of priority so that the prisoners do not have to face another winter with inadequate heating (see paragraph 5.1.3).
- 3.3.5 The move towards blended learning for education courses will result in prisoners being locked up in residential units for longer periods during the working day. This will make it more difficult to develop an effective rehabilitative culture which develops the skills needed by prisoners when released (see paragraphs 7.1.5 and 7.1.6).
- 3.3.6 Resettlement planning: the Board hopes that for next year the prison is able to build on its actions for resettlement and use its influence and creativity to build new opportunities for prisoners with the skills that are in demand in the workplace. This will increase their chances of meaningful employment and decrease the risk of reoffending (see paragraph 7.5.1).
- 3.3.7 The Board urges the Governor to give priority to his plans to re-introduce a full key worker programme as soon as restrictions allow. The Board believes that this will be a critical tool for the successful transition to a normal regime (see paragraph 5.3.3).

#### 3.4 Progress since the last report

- 3.4.1 The installation of a body scanner in reception to detect illicit items being brought into the prison has impacted positively in reducing the use of illegal substances (see paragraphs 4.1.1 and 4.1.5).
- 3.4.2 The installation of in-cell telephony started in January 2021. Its positive impact on prisoner welfare will be significant (see paragraph 5.1.5).
- 3.4.3 Telemedicine is in the process of being established. This will shorten waiting times for prisoners' consultations by enabling them to take place remotely (see paragraph 6.2.1).
- 3.4.4 There has been an improvement in the number of prisoners transferring to Stoke Heath with an offender assessment (OASys) or offender management in custody (OMiC) plan. About 10% transferred in without a plan, compared with 30% last year, but, whilst this is an improvement, it still puts pressure on resources at Stoke Heath (see paragraph 7.3.1).
- 3.4.5 The heating and hot water system is not fit for purpose. Extreme temperatures in the cells are impacting adversely on the health and wellbeing of prisoners. The Board sees replacement of the system as a priority for the fair and humane treatment of prisoners (see paragraph 5.1.3).
- 3.4.6 The Board remains concerned about the quality of some of the prison's responses to complaints but is encouraged that a senior manager has ownership of the quality assurance process for prisoner complaints (see paragraphs 5.7.2 and 5.7.3).

- 3.4.7 The Board remains disappointed that there has been no discernible improvement in the management of prisoners' property. However, as Stoke Heath is now part of a regional group seeking to improve the system for managing prisoners' property, the Board hopes to see significant progress over the coming year (see paragraph 5.8.1).
- 3.4.8 Funding cuts to the education budget have resulted in the loss of 102 full-time equivalent activity spaces, a loss of qualification and a lack of progress on employment outcomes. Furthermore, the prison continues to prioritise maths and English assessment for new prisoners who should have been encouraged to take up maths and English at an earlier stage in their sentence (see paragraphs 7.1.3, 7.2.1, 7.2.2 and 7.2.3).

#### Evidence sections 4 – 7

#### 4. Safety

The ability to speak directly to prisoners has been severely restricted during the reporting year due to the pandemic and as a result the Board is much less able to reflect the lived experience of the prisoners than in previous years. Nevertheless, through remote electronic access to the daily briefing prepared by the duty governor, the Board has been able to monitor reportable incidents and other information. Access to safety meeting papers, statistics, minutes and, crucially, to the responsible governor has allowed for identification of trends and actions. Attendance, albeit remotely, at meetings has been readily facilitated. Applications to the IMB show a minimal number of safety related concerns which, where appropriate, have been taken up directly with the deputy governor. Where investigation of incidents has been required on site or remotely, the Board has found an open approach from governors and staff.

Limited direct feedback from prisoners is that the prison has worked hard to keep them safe from the pandemic at the expense of time out of cell, activities and association. A quote from one prisoner in early April indicated "less violence and less drug use but in a 'plodding on' routine, some men making the best of it, others not so good". Restrictions were broadly accepted by the prisoners in the first few months but then started to lead to frustrations and adverse safety trends.

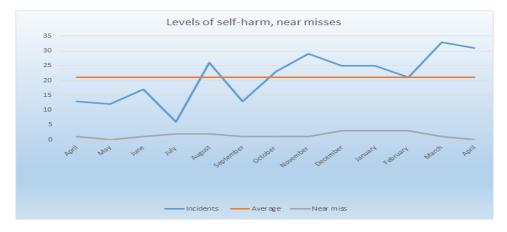
#### 4.1 Reception and induction

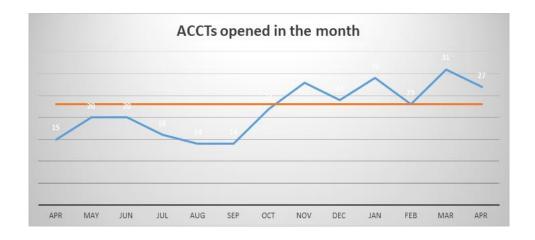
- 4.1.1 The Board has regular telephone contact with the reception team and has made a small number of site visits. Reception has been at the forefront of keeping the prison safe both from Covid-19 and, within the last quarter of the reporting year, through the installation of a body scanner to detect illicit items.
- 4.1.2 Social distancing and separation arrangements for new arrivals start immediately as prisoners leave the transport and are managed through to the reception wings. This has required careful coordination with healthcare staff and has been facilitated by prisoners designated as reception induction orderlies to help with welcoming, explaining arrangements and listening to new arrivals. Challenges have come from large numbers of prisoners arriving from other establishments on the same day, and sometimes at the same time, largely out of the direct control of Stoke Heath. Some prisoners have arrived apparently without having completed the necessary quarantine period at the sending prison and also from locations with severe outbreaks of Covid-19. Consequent arrangements, essential to keep everyone safe at Stoke Heath, have been managed well.
- 4.1.3 On induction, a booklet containing frequently asked questions about Covid-19 and its effects is given to each prisoner to try to allay any anxieties they may have.
- 4.1.4 In January and February 2021 there was evidence of high numbers of prisoners being moved between establishments to the point where Stoke Heath was approaching maximum capacity. Some incoming and outgoing transfers were cancelled in late February and early March as the prison was approaching capacity.
- 4.1.5 In February, the installation of a body scanner improved the detection of illicit items, either through direct detection or by surrender of items. Where an individual

declines to use the scanner, the policy is to segregate them for further investigation. Through intelligence received the security governor believes that there is evidence of the effectiveness of the scanner in detecting illegal substances.

#### 4.2 Suicide and self-harm, deaths in custody

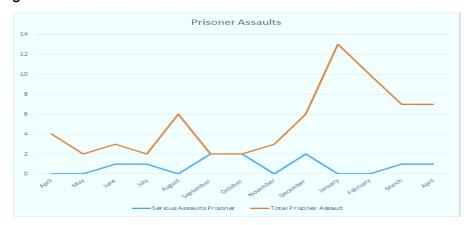
- 4.2.1 Sadly, there have been three deaths in custody, each one in a local hospital. One occurred following emergency admission; the other two whilst inpatients. Two were Covid-related. The Board was advised in each case and was able to understand the circumstances in liaison with the nominated governor and other staff. A Board member was available to speak to the Prison and Probation Ombudsman (PPO) investigator but no approach was received.
- 4.2.2 Self-harm and the risk of attempts to take own life are managed proactively using the assessment, care in custody and teamwork (ACCT) process when necessary. During the early stages of Covid-19 and changes to the regime, the incidence of self-harm and risk reduced but then increased in the second half of the year. The governor for safer prisons at Stoke Heath stated, in a report to the IMB, "Evidence would suggest that we are receiving a greater number of prisoners with mental health concerns due to the Covid-19 restrictions and the lack of accommodation in secure hospitals". The Board has not been able to monitor this through direct observation but has engaged remotely in individual cases. From rule 45/49 segregation reviews and monitoring of both healthcare and the segregation unit, there is an indication that instances of potential mental health issues are arising more frequently.



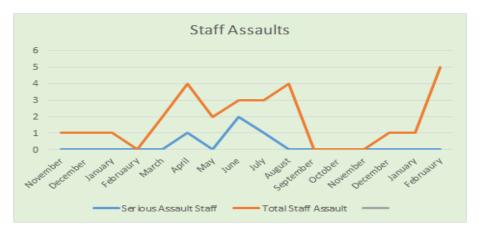


#### 4.3 Violence and violence reduction, self-isolation

4.3.1 The level of violence at Stoke Heath is relatively low, but any level or incidence of violence by one person to another is unacceptable. At the start of the pandemic prisoner on prisoner violence reduced but then increased toward the end of the reporting period. There was an increase in prisoner on staff violence in the early stages of the pandemic, which reduced and then peaked again early in 2021. However, there were no instances of prisoner on staff violence in March and April 2021. In a report to the IMB, the governor for safer prisons said "Although we have seen an increase in Q4 the spike was mainly in January when the establishment was at the height of the pandemic and staffing was at a low. Having looked for trends or reasons for the spike there are no consistent markers to suggest we have specific issues with violence. There is a link to our sending establishments, who have reported high levels of violence".



The chart above represents prisoner on prisoner assault. The chart below represents prisoner on staff assault.



- 4.3.2 The Board observed very high occupancy rates during the early part of 2021, and, coupled with the restricted regime and lack of activity opportunities, we believe that it created frustrations which have impacted adversely on the level of assaults. The management of 'bubbles' or 'family groups' of prisoners on all wings has been positive in reducing the risk of infection and, crucially, bullying, but this has been at the cost of long periods in cell with little meaningful distraction, stimulation or work on rehabilitation. Management of this kind can be effective only for a limited length of time and will become counter-productive.
- 4.3.3 The Board has been made aware that the prison service, nationally, proposes to embed this type of restrictive regime more permanently to yield the evident

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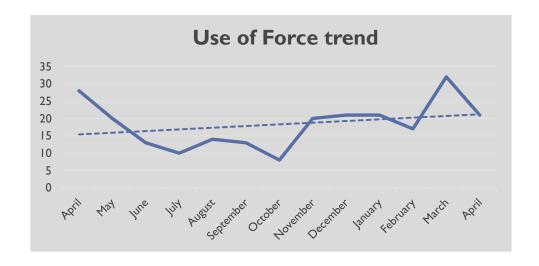
violence reduction benefits which resulted from changes to the regime during the pandemic. We view this as flawed thinking that will lead to detrimental outcomes for prisoners, staff and society.

#### 4.4 Prisoners with specific vulnerabilities

- 4.4.1 Stoke Heath does not have a vulnerable prisoner wing or unit. The design and layout of the prison gives adequate opportunity for staff and governors to manage those who may be vulnerable in one location by a discreet move to another and by controlling when and where work, education and exercise takes place. The key worker policy whereby staff are trained and allocated to support specific individuals is used actively to prioritise those who may be vulnerable.
- 4.4.2 Stoke Heath holds 75 care experienced prisoners, representing 11.09% of the prisoner population at Stoke Heath, who qualify for advice and assistance. At the end of April 2021, 14 were due to be released within the next three months. Care experienced offenders, together with other prisoners identified as vulnerable, remain part of a priority group identified for key worker support during the pandemic. A report to the IMB in January indicated that key workers were engaging with an average of 40 prisoners on a weekly basis.

#### 4.5 Use of force

- 4.5.1 The Board has previously expressed some concern about the use of force, alleged in a number of applications by prisoners in previous years. The Board has been invited to weekly restraint minimisation meetings and to monthly use of force (UoF) meetings, and has managed to attend only twice, in person, due to the limitations caused by Covid-19. The Board is given access to the papers, statistics and minutes of UoF meetings. Specific instances arising from applications or the daily briefing sheet are raised with the governor for safer prisons, duty governor or deputy governor. This has given some transparency and reassurance.
- 4.5.2 The increase in UoF in March has been identified by the governor for safer prisons as due to "threats and non-compliance, which have more than doubled compared to last year". Half of the UoF incidents can be attributed to two wings, one "possibly due to the population and lack of illegal substances available. Intelligence suggests that there has been an increase in diverting medication and in bullying". This would align with the introduction of the scanner, in reception, which is detecting illicit items.
- 4.5.3 The charts below reflect the impact of the pandemic and introduction of a restrictive regime on the rise in uses of force, similar to the rise in levels of violence. The trend (dotted) line in the first chart averages out the monthly data to show an average trend in use of force across the period, which is slightly up.





- 4.5.4 The increasing use of body worn cameras (BWCs) has been encouraged by the governors and there are anecdotal reports of these helping to de-escalate developing incidents. The Board has been given access to view BWC footage. However, there is apparent reluctance on the part of some staff to wear and use BWCs. Governors are engaging with them to increase their acceptance and use. Latest figures suggest that about 50% of UoF incidents are captured on BWCs.
- 4.5.5 In previous years the Board has been able to observe staff training for the deployment of pepper spray (PAVA), rigid bar handcuffs (RBH), batons and the SPEAR (spontaneous protection enabling accelerated response) self defence system. It is pleasing to note that in the reporting year there has been only one baton drawn and one PAVA drawn, but with no uses recorded. The ability of staff to manage incidents and indeed the generally positive relationship between staff and prisoners is a major factor in making the prison safe.

#### 4.6 Substance misuse

4.6.1 The reported incidence of misuse of drugs has been low throughout the year due, in part, to the restricted regime which made supply much more difficult, as sources had less access. The number of visitors was greatly reduced, there was a

continued focus on the examination of post and packages using drug dogs, and a reduced risk of throw overs whilst society was in lockdown.

4.6.2 Intelligence suggests that prisoners have felt safer from drug misuse but there is also an indication of increased misuse of prescription drugs. Random testing for drugs has been curtailed but intelligence-lead action has continued. The main source of supply has been with new arrivals from other establishments but the introduction of a body scanner in reception in February 2021, as well as feedback to sending establishments, has greatly reduced the incoming supply of illegal substances. The Board believes that the prison is tackling the misuse of drugs in a proactive and positive way for the safety of all concerned.

#### 5. Fair and humane treatment

#### 5.1 Accommodation, clothing, food

5.1.1 Stoke Heath prison was built in 1964 and very much reflects the cold concrete architecture of the time. However, the buildings are set in a large open space with beautiful gardens, maintained by the prisoners, displaying colourful flowers, garden sculptures and manicured lawns. Many prisoners speak of the tranquillity and calming effect the gardens and outside spaces have on them.



- 5.1.2 The prison has a clear plan for the replacement of furniture and fittings and improvements have had a positive effect on the general look and feel of the wings. Mattresses have had to be replaced much sooner than would normally be expected, most likely due to the lengthy time prisoners have had to spend in their cells this year. The Board looks forward to seeing further progress on refurbishing the wings in the coming year.
- 5.1.3 The prison heating system is old and not fit for purpose. Over a number of years, the Board has reported on complaints and feedback from prisoners about extreme temperatures in cells, being either too hot or too cold. Prisoners have said that extreme cell temperatures have impacted negatively on their health and wellbeing. There have been short-term fixes over the years but it is recognised that a new heating and water system is required. This will require significant capital expenditure and whilst the Board has been informed that funding has been secured and that the work is planned for next year, it considers replacement of the system as a priority so that the prisoners do not have to face another winter with inadequate heating.

- 5.1.4 The Board has observed good use of the estate management system 'Planet FM' to monitor the logging and response to general maintenance requests. Having previously expressed concern about response times from the maintenance contractor, the Board has now seen evidence of improvement.
- 5.1.5 Last year we reported on the small number of communal telephones available in the wings, resulting in prisoners being unable to contact their families at peak times. We identified this as a major area for development and it became a serious issue during the pandemic when time out of cell was limited. However, in January 2021 work started on the introduction of in-cell telephony at Stoke Heath. The Board is pleased with this progress. Its positive impact on prisoner welfare will be significant.
- 5.1.6 Hygiene in the main kitchen continues to be excellent. The kitchens retained their 5\* rating from Shropshire Council's environmental health inspection in January. New ovens have been purchased to replace those that were faulty, so a wide variety of menu choice is able to be maintained. The Board has observed prisoners cooking their own food on the wings and has concerns about hygiene practices of some prisoners.

#### 5.2 Segregation

- 5.2.1 There are 16 cells and two holding cells in the segregation unit, all in good order, and two special accommodation cells one used to store kit and one to hold evidence and property. The special cells are not used as normal accommodation, but if required, use must be authorised by a governor, and then monitored at least hourly, with the aim of moving a prisoner out of these cells as soon as possible. The special cells have not been used to accommodate prisoners over the past 12 months. Prisoners have access to 30 minutes' exercise every day, daily showers, clean clothes, and a full kit, including toiletries. A fresh T-shirt and underwear are offered daily when showering.
- 5.2.2 A safety algorithm is completed for each prisoner on arrival in the segregation unit. This is completed by a member of staff in the unit and then signed by a staff member in healthcare within two hours, and by a governor within 24 hours. Prisoners on an ACCT have a defensible decision signed off daily by the duty governor. During the past year, two prisoners with complex mental health needs were segregated whilst waiting to be transferred to a suitable prison with in-patient beds.
- 5.2.3 Some prisoners regard the segregation unit as a place of safety, but every effort is made to re-locate prisoners to a wing where they do feel safe, the objective being that they spend as little time as possible in segregation. During the past year no prisoner has been segregated for more than 42 days and no restraints have been used in segregation.
- 5.2.4 Prisoners are visited daily by a duty governor and a chaplain, and by a doctor three times a week. Prisoners can also request to see a doctor or a nurse. The unit has been fully staffed with a dedicated group of 10. Staff can work in the unit for up to three years, with the possibility of a one-year extension, which must be approved by the Governor. All staff in the unit are subject to interview for suitability.
- 5.2.5 The Board is informed when prisoners are located in the segregation unit. Rule 45 reviews, relating to good order or discipline, have been attended by a

member of the Board remotely, using a spider phone connection. The Board considers that Rule 45 reviews have been conducted appropriately.

#### 5.3 Staff-prisoner/detainee relationships, key workers

- 5.3.1 The prison has faced a challenging year but it is testimony to embedded good working practice that very good staff/prisoner relationships have been maintained. The Board commends the way in which staff have managed the many challenges, particularly during the difficult period when Covid-19 infections in the prison were worryingly high.
- 5.3.2 At the start of the pandemic, prisoners said that they felt that staff were doing their best under very difficult circumstances to keep them safe and well. The decision to increase access to television, provide comfort packs and telephone credits, and to create small 'bubbles' to enable some association helped create a more relaxed and compassionate atmosphere which was appreciated by the prisoners. The Board was encouraged when a survey measuring the quality of prison life (MQPL) showed that, as an average across all wings, 68% of prisoners felt that they were treated with respect and 65% felt that relationships between staff and prisoners were good.
- 5.3.3 The Board feels that pausing the key worker programme has had a significant negative impact on prisoners' progress toward rehabilitation. Prisoners have reported that they do not feel they have the same level of understanding about their situation as they had when they were working with their key worker. The Board was pleased to see the introduction of a key worker for the most vulnerable prisoners, albeit that only a small number of prisoners benefited from this. The reintroduction of a full key worker programme, as soon as restrictions allow, must be a priority for the prison.

#### 5.4 Equality and diversity

- 5.4.1 Safeguarding and promoting equality and diversity are core aspects of the prison's work. Equalities meetings are held regularly and attended by a range of governors and other staff, which gives continuity. All the protected characteristics are monitored, action points generated and followed through. For example, education about homophobic abuse, and a policy of zero tolerance, make it clear that what might be considered as harmless banter has no place in the prison community.
- 5.4.2 Religious and cultural diversity is celebrated in many ways. Religious festivals are kept, with prisoners of all faiths and none being invited to special meals. Events such as Stephen Lawrence Day, Holocaust Memorial Day and Black History Month bring home the dangers of intolerance and hatred, but also celebrate the progress that is being made and the distinctive contributions of different ethnic groups and traditions.
- 5.4.3 Equalities posters and other materials are prominently displayed in the wings and other areas. The reception handbook given to prisoners on arrival makes clear the prison's commitment to fair treatment and the individual's rights, although the language used could be clearer in places.
- 5.4.4 Data on disciplinary adjudications and referrals to the segregation unit show no significant sign of racial imbalance. Similarly, an analysis of incentives data at the

end of the reporting period shows no imbalance against BAME prisoners achieving enhanced status (see paragraph 5.6.1). It was reported in the July 2020 equality diversity action team (EDAT) meeting that the number of reported discrimination incidents fell during the period, down by roughly half compared with the same period last year.

- 5.4.5 Two applications in particular occupied the IMB for several months. In August 2020, two prisoners contacted the IMB, independently, about an application to the prison in July for a disability aid to help with chronic pain. The applications were supported by medical professionals and approved but the prisoners were concerned that they had heard nothing further. Over the following months the IMB's enquiries were referred to various staff members and met with answers which were often contradictory, or with no answer at all. Having persisted, we were informed in mid-February that the support chairs had been delivered to the prison. However, it was only after a further application in mid-March and further IMB questioning that the chairs finally reached the two prisoners eight months after their applications. The IMB concluded that no-one with authority had taken responsibility for ensuring that the prison's decisions were followed through.
- 5.4.6 A concern was raised at a prisoner consultation meeting that in-cell materials, including those for vocational training, did not meet the needs of prisoners who had difficulties with the written word and that these prisoners would need face-to-face support to complete the courses. The Board is not aware that the prison has responded to this concern.

#### 5.5 Faith and pastoral support

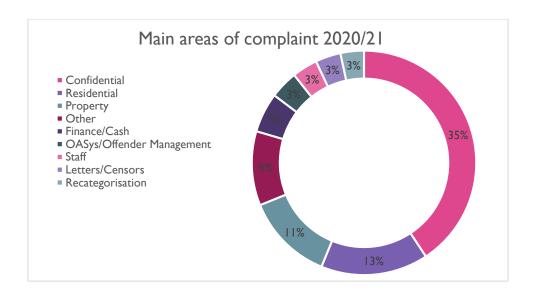
- 5.5.1 Group meetings and worship were suspended during the reporting period but the chaplaincy team supplied faith-based reading and more advanced study materials to prisoners. Requests for these materials increased significantly. Groups such as the travellers' group and the over 50s group were also suspended but events raising awareness of the Holocaust, BAME and mental health issues were promoted through exhibitions and showings of short films.
- 5.5.2 Major religious festivals were celebrated and where special meals were organised all members of the prison community were invited to join in.
- 5.5.3 Pastoral support continued through one-to-one meetings with prisoners of all faiths and those of no faith. Chaplaincy team members have praised the prisoners' response to Covid-19 restrictions. They noted an increase in anxiety because of lack of opportunities to contact support agencies and lack of physical contact with families, as well as a general sense of loss of control.
- 5.5.4 Prisoners facing bereavement or family illness were able to join with their relatives via live streaming using an iPad and also DVD recordings of funerals. This contact was valued and it is planned that the technology should continue to be used where prisoners are not entitled to be physically present at key family events.

#### 5.6 Incentives schemes

- 5.6.1 During the pandemic all prisoners at the basic level were uplifted to standard. The first half of the year saw, on average, 36% of prisoners at the enhanced level, and 64% at standard. However, from October 2020 only 28% were on enhanced and 72% on standard, due mainly to there being limited opportunity during Covid-19 restrictions for prisoners to demonstrate the behaviours required for enhanced status. A snapshot at the end of the period showed that 29% of the prison population who identified as white were at the enhanced level compared with 35% of those who identified as BAME.
- 5.6.2 A new employment and pay policy was developed to address an escalation in the number of adjudications that could have been dealt with through the incentives scheme, with low level issues managed via the incentives system. Where behavioural issues resulted in three infringements, a manager could recommend the removal of a prisoner from an activity. However, it has not been possible to enforce this during the Covid-19 crisis because loss of privileges has been on hold. During the period, of 861 adjudications raised, only eight were appealed, two successfully.
- 5.6.3 All prisoners received minimum private cash of £15 per week and all had access to a television, free of charge. Those unable to work because of the restrictions received pay in line with their usual activities. Essential workers carrying out cleaning, kitchen work, essential manufacturing, and health and wellbeing champions (HAWCs) received a £5 bonus payment, reduced to £2.50 from April 2021 as restrictions eased. An additional bonus continued to be paid to those with biohazard qualifications for enhanced cleaning of cells. All prisoners received a comfort pack of sweet treats and essentials, and a £5 phone credit, but from January 2021 the phone credit was not issued to those with a phone account balance of more than £25, as credit was building up in some accounts and not being used as intended for calls to family and friends.
- 5.6.4 Only 1% of prisoner complaints were about incentives. The prison had planned to review prisoner perceptions of the incentives scheme and its proportionality and fairness to BAME prisoners but Covid-19 restrictions have prevented progress. When the scheme is fully reinstated this will be progressed through prisoner consultation. A key consideration will be to ensure consistent application of the scheme across wings.

#### 5.7 Complaints

5.7.1 There was a small increase in complaints registered this year, at 1,234 compared with 1,120 last year. Given the circumstances around Covid-19 and necessary restrictions, this is perhaps understandable. Confidential, residential and property complaints remain high on the list.



- 5.7.2 The Board remains concerned about the quality of some of the prison's responses to complaints which often do not resolve prisoners' grievances. This is a major cause of frustration and delay for prisoners and it generates repeat complaints to the prison and the IMB.
- 5.7.3 A senior governor has ownership of the quality assurance process for prisoner complaints, each month taking a random sample of around 10% of complaints for test and audit. This is a quality test to ensure that they meet the criteria set out in the complaints' framework, such as timely response, satisfactory response and answering the complaint appropriately. Any emerging issues are discussed at a senior management meeting. The Board had planned to undertake its own audit of complaints but this has been deferred to next year due to Covid-19.

#### 5.8 Property

- 5.8.1 There were 135 property complaints within the year and eight claims for compensation for loss of canteen (two), lost property (five) and damaged property (one). Controlling the volume of property that individual prisoners hold appears to be a key problem nationally. Escorting contractors Prisoner Escort and Custodial Services (PECS) will take only three bags of property per prisoner on transfer, but national controls are not in place to ensure that the quantity of property requiring transfer is not exceeded. Significant cost implications arise from the need to chase up or send on parcels and there has been an escalation of complaints regarding late and lost property.
- 5.8.2 The loss of personal items such as photos, legal papers and gifted items has caused a great deal of distress to prisoners and is resource intensive to sort out. The Board has been made aware that Stoke Heath is part of a regional group seeking to improve the management of prisoners' property. However, as yet, there has been no discernible improvement and the system remains woefully inadequate. The Board hopes to see a significant improvement over the coming year.

#### 6. Health and wellbeing

#### 6.1 Healthcare general

- 6.1.1 The Shropshire Community NHS Trust holds the contract for integrated healthcare, with sub-contracts/partnerships with North Staffordshire Combined NHS Trust, Forward Trust, Time for Teeth, Axis counselling and other small contracts and services from the wider Trust. The contract integrates services and moves away from silo working that historically resulted in less than ideal outcomes for patients. The integrated care system has improved healthcare provision with a whole prison/healthcare approach.
- 6.1.2 Covid-19 has impacted dramatically on healthcare services and changed the landscape of healthcare provision in all areas. Lockdowns, reverse cohorts and a significant Covid-19 outbreak have been challenging during this time healthcare questioned the regime offered to those who were confirmed positive and their ability to carry out effective welfare checks, given the regime.
- 6.1.3 During the period, the Care Quality Commission (CQC) conducted an emergency support framework/inspection. This was performed remotely and the CQC considered that "no further regulatory activity is indicated at this time". The prison was deemed to be dealing efficiently with Covid-19 and the provision of health services within the current constraints.
- 6.1.4 In early 2021, the prison experienced a significant outbreak of Covid-19 infection among staff and prisoners. Prior to this, the prison had experienced only a very small number of prisoner infections. Whilst difficult to pinpoint the source of the outbreak, it was considered highly likely that it was imported from the community via prison staff to the prisoner population. Public Health England (PHE) outbreak control team feedback throughout the larger outbreak considered Stoke Heath's response to have been managed exceptionally well. The prison came out of the outbreak in April 2021 following a very difficult three months and, sadly, losing two prisoners to Covid-19. It is worthy of note that one prisoner whose family had been told to expect to lose him has returned to the prison and, with support, physiotherapy and care, is making a good recovery.
- 6.1.5 The Covid-19 vaccination programme started in February 2021 and has been driven effectively in line with NHS guidance on prioritising groups. Uptake has been excellent with around 90% of those eligible agreeing to be vaccinated.
- 6.1.6 Throughout the pandemic, the IMB and the head of healthcare maintained regular contact. The partnership/relationship between the wider prison senior management team and healthcare is greatly improved as the head of healthcare is an active part of this team.

#### 6.2 Physical healthcare

6.2.1 Routine clinics have been limited but where facilities exist, and to avoid unnecessary mixing of wings, many services have been provided as out-reach on residential wings. Requests for appointments are triaged by a healthcare professional and urgent needs identified and addressed promptly. PHE and commissioners have praised the effective and well-led healthcare services at Stoke Heath. Telemedicine is being established – licences for Visionable, a health collaboration platform, have been obtained. This will enable remote external

consultations, saving time and resource on escorts to hospital for consultation appointments. Shropshire and Telford Hospitals NHS Trust is working with HMP Stoke Heath to implement this project and a 12-month fixed term appointment has been made to drive it forward.

- 6.2.2 Waiting times increased greatly due to Covid-19 restrictions but healthcare provided extra clinic sessions to get patients seen in a timely manner. The podiatrist and optician also conducted extra sessions. Dental waiting times also increased but an additional dentist ran extra sessions on Mondays to help reduce waiting lists.
- 6.2.3 Healthcare facilitated regular on-site diagnostics such as ultrasounds and x-rays so that patients were seen more quickly than waiting for hospital appointments, which can take six months. Patients are actively involved in decisions about their care and have the opportunity to provide feedback. However, during Covid-19, the prison population changed significantly with many more short-term sentences. This did not support continuity of care for prisoners upon release.
- 6.2.4 Reception screening has been maintained and there is early identification of healthcare needs. Long-term conditions and care planning are embedded in the service, with named nurses allocated during the reception process. To assist the GP and focus on long-term condition clinics and care planning, an advanced nurse practitioner has been recruited.
- 6.2.5 Pharmacy services are structured and medicines reconciliation is standard. The GP and psychiatrist lead a weekly 'safer prescribing' committee involving primary care, mental health and pharmacy staff to ensure that prescribed medication is not misused and that it has not impacted on violence or bullying. To assist with the provision of medication, an additional Band 5 pharmacy technician will be recruited and, to ensure sufficient space to work safely within the CQC guidelines, the pharmacy is due to be expanded.
- 6.2.6 Complaints have been minimal, averaging 12 per month compared to 21 per month last year and where a prisoner complains twice, he is given an opportunity to discuss his concerns with the head of healthcare.

#### 6.3 Mental healthcare

- 6.3.1 Healthcare has continued to provide mental health services and the psychiatrist has maintained a presence in a more limited face-to-face capacity. Occupational therapy has been an excellent resource for enabling prisoners to cope with lockdown and provided significant activities, such as distraction packs, targeted at those struggling with isolation.
- 6.3.2 Mental health staff work well with prison staff. A weekly multi-disciplinary team meeting for mental health services includes a health and wellbeing champion (HAWC) for the first part of the meeting to raise any issues with prisoners receiving peer support and any who are causing concern on the wings. Nevertheless, as normal services start to resume, there are concerns about the impact that the lockdown has had on the state of mind of individuals. To help with this, healthcare has requested Axis to attend the prison on a weekly basis for counselling sessions.
- 6.3.3 Many prisoners transferring in have been mentally unwell, their mental health needs not having been picked up by the transferring prison. This, combined with the impact from the pandemic on the general prison population, has led to an increase in

the number of prisoners with mental health needs and a large increase in the caseload for the primary and secondary mental health teams. The number of ACCTs increased to an average of 20 per month this year compared with 15 per month last year. However, as healthcare is more deeply involved with those prisoners identified with mental health concerns and placed on an ACCT, this may be seen as a positive outcome as more prisoners with mental health needs are being identified.

#### 6.4 Social care

- 6.4.1 There has been little requirement for social care during the last 12 months. A memorandum of understanding written jointly by the prison, healthcare and the local authority ensures that the social care needs of prisoners are met. It provides the structure to jointly plan and provide care and support for prisoners at Stoke Heath, and is accomplished through cooperative working via the prison health and social care partnership board.
- 6.4.2 Safeguarding has been given a real focus during the year. Procedures are robust and staff are reminded constantly of the importance of safeguarding and the part they play in it. Staff are supported to raise any concerns.

#### 6.5 Exercise, regime

6.5.1 The exercise programme prior to Covid-19 included a park run for up to 30 prisoners, a football league, well-being man, remedial fitness, exercise on referral and various clubs such as volleyball, weights and cardio-vascular work. Covid-19 had a radical effect and the restrictions necessitated closure of the gyms and loss of other activities. To try to counter-balance this, staff worked hard to put support networks in place and provide additional services such as in-cell workouts, in-cell distraction packs and a football super-six challenge. As restrictions eased and activities started to open up, outdoor gym sessions recommenced with either a run or walk around the field. Some prisoners took this opportunity for exercise seriously whilst others just enjoyed extra time out of their cells.

#### 6.6 Drug and alcohol rehabilitation

- 6.6.1 Drug services are run jointly by the Forward Trust, which manages psychosocial group work, and the North Staffordshire Combined NHS Trust, which manages clinical support. The work has continued throughout the reporting year but with a revised level of service in response to the restrictions of the pandemic. Workbooks and distraction packs have been made available to all those requesting support. Face-to-face support continued throughout on a more limited basis, prioritised against the needs of the individual. This was most restricted during level 4 regime periods when men were accessible only during limited association.
- 6.6.2 The level 3 regime saw small groups of four men and two staff being able to work together on F wing, which is the dedicated rehabilitation wing. The focus has been on resilience, self-care and wellbeing. It is hoped that as we progress out of restrictions, the level 2 regime will allow slightly larger groups outside association periods. More recently, this work has been extended to G Wing.
- 6.6.3 Staffing has been challenging, but just two members of the team experienced Covid-19 symptoms and they are recovering well. This has allowed the drug rehabilitation work to continue, modified, but uninterrupted.

#### 6.7 Soft skills

- 6.7.1 HAWCs have continued as an exceptionally successful innovation. They have been critical to prisoners' wellbeing during such difficult times and in communicating with healthcare and the wider prison population. Throughout the pandemic, weekly meetings took place between trained HAWCs, the head of healthcare, deputy governor and the governing governor/other senior managers as required. HAWCs distributed newsletters to the prison population and had an opportunity to question senior management at their regular team meetings.
- 6.7.2 A bid to the Big Lottery Fund to develop a 'departure lounge' was suspended due to Covid-19 but work is underway to identify further funding as the regime opens up and access to such funding is re-established.

#### 7. Progression and resettlement

#### 7.1 Education, library

- 7.1.1 Novus has managed the education department at Stoke Heath since April 2011 and was successful in tendering for the new contract starting in April 2019. Prior to the pandemic, the prisons service contracts department issued Novus with a Notice to Improve (NTI). The implementation of the action plan to address the points identified in the NTI has been made more difficult due to the pandemic.
- 7.1.2 Measures to reduce the impact of Covid-19 have severely reduced the number of classroom-based courses, with the only classroom-based courses being food hygiene and health and safety. All prisoners had access to activity packs to use in-cell, provided by Novus. However, a concern was raised at a prisoner consultation meeting that in-cell materials did not meet the needs of prisoners who had difficulties with the written word and that these prisoners would need face-to-face support to complete the courses (see paragraph 5.4.6). A number of partner agencies withdrew their services from Stoke Heath, including Novus, PACT, Barnardo's and Shropshire Library. More recently a non-contact library/DVD service has been provided and is appreciated by prisoners.
- 7.1.3 The prison continues to prioritise maths and English assessment for all new prisoners to ensure they can access in-cell education should they wish to. Many prisoners come to Stoke Heath towards the end of their sentence having failed to achieve the necessary standard in maths and English, and take up valuable learning spaces. Prisoners should be encouraged to take up and work toward the achievement of maths and English qualifications at an earlier stage in their sentence, before coming to Stoke Heath, to allow more focus on their vocational training.
- 7.1.4 The prison has improved the offer to learners for in-cell learning packs to include working towards qualifications, and learners have been issued with in-cell art materials to achieve an art qualification. Face-to-face industrial cleaning courses started again in March 2021 and include a bio-hazard module with follow up work experience in the prison.
- 7.1.5 We are told by Novus and the prison that in future prisoners will do more education through blended learning i.e. a combination of in-cell learning and face-to-face learning, with learners doing entry-level courses being prioritised for some face-to-face learning.
- 7.1.6 All these issues which impact on the learning environment cuts in funding, Novus's notice to improve, actions to minimise the impact of the pandemic, the move to deliver more courses by blended learning result in more prisoners being locked up for longer periods in residential units during the working day. This makes it even more difficult to develop an effective rehabilitative culture which develops the skills needed by prisoners when released. We question whether Stoke Heath can deliver a key prison objective of rehabilitation with the resources at its disposal.

#### 7.2 Vocational training, work

7.2.1 Stoke Heath has had a 32% cut in funding (over three years from April 2019) which is having a profound impact on vocational training and potential rehabilitation of prisoners. The impact of these cuts resulted in a loss of 102 full-time equivalent activity spaces, 71 full-time and 62 part-time, by April 2021.

- 7.2.2 Stoke Heath is unable to meet HMIP and Ofsted inspection requirements as the cut to the education budget has resulted in the loss of all prisoner qualifications in engineering, tailoring, horticulture, gardens, waste management and gym. The barista café has not been operational and there has been no barista skills learning for the whole year. This was a key skills course for Stoke Heath.
- 7.2.3 Around 140 prisoners carry out essential work in the prison including kitchen work, cleaning, manufacture of essential prison service products and as health and wellbeing champions (HAWCs). The prison has been able to keep some purposeful activity, when Covid-19 restrictions have allowed, in cleaning, fabrication and tailoring. However, it is questionable how much of this work translates into gainful employment opportunity upon release.
- 7.2.4 It is important that the prison continues to work with the private sector to sponsor key vocational skills. The prison has explored several opportunities with local manufacturing and waste management firms but none of these has resulted in new activities within the prison. The prison has found it difficult because of lack of storage areas for products and an inability to appoint skilled staff. The small number of prisoners in the Clive unit occupy the majority of ROTL (release on temporary licence) placements. The prison is able to find local employment for the majority of these prisoners.
- 7.2.5 Careers information, advice and guidance (IAG) was run by the Forward Trust in 2020-2021 and this will continue for 2021-2022. The number of employment outcomes achieved during this challenging year were low, with six verified employment outcomes achieved in the six months leading up to April 2021.

#### 7.3 Offender management, progression

- 7.3.1 The short length of stay in Stoke Heath is a challenge for any meaningful progression. The average length of stay is 13.59 months; 20% of prisoners have a release date within three months and 56% within 12 months. About 10% of prisoners who transfer into Stoke Heath have no OASys (offender assessment) or OMiC (offender management in custody) plan in place, down from around 30% last year. Whilst this is an improvement, it puts pressure on resources at Stoke Heath when other prisons should be organised to have plans in place.
- 7.3.2 Covid-19 and social distancing arrangements have limited the ability of key workers to operate effectively. Contact has taken place for just a small cohort of prisoners. Current practices, including key worker quality assurance, will be reviewed following the publication of the exceptional delivery model (EDM) for OMiC key workers, which looked at ways of working during the pandemic and showed some best practice examples. Under phase 2 of OMiC which commenced last year, offender supervisors were up-skilled to become prison offender managers (POMs). This gave them a different level of responsibility for prisoner management, taking over the responsibility of rehabilitation during prisoners' time in custody, handing this over to community probation officers prior to release.

#### 7.4 Family contact

- 7.4.1 Visits were restricted for much of the year due to Covid-19. The chaplaincy team and Barnardo's offer services to support families and significant others but these services were also severely impacted by Covid-19 (see also paragraph 5.5.4).
- 7.4.2 Barnardo's has placed greater emphasis on Purple Visits (a secure video calling system to keep people connected) for prisoners. Stoke Heath is participating in a pilot project for the West Midlands, using Purple Visits to support care-experienced prisoners. This will be extended to other vulnerable groups who receive no visits.

#### 7.5 Resettlement planning

- 7.5.1 Stoke Heath has an action plan for resettlement to which both the prison and external organisations, such as Acorn recruitment and Barnardo's, contribute. The action plan has seen little progress due to Covid-19 restrictions but the Board hopes that next year the prison is able to build on its actions for resettlement and use its influence and creativity to build new opportunities for prisoners with skills that are in demand in the workplace. This will increase their chances of meaningful employment and decrease the risk of re-offending.
- 7.5.2 Just 6% of prisoners disclose that they have employment upon release, against a prison target for employment of 27%. Trades include industrial work, building and waste management, although many have other employment opportunities in mind.
- 7.5.3 Acorn is contracted to look for employment opportunities. They advise prisoners, within the last few months before their release, on training available to them and employers who may be interested in employing ex-offenders. They arrange workshops for prisoners to prepare for interview and to develop their CV.
- 7.5.4 Covid-19 has brought many challenges for the prison, none more so than trying to secure accommodation for prisoners upon release. Restrictions imposed as a consequence of Covid-19, and the lack of inter-prison communication, have been very challenging for the resettlement team. On average, 50% of prisoners declare at the 14-week pre-release stage that they have no accommodation to go to on release. The resettlement team and Forward Trust are commended on their work in finding accommodation for 97% of prisoners this year, against a target to secure accommodation for 82.7% of prisoners on release.

#### 8. The work of the IMB

- 8.1.1 Remote monitoring replaced normal Board duties for much of the year. During this period, the Governor and prison staff provided information to the Board, and this still continues. The IMB receives daily briefings, notices to prisoners and staff, the weekly 'Insider' newsletter for staff, and minutes of departmental and other meetings, such as use of force and segregation meetings, with associated data. National directives and Covid-19 regime management plans and updates have been promptly provided. The Governor has attended monthly IMB meetings, held remotely, and the Chair has had additional telephone contact with the Governor and deputy governor, but inevitably, we have had to rely for much of the year on information provided to us by prison staff and we have not been able to triangulate this in the usual manner through observation and more thorough investigation.
- 8.1.2 The Board's relationship with the prison's senior management team is positive and, overall, the Board has a good relationship with prison and civilian staff. The prison's business hub has been especially supportive during this very difficult year.
- 8.1.3 Four members, appointed to the Board in 2019, successfully completed their probation in September 2020. Shortly after the close of our reporting year two members resigned, one long-standing and one new member, so we enter our new reporting year with nine members, against our recommended complement of 14.

#### **Board statistics**

Recommended complement of Board	14
members	
Number of Board members at the start	11
of the reporting period	
Number of Board members at the end	11
of the reporting period	
Total number of visits to the	34*
establishment	
Total number of segregation reviews	62
attended	

<sup>\*</sup> Very few visits were made in person due to the pandemic. IMB members worked remotely from home in teams of two or three per week, receiving briefings, speaking to wing and other staff, attending reviews for segregated prisoners via spider phone, and dealing with applications which were made available, on a secure system, by the business hub.

# Applications to the IMB

Code	Subject	Previous reporting year	Current reporting year
А	Accommodation, including laundry, clothing, ablutions	12	2
В	Discipline, including adjudications, IEP, sanctions	13	1
С	Equality	10	17
D	Purposeful activity, including education, work, training, library, regime, time out of cell	22	2
E1	Letters, visits, telephones, public protection restrictions	18	10
E2	Finance, including pay, private monies, spends	17	23
F	Food and kitchens	2	4
G	Health, including physical, mental, social care	50	46
H1	Property within this establishment	36	34
H2	Property during transfer or in another establishment or location	74	24
H3	Canteen, facility list, catalogue(s)	6	0
1	Sentence management, including HDC, release on temporary licence, parole, release dates, recategorisation	67	46
J	Staff/prisoner concerns, including bullying	60	50
K	Transfers	31	20
L	Miscellaneous, including complaints system	37	33
	Total number of applications	455	312



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