



# **Annual Report of the Independent Monitoring Board at HMP Ashfield**

**For reporting year  
1 July 2020 – 30 June 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 Independent Monitoring Board (IMB) is part of the United Kingdom's National Preventive Mechanism.

## 2. Description of the establishment

2.1 HMP Ashfield is a contracted-out prison run by Serco, located in the village of Pucklechurch in South Gloucestershire, around nine to 10 miles from each of Bristol and Bath. It is a specialist training and treatment category C adult male establishment, exclusively for convicted prisoners serving sentences for sexual offences.

2.2 The prison has a baseline certified normal accommodation of 416. For most of the reporting period, Ashfield was working to an operational capacity of 412 but from 1<sup>st</sup> April 2021 this reverted to 400 when Her Majesty's Prison and Probation Service (HMPPS) decommissioned the 12 additional prisoner places contracted for in March 2020.

2.3 Accommodation consists of two main residential units, Avon and Severn, each with four wings accommodating between 40 and 60 prisoners, and the early days centre (EDC), which is a smaller, 16-cell unit which acts as a first-night and induction centre (and which, in spring 2020, became a Covid-19 reverse cohort unit for prisoners requiring regular hospital appointments and any new transfers in, if they had not self-isolated for 14 days in advance of transfer). There are 260 single cells and 78 double cells in total, all with integral sanitation, and eight shower cubicles on each of the main wings. Seven of the single cells are ground floor cells which are purpose-built for prisoners with disabilities, and there are two gated cells for prisoners requiring constant supervision. There is no separate care and separation unit.

2.4 Black and minority ethnic prisoners typically make up around 20% of the population (16.5% in the last reporting period), and foreign national prisoners 7.8% (6% last report). 45.8% (47.8% last report) of the population are aged over 50.

2.5 Services run by organisations other than Serco:

- Healthcare is commissioned by NHS England; the primary contract covers both HMP Ashfield and HMP Leyhill. The lead contractor is Avon and Wiltshire Mental Health Partnership NHS Trust (AWP) who provide mental health services; physical healthcare is run by Hanham Secure Health Limited (HSH), whilst a dedicated team dispense medications which are primarily sourced from the pharmacy at HMP Bristol. A number of specialist contractors provide further services including dentistry, podiatry, audiology and physiotherapy. Social care is organised through South Gloucestershire Council in conjunction with Agincare, a social care provider. Notwithstanding the variety of providers, an overall healthcare approach is presented to prisoners under the single banner of 'Inspire Better Health'.
- Catch 22 for an Enhanced Through the Gate Service.
- Voluntary services: Shannon Trust, Peace Education Programme (from the Prem Rawat Foundation), faith volunteers, prison visitors, Changing Tunes, Citizens Advice.

2.6 As a contracted-out prison, Ashfield has a Director and an HMPPS Controller. Martin Booth has been Director since April 2019.

2.7 Until the Covid-19 lockdown, when HMPPS suspended prison performance assessments, Ashfield was consistently assessed as a level 4 prison.

### **3. Executive summary**

#### **3.1 Background to the report**

The Covid-19 outbreak has had a significant impact on the Board's ability to gather information and discuss the contents of this annual report. The Board has therefore tried to cover as much ground as it can in these circumstances, but inevitably there is less detail and supporting evidence than usual. 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.

#### **3.2 Main judgements**

It is the judgement of the Board that, particularly in the light of the significant challenges posed by the pandemic, HMP Ashfield is a well-managed prison with high standards where prisoners are treated fairly and humanely in a safe environment.

##### **How safe is the prison?**

In the view of the Board, Ashfield has provided a safe environment in what has been a more challenging twelve months than the last reporting period.

- Levels of self-harm are relatively low, and assessment, care in custody and teamwork (ACCT) processes are particularly well managed and embedded.
- Support for individuals who struggle with the prison environment and particularly lockdown has been good through the use of personal intervention plans (PIPs), targeted key work, care plans and access to safer custody prisoner representatives and staff.
- Levels of violence have, however, increased with 13 physical assaults (compared to four in the last report) over the last 12 months, three of which were against staff (none in the last report).
- Since the ending of regime stage 4, evidence of illicit substances in the prison has emerged through a number of prisoners failing drug tests. Increased security measures have been brought in to address the problem. As at the end of the reporting year, the situation was being closely monitored.

##### **How fairly and humanely are prisoners treated?**

The Board's considered view, based on the evidence available, is that prisoners at Ashfield are treated fairly and humanely.

- The relationship between staff and prisoners has been good, despite a more difficult environment with the restricted regimes and a changing population of prisoners, and a turnover of approximately a third of custodial staff.
- There has been a more challenging 12 months for the catering department including staffing shortages (due to sickness absences and prisoner cohorting requirements), constraints due to Covid-19 and a change of supplier.
- Regular fora/meetings and prisoner engagement have been disrupted by the restricted regimes and the monitoring of equality and diversity has similarly been limited. However, no evidence has been found that there is discrimination in relation to protected characteristics, but the Board would urge Ashfield to resume equality and diversity fora as soon as possible.

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

The Covid-19 restrictions have created challenges for the provision of healthcare services but despite this, prisoners have received reasonable levels of care. The healthcare service is generally assessed as being equal to that provided in the community, but the Board has some concern over the level of mental health support.

Outbreaks of Covid-19 were very well managed and only six prisoners contracted the virus during the reporting period which is a testament to the effective safety measures implemented and the hard work of all staff to minimise the risk of the virus spreading.

- Ashfield is to be commended for maximising the opportunities within Covid-19 restrictions for time out of cell and exercise.
- Mental health support has been affected by Covid-19 restrictions and staff shortages.
- Group sessions during lockdowns ceased but when limited sessions did resume, the Covid-19 restrictions meant much smaller numbers of participants.

### **How well are prisoners progressed towards successful resettlement?**

Covid-19 restrictions have continued to affect some aspects of progression to successful resettlement but Ashfield staff continue to work hard to support prisoners within those constraints and prepare them for resettlement.

- The delivery of intervention programmes has been particularly impacted by Covid-19 restrictions. The potential for adverse consequences on prisoners with programmes forming part of their sentence plan has increased.
- The number of prisoners transferring to open conditions (category D prison) has for a second year been significantly higher than pre-pandemic numbers which is welcomed by the Board, as open prison conditions are seen by many prisoners as an important stage in their successful resettlement. It is of concern though that the indications are that these numbers will not be sustained going forward.
- The release of prisoners from Ashfield continues to be a highly stressful process for prisoners due to the difficulties in securing suitable accommodation, including approved premises.

- The Board commends the initiatives by Ashfield to secure, where appropriate, external bank accounts for prisoners and to encourage them to save regularly towards their release.

### **3.3 Main areas for development**

#### ***TO THE MINISTER***

The difficulties securing appropriate accommodation in a timely fashion for prisoners released from Ashfield continue to be a major concern exacerbated by the Covid-19 restrictions. Many prisoners due to be released do not have accommodation confirmed (including approved premises) until the week prior to their release and that only after extensive work by offender management staff. Two prisoners were only found accommodation when they met with their community offender manager on the day of their release.

- The Board welcomes the response to last year's report on this issue but the accommodation challenges facing prisoners convicted of sexual offences continue unabated. Can the Minister confirm how many of the 200 approved premises new placements can be used for prisoners convicted of sexual offences and the timescale for delivery of these placements?

#### ***TO THE PRISON SERVICE***

COVID-19 restrictions have severely reduced the number of offending behaviour programme (OBP) places available. For a large percentage of the population at Ashfield, OBPs feature on their sentence plan and the reduced availability of places is causing anxiety and concerns that, where relevant, the chances of parole have decreased if OBPs have not been completed.

- In the light of the backlog of prisoners awaiting places on OBPs, are there any plans for HMPPS to increase further, beyond current strategies, the number of OBP places to address the problem?

The Board notes that the number of category D places in the only open prison in the south west, HMP Leyhill, is set to reduce in coming years; it also notes that the only other open prisons accepting prisoners convicted of sexual offences are located in Suffolk, Lincolnshire and Cumbria.

- Does HMPPS have plans to create further category D places for prisoners convicted of sex offences in the south of the country or the Midlands?

#### ***TO THE DIRECTOR***

The Board appreciates that Covid-19 restrictions have significantly disrupted normal activity in equality and diversity but considers it is an area for attention as soon as easing of restrictions allow.

- Incentive warnings data captured does not hold ethnic information. As there was a view from the survey of black, Asian, and minority ethnic prisoners that they received more warnings proportionately than white prisoners, this view

ought to be investigated. Can consideration be given to identifying ethnicity when reviewing incentive warnings?

- The scheduling of diversity and equality action team (DEAT) meetings four to five weeks after the quarter to be reviewed is, in the Board's view, not conducive to timely action to address emerging issues and the brevity of the minutes is not helpful to record the work being undertaken in this area. Can action be taken to improve the DEAT meetings?

### 3.4 Progress since the last report

Issue in previous report	Progress/update
<p><b>For the minister</b></p> <p>The lack of availability of appropriate accommodation for prisoners convicted of sexual offences on release be raised with the minister for housing, communities and local government</p> <p>Insufficient number of places in approved premises</p>	<p>The response from the Minister detailing efforts to address these problems was welcomed. Sadly, the measures outlined have yet to make any difference to the problems being encountered.</p>
<p><b>For HMPPS</b></p> <p>Missing property on transfer to HMP Ashfield. The costs associated following up complaints often far exceeds the value of the items.</p>	<p>Missing property for prisoners transferring in continues to be an issue.</p>
<p><b>For the Director</b></p> <p>The progression wing be advanced, to encourage greater independence and prepare prisoners for the next stage of their sentence.</p>	<p>During the pandemic a significant number of category D prisoners were moved on to the open estate and due to the Covid-19 restrictions necessitating moves within the prison to be minimised, the progression wing could no longer predominantly be used for category D prisoners. This is due to be reviewed within the next reporting period.</p>

## **Evidence sections 4 – 7**

### **4. Safety**

The Board notes that effective processes and a culture of continuous improvement have been significant contributors to HMP Ashfield delivering a safe and supportive environment in very challenging times for both prisoners and staff. The ongoing analysis of information gathered routinely by the safer custody team, together with well-embedded processes including assurance, ensures a regime that adapts well to emerging issues. The Avon and South Dorset Group safety team were asked to visit HMP Ashfield in June to discuss and test the effectiveness of the quality assurance and governance processes in place. Generally, safety processes were found to be effective and robust. Recommendations from the report are being implemented.

#### **4.1 Reception and induction**

Reception continues to be well managed. Assessments by healthcare are conducted within 24 hours of arrival but during the periods when the prison was at stage 4, the most restrictive regime, educational assessments were not carried out. Once restrictions were eased, educational assessments resumed and the backlog has now been addressed.

The majority of transfers to HMP Ashfield during the reporting period spent their first two weeks in the EDC to meet quarantine requirements, but some prisoners who came from COVID-free establishments fulfilled their two weeks of isolation at their previous prison. Outside of a lockdown regime, a programme of induction includes appointments with relevant departments, tours round the prison, introduction of support services and awareness sessions conducted by induction orderlies. With the need to minimise face-to-face contact, induction was severely curtailed and for the most part was delivered via a very comprehensive package of handouts. Newly arrived prisoners could ask induction orderlies questions through cell doors and for those prisoners unable to read, a socially distanced induction session was arranged.

Oversight by Board members of both reception and induction has, due to Covid-19 restrictions, been limited but all encounters that have taken place with new arrivals have been positive. Two men who had isolated in EDC for two weeks both said that the induction they had received had been excellent. Several others were, by and large, complimentary about their experience since arrival. The amount of time out of cells during Covid-19 restrictions was particularly praised.

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

In this reporting period there have been 82 ACCTS opened (100 in the last report). There were 67 incidents of self-harm, which is only an increase of one since the last report. October was the worst month with 11 self-harm incidents, but three of those incidents were by one individual. Of note though, four were by individuals who had not self-harmed previously. This spike in self-harm did coincide with a change in regime restrictions and the emergence of active cases of Covid-19 in the prison

which was closely followed by the introduction of face masks. The safer custody team, aware that some individuals find it harder to process new information and that change can result in increased anxiety, have deployed peer to peer support to help those individuals and ensure that information is distributed to them in a tailored manner. Additionally, prisoners identified as struggling had key workers assigned when (during the most restricted regimes) key worker engagement had been suspended for the majority of prisoners.

The causes for self-harm are analysed on a monthly basis but no particular trends have been identified. The majority of incidents were superficial cuts with only a small number requiring hospital assessments. However, during the reporting period there was one case requiring constant supervision for approximately six weeks culminating in transfer to a secure hospital. Enhanced care management was implemented and there was full engagement with medical experts to ensure that the prisoner's best interests were met. This is a rare event for HMP Ashfield, but staff responded well and the Board felt it was effectively managed.

Extensive work to improve the quality of ACCTS (and post closure ACCTS) has been undertaken with regular reviews by the safer custody team and night manager checks. The new version of the ACCT, version 6, was introduced on 1 July 2021 following training of all relevant staff.

Safer custody representatives have been active on the wings particularly during lockdowns. To meet the need to keep prisoners on different wings apart from one another, the numbers of safer custody representatives were increased to ensure sufficient presence on each wing.

There was one death in custody (in hospital) in this reporting period due to natural causes.

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

There were 13 physical assaults during the reporting period. Three were assaults on staff (two by the same individual) and the remainder were prisoner on prisoner. This is a concerning increase on last year's figure of four. Fortunately, the assaults have been low level in nature. It is difficult to be sure of causes, but restricted regimes can heighten tensions. The overall assault rate, however, is comparable with other similar prisons at less than 0.5% of the population.

Challenge support and intervention plans (CSIPs) are used to help address aggressive behaviour. Referrals are investigated and, where appropriate, progressed to a plan, or support is provided outside of the CSIP process usually through key workers. Use of the violence reduction fact finding logs, which encourages staff to collect qualitative data from the involved parties following an incident, has helped to improve the quality of referrals.

#### **4.4 Prisoners with specific vulnerabilities**

Safety intervention meetings (SIM) held fortnightly are comprehensive with multi-disciplinary representation. Discussion focuses on prisoners on ACCTs, existing and new prisoners with complex needs, cell sharing risk assessments, CSIP referrals,

mental health support, PIPs, men due for release and intelligence reports relating to behaviour. This sharing of detailed information is an important contributor to the maintenance of a safe environment at Ashfield.

PIPs have been set up for those prisoners having difficulty coping. The (PIP) support model focuses on individual-led care with multi-disciplinary input. Prisoners are encouraged to identify triggers and drivers for harmful behaviours and build on protective factors. The support also encourages the individual to provide feedback, set achievable goals and to recognise progress. On average there have been eight PIPs per month in the reporting period with the highest at any one time being 13. The resumption of key working in September for those prisoners identified as vulnerable led to a decrease in the number of PIPs. In the autumn of 2020, prisoners on PIPs were canvassed for feedback on the support provided through these plans and ideas for improvement. One of the main demographics, which are disproportionately represented in PIPs, are those with autism or who display autistic traits. With this in mind, prisoners who identify as having autism were also consulted. The findings have informed the delivery style for support, including more frequent usage of diagrams and pictures and an emphasis on listing personal coping mechanisms and distraction techniques.

Prisoners identified as being at risk/vulnerable under the Covid-19 risk criteria continued to be supported through their isolation, which was all the more critical when there was an outbreak of Covid-19 amongst prisoners. The outbreak amongst prisoners was very effectively contained, with only six contracting the virus: a credit to the measures put in place and compliance by both staff and prisoners.

Safeguarding is reviewed at the monthly Safer Custody meeting so any instances of abuse and neglect including food refusals are examined together with any complaints of bullying by staff.

#### **4.5 Use of force**

There were 15 incidents in this reporting period where use of force was applied (nine last report) to manage threatening and abusive behaviour, separate prisoners and to stop self-harm. There were eight occasions where control and restraint was deployed. Batons were only drawn on one occasion and similarly handcuffs were only used in one incident.

Due to Covid-19 restrictions there have been no routine cell searches during this reporting period but there have been 24 intelligence-led searches conducted. Finds have included fermenting liquid, a USB, improvised weapons, adapted aerials and vapes capsules that have been tampered with.

#### **4.6 Substance misuse**

The end of this reporting period saw the emergence of synthetic cannabinoids ('spice') at Ashfield which led to increased security activity to identify the source of supply and those involved. Covid-19 restrictions had meant drug testing was only permitted for six months of the reporting period and of 128 mandatory drug tests

(MDTs) conducted there was only one positive result. However, there have been 33 intelligence-led drug tests with seven positive results for 'spice'.

One potential source of supply of illegal substances is via incoming mail. To counteract this, Ashfield deploys the Rapiscan system to scan mail for traces of illegal substance. In the reporting period the Rapiscan system has been utilised on 343 occasions with 24 positive indications. Another potential source of drugs reaching Ashfield is via prisoners transferring in. To address this threat, a body scanner has been installed and went live on 1 July 2021

## **5. Fair and humane treatment**

### **5.1 Accommodation, clothing, food**

Although the number of visits by the Board to the prison was significantly reduced due to Covid-19 restrictions, it was very satisfactory to see that the pre-lockdown standards of cleanliness were still evident on members' return and continue to be maintained. Throughout lockdowns, areas were regularly maintained by small working parties comprising suitably trained prisoners from carpentry and painting and decorating as well in-house maintenance staff. Larger projects undertaken by contractors included three wings being completely re-floored with carpet and vinyl and two other wings having existing vinyl replaced with anti-slip vinyl. Externally, once again the horticulture department has delivered a magnificent display of flowers and plants in the grounds.

The occasional unavailability of touchscreen kiosks located on the wings has caused frustration as the touchscreen kiosks are used extensively by the prisoners who rely on them to select their food, place orders, communicate with prison departments, make complaints and receive emails (from the "email a prisoner" scheme). There are two machines on each wing of the main house blocks (excluding EDC), a total of 16. Each block has up to 50 prisoners using the machines, so a lot of irritation is caused by any delay to repair of a machine which is out of action. Ashfield are investigating the potential of in-cell technology, which would alleviate this problem but no timescale is currently available.

Catering at Ashfield has, for a number of years, had a good reputation endorsed by the league table of prisons drawn up by the law firm, Stuart Miller, published in 'Inside Time' last year where Ashfield came third. This was based on prisoner surveys. However, the Board has seen a significant change in prisoners' views of the catering and from the information available it would appear to be linked mostly to the change of supplier in November 2020. The supplier is new to Ashfield but currently supplies all HMPPS establishments.

Prisoners usually report comments on the food provided via the touchscreen kiosks and last reporting year there were 61 negative comments. This year there have been 142. The comments ranged from complaints about portion sizes to the quality of food/cooking and 47 related to items for special diets not being delivered to the wing. It is particularly noteworthy that during the four months prior to the change of supplier there were only four complaints about portion size and in the eight months

afterwards 29. The catering department addresses all complaints and where appropriate makes adjustments but obviously is constrained by what is delivered. The quality of fruit being delivered has been a particular issue and product shortages and the number of substitutions has also been challenging. A catering questionnaire circulated to prisoners in April 2021 echoed the complaints received via the touchscreen kiosks.

There were 64 positive comments received which is an increase from 26 in the last reporting period. Of particular note were compliments about the Christmas meal and food provided during this year's Ramadan and Eid.

The need to maintain prisoners working in the kitchen in their respective house block cohorts has meant that resource shortages could not be addressed by rebalancing shifts. This was exacerbated by a couple of prisoners working in the kitchen contracting Covid-19 which led to a number from the same cohort having to quarantine, but all credit to the catering manager and team for continuing to provide an uninterrupted service throughout.

The canteen shop has continued to be used extensively by the prisoners, particularly during lockdowns. There have been no major supply issues in this period but there have been some complaints about lack of specialised products for ethnic minorities (see section 5.4) Requests for different products are discussed at prisoner information advice committees (PIACs) (currently during separate meetings for each house block) with representatives from each wing.

## **5.2 Segregation**

Ashfield does not have a separate care and separation unit. When there is a need to segregate prisoners, they are either confined to their own cell or, in exceptional circumstances, transferred to the EDC or, in the cases of constant supervision, a gated cell of which there are two. The number of prisoners on segregation or confinement during the reporting period has, again, been low, with two prisoners being placed on good order or discipline (GOOD) and two on cellular confinement (CC). The fact that Ashfield has been in restricted regimes for the reporting period may have influenced the low numbers. The Board reported six GOOD and three CC cases in the last report, so this represents a marked decrease in CCs. Board members have visited all prisoners placed on GOOD and CC in this period, and attended all GOOD reviews, and in every case members were satisfied that the process was fair and the outcomes equitable.

The number of new adjudications conducted in the 12-month period was 94 (90 reported in the last report). Attendance at adjudications by Board members has been severely limited during this reporting period due to Covid-19 but the few that have been observed were all found to be fair and professionally conducted.

## **5.3 Staff/prisoner relationships, key workers**

Since the first lockdown in March 2020 there have been four cohorts of new officers and an approximately 50% turnover of prisoners which, together with restricted regimes, has meant that for many the staff/prisoner relationships have not had the

time and regular engagement to develop as in more normal times. Understandably this puts an additional strain on officers, prisoners and non-custodial staff (with whom much of the prisoner communication has been restricted to phone calls or touchscreen kiosk messages). However, despite this, staff/prisoner relationships have been good. Generally, prisoners have appreciated the way lockdown has been managed but at times, changes in arrangements for time out of cell have caused disgruntlement amongst some prisoners. Concerns and views are listened to in the PIAC held with Ashfield management and, where deemed appropriate, adjustments are made. PIACs (one meeting per houseblock on a monthly basis) have been held and provide constructive means of communication between managers and prisoners.

Formal key working was suspended during lockdown until September 2020 when it was reintroduced for more vulnerable prisoners. Criteria included individuals who had been or were on an ACCT, PIP, CSIP or basic regime and were used to help identify what extra support they might need. Initially 30 prisoners received weekly key working sessions. On average over the 10 months there have been 23 prisoners receiving weekly key work which has been important in helping those struggling with the situation. Prior to September, weekly welfare chats were conducted with all prisoners in place of key working and continued for those without formal key working sessions. This ensured that there was weekly documented engagement with all prisoners.

#### **5.4 Equality and diversity**

Regime restrictions have posed significant challenges for the prison in terms of monitoring equality and diversity issues. In general the prison has, to its credit, been successful in rising to these, though there have been some areas of missed opportunity.

On a positive note, a dedicated member of staff was assigned responsibility for equality and diversity issues just before the start of this reporting year, following a period without anyone in this role, but the scope to develop the role into something more proactive was hampered by the restricted regimes.

In December 2020 Ashfield participated in an HMPPS survey distributed to black, Asian, and minority ethnic prisoners (approximately 18-20% of prisoners). The results suggested that prisoners had a generally positive view of the revised regime. However, there was criticism of:

- the limited range of specialist products available for purchase, particularly Afro hair products.
  - In response, in early 2021 the prison did expand the range of products available to order on a quarterly basis.
- the library, namely that the range of books, CDs and DVDs failed to reflect the cultural and religious diversity of the prison.
  - Of note a dedicated budget was allocated for this purpose in 2019-20, but for representing different protected characteristics failed to respond to repeated requests from the library for suggestions for new items.

- the kitchen, namely that it should offer a more culturally diverse range of foods.
  - The Board is satisfied that the catering department, in consultation with the equality and diversity officer and with the chaplains of different faiths, has gone to considerable lengths to provide appropriate food for different religious periods or festivals and that it has continued to keep the range of halal and other foods under regular review.
- officers who were perceived as displaying a lower level of tolerance of minor infringements by black, Asian, and minority ethnic prisoners than was the case with white prisoners and that there was inconsistency among staff in their ability to engage in constructive conversation.
  - The Board is not aware of any specific internal follow-up investigation into this issue and is concerned that the prison does not routinely collect ethnicity data with regard to behaviour warnings. However, in terms of the percentage of prisoners whose overall status was altered in this reporting period, black, Asian, and minority ethnic prisoners were proportionately represented in those whose status was upgraded and only marginally over-represented in those whose status was downgraded. Adjudications in the reporting period showed that the number of black, Asian, and minority ethnic prisoners adjudicated was in line with the overall percentage of such prisoners at Ashfield.

The Board does have some concerns about the support to prisoners with conditions such as attention deficit hyperactivity disorder (ADHD), Aspergers, autism and those with other learning difficulties. Primarily this is due to the lack of access to neurodiverse specialists (see also section 6.3) who would be responsible for drawing up the reasonable adjustment plans for individual prisoners. As a temporary solution, the safer custody department has, since spring 2021, been drafting individual care plans, in conjunction with the prisoner, where they have “self declared”. To facilitate this, reception paperwork was revised by adding a question about learning disabilities. Sharing of information with safer custody from assessments conducted by other departments such as education and interventions has, when it has occurred, been beneficial but is not routine.

Prisoners are assessed prior to transfer and during induction to ensure that, where appropriate, measures are in place to support them e.g. physical disability, visual impairment. A prisoner peer support system - known as Buddies – is crucial in assisting those who need help such as fetching meals, tidying cells and placing requests via the touch screen kiosks. The Buddy system is supported by the prison’s day to day routine, and these men also play an invaluable role in helping staff identify changing needs for the men they support. Where necessary a specially adapted cell is allocated.

A total of 31 discrimination incident reporting forms (DIRF) were submitted during the reporting period, a number broadly in line with previous years. All DIRFS were appropriately investigated and most were resolved. Of the 31 DIRFs correctly

submitted, almost all were about specific or isolated incidents and none suggested there was any institutional culture of discrimination.

Regrettably, regime changes from April 2020 have meant that the monthly fora for each protected characteristic have ceased. Prisoners were advised to raise any matters with their PIAC representatives, as equality and diversity would be included as a specific agenda item in PIAC meetings. PIAC records for the period are also incomplete (October–November, June–September are missing due to an IT issue) but the documents that are available suggested that equality and diversity issues were very rarely raised and, when they were, were largely confined to the non-availability of ethnic hair products for purchase.

DEAT minutes for 2020-21 were insubstantial and did not include any resume of the detailed content of any discussions or conclusions drawn from any analysis of data compiled for them. Also, their scheduling four to five weeks after the end of each quarter meant that they were reviewing data for periods of time as much as four months earlier.

In summary, therefore, but based upon rather more restricted evidence in comparison with previous years, it is the Board's view that the prison has broadly ensured that prisoners, regardless of ethnic, cultural and religious background, age, gender or sexual orientation, have been fairly and humanely treated under the regime changes made in response to the pandemic, but that some recording of this was inadequate and some opportunities for in-depth analysis were missed.

## **5.5 Faith and pastoral support**

There is a wide range of faith support that all prisoners have access to: Baha'i, Buddhism, Christianity, Hinduism, Islam, Jehovah's Witness, Judaism, Latter Day Saints, Paganism, Quaker, Rastafarianism, Sikhism and Spiritualism. The chaplaincy team consists of four permanent staff (two part-time) who represent Christianity, Islam and Paganism and all other faiths are supported by visiting sessional chaplains.

For significant periods of time, the chapel could not be used for communal worship and sessional chaplains, due to Covid-19 restrictions, were unable to attend the prison in person. The core chaplaincy team deserves to be congratulated on how well it ensured that prisoners of all faiths (or none) were provided with a high level of pastoral care, especially those who suffered bereavement. Wherever possible, they enabled prisoners to conduct compassionate visits, view video recordings of relatives' funerals, and in addition they ran "Living with Loss" courses and were innovative in providing televised weekly religious services. Liaison with faith groups in the local area ensured that many prisoners were able to receive additional religious materials in support of their respective faiths.

During the most restrictive regimes services were televised which proved very popular with many prisoners and continued even when limited attendance in the chapel was allowed.

The chaplaincy team has continued with the Storybook Dads scheme, whereby those prisoners who are allowed contact with their children record stories for them. During this period, only seven recordings were made, compared with 32 during the last reporting period. This considerable reduction was mainly a result of lockdowns within Ashfield, when it was not possible to make recordings but there was also a smaller number of prisoners during this reporting period who were permitted access to their children.

## **5.6 Incentives scheme**

Throughout the reporting year, prisoners have been confined to their cells to a far greater degree than would normally be expected. National guidelines, which were in place until the end of January 2021, required any reduction to basic status to be imposed only via a defensible decision process. The same guidelines also required that the removal of access to a TV, normally automatic when basic is imposed, should occur only in exceptional circumstances. The number of prisoners being downgraded to basic over the year has been low, with only 36 men having this imposed (104 in the previous reporting year), and in no case did this include removal of TV.

138 warnings were issued over the twelve months (221 previously), with slightly under 50% being of the shortest duration of one month. Most warnings have been issued for unacceptable behaviour to staff (37), followed by breaking rules and regulations (27), breach of contact rules (19), and possession of unauthorised items (16).

Ethnic codes are recorded for changes in status, but not for warnings issued; those recorded are broadly in line with the prison's population. Due to Covid-19 restrictions, a scheme to incentivise good behaviour through the awarding of vouchers was suspended throughout the year, and no fora or review meetings involving both staff and prisoners have been held to discuss the incentives policy.

## **5.7 Complaints**

A total of 800 complaints (Comp1/1A/2) were received in this reporting period, an average of 66.6 per month. The highest received in any month was 88 and the lowest 49. This is a decrease of 61 from the last report. The most complaints received from a single prisoner in a month has been nine. Residential continues to be the category attracting the most complaints, but the complaints submitted vary considerably so no particular trend has been identified. The second highest category is security and operations which covers, inter alia, letters, phone contact, "email a prisoner", visits, internal property and security related matters.

Ashfield takes seriously performance targets for responding to complaints within the stipulated time and closely monitors the percentage of complaints responded to in time. In the last six months of the reporting period, for three of those months 100% of complaints were responded to within the timescale, with two months achieving 98% and only one month at 93%. Interim responses will extend the date for a full response so this is also monitored and, in the same six-month period, there were 31 interim responses of which only six were late. An interim response can be issued, for example, when a complex issue has been raised which requires multiple agency

input that will take time to collate. Ashfield endeavours to keep interim responses to a minimum, hence the close monitoring.

Board members periodically review complaint responses and have found the standard of response generally to be good in terms of addressing the issue raised.

## **5.8 Property**

Property management at Ashfield continues to be well run, underpinned by the electronic property card system introduced last year. Missing property on transfer between prisons continues to be an issue, although, with transfers being disrupted by lockdowns, the scale of the problem has not been as severe in this reporting period. The Board received 31 applications relating to property going missing on transfer into Ashfield but 24 of those were submitted by one prisoner, the majority of which related to the same items.

## **6. Health and wellbeing**

### **6.1 Healthcare: general**

The pandemic has impacted upon healthcare provision with departments having to adapt to changing circumstances and staff availability. The health teams have worked hard to mitigate these factors and the Board considers that basic healthcare provision has been good, and of at least a standard available in the community over the same period. Group work has, however, been badly affected.

Healthcare, which runs its own complaints system, received 42 submissions (63 previously) of which 10 (15) were upheld; a majority of these related to medication issues. Applications to the Board relating to healthcare remain low.

A registered nurse conducts a health assessment on the day of a prisoner's arrival; this includes questions relating to mental health with referral as required. A common medical health computer system is used across the prison estate so records are available for new arrivals although not all this information is comprehensive. Furthermore, notification from previous establishments highlighting men arriving with specific issues of concern is poor.

The number of prisoners having a confirmed Covid-19 diagnosis, just six men, has been exceptionally low over the year and is a credit to the controlled approach taken throughout the establishment. Vaccinations for prisoners have been rolled out in much the same way as in the community; take-up has been high, with approximately 90% of the population receiving two vaccinations by the end of the reporting period.

Following comment in recent Prison and Probation Ombudsman (PPO) reports, healthcare has worked to improve liaison with other departments across the prison, and with external agencies, so that all aspects of an individual's welfare are better considered in a more holistic approach.

A project group has met regularly to discuss medication management, and TRAKA medication distribution lockers will be installed shortly. These will help reduce the

burden on residents when collecting their medicines; problems here can include men missing scheduled education or work, and there will be less opportunity for bullying in medicines queues.

## **6.2 Physical healthcare**

A clinical nurse manager oversees the work of seven nursing staff based at Ashfield, and a small medicines team is in place to oversee the management and dispensation of prescribed drugs. Healthcare staff are in the prison every day including weekends, although none are present overnight. GP clinics are held three times a week with an on-call service available for out-of-hours consultation. Dental/dental health clinics are typically held twice weekly. A physiotherapist is on site each week, and audiology, optometry and podiatry clinics are scheduled regularly.

By the start of the reporting year routine provision of services had largely settled down following initial pandemic adjustments and, whilst there have been inevitable issues with staffing levels from time to time, prisoner access to, and waiting times for, services have generally been good. Certain enforced changes in procedure are seen as effective and will continue, in particular the use of telephone triage for initial assessment by healthcare staff. The only notable service failure was by the podiatry contractor who did not meet their commitment for several months.

Various adjustments were made through the year to ensure service levels; of note was the installation of upgraded extraction equipment in the dental surgery to allow much reduced delay between appointments.

Because of pandemic restrictions various initiatives such as wellman clinics have not run during the year. A long-term condition project did become active in February; this is designed to streamline review processes, plan effectively for men with chronic conditions, and optimise patient awareness and self-care. Conditions supported include asthma (46 patients), COPD (20), coronary disease (32), diabetes (45) and hypertension (61).

## **6.3 Mental healthcare**

The mental health team is based across two prisons and comprises a team leader and four other staff, although one of these, a band 6 nurse position, has been vacant since January with recruitment proving difficult. Covid-19 related absences have also affected the team over the course of the year and an experienced mental health nurse was appointed on a temporary contract for several months. Also, the lack of access to specialised support has, in the Board's view, hampered support to prisoners with neurodiverse conditions.

A psychiatrist holds monthly clinics and is available for further consultation.

The team runs both individual and group sessions. One-to-one requirements have largely been met, although much of this work has had to be undertaken remotely via telephone consultation, with in-person sessions only held if deemed essential. Men request appointments via the wing touchscreen kiosks and are phoned in their cells,

usually within 72 hours. Urgent referrals are made via residential staff, particularly the safer custody team.

Group work throughout the year has been severely restricted. Limited sessions resumed, albeit briefly, in the autumn. Two key groups – anxiety management and relapse prevention – started again in April with up to six attendees. Inevitably there is a lengthy backlog of group sessions.

Ongoing, as restrictions ease, the Board has serious concerns that the availability of mental health staff will severely impact upon the department's ability to return to a full schedule of support in all areas including work with individuals, with groups, and in support of wider requirements across the prison such as attendance at ACCT reviews and in the formulation of cross-departmental support for individuals.

#### **6.4 Social care**

Ashfield has a relatively elderly age profile of prisoners, but no social care plans using external staff have been required during the reporting year. Neither have there been any palliative care requirements. The prison has effective working relationships with the social care provider in terms of the provision of wheelchairs, walking sticks and other essential aids to enable reasonable adjustments.

#### **6.5 Exercise, time out of cell, gym**

The effect of the pandemic on the amount of time out of cell varied throughout the reporting year. At the start of the reporting period, Ashfield was still at prison service stage 4, the most restrictive regime. However, by September 2020, it had moved to stage 3, but by January 2021 it was back to stage 4. As the Covid-19 restrictions started to ease in April 2021, Ashfield became a stage 3 prison again and, by the end of the reporting year, had moved to stage 2. Throughout the pandemic Ashfield staff have worked hard to meet the requirements necessary to move to the lower regime stages, thus maximising the opportunities for prisoners for time out of cell and access to exercise and the gym. There are very few prisons across the country that have been as successful in transitioning to lower regime stages in such a short timescale: all credit to the staff involved. It is an impressive record.

During the most restrictive regime, prisoners had approximately 90 minutes a day out of their cells. This included an hour's exercise and time for showering, using the touchscreen information kiosks and carrying out other domestic tasks. Additionally, prisoners could book a weekly session on the Astroturf, to walk or run (one wing at a time) supervised by gym staff. Once at stage 3 the refurbished sports hall opened for limited, socially-distanced activities like badminton singles, and use of static cardiovascular equipment. Structured physical activity on the Astroturf, consisting of circuits, running and bowls also commenced. Football resumed with minor rule changes to accommodate additional Covid19-secure measures. By June 2021, all exercise had recommenced and those prisoners at work or in full-time education had access to 10 hours out of cell.

### **7. Progression and resettlement**

#### **7.1 Education, library**

Normally there is a good range of courses offered by the education department with both portfolio and exam-based qualifications. There is rightly a strong focus on maths and English as the subjects are the bedrock for employability.

Due to Covid-19 restrictions, no face-to-face education sessions took place for almost the entire reporting year. During the closure of the education department, its 31 in-house education staff were deployed elsewhere within the prison often filling in, where feasible, for staff absent due to Covid-19 isolation requirements.

During lockdowns, weekly work packs were made available to all prisoners to complete in their cells. Initially these dwelt heavily on maths and English activities; however, in consultation with prisoners, distraction activities such as quizzes and crosswords were included alongside theme-based English and maths. Prisoners did have the option to return completed packs for marking and feedback. Ashfield is also, rightly, proud of its use of in-cell TV to engage prisoners during the lockdowns when it offered a wide-range of programmes ranging from dispelling the myths of Covid-19 to TED talks, English lessons and in-cell fitness workouts.

Although closed throughout lockdown, the library has been a vital lifeline for prisoners. A daily in-cell delivery service amounting to 400+ deliveries of books, games and DVDs was greatly appreciated by prisoners.

Distance learning courses were able to continue throughout lockdown. The prison had 28 active registered students, studying 36 modules. Eighteen students received charitable funding through the support of the Prisoners' Education Trust to pursue their chosen courses with outside agencies. Degree level education is delivered through organisations such as the Open University

Face-to-face education and purposeful activity reopened to prisoners mid-June 2021. With numbers limited to maintain social distancing, it is operating a hybrid teaching model, consisting of classroom/workshop delivery supplemented with in-cell work such as creating portfolios, completing extension tasks, updating diary entries and undertaking assignments and tasks that, together, contribute to a qualification. Prior to lockdown a student might have received an average of 20 hours face-to-face activity per week. Going forward, and while restrictions continue, the education department aims to provide as much purposeful activity to as many prisoners as possible while maintaining them in their house block bubbles. Prisoners will therefore be receiving an increasing amount of face-to-face education per week.

## **7.2 Vocational training, work**

Since many prisoners convicted of sexual offences, on release, are unlikely to return to their previous work there is a focus on re-training and learning self-employability skills. Unfortunately, Covid-19 restrictions have severely disrupted vocational training and work. During lockdowns work was limited to small working parties involved in the delivery of essential services like industrial cleaning, laundry, waste management, some electrical work, carpentry, painting and decorating and horticulture. Additionally, light industries operated with a small number of prisoners socially distanced in the workshops.

Outside of lockdowns, numbers for vocational activity have been restricted to small groups based on their house block. The Board looks forward to Ashfield's

progression to stage 1 when it is expected that prisoners will have full access to vocational training and qualifications.

### **7.3 Offender management, progression**

In last year's report, the Board reported on the introduction of the new offender management in custody (OMiC) model. Both probation and offender management teams are now co-located and there are noticeable benefits of working together, including cross-pollination of ideas, and an improved knowledge and experience base. Also, whilst in last year's report the Board raised a concern about the high turnover of staff, resulting in both staff shortages and lack of experienced staff, the situation this reporting year has stabilised considerably, and the teams have managed to achieve full staffing levels, and there is now only a more regular/normal staff turnover.

At the end of June, there was only one OASys record out of date (using the HMPPS definition of what constitutes an out of date record). This represents a considerable improvement, compared to the 2019 HMIP inspection report findings and the last report when there was a total of 19 out of date. All new transfers are now required to have an "in date" OASys before Ashfield will accept them, which will facilitate maintaining OASYS records.

Completion of an intervention programme is, for many prisoners coming to Ashfield, a key element of their sentence plan. Of major concern to the Board has been the effect of Covid-19 on Ashfield's ability to deliver programmes during this reporting period. In between lockdowns, Ashfield was able to deliver both Kaizen and Horizon programmes, but with much reduced numbers, due to the need to socially distance. It was also necessary, in some cases, for men to move wings, to keep men in house block cohorts. During this reporting period, only 16 men started and completed either a Kaizen or Horizon programme (eight per programme). If there were no Covid-19 restrictions, the interventions department would expect to deliver Horizon to between 54-60 prisoners.

As noted in last year's report, Ashfield had intended to start delivery of a new programme, the Healthy Sex programme (HSP), as soon as restrictions permitted. However, due to Covid-19 the training of the facilitators was delayed and only completed in May 2021. It is expected that the first course for prisoners will start in August.

Ashfield is currently working in conjunction with the contracted health provider to introduce a MMSA (Medication to Manage Sexual Arousal) programme; the service is available to those considered and professionally assessed as needing support during HSP. Ashfield will also explore the possibility of access to it for individuals completing other programmes.

HMPPS set out in August 2020 prioritisation principles for prisoners who have been identified as needing an offending behaviour programme (OBP). This took into account the prisoner's risk (utilising their RM2000 score, replaced in April 2021 by the OASYS sexual reoffending predictor (OSP)) and their conditional release date (CRD)/parole date. A multidisciplinary team looked at these factors and then

identified those prisoners that required an OBP before they were released into the community. Prisoners were then allocated a place on a programme, if they had time to complete it or, if out of time, identified to their offender manager that, in the case of the Horizon programme, they may need to undertake this once released. It also identified prisoners who required Kaizen, but did not have time to complete this OBP, but would benefit from completing Horizon by addressing their current risk.

Although up to June 2021 there was no significant change, following the reassessment based on the OSP on the overall number identified as suitable for an OBP, for those prisoners whose risk assessment level had increased there could be a significant impact. For one prisoner a re-categorisation to category D was overturned and for others the change of risk level meant they were now required to undertake the Kaizen programme which could affect their eligibility for parole if not completed before the parole date.

#### **7.4 Family contact**

Maintaining family contact can be an important element for a prisoner in achieving, or working towards, rehabilitation and ensuring effective resettlement on release. Unfortunately, Ashfield's innovative scheme of Family/Friends at the Centre of Throughcare (FACT) was severely affected by lockdowns. During this reporting period, it was not possible to hold any FACT days, which would have allowed up to six families opportunities to visit the prison. As well as meeting the prisoner, they would have met relevant staff and, as part of the scheme, receive regular updates. During lockdown, it has only been possible for those family members where the prisoner has already been "signed up" to the scheme to receive a newsletter and have a point of contact – the key worker hub – if they have any queries or concerns.

Given that during the period of lockdown it was not possible for prisoners to be visited by families or friends, it was disappointing that that video calls, through Purple Visits, only commenced in January 2021. There were considerable delays in Ashfield and other private sector prisons in obtaining the necessary approvals. However, once available, prisoners at Ashfield were able to book an hour's free call and additionally during lockdowns prisoners were given 10 minutes free phone calls a day.

#### **7.5 Resettlement planning**

As a category C specialist training prison, the number of prisoners released direct from Ashfield should be low, and moving forward the numbers are expected to decrease as the offender flow model is implemented (part of the OMIC model). During this reporting period there were 72 prisoners released from Ashfield compared with 78 in the last reporting period, the majority released to approved premises (AP). However, the Board continues to have concerns about the last-minute nature whereby accommodation was only being confirmed within the last week pre-release. This clearly impacts on the anxiety levels of prisoners who already have concerns about returning to the community. In addition, Ashfield have advised

that there were two prisoners who, on their day of release, had no confirmed accommodation. Both were subsequently found accommodation, following urgent referrals being made, when the prisoners arrived at their reporting time with their community offender manager on the day of release. The lack of AP places for men convicted of sex offences continues to cause problems particularly as Covid-19 restrictions have reduced AP capacity with many double rooms reduced to single occupancy.

Transferring men to open conditions (category D prisons) can be considered to be an important step in preparing them for release. Sixty-five men transferred to category D prisons, 59 went to Leyhill and six to North Sea Camp. However, it is now understood that temporary accommodation put into many prisons around 20 years ago to ease population pressures at that time have now been deemed not compliant with fire regulations (it is understood that 80 spaces are being taken out of use at Leyhill). This will inevitably adversely impact upon Ashfield's waiting list.

In the last report, it was noted that no workshops (providing advice on approved premises, open prisons, etc.) had been held. The reasons were, initially, that resources had to be diverted to dealing with the transition to the OMiC model, and then subsequently the effects of Covid-19. However, as Ashfield managed to achieve an early transition to the more relaxed regime stage 2 in June 2021, planning for workshops recommenced and the first one is scheduled for September 2021, on 'understanding release licence conditions and supervision requirements'. To try and mitigate some of the effects of no workshops being held, during this reporting period prison offender managers (POMs) have been working with their cases to better prepare them for the challenges of going into a less supervised environment.

During this reporting period, Catch 22 continued to provide advice and support to help prisoners prepare for release. This included help with accommodation, availability of benefits, assistance with education or employment issues, and advice or referrals on health and wellbeing issues.

Following the changes introduced by HMPPS in the rules relating to a maximum of £900 that a prisoner can hold in a bank account, Ashfield can be commended for trying to find a suitable alternative for those prisoners who were holding in excess of this amount, and wanted a savings account, even though they might have had more than six months to serve prior to their release date. Ashfield therefore sought an alternative solution and approached Great Western Credit Union. A number of prisoners have now opened up basic savings accounts with them, regardless of release date. In addition, Ashfield initiated a savings scheme to encourage prisoners to put money aside for their release on a regular basis. Three hundred prisoners have signed up to the scheme.

## 8. The work of the IMB

Visits to HMP Ashfield by members of the Board have been severely disrupted by the two lockdowns in the reporting period. However, monitoring continued remotely through weekly rota calls, particularly focused on the regime, residential accommodation, safer custody, healthcare, mental health support, the chaplaincy and catering. Monthly board meetings were conducted by teleconference and applications from prisoners continued to be collected, albeit via the complaints boxes, which the Board clerk scanned and forwarded to members using secure electronic email. Additionally, applications were received via the 0800 telephone line. Once physical visits were permitted again, a number of members of the Board resumed rota visits which included visiting all accommodation units, the kitchen/bistro, and the healthcare department. In addition, prison functions, services and departments were divided, for practical monitoring purposes, into seven themed areas (safer custody/pastoral care; sentence management and resettlement; prisoner employment and vocational training; prisoner education; prisoner services and facilities; dynamic security; and central services), to ensure that each theme is monitored in depth approximately every eight weeks.

The weekly collection of applications from IMB boxes on the wings by members only resumed in July 2021. This replaced the lockdown-initiated approach of applications being submitted via the complaints system. Wherever possible, a rota or applications visit is combined with attendance at a prison meeting, such as the prisoner information and advice committee (PIAC), an adjudication, a GOOD review or an ACCT review, but the scheduling of these often necessitates a separate visit.

One new member joined on transfer from another IMB in September, but two members resigned in May reducing the membership to eight.

The Chair has continued to attend south-west Chairs' meetings and a member of the Board attends the meetings of the IMB working group of establishments holding men convicted of sexual offences. Both have been conducted by teleconference/video conference in the reporting period.

The Board would once again like to thank most sincerely all of the managers and staff at every level at HMP Ashfield for their cooperation and help particularly during the lockdowns. Always responsive to requests for information and questions, the very positive and constructive attitude by the staff towards the Board greatly facilitates the monitoring role.

Of particular note is the excellent support provided by the IMB clerks, which during lockdowns was vital to the role. The Board welcomed a new clerk in February following a period of over three years of sterling support by the former clerk.

**Board statistics**

Recommended complement of Board members	12
Number of Board members at the start of the reporting period	9
Number of Board members at the end of the reporting period	8
Total number of visits to the establishment	76
Total number of segregation reviews attended	2

## **Applications to the IMB**

This reporting period has seen an increase in the number of applications compared to last year (an increase of 16). However, it should be noted that 34 were submitted by one prisoner via the 0800 line; predominantly these related to issues from previous establishments. Compared with other prisons, the figures continue to be low.

The categories attracting the largest number were H2 (31), which covers property issues on transfer; G (15), which covers healthcare; and I (12), which covers sentence management.

H2 - Property during transfer or in another establishment or location. Of the 31 submitted, 24 were submitted by one prisoner and of those the majority related to a single issue so the total is misleading when assessing areas causing most complaint.

G - Health, including physical, mental, social care. Of the 15 received, five were from one prisoner. Medication issues and complaints related to Covid-19 measures featured most in this category.

I – Sentence management, including home detention curfew, release on temporary licence, parole, release dates, re-categorisation. Of the 12 received, issues were varied but included prisoners' OASYS records, risk assessments, OBPs and transfers.

<b>Code</b>	<b>Subject</b>	<b>Current reporting year</b>	<b>Previous reporting year</b>
A	Accommodation, including laundry, clothing, ablutions	2	4
B	Discipline, including adjudications, IEP, sanctions	5	17
C	Equality	2	1
D	Purposeful activity, including education, work, training, library, regime, time out of cell	5	11
E1	Letters, visits, telephones, public protection restrictions	7	2
E2	Finance, including pay, private monies, spends	1	3
F	Food and kitchens	2	0
G	Health, including physical, mental, social care	15	6
H1	Property within this establishment	1	3
H2	Property during transfer or in another establishment or location	31	5
H3	Canteen, facility list, catalogue(s)	1	0
I	Sentence management, including home detention curfew, release on temporary licence, parole, release dates, re-categorisation	12	10
J	Staff/prisoner concerns, including bullying	5	12
K	Transfers	0	0
L	Miscellaneous, including complaints system	1	0
	Total number of applications	<b>90 (including 1 confidential app)</b>	<b>74 (including 4 confidential applications)</b>



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