

Report on an unannounced short follow-up inspection of

HMP Bullwood Hall

13 – 16 September 2010

by HM Chief Inspector of Prisons

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Introduction

Bullwood Hall in Essex is one of two prisons in England and Wales dedicated to holding only foreign national prisoners. Our last inspection – the establishment's first – commended much of what we found, but particularly criticised the lack of resettlement work and urged the National Offender Management Service to draw up a national policy and standards for the treatment of foreign national prisoners. Commendably, this unannounced follow-up inspection found that progress had been made in most areas.

Prisoners confirmed to us that Bullwood Hall remained a very safe place. Early days were well managed, those at risk of self-harm were well cared for, there was little bullying and little evidence of substance abuse. Security was generally proportionate but an overzealous approach was taken to strip searching after visits, and governance of both use of force and special accommodation needed improvement.

Bullwood Hall continued to suffer from frail automatic night sanitation arrangements, which resulted in the degrading spectacle of grown men being issued with potties and led some to throw human waste out of windows. Otherwise, accommodation was generally satisfactory. Staff-prisoner relationships were positive but interpretation services were underused and the personal officer scheme needed to be developed further. Staff from the UK Border Agency were accessible but were the subject of complaints from prisoners. Diversity was generally well managed and the chaplaincy was well respected. Health care provided a generally good service.

There had been considerable improvements in purposeful activity. Most prisoners were involved in meaningful work or education. The range of vocational opportunities was much increased and the quality of teaching had improved. Both the library and PE provision were adequate.

Following criticism at our last inspection, work on resettlement had improved but there was still a lack of national guidance for staff and a number of initiatives remained in their infancy. Moreover, uncertainty over the immigration status of many prisoners meant that resettlement planning was limited and focused almost exclusively on those scheduled to be released into the United Kingdom. Support to maintain contact with family and friends was generally good.

Bullwood Hall is an important, dedicated facility for foreign national prisoners and it is pleasing to be able to once again commend levels of safety, to note much improved purposeful activity and to see the beginnings of better resettlement services. Less commendable were the continued lack of adequate night time sanitation and, more broadly, the lack of national guidance on what staff should be expected to provide, particularly in terms of resettlement to men returning overseas. Nevertheless, this is a largely positive report of an establishment striving hard to meet the particular needs of its niche population.

Nick Hardwick
HM Chief Inspector of Prisons

November 2010

Fact page

Task of the establishment

Bullwood Hall is a publicly owned category C training prison taking convicted foreign national prisoners serving four years or less, with two years or less to serve. No prisoners with convictions for sexual or violent offences are accepted.

Number held

221

Certified normal accommodation

220

Operational capacity

228

Last full inspection

3-7 December 2007

Brief history

Bullwood Hall is situated between the village of Hockley and the town of Rayleigh, approximately seven miles from Southend-on-Sea on the Essex coast. The hall was a private dwelling built in extensive grounds at the turn of the 20th century. The estate was purchased by the Prison Commissioners in 1955. A closed female borstal was built in the new grounds and opened in 1962 and its role was extended in 1983 to hold adult female prisoners. In June 2006, Bullwood Hall re-roled to a category C adult male foreign national prison.

Description of residential units

The residential living accommodation is made up of seven wings. A, B and C wings are of a similar size, housing between 27 and 32 prisoners in single cells. D wing can house up to 30 and includes four double cells. E and F wings are enhanced wings and can hold up to 13 and six prisoners respectively. None of the cells in these areas has integral sanitation. Prisoners on A, B, C and D wings have to use a night sanitation system, while men on E and F wings are unlocked 24 hours a day and can use the communal toilet facilities. The six original buildings are 40 years old. G wing was built more recently in a 'quick build' design. It has 40 cells, all doubled to hold 80 prisoners. All G wing cells have en suite toilet and shower facilities.

Section 1: Healthy prison assessment

Introduction

HP1 The purpose of this inspection was to follow up the recommendations made in our last full inspection of 2007 and examine progress achieved. We have commented where we have found significant improvements and where we believe little or no progress has been made and work remained to be done. All inspection reports include a summary of an establishment's performance against the model of a healthy prison. The four criteria of a healthy prison are:

Safety	prisoners, even the most vulnerable, are held safely
Respect	prisoners are treated with respect for their human dignity
Purposeful activity	prisoners are able, and expected, to engage in activity that is likely to benefit them
Resettlement	prisoners are prepared for their release into the community and helped to reduce the likelihood of reoffending.

HP2 Under each test, we make an assessment of outcomes for prisoners and therefore of the establishment's overall performance against the test. In some cases, this performance will be affected by matters outside the establishment's direct control, which need to be addressed by the National Offender Management Service.

- outcomes for prisoners are good against this healthy prison test.

There is no evidence that outcomes for prisoners are being adversely affected in any significant areas.

- outcomes for prisoners are reasonably good against this healthy prison test.

There is evidence of adverse outcomes for prisoners in only a small number of areas. For the majority, there are no significant concerns. Procedures to safeguard outcomes are in place.

- outcomes for prisoners are not sufficiently good against this healthy prison test.

There is evidence that outcomes for prisoners are being adversely affected in many areas or particularly in those areas of greatest importance to the well being of prisoners. Problems/concerns, if left unattended, are likely to become areas of serious concern.

- outcomes for prisoners are poor against this healthy prison test.

There is evidence that the outcomes for prisoners are seriously affected by current practice. There is a failure to ensure even adequate treatment of and/or conditions for prisoners. Immediate remedial action is required.

HP3 This Inspectorate conducts unannounced follow-up inspections to assess progress against recommendations made in the previous full inspection. Follow-up inspections are proportionate to risk. Short follow-up inspections are conducted where the

previous full inspection and our intelligence systems suggest that there are comparatively fewer concerns. Sufficient inspector time is allocated to enable inspection of progress and, where necessary, to note additional areas of concern observed by inspectors. Inspectors draw up a brief healthy prison summary setting out the progress of the establishment in the areas inspected. From the evidence available they also concluded whether this progress confirmed or required amendment of the healthy prison assessment held by the Inspectorate on all establishments but only published since early 2004.

Safety

- HP4 In 2007, outcomes for prisoners against this healthy prison test were good. Of the 48 recommendations in this area, 23 were assessed as achieved, eight partially achieved and 17 not achieved. We have made 16 further recommendations.
- HP5 Prisoners reported respectful treatment by escort staff but were still given insufficient notice of transfer. Some people had been subject to successive moves in a short period of time. There were some unnecessary delays on vehicles entering the prison if they arrived during staff lunch periods.
- HP6 Reception was cramped and allowed for little privacy but staff were friendly and managed the considerable numbers going through reasonably well. There was too little use of interpretation during the reception process. Some prisoners did not receive a free telephone call before being locked up on their first evening in custody. The induction programme was reasonably comprehensive and prisoners found it useful and informative.
- HP7 Prisoners reported feeling very safe. There were good systems for supporting vulnerable prisoners, including those who had been bullied. A well-managed befrienders scheme provided extra support to prisoners in need. The revised violence reduction strategy was comprehensive, although staff had not yet been trained to deliver it. Assessment, care in custody and teamwork (ACCT) documents reflected a good level of care for prisoners in crisis. The constant observation cell in health care was stark and unwelcoming.
- HP8 Security was proportionate and did not unduly restrict access to the regime. Security information was managed appropriately but analysis and associated security objectives were inadequate. Strip searching after visits was not intelligence-led. There were few adjudications and awards appeared broadly fair, although some incidents were poorly investigated and there were some weaknesses in the management of hearings.
- HP9 In some cases where force had been used, there was insufficient evidence of de-escalation and planned uses were not recorded. Force was used relatively frequently but often for low level coercion. The care and separation unit was used sparingly but disproportionately high numbers were segregated pending adjudication, suggesting some overuse. Communal areas and cells were bright and clean but cell toilets needed cleaning and de-scaling. Strip searching on entry to the unit was not always subject to risk assessment and some paperwork was incomplete. Although special accommodation appeared to be rarely used, we found one case where the relevant paperwork had not been completed.

- HP10 The incentives and earned privileges scheme worked reasonably well. The dedicated enhanced wings had appropriately open regimes. However, only enhanced prisoners were allowed to wear their own clothes and prisoners found guilty on adjudication could be automatically demoted to the basic regime. The P-Nomis system defaulted to standard level on transfer, which particularly disadvantaged non-English speakers who might not understand the processes or be able to request confirmation of status.
- HP11 There was very little evidence of illicit substance misuse. The integrated drug treatment system had been in place since May 2010 and three prisoners were on methadone maintenance. The health care and counselling, assessment, referral, advice and throughcare (CARAT) teams had good working relationships. There had been improvements in the links with mental health services and secondary detoxification was available if required. The CARAT peer support scheme worked well.
- HP12 On the basis of this short follow-up inspection, we considered that outcomes for prisoners against this healthy prison test were still good.

Respect

- HP13 In 2007, outcomes for prisoners against this healthy prison test were reasonably good. Of the 60 recommendations in this area, 35 were assessed as achieved, nine partially achieved, 15 not achieved and one was no longer applicable. We have made 26 further recommendations.
- HP14 Some prisoners on wings using night sanitation reported long delays in being able to use the toilet. The system was inefficient and had broken down three times in the previous year. These shortcomings were linked to the frequent problem of urine and faeces being thrown from cell windows. Most accommodation was in reasonable condition, although some wings were in need of repainting and many showers and toilets needed thorough cleaning.
- HP15 Prisoners generally reported positively on relationships with staff and we observed many good interactions. History sheet entries were regular but usually minimal, although regular management checks had led to some improvements. Most prisoners found personal officers helpful, if not always knowledgeable about the predominant immigration and resettlement concerns. Personal officer entries on P-Nomis often did not appear until a month or more after a prisoner's arrival and there was little evidence of personal officers being involved in assessing or meeting resettlement needs.
- HP16 The diversity strategy did not cover all key diversity areas. The multidisciplinary diversity committee included prisoner representation and the two dedicated diversity staff were well informed and enthusiastic. The diversity orderlies worked effectively and were very visible.
- HP17 The management of race equality had improved. Regular cultural events were held and there was little evidence of tension between different nationality groups. The foreign nationals development officer had successfully developed community contacts and brought community representatives into the establishment. The Immigration Advisory Service ran weekly surgeries and the Detention Advice Service attended

every two months. However, there was still insufficient legal advice and representation to meet the needs of the population.

- HP18 There was no local or national foreign national strategy to support the prison's distinct function. Only a small number of staff had received specific training in work with foreign national prisoners using a locally developed package. It was in need of updating and focused largely on immigration status with little consideration of other issues or specific needs. While the UK Border Agency (UKBA) team had face-to-face contact with as many prisoners as possible, many prisoners complained of abrupt and rude behaviour and those with little English did not always understand the forms issued to them.
- HP19 There were no systematic attempts to communicate with those who spoke little or no English, such as through groups that could help to identify unmet needs and keep abreast of prisoner issues. Prisoner interpreters were often called on for help but professional interpreters were mainly used in health care and often not in other clear cases of need, such as ACCT reviews and adjudications.
- HP20 Older prisoners and prisoners self-identifying with disabilities were interviewed on induction and care plans were drawn up for those with disabilities. Meetings for older prisoners and prisoners with disabilities were no longer held and there had been no discussion of relevant issues in the community development meetings. The two cells on G wing designated for prisoners with disabilities were not fully equipped.
- HP21 Prisoners reported very positively on faith provision and a committed chaplaincy team provided religious services, some classes and pastoral care. Despite lacking a permanent coordinator for the previous year, the team was meeting prisoners' needs well but had found it difficult to provide for the substantial Buddhist population. There was some evidence of inappropriate restrictions on religious dress as not all staff were aware of what prisoners were allowed to wear. Fasting prisoners reported that the food arrangements during Ramadan were good and meals were generally of a reasonable quality.
- HP22 Responses to complaints were mostly polite and constructive. However, there were some shortcomings and in one case a witness to an incident had been asked to investigate the same incident. There was little confidence among prisoners in the complaints system, especially in respect of racial complaints. Complaint forms were not freely available on the wings in a range of languages.
- HP23 Overall health care services were good and prisoners reported positively on their treatment by health care staff. Partnership working with the primary care trust had improved and all service level agreements were being reviewed to enhance the GP, dental, optical and pharmacy services. The health care environment itself was cramped and areas for storage and administration of medicines were inadequate. There were no pharmacy-led clinics, medication reviews or clinical audits and pharmacy services overall were inadequate. The dental suite had been refurbished and was now fit for purpose but dental provision was erratic. Mental health care provision was adequate.
- HP24 On the basis of this short follow-up inspection, we considered that outcomes for prisoners against this healthy prison test were still reasonably good.

Purposeful activity

- HP25 In 2007, outcomes for prisoners against this healthy prison test were reasonably good. Of the 11 recommendations in this area, six were assessed as achieved, three partially achieved and two not achieved. We have made no further recommendations.
- HP26 Learning and skills provision was well managed. There was effective communication between the prison and OLASS providers who were responsive to the needs of changing nationalities in the centre. New areas of accredited learning introduced in vocational training and education included a particularly well run employability and personal development course open to all prisoners.
- HP27 Prisoners received good advice and guidance from induction to discharge. This had significantly improved since the last inspection. There was good induction to learning and skills and good initial assessment of support needs. Although some visual aids were used around the prison, many posters and signs were difficult for prisoners to read as they were often in small print or poorly copied with large quantities of information.
- HP28 A high proportion of prisoners were engaged in purposeful activity. Only two prisoners were unemployed and most of the work on offer was interesting and meaningful. Allocation to activities and waiting lists were well managed. Good use was made of peer mentors in learning and skills.
- HP29 About 90% of prisoners were engaged in a good range of vocational training or education courses leading to a qualification, a significant improvement since the previous inspection. Most courses achieved high pass rates. The room used for bricklaying was too small for the number of prisoners. The outside area for practical work was not covered.
- HP30 Education was appreciated by prisoners and well managed. Changes had been made to the curriculum to ensure that more prisoners could access a wide choice of courses and programmes at appropriate levels. Overall teaching and learning were very good and had improved, with good individual support for learners and good use of resources. Retention and pass rates were high. English for speakers of other languages classes were popular, with a high standard of teaching.
- HP31 Prisoners had reasonable access to the library, although there was still no evening or weekend provision. There was a wider range of books in languages other than English. Library book loss was not recorded and usage was not analysed.
- HP32 PE was well managed and appreciated by prisoners. Facilities were particularly good and had been improved with the addition of an outdoor playing surface. There was a comprehensive timetable for recreational PE. Gym attendance had declined slightly and attendance at some daytime sessions was particularly low. Good links had been maintained with health care and the CARAT service for remedial PE.
- HP33 On the basis of this short follow-up inspection, we considered that outcomes for prisoners against this healthy prison test were now good.

Resettlement

- HP34 In 2007, outcomes for prisoners against this healthy prison test were poor. Of the 34 recommendations in this area, 13 were assessed as achieved, nine partially achieved and 12 not achieved. We have made nine further recommendations.
- HP35 There was a much greater focus on resettlement. However, the uncertain status of nearly all prisoners throughout their time at Bullwood Hall meant that plans for resettlement in the UK could rarely be made with confidence and there was still insufficient focus on the needs of those being removed. Despite a comprehensive resettlement needs analysis undertaken in 2009, the strategy focused almost exclusively on prisoners likely to be released in the UK. The lack of a national foreign national strategy and sometimes lengthy UKBA decision-making processes undermined the prison's ability to deliver effective resettlement.
- HP36 Following the recent withdrawal of the International Organisation for Migration, little had been done to address the resettlement needs of the majority of prisoners who were returning to home countries. For those released in the UK, pathway champions and a range of contributing stakeholders were identified. Resettlement reviews were completed two and eight weeks before a UK release where a date was known. A resettlement surgery brought together a number of agencies and advisors for the benefit of these prisoners.
- HP37 Only a quarter of eligible prisoners had a completed offender assessment system (OASys) assessment. Assessments were hampered by the large number of prisoners who arrived without a pre-sentence report or any sentence planning documentation. Bullwood Hall did no sentence planning for those serving less than a year and no offending behaviour programmes were offered.
- HP38 St Mungo's provided accommodation advice for those being discharged in the UK but there was no professional accommodation advice for those discharged overseas. Weekly surgeries on finance, benefits and debt were available to all prisoners. There were good links between the prison and external employment, training and education agencies, although this mainly benefited UK discharges. A new employability and personal skills course recognised and developed job-related skills needed for employment. There was a jobs board for overseas work and local job opportunities.
- HP39 The visits hall was comfortable, bright and cheerful, although the children's play area was not always supervised. Despite efforts to improve the visitors' centre, it was not fit for purpose. Prisoners were inappropriately required to wear prison-issue clothing when in the visits hall. Monthly children's visits were open to all prisoners by application, regardless of privilege level. Storybook Dad sessions were run regularly by the library and education also delivered a short family relationships/parenting course alongside children's visits. There was no official system to ensure that prisoners with family in different time zones could contact them other than when using the night sanitation system.
- HP40 On the basis of this short follow-up inspection, we considered that outcomes for prisoners against this healthy prison had improved but were still not sufficiently good.

Section 2: Progress since the last report

The paragraph reference number at the end of each recommendation below refers to its location in the previous inspection report.

Main recommendations (from the previous report)

- 2.1 **The National Offender Management Service, in consultation with the UK Border Agency, should ensure that foreign national prisoners who fit the criteria for Bullwood Hall are transferred there early enough for adequate pre-discharge preparation to take place. (HP37)**
Achieved. Sixty-three per cent of prisoners were serving between one and four years and most spent a reasonable period at Bullwood Hall before discharge. Resettlement work was arranged to fit into the time available for most prisoners (see section on resettlement).
- 2.2 **There should be a national policy for the management and support of foreign national prisoners, which provides clear practice guidelines to establishments and is supported by auditable standards, service level agreements or contractual requirements. (HP38)**
Not achieved. Other than the purely procedural provision of Prison Service Order 4630, which focuses primarily on immigration status, no such policy or guidance has been published by the National Offender Management Service (NOMS).
We repeat the recommendation.
- 2.3 **The National Offender Management Service should give a clear strategic lead on offender management for foreign nationals, which ensures that risks are properly managed and that prisoners are adequately prepared for release or removal. (HP39)**
Not achieved. NOMS had not produced a strategy for the management and resettlement of foreign national prisoners. This had left Bullwood Hall unclear about the extent of work it could or should undertake with individual prisoners to reduce the risk of re-offending and prepare them for release or removal.
We repeat the recommendation.
- 2.4 **Defensible decisions on whether or not to proceed to deportation or removal should be made and relayed as early as possible in sentence. (HP40)**
Partially achieved. Decisions were often still made and communicated very late, causing great anxiety and making resettlement work by the prison very difficult.
We repeat the recommendation.
- 2.5 **The resettlement strategy should be implemented and should include consideration of the resettlement needs of prisoners who are resettling in the UK and abroad. (HP41)**
Partially achieved. The psychology team and offender management unit had completed a thorough resettlement needs analysis in 2009 and a resettlement policy had been produced. It was not clear to what extent the policy had drawn on the needs analysis. All prisoners were now asked about resettlement on their first night and during reviews eight weeks and two weeks before sentence completion date. However, the focus was almost entirely on resettlement in the UK. The International Organisation for Migration (IOM) had previously visited regularly and provided very helpful advice to those facing the prospect of removal abroad. These visits had stopped and Bullwood Hall was not in contact with any agency capable of helping the majority who had to plan for resettlement abroad.

Further recommendation

2.6 The resettlement policy should include needs-based support for resettlement abroad.

2.7 **A professional telephone interpreting service should be offered in sensitive matters such as adjudications and healthcare. Prisoner interpreters, subject to informed consent, should supplement and not replace this provision. (HP42)**

Partially achieved. On average over the previous six months, professional telephone interpreters had been used 56 times a month, of which health care accounted for about 45. Telephone interpreters were used in adjudications only in the minority of cases where prisoners spoke little or no English and did not sign a form agreeing to a peer interpreter being used. Telephone interpreters were not always used for first night assessments or assessment, care in custody and teamwork (ACCT) reviews despite the confidential and sometimes sensitive nature of the discussions (see also sections on first days in custody and suicide and self-harm).

Further recommendation

2.8 Professional telephone interpreters should be used in adjudications, assessment, care in custody and teamwork (ACCT) reviews and first night assessments as well as in health care consultations. Subject to informed consent, prisoner interpreters should supplement and not replace this provision.

2.9 **The population of G wing should not be permanently increased. (HP43)**

Not achieved. The population of G wing had remained at 80, double the previous single cell limit of 40. The requirement to share presented difficulties for some prisoners but the cells were reasonably spacious and nearly all prisoners we spoke to said they were content because they had in-cell sanitation, which was not available on other wings. Despite the narrow corridors and poor design of the unit, there was no evidence that the increase in size had compromised safety or access to activities.

Recommendations

Courts, escorts and transfers

2.10 **Prisoners should be given at least 24 hours' notice of planned transfer and the opportunity to inform family and legal representatives of their move. (1.5)**

Partially achieved. Prisoners were still transferred to Bullwood Hall at short notice. Most of those we spoke to said that, at best, they had been told about their transfer at lock up the night before so had little or no opportunity to tell their family or legal representatives. Where possible, prisoners being transferred from Bullwood Hall were routinely given at least 24 hours' notice but some were still the subject of movement orders received at short notice.

We repeat the recommendation.

2.11 **Detainees held solely under Immigration Act powers should not be held in a prison other than on the basis of security risk. (1.6)**

Not achieved. Eight men were being held under immigration powers alone, with little evidence that this was on the basis of security risk. For example, one man who had received a 111 day sentence for using false documents had been detained in prison for several months after the

end of this short sentence with no risk factors of any kind documented.
We repeat the recommendation.

2.12 Prisoners and detainees should not be subjected to successive moves with short notice within a short space of time. (1.7)

Not achieved. A number of prisoners we spoke to had been held at different prisons within a short period before arriving at Bullwood Hall.

We repeat the recommendation.

Additional information

- 2.13** Bullwood Hall still dealt with a number of escort contractors. These included Group 4 Securicor, which transferred prisoners from other prisons and took transferees to immigration removal centres on behalf of the UK Border Agency (UKBA), and Serco, which took people to court. Prisoners reported respectful treatment by escort staff. Most spent less than two hours on escort vehicles, although this could be extended if they arrived over lunch when reception was not staffed.

Further recommendation

- 2.14** Reception should remain open during lunch times when new arrivals are expected.

First days in custody

2.15 The reception area should be redesigned to be fit for present purposes as soon as possible. (1.18)

Partially achieved. Reception was now based in a prefabricated building on a temporary basis. This was a better facility that enabled staff to manage the throughput of around 60 new arrivals each month more effectively but it was still cramped. Planning permission and funding for an extension and refurbishment had been secured and the new reception was likely to be suitable for the needs of the prison.

2.16 In addition to the missing property board, reception staff should maintain a log tracking pursuit of missing property to identify weak spots over time. (1.19)

Partially achieved. A significant number of prisoners still arrived from other establishments with some items of property missing. A log of such missing property had been introduced but did not always match the information on the missing property board and was rarely updated by residential staff to reflect the outcomes of their efforts to retrieve outstanding items.

Further recommendation

- 2.17** A single log system should be used by all staff involved in tracking missing property.

Additional information

- 2.18** Reception staff were friendly and welcoming. The two holding rooms were clean and toilets were screened. There was also a telephone without a hood, which offered little privacy and was rarely used. Apart from health care interviews, which were held in a small but functional

office, other initial interviews, including cell-sharing risk assessments, lacked privacy and were usually conducted by a G wing induction officer in the reception corridor.

- 2.19 All 10 officers on G wing undertook first night and induction duties and those we observed tried to put new arrivals at ease. A first night/induction record started in reception included the first night assessments that dealt with immediate needs and began to identify needs under a number of the resettlement pathways. These were completed sensitively but, when interpreters were required, prisoners tended to be used rather than professional telephone interpreters (see paragraph 2.7 and further recommendation at paragraph 2.8).
- 2.20 New arrivals were usually located in double cells on the ground floor of G wing. The accommodation was clean but cramped and the integral showers and toilets were grubby (see section on residential units). A number of prisoners we spoke to said they had not been offered a free call on their first night. Staff were supposed to indicate in the first night/induction records whether a telephone call had been given but these were often not completed and some showed that calls had been given after the first night. Prisoners were positive about the range of peer supporters involved in first night and induction arrangements. These included Insiders, safer community orderlies and equality and diversity orderlies.
- 2.21 A staff office doubled as the induction room but was not properly equipped for this. The induction programme was comprehensive and prisoners told us it was useful and informative. It was scheduled to last three days but often took longer to complete.

Further recommendations

- 2.22 All new arrivals should be offered and receive a free telephone call before they are locked up on their first evening and this should be documented.
- 2.23 Reception interviews should be conducted in private.

Housekeeping points

- 2.24 The telephone in reception should be fitted with a privacy hood.
- 2.25 The induction programme should be delivered in a properly equipped environment and completed within reasonable timescales.

Residential units

- 2.26 **A regular programme of good quality refurbishment work should be carried out throughout the prison. (2.8)**
Partially achieved. Most accommodation was in reasonable condition but an ongoing repainting programme was badly needed. There had been some improvements to D wing, including a new floor, but it was particularly gloomy with no natural light in communal areas. Many G wing cells were drab and had pockmarked walls. Many showers were musty and dirty and many toilets had ingrained dirt and faeces.
We repeat the recommendation.

Further recommendation

2.27 Toilets should be deep cleaned and regularly descaled.

2.28 **In-cell toilets or an alternative system to the current unsatisfactory arrangements should be introduced in order to provide 24-hour access to toilet facilities. (2.9)**
Not achieved. Apart from on G wing, there were no in-cell toilets. Prisoners had to wait their turn in the night sanitation system and were issued with degrading 'potties' in case this took too long. Urine and faeces were often thrown from cell windows as a result.
We repeat the recommendation.

2.29 **While the current night sanitation arrangements persist, more prisoners should be unlocked for 24 hours a day, and additional night staff should be deployed when there are technical problems with the night sanitation system to ensure that prisoners can access toilets without undue delay. (2.10)**
Not achieved. Only prisoners on the three enhanced units (E wing, F wing and the C wing annex) were unlocked 24 hours a day. This amounted to just 25 prisoners from a total population of around 225. There were enough enhanced prisoners to create another enhanced wing and managers planned to use D wing for this purpose. Additional night staff were not deployed when the sanitation system broke down, as it had done three times in the previous year. Prisoners reported long waits to use a toilet even when the system was working.
We repeat the recommendation.

2.30 **Prisoners should have better access to hot and cold water. (2.11)**
Not achieved. The situation had not changed and, unless they had filled flasks, prisoners on the older wings had to use the night sanitation system to access water at night.
We repeat the recommendation.

Staff-prisoner relationships

2.31 **Wing staff should receive training to help them understand the distinct needs of foreign national prisoners. (2.17)**
Not achieved. Training developed and delivered by the race equality officer had been delivered to a small number of staff in the previous four months. The training package was in need of updating and contained little about the distinct needs and situations of foreign prisoners apart from their immigration status and UKBA processes (see section on foreign nationals).
We repeat the recommendation.

Personal officers

2.32 **The role of the personal officer should be extended to include more active involvement in specialist areas of work. (2.22)**
Not achieved. There was little evidence of personal officer involvement in assessing or meeting resettlement or other needs. Personal officer entries on P-Nomis often did not appear until a month or more after the prisoner's arrival and all those we sampled covered only wing-related issues. Prisoners said personal officers helped with practical issues but were not always knowledgeable about immigration or resettlement needs. None of the personal officers we spoke to were aware of broader responsibilities.
We repeat the recommendation.

Additional information

- 2.33 Prisoners generally reported positively on relationships with staff and we observed many good interactions. Most staff we spoke to had a sympathetic and respectful approach to prisoners in their care and this was reflected in the calm and ordered atmosphere of the prison. However, history sheet entries on the P-Nomis system were regular but minimal. In one case, a personal officer did not see a prisoner subject to an ACCT document for a month until a management check instructed the officer to make contact. Regular management checks had led to some improvements.

Further recommendation

- 2.34 Personal officers should see prisoners promptly after allocation and regularly thereafter, detailing this in history sheet entries.

Bullying and violence reduction

- 2.35 **There should be a comprehensive policy, based on a needs analysis, that sets out how bullying will be dealt with and is clearly linked to the violence reduction strategy. (3.10)**
Achieved. A comprehensive violence reduction survey had been conducted in July 2009 and a revised and comprehensive violence reduction strategy had been finalised in 2010. The strategy incorporated the cell-sharing risk assessment procedure and the challenging anti-social behaviour (CAB) policy.
- 2.36 **Staff should be trained in the revised bullying policy and violence reduction policy. (3.11)**
Not achieved. Training on the revised violence reduction policy had not taken place and the first violence reduction awareness training session was scheduled to be held in October 2010. **We repeat the recommendation.**
- 2.37 **Mediation and restorative justice programmes delivered by trained staff should be developed to underpin the PACT policy. (3.12)**
Not achieved. The violence reduction policy, which had superseded the PACT policy, referred to mediation and restoration but the violence reduction coordinator had not used mediation or restorative justice programmes or been trained in them.

Further recommendation

- 2.38 Mediation and restorative justice programmes delivered by trained staff should be developed to underpin the violence reduction strategy.
- 2.39 **The vulnerable prisoner strategy should be overseen by the safer community management committee and should be an integral part of other inter-related safety strategies. (3.13)**
Achieved. The vulnerable prisoner strategy had been finalised in October 2009 and was overseen by the safer community team. The strategy encompassed 'CARE' (concern, advise, review, empathy) plans (see additional information) and was linked into the violence reduction and the suicide and self-harm strategies.

- 2.40 **The analysis of monitoring information should allow identification of patterns in bullying and self-harm. (3.14)**
Achieved. Bullying and self-harm statistics covering wing location, age, ethnicity, religion and nationality were collated and analysed at the monthly safer community team meetings. There were few incidents of bullying and self-harm so the team had not been able to identify discernable trends.
- 2.41 **All allegations of bullying should be properly investigated. (3.15)**
Achieved. Allegations of bullying were reported to, and investigated by, the violence reduction coordinator. There had been 21 allegations of bullying in the previous three months and some of the investigations had resulted in CARE plans and CAB documents (see additional information).
- 2.42 **Victims of bullying should be properly supported through an agreed support plan. (3.16)**
Achieved. Victims of bullying were supported through the vulnerable prisoner strategy, which encompassed the CARE policy. Prisoners were encouraged to contribute and agree the measures in the support plan.
- 2.43 **The Concern Line should be more actively promoted through prominently-displayed notices in the visitors' waiting room and notices sent out with visiting orders and travel instructions. (3.17)**
Achieved. The Concern Line was actively promoted in the visitors' waiting room and notices sent out with visiting orders encouraged visitors to report issues through it.
- 2.44 **Designated members of the safer community management committee should attend meetings. (3.18)**
Achieved. Safer community team meetings were well attended. Attendees included the deputy governor, various functional heads, the suicide prevention coordinator, the violence reduction coordinator and the head of health care.
- 2.45 **The responsibilities of the prisoner safer community representatives, including their role as peer supporters, should be clarified and promoted more actively. (3.19)**
Achieved. Both safer community orderlies in post were aware of their responsibilities and spoke positively about their role. They were confident that prisoners would discuss with them issues they might not disclose to a prison officer. They regularly attended the non-confidential part of the safer community team meetings. The orderlies met all new arrivals in reception or on the induction wing and advised them about expected standards of behaviour and support available. Both wore bright orange T-shirts to identify themselves and had been issued with a 'wing passport' allowing them to move freely around the residential units and speak to prisoners. However, neither had received formal training.

Housekeeping point

- 2.46 Safer community orderlies should be given formal training in bullying and violence reduction.

Additional information

- 2.47 Prisoners told us that the prison was safe, and there was little evidence of bullying. Anti-bullying and violence reduction activities were overseen by the safer community team, whose meetings had a structured agenda with action points being followed up. The meetings were underpinned by the safer community continuous improvement plan which detailed actions from

the violence reduction audit, Prison Service Orders, Prison Service Instructions and our 2007 inspection report.

- 2.48 Between January and September 2010, 14 CAB booklets had been opened. Currently, two were at stage two of the three-stage policy and one was at stage three. As well as victims of bullying, the CARE system was also used to help vulnerable prisoners who were not at risk of self-harm or suicide but who needed extra support, such as those who had suffered bereavement or were not coping in prison. Of the 18 CARE plans opened to date in 2010, eight had been for victims for bullying. No CARE plans were open during the inspection.

Self-harm and suicide

- 2.49 **The quality assurance system should be revised to ensure that the quality of initial assessment and care mapping is checked as well as compliance with procedures. (3.26)**
Achieved. ACCTs were checked daily by duty officers and the suicide prevention officer. Ten per cent of all closed ACCTs were quality checked at the safer community team meetings.
- 2.50 **Analysis of self-harm data should be strengthened to include breakdown by reason, location, time of day, stage in sentence and nationality of the prisoner. (3.27)**
Achieved. Self-harm data included reasons, wing, time of day, stage in sentence and nationality. The data were analysed at the safer community team meetings. The main trigger for self-harm incidents was adverse immigration decisions.
- 2.51 **Family support should always be considered as part of care planning for prisoners at risk of self-harm. (3.28)**
Achieved. All prisoners were asked if they wanted their families to be involved in care planning (CARE and ACCT). In at least one case, the offer and refusal of family support was recorded on the prisoner's ACCT document. Staff said take-up of family involvement was low because many prisoners did not want their families to know they were suffering with depression or stress and many prisoners' families were in any event based abroad.
- 2.52 **Peer support should be available after prisoners are locked up at night and a care suite made available to support their work. (3.29)**
Achieved. The befriender suite protocol published in June 2010 provided for night-time access to peer support. The night orderly officer was informed of any prisoner requesting a befriender at night and checked P-Nomis to assess the prisoner's history and cell-sharing risk assessment level. If the risk level was appropriate, the prisoner was moved to the dedicated suite on F wing where he could speak to a befriender. (See also additional information.)
- 2.53 **Detailed records should be maintained and retained when the constant observation cell is used and its use should be monitored by the safer community management committee. (3.30)**
Partially achieved. Observations of prisoners located in the constant observation cells were recorded in the relevant ACCT documents. The policy for the use of the constant observation cell was available outside the cell together with the proforma documenting authorisation, which was required from both the duty manager and a member of health care. Use of the cell was not a standing item on the safer community team meeting agenda.

Further recommendation

- 2.54 Use of the constant observation cell should routinely be considered at the safer community team meeting.
- 2.55 **Assessment, care in custody and teamwork (ACCT) reviews should be scheduled at times when key staff involved with the prisoner, including personal officers, are available to attend. (3.31)**
Achieved. ACCT documents indicated that key staff attended the reviews.
- 2.56 **All staff should have ACCT foundation training and there should be a programme of refresher training. (3.32)**
Not achieved. Ninety-eight of the 142 staff had received ACCT foundation training, which was held once every two months.
We repeat the recommendation.
- 2.57 **Peer interpreters should be used in ACCT reviews only to support prisoners and to supplement, not replace, professional interpretation. (3.33)**
Partially achieved. The local use of interpretation services policy stated that peer interpreters could be used only when it would help the prisoner in need. They were not used as a cost-cutting mechanism or where there was doubt about appropriateness. The detainee and the peer interpreter signed to confirm they were happy with the arrangements. However, the confidential and potentially sensitivity of discussion at ACCT reviews was such that it was more appropriate always to use professional interpreters. (See paragraph 2.7 and further recommendation at paragraph 2.8.)

Additional information

- 2.58 There had been 13 recorded incidents of self-harm in the previous three months. The ACCT documents and CARE plans demonstrated a good level of care for prisoners in crisis. There were no open ACCT plans during the inspection.
- 2.59 The befriender suite was a welcome development. It contained a sofa, three easy chairs and hot drink facilities and was carpeted and had pictures on the wall. The safer community team meeting minutes noted that night-time support arrangements were not widely publicised to prisoners 'to prevent abuse of the service', which was inappropriate and risked prisoners in crisis being unaware of the support available and therefore less likely call for help. The constant observation cell was stark and did not provide a suitable environment for prisoners in crisis. It had been used only once in the previous six months.
- 2.60 The peer befriending scheme had been established with the assistance of the Mentoring and Befriending Foundation and the five befrienders provided valuable support for prisoners in need. Prisoners interested in becoming a befriender attended a workshop detailing what the role entailed before security and health care checks were made to ensure suitability. Candidates then had a semi-structured interview and those selected signed a compact and underwent a week-long training course. An application for approved provider standard had recently been made to the Mentoring and Befriending Foundation. Befrienders had access to all wings and regularly walked the wings wearing distinctive T-shirts.

Further recommendations

- 2.61 The night-time peer support arrangements for prisoners in crisis should be widely publicised.
- 2.62 The constant observation cell should be a suitable therapeutic environment for prisoners in crisis.

Applications and complaints

- 2.63 **Responses to complaints should be addressed personally and address the issues raised. Apologies and compensation should be offered when appropriate. (3.117)**
Partially achieved. Most responses we looked at addressed prisoners personally, addressed the issues raised and made appropriate proposals for resolution but a number of complaints about food had received an identical standard response.

Housekeeping point

- 2.64 Standardised replies should not be used when responding to complaints.
- 2.65 **Prison staff should be made aware of how complaints diverted to the UK Border Agency will be dealt with, including standards and tracking. (3.118)**
Achieved. Prison staff were aware of how complaints diverted to the UKBA were dealt with. Such complaints initially entered the Prison Service complaints system and were forwarded by the complaints clerk to the local chief immigration officer. She dealt with the complaint herself if she could and returned it to the complaints clerk. This information was not fed back to senior UKBA managers who were therefore unable to monitor and analyse the true level of complaints about UKBA staff in the prison.

Further recommendation

- 2.66 National UK Border Agency (UKBA) complaints statistics should include complaints made in the prison about UKBA staff. These statistics should be analysed and monitored by senior UKBA managers.
- 2.67 **Application logs held on wings should provide a proper audit trail so that managers can check for timeliness and staff are able to deal with prisoners enquiries about the progress of their application. (3.119)**
Not achieved. The applications logs detailed the date when applications were submitted and the column for recording the outcome was rarely completed. It was therefore impossible for prisoners to follow the progress of their application and managers were unable to check for timeliness.
We repeat the recommendation.

Additional information

- 2.68 Prisoners said they had little faith in the complaints procedure, particularly for racist complaints. In one case, a witness to an incident had been asked to investigate the complaint rather than an independent investigator and this conflict of interests had not been picked up by the quality assurance check. Complaints statistics were analysed each month at the SMT

meeting. Information on the location, ethnicity and age of the complainant was collated. Complaint forms in a number of languages other than English were not freely available on the wings. Responses were often handwritten and difficult to read.

Further recommendations

- 2.69 Events that give rise to complaints should not be investigated by witnesses to the event.
- 2.70 Prisoners should be able to make complaints in their first language on freely available translated complaints forms. Subsequent responses should be written legibly in the language of the original complaint.

Legal rights

- 2.71 **In consultation with the Legal Services Commission, the prison should seek to expand access to independent specialist immigration legal advice to meet the identified needs of the population. (3.125)**
Not achieved. There was no evidence that the Legal Services Commission had been consulted to expand access to independent specialist immigration legal advice. The Immigration Advisory Service visited once a week and applications to meet with its staff were available on the wings. However, many prisoners were unaware of this and complained that it was difficult to access legal advice. The Detention Advice Service also attended every two weeks but was unable to provide the much needed legal representation.
We repeat the recommendation.
- 2.72 **The Prison Service should develop a training pack for staff in basic immigration law and procedure. (3.126)**
Not achieved. There was no evidence of a national training pack for staff in immigration law and procedure. The local training package on foreign national prisoners gave some basic information (see section on foreign nationals).
We repeat the recommendation.

Additional information

- 2.73 Legal visits were held only on Mondays and Fridays and as they were held in the same room as social visits, they were not confidential. Lists of legal advisors were available from the legal aid officer in the offender management unit but details of the community legal advice helpline were not posted on the wings. Prisoners wanting to complain about unsatisfactory service in relation to legal advisors did not have access to relevant notices, guidance and complaints forms.
- 2.74 Eight immigration detainees were being held. Staff had little knowledge of immigration bail rights and bail application forms and the Bail for Immigration Detainees 'Handbook on Bail' were not available from the foreign national development coordinator or the legal services officer. They could request bail application forms from UKBA staff but this required men who often had little understanding of the system to take the initiative.

Further recommendation

2.75 Legal visits should take place every weekday in a confidential environment.

Housekeeping points

2.76 Bail application forms and Bail for Immigration Detainees 'Handbook on Bail' should be freely available to immigration detainees and notices advertising this widely displayed.

2.77 Notices promoting the community legal advice helpline should be posted around the establishment.

2.78 Notices about the Legal Complaints Service (LCS) and the Office of the Immigration Services Commissioner (OISC) should be widely displayed and prisoners should be able to request and receive LCS and OISC complaint forms from staff.

Faith and religious activity

2.79 **Information on services should be available in languages other than English. (5.32)**
Not achieved. Plans to translate service information had not yet been implemented. Chaplaincy staff spoke to all new arrivals at induction and provided information on services.

Housekeeping point

2.80 Information on services should be available in languages other than English.

2.81 **The current multi-faith room should not be closed before an alternative room of adequate size and with appropriate facilities for ablutions has been identified and opened. (5.33)**
Achieved. The new multi-faith room had been opened before the previous room had been closed. The new room provided an adequate space for worship and had ablution facilities in a separate area.

2.82 **A Muslim chaplain should be appointed. (5.34)**
Achieved. The Muslim chaplain was employed on a half-time basis and had been in post for about 18 months.

Additional information

2.83 The chaplaincy team had not had an official coordinator for about a year, although the Anglican chaplain had unofficially carried out coordinating duties pending a permanent appointment. This had not had any obvious detrimental effect on provision. Prisoners reported very positively on the chaplaincy and received adequate pastoral care. As well as Christian and Muslim services, Qur'anic and Bible studies classes were run each week and visiting ministers from a range of faiths attended as required. The main exception was for the 25 or so Buddhists as the coordinator had found it difficult to find a Buddhist chaplain willing to visit regularly.

Further recommendation

- 2.84 Buddhist prisoners should have regular access to a Buddhist chaplain.

Substance use

- 2.85 **A suitable secondary detoxification programme should be introduced. (3.133)**
Achieved. The integrated drug treatment system (IDTS) had been introduced in May 2010 and three prisoners were receiving substitute medications. There was a good range of clinical protocols. Secondary detoxification options, including symptomatic relief and methadone maintenance, were available for men who relapsed while in prison. Prisoners could be transferred to HMP Chelmsford if required. The IDTS, counselling, assessment, referral, advice and throughcare (CARAT) service and mental health professionals worked well together to deliver an integrated service, helpfully supported by the CARAT peer support scheme.
- 2.86 **The necessary level of mandatory drug testing should take place at weekends. (3.134)**
Achieved. Targets for random drug testing were being met. Random weekend testing took place, although mostly on Saturdays. There had been two positive tests in the previous nine months, which were consistent with prescribed medication use. This supported the widespread view of staff and prisoners that there was little illicit substance misuse. Compliance-based and mandatory drug testing were clearly separated.

Further recommendation

- 2.87 Random mandatory drug tests should take place across all days of the week.

- 2.88 **Holding cells in the mandatory drug testing suite should be enlarged. (3.135)**
Achieved. The holding cells had been enlarged and were about to be decorated. There was no health promotion material available.

Housekeeping point

- 2.89 Health promotion information should be made available in the mandatory drug testing holding areas.

Diversity

- 2.90 **The diversity strategy should be completed and include consideration of the needs of older prisoners, prisoners with disabilities and gay prisoners. It should include a disability equality scheme that involves prisoner needs assessment. (3.42)**
Partially achieved. The strategy was incomplete. The section on disability and older prisoners had not been updated since the last inspection and made little reference to older prisoners. Sexual orientation was not covered. Prisoner needs assessment was now built into the processes.

Further recommendation

- 2.91 The diversity strategy should be completed as an integrated whole, covering all the main aspects of equality including issues of sexuality.
- 2.92 **The role of the diversity orderlies should be clearly defined and promoted. (3.43)**
Achieved. The three diversity orderlies had clear job descriptions and were actively supported by a member of staff. Their photographs were prominently displayed in many residential areas.
- 2.93 **The disability liaison officer should be given profiled time sufficient for the work. (3.44)**
Achieved. The disability liaison officer role had been allocated four hours a week and had recently been combined with that of race equality officer, with flexible allocation of time between the roles. As a result, more time was available for disability work and less for race equality work (see section on race equality).
- 2.94 **The cells identified for prisoners with disabilities should be properly assessed and made suitable. (3.45)**
Not achieved. The two designated cells on G wing were still not fully accessible to wheelchair-users and the showers had no seat or hand rail.
We repeat the recommendation.
- 2.95 **There should be regular diversity awareness training. (3.46)**
Achieved. The 'Challenge It, Change It' course was delivered regularly as part of the weekly training programme. Sixteen staff had received diversity training in the previous month.
- 2.96 **There should be regular minuted diversity meetings that include prisoner representation and consideration of prisoner issues. (3.47)**
Achieved. The diversity equality action team met bi-monthly. At least four prisoners attended each meeting and the main focus was on prisoner issues.
- 2.97 **Prisoners with disabilities should be correctly identified, and support and care plans should be completed for each individual. (3.48)**
Achieved. New arrivals were asked to declare any disability in reception and were interviewed during induction by the disability liaison officer. Care plans were drawn up for each person with significant disability, personal emergency evacuation plans were drawn up and the names of prisoners needing help were prominently marked on wing roll boards.

Additional information

- 2.98 Meetings of prisoners with disabilities and older prisoners had been discontinued because of poor attendance and little by way of outcomes. Issues relating to prisoners with disabilities and older prisoners were supposed to be covered at the community development meetings but were never mentioned in practice.
- 2.99 There was some confusion among staff about appropriate religious dress. One Muslim prisoner had made a written complaint that he was not allowed to wear a prayer cap when he wanted. The written answer from a wing manager was polite but unclear and appeared to suggest this was not allowed, even though senior managers said they had sent out an instruction stating there was no restriction. The prisoner was finally given permission to wear his prayer cap during the inspection.

Further recommendation

- 2.100 Issues relating to prisoners with disabilities and older prisoners should be a standing agenda item at the community development meetings.

Race equality

- 2.101 **Residential staff and prisoner representatives should attend race equality action team meetings. (3.63)**
Achieved. Residential staff and prisoners attended and the monthly community development meeting focused largely on race equality issues.
- 2.102 **Cultural awareness training should be delivered regularly to all staff. (3.64)**
Not achieved. A cultural awareness training package had been developed by diversity staff but had not yet been delivered.
We repeat the recommendation.
- 2.103 **The race equality officer should be given enough time to complete race equality work, and attend the violence reduction committee meeting. (3.65)**
Partially achieved. The race equality officer post had been combined with that of the disability liaison officer (see section on diversity) and was now full time. However, he was redeployed to other duties for about 40% of his working time and therefore could usually undertake only basic tasks. He attended the violence reduction meeting when available.

Further recommendation

- 2.104 The race equality officer should be given enough time to complete race equality work.
- 2.105 **Nationality monitoring should be developed. Support and advice should be sought from, and provided by, the Prison Service's race equality action group. (3.66)**
Achieved. Bullwood Hall's own data collection system, available to all staff, included nationality and there was monthly monitoring of residential areas by nationality to ensure a fair distribution.
- 2.106 **Racist incident report forms should be independently scrutinised on a regular basis. (3.67)**
Achieved. Racist incident reports were checked by the area diversity officer, a member of the Independent Monitoring Board and by the diversity development officer of Braintree District Council. A recommendation had been made that verbal feedback be given to the complainant in their own language and recorded, which would address prisoners' lack of confidence in the racist complaints system.
- 2.107 **Appropriate actions should be taken and recorded if a member of staff is identified as behaving poorly in racist incident report forms, whether or not the behaviour is considered racist. (3.68)**
Achieved. There was evidence that senior managers had fed back to individual staff any lessons to be learned from the investigation of reported racist incidents. No investigation had uncovered grounds for formal action against any staff.

2.108 Prisoner representatives meetings should have a set agenda and clear action points. (3.69)

Achieved. Agendas, minutes and action points were all recorded for each meeting.

2.109 Racist incident report forms should be placed on G wing and other key areas, and should be original forms rather than photocopies. (3.70)

Partially achieved. Forms were not available on G wing. They had recently been present but were no longer available in other key areas.

Further recommendation

2.110 Racist incident report forms should be freely available on all residential units.

2.111 Regular cultural events should be held and displays throughout the prison should reflect the diversity of the population. (3.71)

Achieved. A bi-monthly programme of cultural events, including menus, displays and activities, was published and implemented, marking occasions such as Chinese New Year and black history month.

Additional information

2.112 The management of race equality had improved. Ethnic monitoring was carried out and any out-of-range figures reported to the senior management team (SMT), where the reasons were discussed and any required action agreed. However, the SMT had recently noted an ethnic imbalance in the allocation of cleaners' jobs and had simply judged that no further action was required because positive discrimination was not practised. Such an approach lacked the sophistication required to ensure equality of opportunity and did not address the possibility of indirect discrimination.

2.113 There did not appear to be any pattern of tension or disagreement between different nationalities. Monitoring by nationality had begun and valuable data were available but were not used to identify any nationality groups that may be disadvantaged and the NOMS short-term monitoring tool was not used to focus on specific areas where there was a possibility of unequal treatment or access. Managers had not brought together prisoners of particular nationalities, using professional interpreters as required, to clarify any specific needs relating to that nationality and to learn from any common themes in their experience.

2.114 Twenty-six racist incident report forms had been submitted in the previous six months and had been thoroughly investigated. Separate boxes for racist incident report forms were not provided.

Further recommendations

2.115 Senior managers should consider the possibility of indirect as well as direct discrimination in their consideration of ethnic monitoring.

2.116 Managers should carry out or commission analysis of nationality monitoring data, especially through use of the NOMS short-term monitoring tool.

2.117 Managers should meet with prisoners of significant nationality groups, using professional interpreters as appropriate, to identify needs and issues specific to that particular group.

Housekeeping point

- 2.118 Separate secure boxes should be provided for completed racist incident report forms.

Foreign national prisoners

- 2.119 **The foreign national strategy under development should involve prisoner consultation and identify needs. (3.85)**

Partially achieved. A great deal of consultation, and a needs analysis, had been undertaken but the project of developing a foreign national strategy had been discontinued. There was therefore no foreign national strategy that articulated and focused Bullwood Hall's mission in relation to its main function of holding foreign national prisoners.

Further recommendation

- 2.120 A foreign national prisoner strategy should be drawn up in consultation with prisoners and based on a needs analysis reflecting and informing all aspects of their management.

- 2.121 **All staff should be made aware of the list of staff and prisoner interpreters and issued with guidance on their appropriate use. (3.86)**

Achieved. The interpreter list was available electronically on a shared drive and staff were aware of it. The diversity officers arranged interpretation whenever asked.

- 2.122 **All staff should be made aware of the information available in translation on the Prison Service intranet. (3.87)**

Achieved. Staff were aware of what was available and the diversity staff helped keep them up to date with any changes.

- 2.123 **The cost of international telephone calls should be reviewed nationally. (3.88)**

Achieved. The contract had been reviewed and prices reduced, although prisoners still found them high compared to charges in the community.

- 2.124 **There should be enough suitably-experienced on-site immigration staff to explain status and options to detainees and to progress their cases. (3.89)**

Achieved. Another immigration officer had been recruited and managers believed they could cover all of this work. UKBA staff spent a great deal of time on face-to-face work with prisoners and held regular surgeries on all residential units.

- 2.125 **Decision documents, including reasons for detention and documents presented for signature by the prisoner/detainee, should be issued and explained in a language the detainee understands. (3.90)**

Not achieved. Documents were issued in English. Interpreters were frequently used when major documents were issued but many prisoners said they knew of people being asked to sign documents they could not understand. One Iraqi prisoner had been issued with a document the previous day notifying him of removal to Sweden the following week. He had mistakenly thought he was being removed to Iraq and had been in great distress for several hours until prison staff had realised the situation and put him right.

We repeat the recommendation.

- 2.126 **Detainees should not be pressured into signing documents that affect their rights, but given a copy and encouraged to seek prior legal advice. (3.91)**
Partially achieved. Prisoners said this still happened, and referred mainly to disclaimers that prisoners at the end of sentence were asked to sign so that they could remain at Bullwood Hall rather than being transferred temporarily to a local prison under remand conditions. UKBA staff tried to give prisoners time to seek advice but time pressures usually out of local UKBA staff control sometimes led them to request an immediate response.
We repeat the recommendation.
- 2.127 **The on-site immigration team should be properly equipped and connected to the UK Border Agency casework information database to enable them to work to a proper standard and maintain up-to-date files. (3.92)**
Achieved. The UKBA team was now fully online with the case information database IT system.

Additional information

- 2.128 A full-time foreign national development officer was doing good work in the establishment and in building contacts in the wider community. She had brought in a number of community leaders from different nationality groups to meet with prisoners. A training package on foreign national prisoners had been developed locally and delivered to a number of staff but parts were not up to date and the content dealt mainly with immigration status without considering other issues common to foreign nationals or their particular needs.
- 2.129 In a recent needs analysis, just under 39% of prisoners had said English was their first language and 22% that they needed language support. Twenty-eight per cent did not feel they understood spoken English very well and 33% said the same about written English. Fifty-three prisoners at the time of inspection had not given English as one of their spoken languages.
- 2.130 Although UKBA staffing was at a satisfactory level, many prisoners said the service was inadequate. Several said they had found staff abrupt or even rude, an assertion that was supported by some prison officers who felt this made their task more difficult. Some prisoners still said they had insufficient access to independent legal advice and representation (see also section on legal rights).

Further recommendations

- 2.131 Prison managers and the UK Border Agency should ensure, through a systematic needs analysis, that sufficient legal advice is available.
- 2.132 UK Border Agency staff should receive training and solicit feedback on the quality of their face-to-face communication.

Health services

- 2.133 **A full skill mix review should be undertaken by the primary care trust to ensure sufficient appropriately-qualified health workers are recruited to deliver health services. (4.41)**
Partially achieved The commissioning arrangements of all health care services had been reviewed by South East Essex Primary Care Trust (PCT). Full procurement of all services was not possible. Service level agreements were being reviewed for GP, dental, optical and

pharmacy services. A nurse lead and health care assistant had been recruited to support the IDTS service. There was a lead nurse for primary mental health services but no expertise in dual diagnosis. GP services were provided by locum staff. There was significant reliance on the use of agency and bank staff as there had been a recruitment freeze for three years. This had caused difficulties, although work had been undertaken to ensure consistency in the use of bank/agency nursing staff.

Further recommendation

2.134 Skill mix arrangements should be implemented to enhance health care services for prisoners and minimise the reliance on temporary staff.

2.135 **The head of healthcare should be professionally qualified and have direct access to the governor. (4.42)**

Achieved. The interim head of health care was professionally qualified and a member of the SMT and had direct access to the governor. Recruitment for a new head of health care had taken place and the appointed candidate also held a professional qualification.

2.136 **Emergency equipment should be checked daily and records kept. (4.43)**

Partially achieved. Resuscitation equipment, automated emergency defibrillators, oxygen and first aid kits were checked weekly and records were kept. Not all first aid kits were in date and not all staff were up to date with their resuscitation training.

Housekeeping point

2.137 The resuscitation equipment in the health care department should be checked daily, out-of-date equipment in first aid kits should be replaced and there should be sufficient staff trained to use emergency equipment.

2.138 **A healthcare worker should be identified to take responsibility for the health management of older prisoners. (4.44)**

Achieved. A registered nurse held responsibility for older prisoners and worked closely with the disability liaison nurse. There were plans to consult older prisoners and prisoners with disabilities to develop an effective service to meet their needs.

2.139 **The healthcare manager should contact the Medical Foundation for the Care of Victims of Torture for guidance on the care of prisoners who may have been victims of torture, and all healthcare staff should undergo specialist training on the management of such prisoners. (4.45)**

Achieved. Arrangements were in place to ensure that relevant training opportunities were available. Staff had been trained in caring for victims of torture in November 2009.

2.140 **The doctor's office should be fitted with hand-washing facilities and reconfigured to meet safety regulations. (4.46)**

Achieved. The doctor's office had been moved and hand washing facilities provided.

2.141 **A new dedicated room should be provided in reception to allow initial health screenings to take place. (4.47)**

Achieved. Health care staff had use of a small room in reception but this did not have access to SystemOne. Plans to extend the building (see section on first days in custody) included a larger room for health reception screening.

Further recommendation

- 2.142 Nursing staff should have access to a computer in reception to complete the electronic reception screen on SystmOne.
- 2.143 **Regular pharmacist-led clinics should be held to allow patients to discuss their medication. (4.48)**
Not achieved. Discussions had taken place with the pharmacy lead for South East Essex PCT. The pharmacy contract was under review and interim plans to start pharmacist-led clinics were only at discussion stage.
We repeat the recommendation.
- 2.144 **The pharmacist should visit the prison at least once a month to oversee pharmacy functions and undertake pharmacist-led clinics, clinical audit and medication review. (4.49)**
Not achieved. There was no pharmacist overseeing the pharmacy functions. Pharmacist-led clinics, clinical audit and medication reviews were not in place. The administration hatch was small and nurses could not fully observe men while administering controlled drugs. We were not convinced that the safety and security of medicines had been sufficiently thought through.
We repeat the recommendation.
- 2.145 **Administration of medicines records should be completed methodically and accurately, and where patients fail to attend or refuse medication this should be recorded. (4.50)**
Not achieved. Medicines were administered using SystmOne but administration was not always accurate. Medicines were administered from an unsigned copy of the prescription before being recorded on SystmOne. We saw controlled drugs being administered and the register being completed at the end of the session. Non-controlled drug medicines were moved from one clinical area to another to be administered. These actions constituted a clinical governance risk. A record was made on SystmOne if a prisoner did not attend or declined medicines.

Further recommendation

- 2.146 All administration of medications should be carried out in accordance with professional bodies' guidance and administration should be documented contemporaneously.
- 2.147 **The computerised clinical management system should be designed to allow the administration of medication to be recorded. (4.51)**
Achieved. Electronic administration of medicines was available but access to a computer was not available in the pharmacy for the administration of controlled drugs. Administration of other medicines occurred in a clinical area where the computer was not within reach.

Further recommendation

- 2.148 Action should be taken to ensure medicines can be administered safely from the electronic system.
- 2.149 **The ambient temperature of the pharmacy should be monitored to ensure that it provides an appropriate environment for medicines to be stored. (4.52)**
Achieved. The temperature of the pharmacy was monitored but the overall appropriateness of

the storage facilities for medicines was poor. The pharmacy room was cramped and untidy and was also used for general storage.

Housekeeping point

2.150 The pharmacy should be kept clean and tidy and comply with relevant security regulations.

2.151 **All pre-packs should be dual-labelled and one label removed when the pre-pack is dispensed. Where practicable, the use of patient-named medication should be encouraged. (4.53)**

No longer applicable. An in-possession risk assessment was undertaken during the reception screen for all prisoners. Prisoners were mostly administered monthly supplies of medicines. The in-possession policy was out of date. Some pre-packed medicines, such as simple analgesia, were unlabelled before administration or hand written white labels were completed by nursing staff. Patient-named medicines were not always returned to the pharmacy as they were intended for reissue to other prisoners.

Housekeeping point

2.152 The in-possession policy should be updated.

2.153 **Patient group directives (PGDs) should be introduced to enable nurses or the pharmacist to supply more potent medication and to avoid unnecessary consultations with the doctor. A copy of the original signed PGDs should be present in the pharmacy. Staff should read and sign them. (4.54)**

Achieved. A range of patient group directions and over-the-counter remedies were used. They were being updated and were waiting to be signed by the GP. The IDTS nurse was an independent prescriber.

Housekeeping point

2.154 The GP should sign the patient group directions and all clinical staff should sign that they have read them.

2.155 **The dental surgery should be refurbished to bring it up to acceptable standards. This should include cabinetry, flooring and essential dental instruments. (4.55)**

Achieved. The dental surgery had been refurbished and was fit for purpose.

2.156 **Dental treatment should be suspended until the amalgamator is removed, a mercury vapour check carried out and any necessary decontamination completed. Mercury hygiene measures should be instituted, including a new amalgam mixer, with a tray beneath, and provision of a mercury spillage kit. (4.56)**

Achieved. The dental suite had been closed and fully decontaminated. Mercury products were no longer used.

2.157 **The x-ray machine should be commissioned urgently, with the visit carried out when the dentist is present. Local rules should be produced urgently, including radiation safety procedures, and the dentist named as the radiation protection supervisor. (4.57)**

Achieved. As part of the refurbishment, a new x-ray machine had been installed and radiation

procedures were in place. A registered nurse was the identified radiation protection supervisor but was not up to date in her radiation protection training.

Housekeeping point

2.158 The radiation protection supervisor should receive regular radiation protection update training.

2.159 **The dental surgery should have its own set of resuscitation equipment. (4.58)**
Achieved. There was specific resuscitation equipment for the dental surgery and this was placed in the dental suite during a clinic.

2.160 **A contract for the disposal of hazardous waste from the dental surgery should be set up urgently to include the provision of clean and contaminated waste. (4.59)**
Achieved. There was a contract for the disposal of hazardous waste, although it was not easily accessible. The disposal of hazardous waste was undertaken by Initial.

Additional information

2.161 Health care services, including mental health provision, were good and prisoners were generally satisfied with their experiences. Prisoners were least satisfied with dental services, where provision appeared uneven and unpredictable. We saw prisoners being treated in a professional and caring way. Clinical governance arrangements were improving. An infection control audit and clinical governance audit were in progress. All policies and procedures were being updated, although staff did not always sign that they had read and understood them. Clinic waiting times were generally short. Waits for the Hepatitis B clinics were long but there were plans to address this. Record-keeping was satisfactory but SystemOne was not used as effectively as it could be, particularly around monitoring appointments to external hospitals. There was a good range of health promotion information in various languages, although many posters were in English and some were outdated. There were good links with the gym and remedial PE was available. Healthy eating was promoted and discussions around the role of health trainers had started.

Further recommendation

2.162 Health trainers should be appointed to enhance the health promotion initiatives in the prison.

Housekeeping points

2.163 Health care staff should sign that they have read and understood all updated policies and procedures.

2.164 There should be comprehensive arrangements to monitor internal and external health care appointments.

2.165 Up-to-date health promotion posters should be displayed around the prison and available in a range of languages.

Learning and skills and work activities

- 2.166 **The information, advice and guidance provision should be fully implemented as a matter of urgency. (5.13)**
Achieved. The CIAS was now provided by Tribal and significant improvements had been made to ensure good access for all prisoners. Good advice and guidance was provided for prisoners from induction to the time of leaving.
- 2.167 **The range of formal nationally-recognised accredited skills training programmes should be increased. (5.14)**
Achieved. The prison had introduced a wider variety of accredited courses and qualifications were now available in all work areas. These included a multi-skills qualification in brickwork and plumbing and a level one qualification in many areas including the garment workshop. Woodwork was no longer offered.
- 2.168 **More suitable basic skills programmes should be introduced to meet the needs of those in prison for short periods. (5.15)**
Achieved. The structure and range of basic skills programmes, particularly in English for speakers of other languages (ESOL), had been effectively reviewed so that short-stay prisoners had more opportunities to achieve a qualification while at Bullwood Hall. The restructured labour board had improved and took into account each prisoner's literacy, numeracy and language needs to allocate work more appropriately.
- 2.169 **Better teaching resources should be provided in vocational areas. (5.16)**
Partially achieved. Most vocational training areas had been improved, including an interactive whiteboard in the plumbing classroom. The room used for bricklaying was too cramped for the numbers using it and the outside area for practical work was not covered. There were plans to rectify this.

Housekeeping point

- 2.170 The outside area for use by bricklaying learners for practical work should be covered to allow better use of the facility in poor weather.
- 2.171 **Planned library opening hours should be provided in the evening and weekends. (5.17)**
Not achieved. As a trial, library services staffed by prison orderlies had been offered to prisoners on one residential wing at weekends for four months. We were told that few prisoners had used this provision. Access to the general library facility had improved through better timetabling and all prisoners had access for at least 30 minutes a week. The library was well used by prisoners studying courses in the education department.
We repeat the recommendation.
- 2.172 **Use of IT should be monitored and its development planned. (5.18)**
Partially achieved. Library computers had been connected and were working. The number of prisoners using the library IT facility was recorded but it was insufficiently monitored to ensure correct usage.
We repeat the recommendation.
- 2.173 **Library guidance materials should be translated into relevant languages. (5.19)**
Partially achieved. The library had recently produced guidance materials in four languages, although library orderlies did not know these existed. Notices in the library were all displayed in

English and were difficult to read for many prisoners.
We repeat the recommendation.

2.174 Library staff should have direct internet access. (5.20)

Achieved. Access to the internet had been in place for staff over the previous 12 months but had not been adequately used to provide prisoners with news or materials in a range of languages.

Housekeeping point

2.175 Library staff should make effective use of the internet facility to provide a wider variety of materials for prisoners.

Additional information

2.176 Leadership of learning and skills was strong and well managed. There was effective communication and partnership working between the prison and OLASS providers who were responsive to changes in nationalities of prisoners. New accredited learning opportunities had been introduced since the previous inspection in vocational training and education. Curriculum changes had been made to help maximise prisoners' opportunities to gain skills and qualifications. For example, improvements had been made in the initial diagnostic assessment of specific learning needs. The recent introduction of a well run programme of employability skills and personal development for all prisoners was also a useful means of improving self-esteem and confidence.

2.177 Inductions were effectively managed by staff, and good use was made of peer mentors to overcome language and cultural barriers. Prisoners were given good one-to-one guidance and support during the first and second week to help them select the appropriate activity to match their needs and aspirations. The CIAS provider worked very effectively and was ably supported by prisoner peer mentors, who were either working towards or had gained a level 2 qualification in providing adult learning support. Prisoners were quickly and fairly allocated to activities once they had completed their induction and waiting lists were well managed.

2.178 Almost all prisoners were able to participate in purposeful activities and only two prisoners were unemployed. The range of work areas included the kitchen, gardens, recycling, laundry and cleaners. Approximately 90% of prisoners accessed education or vocational training. The pay structure was fair and equitable. Attendance and punctuality were good in work and in education and vocational training. Prisoners developed good employability skills and demonstrated high levels of competence in most areas, which gave them a good opportunity for work in their own community. Horticultural training was satisfactory and took place in the afternoons. A small work party maintained the prison grounds and tended to plants and vegetables in the green houses. The standard of work produced in the garment workshop, although low skilled, was satisfactory and included work produced for charities.

2.179 There was a good range of accredited vocational training programmes appropriate to the needs of the prisoners. Vocational training was available in all the work areas. Courses were available in areas such as brickwork, plumbing, horticulture, industrial cleaning, cooking, health and safety, recycling, information technology and web design. Achievement rates on courses were high and most learners who completed a course passed. Training staff were well qualified and experienced and in many cases were well supported by peer mentors. Learners were well supported in literacy and numeracy in practical areas.

- 2.180 Education was well managed and provided a broad curriculum of choice during the day time sessions. The range of education courses included art, information technology, cookery, literacy, numeracy and ESOL. ESOL classes were popular and well taught. Teaching and learning overall were very good with teachers supporting learners well. Learners achieved particularly well with high retention and pass rates. The high standard of teaching was effective in integrating and recognising the cultural differences of prisoners. For example, in an ESOL class where food was being discussed, two Chinese learners showed others in the class how to use chopsticks by using pencils as props. There was good provision in the basic skills of language, literacy and numeracy and courses were available at all levels. Some prisoners who completed basic skills successfully, progressed onto English and maths courses. There was a strong emphasis on developing job-related skills that were fully integrated into work and learning and skills activities through the use of the newly introduced employability and personal development course. All prisoners took this course, which started at induction. Most resources were good and well used. Classrooms were bright and airy and well equipped. Four learners were following distance learning courses. There were no evening classes. Many posters and signs were difficult to read, in small print or poorly copied.
- 2.181 The library facility remained satisfactory and staffing was adequate. Good links had been established with the education department, who made good use of the provision. The range of books and learning materials for prisoners whose first language was not English had been improved. Monitoring of book loss was not undertaken and library usage was insufficiently monitored.

Housekeeping points

- 2.182 Guidance materials, signs and notices should be made clearer so that all prisoners are able to read and understand them.
- 2.183 Processes should be established to record, analyse and use management information and data on library usage and book loss.

Physical education and health promotion

- 2.184 **There should be facilities for team sports. (5.24)**
Achieved. PE facilities for team sports had improved. The asphalt surfaced outdoor activity area had been replaced by a modern astroturf all-weather pitch to which prisoners had good access for organised team sports all year round. This provision was reasonably well used and outdoor sports sessions were timetabled every day.
- 2.185 **There should be a wider range of accredited programmes. (5.25)**
Achieved. An adequate range of relevant accredited level 1 PE courses was offered and included short courses leading to the British Weight Lifting Association (BWLA) awards, health and safety and first aid qualifications. Gym orderlies were encouraged to complete the level 1 gym instructor award.

Additional information

- 2.186 PE facilities were very good, with the all-weather pitch and dedicated room for spin cycling providing more opportunities for a wider range of activities. Shower facilities were adequate. A comprehensive recreational PE timetable allowed adequate opportunities for prisoner use. Although slightly down on the last inspection, gym attendance was satisfactory at between

60% and 65%. Attendance at some daytime sessions was low. The gym was open five days a week, including four evenings, and PE provision was also available at weekends. Good links with health care and the CARAT service for remedial PE had been maintained and there was good promotion of healthy living. Staffing was adequate and PE staff were highly experienced and well qualified.

Housekeeping point

2.187 Better use should be made of the gym facilities, particularly during daytime sessions.

Time out of cell

2.188 Prisoners should have evening association at weekends. (5.37)

Not achieved. The core day adopted nationally by NOMS had ruled out the possibility of evening association at weekends. However, this was not appropriate for a relaxed specialist setting such as Bullwood Hall.

We repeat the recommendation.

Security and rules

2.189 An accurate analysis of security information reports should be used to set security targets for staff. (6.10)

Not achieved. Dynamic security arrangements were good. In the previous six months, 423 security information reports (SIRs) had been submitted and processed, generally within appropriate timescales. Of these, only between three and seven a month had been about mobile telephones and between none and eight a month about drugs. Minutes of the well attended monthly security and prison intelligence executive (PIE) meetings covered all relevant aspects of security but indicated little analysis of SIR-related data and recorded limited discussion around agenda items. Between February and August 2010, drugs and mobile telephones were set as security objectives for staff despite the low levels of intelligence around these areas.

We repeat the recommendation.

Housekeeping point

2.190 Minutes of security and prison intelligence executive meetings should outline discussions that take place.

2.191 Information about security requirements should be distributed in languages other than English. (6.11)

Not achieved. Information about security requirements was still not available in languages other than English.

We repeat the recommendation.

2.192 Security categories should be reviewed in light of the full range of information available to the governor, including timely written information from the UK Border Agency and taking into account prisoners' individual circumstances. (6.12)

Achieved. There was a six-monthly review of each prisoner's security category as a paper-based exercise to note any changes, particularly in relation to immigration status. Prisoners could also apply to be re-categorised. The UKBA submitted written information in each case

and prisoners were invited to attend a board when they had applied to have their security category changed.

Additional information

- 2.193 A small but adequately resourced security team delivered mostly proportionate security arrangements and contributed to a regime that was not overly restrictive. There remained few security concerns. Closed visits was used infrequently and not since February 2009. However, it was inappropriate that 10% of prisoners were randomly strip searched following visits regardless of whether there was any intelligence to support this.

Further recommendation

- 2.194 Strip searching following visits should be conducted only if there is intelligence to support it.

Discipline

- 2.195 **The standardisation meeting should have a set agenda and monitor adjudications by location and type. (6.29)**
Achieved. A quarterly adjudication standardisation meeting had agreed terms of reference and set aims. Adjudications were monitored by location and type at the PIE meeting.
- 2.196 **Adjudications should clearly state why charges are proved and record any mitigation. (6.30)**
Partially achieved. Despite a quality assurance system, a number of adjudication records still recorded insufficient exploration of charges and it was unclear why or how some results had been arrived at. Several records also failed to demonstrate that any mitigation offered had been taken into consideration when making awards after findings of guilt. Resulting punishments, however, appeared fair.
We repeat the recommendation.
- 2.197 **A record should be made on the adjudication hearing about prisoners' ability to understand English. Those with language problems should be offered professional interpreting services and this should be documented. (6.31)**
Partially achieved. All records of adjudication were stamped with questions asking whether prisoners understood English sufficiently well to take part in the process and whether they required an interpreter. Professional interpreting services were sometimes used but there were also examples when prisoner interpreters had been used, which was inappropriate. (See paragraph 2.7 and further recommendation at paragraph 2.8.)
- 2.198 **Conclusions to use of force incidents should be clear and state whether the special cell was used. (6.32)**
Achieved. The use of force paperwork we looked at was generally of a good standard. Although a few lacked detail and records of injury (F213s) were occasionally missing or incomplete, they always recorded the final location of the prisoner involved. Two of the 21 uses of force in the year to end of August 2010 recorded use of the special cell.

Housekeeping point

2.199 Use of force paperwork and F213s should be thoroughly and fully completed following any use of force.

2.200 **Use of force should be separately monitored by senior managers to ensure that all usage is appropriate and to identify any patterns. (6.33)**

Not achieved. Force was used relatively frequently but often for low level physical coercion. It was not always evident that de-escalation techniques had been used. Use of force paperwork had been reviewed by the deputy governor until June 2010, when it became a standing agenda item at the security meeting. Despite this, we had some concerns about the governance arrangements as a number of significant issues had been overlooked. Some uses of force were not clearly justified by the documentation and one use of special accommodation had been recorded on use of force paperwork but had not been authorised and subsequently was not logged or documented. This serious omission had not been picked up during quality reviews.

We repeat the recommendation.

2.201 **Use of the special cell should always be monitored and authorised. (6.34)**

Not achieved. Although there had been only one recorded use of special accommodation to date in 2010, we found another incident (see above) that had not been authorised or recorded. Documentation for the one recorded use in 2010 was poorly completed and did not justify either the initial strip search or the 50 minutes the prisoner spent there.

We repeat the recommendation.

Further recommendation

2.202 Documents authorising use of the special cell should be fully completed and should justify any strip search and the length of time the prisoner remains there.

2.203 **A video camera should be purchased and used at all planned interventions. (6.35)**

Not achieved. A video camera was available but had not been used to film any planned interventions to date in 2010.

We repeat the recommendation.

2.204 **A recorded risk assessment should take place before any strip search. (6.36)**

Not achieved. Blank local risk assessment forms were available outside the search room in the care and separation unit (CSU) and we were told that prisoners were not routinely strip searched on entering the CSU. However, there was no indication of when the risk assessments had been completed and the segregation history sheet for a prisoner held there during the inspection showed that he had been strip searched but not on whose authority or for what reason.

We repeat the recommendation.

2.205 **In-cell activities should be provided in the care and separation unit. (6.37)**

Achieved. Books in a range of languages, jigsaws and games were available on the CSU. Arrangements had recently been made for one of the six cells in the unit to have electricity to allow the longer-term prisoner held in that cell to have use of a television, which was part of a care plan drawn up to manage him pending transfer. The other five cells did not have electricity.

Further recommendation

2.206 All prisoners held in the care and separation unit should have access to in-cell electricity.

2.207 **The rules and routines of the care and separation unit should be re-written to reflect the present population. Restrictions on children visiting should be lifted. (6.38)**

Achieved. A comprehensive and current policy covered the rules and routines in the CSU and abbreviated guidelines for prisoners were displayed outside each cell. There were no longer any restrictions on children visiting prisoners in the CSU. The regime allowed daily showers and exercise and prisoners were visited every day by the duty manager, health care staff and the chaplain. Prisoners in the CSU were not allowed to leave the unit to attend activities other than religious services.

2.208 **Meals in the care and separation unit should be served at similar intervals to those in the rest of the prison. (6.39)**

Achieved. Meals were served to prisoners in their cells at similar times to the rest of the prison.

2.209 **The care and separation unit telephone should have a privacy hood. (6.40)**

Not achieved. The CSU telephone was located by the exercise yard and had not been fitted with a privacy hood.

We repeat the recommendation.

2.210 **Care and separation unit cells should be properly furnished with wooden furniture. (6.41)**

Achieved. All CSU cells contained chairs and wooden tables. Toilets were dirty and scaled and screened only by a small stable-type door that offered limited privacy. Cells were generally clean and graffiti free.

Housekeeping point

2.211 Toilets in the care and separation unit should be cleaned and de-scaled regularly.

Additional information

2.212 Adjudications were conducted in a small but comfortable room. There had been 106 adjudications to date in 2010, a reasonably low number, and none of the charges appeared gratuitous or unjustified. Six had been referred to the independent adjudicator. Information about the disciplinary process accompanied the notice of report in different languages, in an attempt to ensure that recipients understood what was happening to them. Prisoners generally engaged well with the process. Prisoners found guilty of assault, possession of a mobile telephone or a positive MDT were usually demoted to the basic incentives and earned privileges regime without review.

2.213 The CSU was staffed by nine officers and a senior officer who were selected for the role and approved by the governor. Interactions we observed between staff and prisoners on the unit were respectful. Communal areas were bright and clean. The exercise yard was large and contained a bench but remained a bleak area for prisoners.

- 2.214 Use of the CSU was reasonably low, with 25 prisoners held there between March and August 2010. However, 20 prisoners had been held there pending adjudication, which was disproportionately high and raised concerns that the unit was inappropriately being used to manage prisoners who could have remained on normal location prior to their adjudication. During the same period, six prisoners had sought protection in the CSU and two had been located there for reasons of good order. The documents authorising segregation for these prisoners were often incomplete and behaviour targets were too often perfunctory.

Further recommendation

- 2.215 Prisoners found guilty of offences on adjudication should not also be demoted to the basic incentives and earned privileges (IEP) regime without an IEP review meeting.

Housekeeping point

- 2.216 Paperwork authorising location in the care and separation unit for reasons of protection or good order should always be fully completed and behaviour targets should be individualised and meaningful to the prisoner being segregated.

Incentives and earned privileges

- 2.217 **Incentives and earned privileges (IEP) levels should be reviewed automatically. (6.52)**
Not achieved. New arrivals who had been on the enhanced regime at their previous establishment were allowed to remain on that level but other prisoners had to wait four weeks before they could apply for it. Prisoners still had to submit an application before their level was reviewed, so some could wait up to seven weeks to achieve enhanced status. Those who transferred in as enhanced prisoners were also automatically recorded on P-Nomis as standard level until staff had confirmed their enhanced status. This particularly disadvantaged those who did not speak English who might not know to request confirmation of status or who could not articulate such a request. In general, however, the evidence suggested that progression was open to many and 113 (51%) prisoners were at the enhanced level at the time of the inspection.

We repeat the recommendation.

Further recommendation

- 2.218 Enhanced prisoners should automatically retain that level on transfer to other prisons. P-Nomis should always show the current incentives and earned privileges status of enhanced prisoners.

- 2.219 **More should be done to ensure that prisoners with little or no English understand how the IEP scheme works. (6.53)**

Not achieved. Information about the IEP scheme was given to all new arrivals but only in English.

We repeat the recommendation.

Additional information

- 2.220 The IEP policy had been reviewed in May 2010 and was reasonably comprehensive but described a separate scheme for the CSU that disadvantaged those held there who were on the standard or enhanced privilege level. This was rectified during the inspection.

- 2.221 An IEP board chaired by a senior officer was convened if there was evidence of poor or negative behaviour. The prisoner offered his representations and was generally given further opportunity to improve his behaviour before being demoted to a lower privilege level. Use of the basic regime was low and mostly justified, except for those who were automatically demoted following a proven adjudication. The scheme operated fairly and there was evidence that decisions were overturned in favour of the prisoner following appeal. A quality system was overseen by the head of residence and gave assurance that the scheme was fair.
- 2.222 The regime for enhanced prisoners on E and F wings was positive and included 24-hour unlock but there was not enough room on these wings to accommodate all enhanced prisoners. It was inappropriate that only prisoners on the enhanced privilege level could wear their own clothes.

Further recommendation

- 2.223 All prisoners should be able to wear their own clothes regardless of privilege level.

Catering

- 2.224 **All prisoners should have training in basic food hygiene and be screened for suitability to work in the preparation of food. (7.7)**
Achieved. All prisoners working in the kitchen had completed the level 2 award in food safety in catering from the Chartered Institute of Environmental Health. Prisoners were screened for suitability to work in food preparation using a Food Standard Agency questionnaire.
- 2.225 **National vocational qualifications should be available for those working in the kitchens. (7.8)**
Achieved. The level 1 national vocational qualification in food preparation and cooking was available to those with over three months of their sentence left to serve. At least one prisoner working in the kitchen had completed the course and another was studying for it.
- 2.226 **Prisoners on the induction unit should be able to pre-select their meals. (7.9)**
Not achieved. Prisoners on the induction unit could not pre-select their lunch meals.
We repeat the recommendation.

Additional information

- 2.227 The food was of reasonable quality and most prisoners spoken to were content with it. The menu followed a four-week cycle, with vegetarian and halal options provided. Muslim prisoners said the food offered during Ramadan was of good quality. Breakfast was served the night before and comprised cereal, a small carton of UHT milk and bread. Lunch consisted of sandwiches that were served before midday. The evening meal was served at 4pm on Thursdays, Fridays and Saturdays.

Further recommendation

- 2.228 To ensure adequate space between meals, breakfast should be served on the morning it is eaten, lunch between noon and 1.30pm and dinner between 5pm and 6.30pm.

Prison shop

2.229 Following prisoner consultation, the range of goods in the shop should be expanded. (7.15)

Achieved. Changes to the shop product list were discussed at quarterly 'local product list consultations' attended by staff and wing representatives. The minutes indicated that wing representatives consulted prisoners on their respective wings but prisoners in our groups were not aware they could request changes to the list.

Housekeeping point

2.230 Prisoners should be made aware that they can request changes to the shop product list.

Strategic management of resettlement

2.231 The prison should have a robust and accessible system for recording discharge numbers and destinations. (8.8)

Achieved. The information was regularly recorded and had been used in planning, through comparison of categories of movement out for the first quarters of 2009 and 2010.

2.232 A comprehensive resettlement needs analysis should incorporate the views of prisoners who are not fluent in English. (8.9)

Achieved. The resettlement needs analysis was based on 96 questionnaires and interviews. Interviewees had been provided with relevant translated documents and an interpreter had been available for interviews where necessary.

Additional information

2.233 There had been greater emphasis on resettlement activity in recent months. In June 2010, the resettlement policy had been replaced by a 'roadmap for prisoner re-entry', which aimed to 'improve available services that reduce risk of reoffending for the 30%+ prisoners released into the UK from Bullwood Hall' using the resettlement pathways. This did not take account of the majority of prisoners who were not released into the UK. The lack of a foreign national strategy increased the sense of a vacuum in relation to resettlement of the majority, even though the reviews at eight and two weeks before release date were open to all prisoners (see section on offender management and planning). Even those eventually released in the UK often had very little notice that this would be the outcome and therefore could not make preparations with any confidence (see paragraph 2.5).

2.234 A number of prisoners were unhappy that the resettlement strategy did not include programmes to reduce the risk of re-offending as evidence of the reduction of such risk was relevant to decisions on whether to allow bail or leave to remain at the end of sentence (see section on resettlement pathways).

Offender management and planning

2.235 Offender supervisors should have sufficient allocated time to complete their duties. (8.22)

Partially achieved. Staff reductions had forced a re-examination of roles and some duties

formerly within the remit of offender supervisors had been allocated to personal officers. With the exception of those serving lengthy sentences, prisoners did not usually know their offender supervisor and it was apparent that in most cases offender supervisors were not regularly engaging directly with the prisoner. Personal officers were not in practice filling the gap in relation to offender management (see section on personal officers).

We repeat the recommendation.

2.236 All prisoners serving sentences of 12 months and over should have an offender assessment system assessment. (8.23)

Not achieved. Of 137 eligible prisoners, 38 had received a completed offender assessment system (OASys) assessment in 2010. The process was hampered by the number of prisoners who arrived without a pre-sentence report and those who arrived from other establishments without sentence planning documentation. Sentence planning information had been received from the previous establishment for only 49 of the first 148 prisoners received at Bullwood Hall in 2010. Bullwood Hall prioritised OASys completion according to risk factors, sentence length and likelihood of release in the UK. An OASys assessment was completed in the weeks prior to sentence completion date for prisoners serving 12 months and over who might be released in the UK.

We repeat the recommendation.

2.237 Probation areas should accept responsibility for prisoners sentenced in their geographic region. (8.24)

Partially achieved. A case transfer protocol for offenders, including foreign nationals, was in place. In a number of cases, however, the seconded probation officer had needed to liaise at length before identifying the responsible probation area. A pre-sentence report had been received for only 21 of the first 148 receptions at Bullwood Hall in 2010.

Further recommendation

2.238 Probation areas should take responsibility for foreign national prisoners sentenced in their geographic region and actively manage their cases.

2.239 As far as is possible, previous conviction information should be sought by staff completing risk assessments. The National Offender Management Service should provide support and guidance to help achieve this. (8.25)

Partially achieved. Previous convictions were routinely received for offences committed in the UK. Previous convictions were often available for EU nationals and arrangements for countries such as Poland and Lithuania appeared to have improved recently. Several prisoners' files contained information on previous offending from police intelligence officers and offender managers. The establishment was not aware of the detailed international arrangements for obtaining previous convictions from abroad and felt this required more attention.

Further recommendation

2.240 The National Offender Management Service should provide support and guidance to help establishments to access comprehensive information on previous convictions.

2.241 Multidisciplinary sentence/custody planning boards should be run for all prisoners. (8.26)

Not achieved. Bullwood Hall did not receive prisoners in the category for whom sentence planning boards are mandatory within NOMS but the quality of the assessment and planning

process for individual prisoners suffered from the lack of such boards. Reviews took place two and eight weeks before discharge, in addition to the induction assessment, but these were of more limited value than sentence planning boards (see additional information).

We repeat the recommendation.

2.242 With prisoners' consent, families should be invited to contribute to sentence planning boards. (8.27)

Not achieved. Sentence planning boards were not held and there were no attempts to involve families in the assessment and review processes.

We repeat the recommendation.

2.243 Release on temporary licence requests should be assessed in each individual case according to established criteria and this should be recorded. (8.28)

Achieved. There had been only six applications for release on temporary licence (ROTL) in the previous year. A weekly ROTL and home detention curfew board was held and the UKBA was consulted in each case before a decision was made. A standard risk assessment form was used for ROTL. This included indicative criteria and each case was assessed and recorded using this format. Further work was being carried out on the eligibility criteria for foreign national prisoners, with the intention of producing a comprehensive policy and practice framework suited to local conditions.

2.244 The UK Border Agency should promote more effective use of the early removal and facilitated return schemes at Bullwood Hall. (8.29)

Achieved. Immigration officers were based at Bullwood Hall to promote the early removal scheme (ERS) and facilitated return scheme (FRS). The process was explained at immigration induction and reinforced through the general induction on G wing. There were 52 current FRS cases and there had been 15 FRS releases in July 2010. Figures for FRS discharges in 2009 and 2010 were broadly comparable, with 164 discharges in 2009 and 107 by mid-September 2010.

2.245 Progress against identified targets through each resettlement pathway should be relayed back to the offender management unit by personal officers. (8.30)

Not achieved. There was no evidence of structured feedback by personal officers to offender supervisors, although personal officers had been helpfully identified in the resettlement model as significant stakeholders.

We repeat the recommendation.

2.246 The National Offender Management Service should draw on the experience of the International Organisation for Migration and consult with the Department for International Development about the feasibility of supporting programmes that assist the successful resettlement of foreign national prisoners returning to home countries. (8.31)

Partially achieved. The International Organisation for Migration (IOM) had recently withdrawn from the UK prison estate and its service at Bullwood Hall had not been replaced. The impact on take-up of FRS and on overseas resettlement outcomes was not yet clear. NOMS was engaged in bilateral negotiations with counterparts in several countries to establish resettlement avenues for their nationals held in prisons in England and Wales, although any benefits from these discussions were not yet apparent at Bullwood Hall.

Further recommendation

- 2.247 The National Offender Management Service should establish clear resettlement initiatives to support foreign national prisoners returning to home countries.

Additional information

- 2.248 A new resettlement model involved allocation of a personal officer to each prisoner and identification of resettlement pathway champions and contributing stakeholders. It also set out processes for first night interviews and pro forma records with well-framed resettlement pathway questions. A resettlement surgery attended by a number of outside agencies was held every Tuesday and prisoners were invited to this for a resettlement review eight weeks before and an end of sentence review two weeks before sentence completion date. Reviews were coordinated by the offender management unit and a resettlement orderly assisted at the surgery. A considerable amount of practical help was given, although this was limited by the uncertain status of nearly all prisoners throughout their time at Bullwood Hall. The lack of a national insurance number for most prisoners also limited the assistance that could be given with employment, benefits and accommodation.
- 2.249 There was no support available for prisoners preparing to settle elsewhere than in the UK, other than that provided by Citizens Advice and the CIAS provider (see section on resettlement pathways).

Further recommendation

- 2.250 Managers should take action to ensure that practical resettlement support and advice is available to those who will be discharged to countries outside the UK.

Resettlement pathways

Accommodation

- 2.251 **Professional accommodation advice should be available for those prisoners who will be discharged overseas. (8.40)**
Not achieved. Professional accommodation advice was available from St Mungo's for all prisoners likely to be released in the UK but no such advice was available for those due to be discharged overseas.
We repeat the recommendation.

Education, training and employment: additional information

- 2.252 JobCentre Plus, Nacro, Tribal and St Mungo's attended the weekly resettlement surgery to help with employment, training and education as well as accommodation. This mainly applied to UK discharges, although there had been a particularly good attempt by Tribal to provide employer links for prisoners released outside the UK. A jobs board displayed work opportunities in a range of countries. Prisoners in most work areas developed good employment skills. The new accredited employability and personal skills course attended by all prisoners developed and formally recognised the job-related skills needed for employment.

JobCentre Plus gave prisoners released in the UK advice on how to obtain a national insurance number.

Further recommendation

- 2.253 Managers should continue to develop and improve the labour market information for prisoners released outside the UK.

Finance, benefit and debt

- 2.254 Prisoners, including those returning to live overseas, should have access to advice on finance and debt. (8.41)

Achieved. Citizens Advice (Thurrock) had a service level agreement with Bullwood Hall and held a weekly surgery offering one-to-one sessions. The agreement also allowed for group sessions. Where possible, Citizens Advice staff tried to get advice on finance and debt for people returning to live overseas.

Drugs and alcohol

- 2.255 The substance use needs analysis should be repeated annually to ensure that service provision matches the needs of the prisoner population. (8.53)

Achieved. An IDTS needs assessment specific to foreign nationals had been completed in October 2009 and an updated substance use needs assessment had been completed and was about to be published. The health needs assessment was about to be updated. A comprehensive drug and alcohol strategy was updated during 2010. There appeared to be limited analysis of the needs of alcohol users.

Further recommendation

- 2.256 The updated health needs assessment and substance use needs assessment should identify the needs of prisoners who are problematic alcohol users.

- 2.257 Services for prisoners with alcohol problems should be provided. (8.54)

Achieved. Interventions for prisoners who had been alcohol users included an alcohol use information pack, alcohol misuse awareness such as the five-session 'Think Drink' course, the A – Z motivation programme and Alcoholics Anonymous.

- 2.258 The counselling, assessment, referral, advice and throughcare (CARAT) service should develop a peer support scheme for prisoners with drug and alcohol problems. (8.55)

Achieved. There was one peer support worker, which was sufficient for the caseload. The scheme was working well.

Children and families of offenders

- 2.259 Access to special children's visits should not be prioritised by incentives and earned privileges (IEP) levels. (8.62)

Achieved. Monthly children's visits were open to all prisoners regardless of their privilege level. Prisoners applied to the senior officer in charge of visits and a list was created on a first-

come first-served basis and access appeared equitable. Children's visits included additional activities and free food and refreshments and were appreciated by prisoners who used them.

2.260 An accumulated visits scheme should be available to facilitate prisoners' contact with their families and friends. (8.63)

Not achieved. We were told there had been no requests for accumulated visits for a significant period of time. However, the scheme was poorly advertised and only ever in English. Prisoners we spoke to were unaware that accumulated visits were available.
We repeat the recommendation.

2.261 There should be a qualified family support worker to develop all aspects of family contact. (8.64)

Not achieved. The prison had a service level agreement with the Ormiston Trust, which worked with visitors in the visitors' centre and visits hall, but there was no qualified family support worker to develop other aspects of family contact.
We repeat the recommendation.

2.262 Telephones with hoods that offer limited privacy should be enclosed in privacy booths. (3.103)

Partially achieved. A new booth had been created on G wing. All other telephones had hoods that offered little privacy.
We repeat the recommendation.

2.263 Prisoners should be able to maintain contact with family and friends in different time zones. (3.104)

Not achieved. There was no official system to ensure that prisoners with family and friends in different time zones were enabled to maintain contact with them. The wholly unacceptable night sanitation system was cited as the only way prisoners with families and friends in different time zones could access telephones but even this inadequate solution was not available to prisoners on G wing.
We repeat the recommendation.

2.264 Prisoners should have access to email facilities. (3.105)

Not achieved. Unlike in the immigration detention estate, email was banned in the prison estate with no imminent prospect of change.
We repeat the recommendation.

2.265 A needs analysis should be undertaken to ascertain whether the arrangements for weekend and daytime-only visits are adequate to meet the needs of prisoners and their families. (3.106)

Not achieved. No needs analysis had been undertaken and it was unclear whether the visits provision met the needs of the population. The number of tables in the visits halls had been increased to 17 but visits still took place only on Wednesday, Saturday and Sunday afternoons and the duration had been reduced to one hour 45 minutes. Children's visits were held monthly, alternately on a Thursday and a Saturday. Normal visits were cancelled when children's visits took place on a Saturday. Apart from the Wednesday afternoon visits, all visits generally operated at capacity.
We repeat the recommendation.

2.266 Visitors should be able to book their next visit before they leave the prison. (3.107)

Not achieved. Visits had to be booked through a telephone booking line staffed on weekdays from 9am to noon and 2pm to 3pm.
We repeat the recommendation.

2.267 **There should be no restriction on the number of children allowed in a single visit. (3.108)**
Achieved. The restrictions placed on the number of children allowed in a single visit had been lifted.

2.268 **There should be a properly-equipped visitors' centre that is staffed to assist and support visitors. (3.109)**
Partially achieved. The visitors' centre was a pre-fabricated building outside the perimeter fence of the prison. It was open about an hour before and an hour after visits and was staffed by the Ormiston Trust. Free hot drinks were available. The two small waiting rooms contained comfortable chairs, some reading materials and toys and some information in languages other than English. A locker room and adapted toilet and baby changing facility were also available. There was no shelter for visitors between the visitors' centre and visits hall. While improved, the visitors' centre was too small to meet the needs of the people using it.

Further recommendation

2.269 The visitors' centre should be large enough to meet the needs of the people using it.

2.270 **Closed and non-contact visits should be authorised only when there is a significant risk justified by security intelligence. (3.110)**
Achieved. Closed visits had not been used since February 2009 and there were clear guidelines for when they would be appropriate. The systems in place would authorise closed and non-contact visits only on the basis of risk supported by security intelligence.

2.271 **The closed visits rooms should be refurbished. (3.111)**
Achieved. The closed visits rooms had been refurbished. They were roomy, carpeted and contained comfortable chairs. They were used infrequently.

Additional information

2.272 The visits hall was comfortable, bright and cheerful. It was inappropriate that prisoners had to wear prison-issue clothes during visits. Family visits were to be reintroduced after a gap of about nine months.

2.273 Storybook Dad sessions were run regularly by the library and education also ran a short family relationships/parenting course alongside children's visits, both of which were well subscribed.

2.274 Foreign national prisoners could have a free international monthly telephone call in lieu of visits but, despite Bullwood Hall being a foreign national prison, not all prisoners could have the free telephone call to enable them to maintain contact with family members abroad.

Further recommendation

2.275 All foreign national prisoners should be offered a free monthly telephone call regardless of whether they receive visits.

Attitudes, thinking and behaviour

- 2.276 **An offending behaviour treatment needs analysis should be undertaken and necessary treatment options made available to meet identified needs. (8.68)**
Partially achieved. An assessment of need for offending behaviour programmes completed in March 2010 had included prisoner and staff surveys and had informed the resettlement plans. However, there was no funding to provide the cognitive thinking skills programmes that had been identified as potentially useful.

Further recommendation

- 2.277 Offending behaviour programmes should be delivered on the basis of the most recent needs assessment.

Section 3: Summary of recommendations

The following is a list of both repeated and further recommendations included in this report. The reference numbers in brackets refer to the paragraph location in the main report.

Recommendations	To NOMS
<hr/> Courts, escorts and transfers <hr/>	
3.1	Prisoners should be given at least 24 hours' notice of planned transfer and the opportunity to inform family and legal representatives of their move. (2.10)
3.2	Detainees held solely under Immigration Act powers should not be held in a prison other than on the basis of security risk. (2.11)
<hr/> Foreign national prisoners <hr/>	
3.3	There should be a national policy for the management and support of foreign national prisoners, which provides clear practice guidelines to establishments and is supported by auditable standards, service level agreements or contractual requirements. (2.2)
<hr/> Time out of cell <hr/>	
3.4	Prisoners should have evening association at weekends. (2.188)
<hr/> Incentives and earned privileges <hr/>	
3.5	Enhanced prisoners should automatically retain that level on transfer to other prisons. P-Nomis should always show the current incentives and earned privileges status of enhanced prisoners. (2.218)
<hr/> Offender management and planning <hr/>	
3.6	The National Offender Management Service should give a clear strategic lead on offender management for foreign nationals, which ensures that risks are properly managed and that prisoners are adequately prepared for release or removal. (2.3)
3.7	Probation areas should take responsibility for foreign national prisoners sentenced in their geographic region and actively manage their cases. (2.238)
3.8	The National Offender Management Service should provide support and guidance to help establishments to access comprehensive information on previous convictions. (2.240)
3.9	The National Offender Management Service should establish clear resettlement initiatives to support foreign national prisoners returning to home countries. (2.247)

Recommendation

To UKBA and NOMS

Courts, escorts and transfers

- 3.10 Prisoners and detainees should not be subjected to successive moves with short notice within a short space of time. (2.12)

Recommendations

To UKBA

Applications and complaints

- 3.11 National UK Border Agency (UKBA) complaints statistics should include complaints made in the prison about UKBA staff. These statistics should be analysed and monitored by senior UKBA managers. (2.66)

Foreign national prisoners

- 3.12 UK Border Agency staff should receive training and solicit feedback on the quality of their face-to-face communication. (2.132)

Offender management and planning

- 3.13 Defensible decisions on whether or not to proceed to deportation or removal should be made and relayed as early as possible in sentence. (2.4)

Recommendation

To the governor and UKBA

Foreign national prisoners

- 3.14 Prison managers and the UK Border Agency should ensure, through a systematic needs analysis, that sufficient legal advice is available. (2.131)

Recommendations

To the governor

Courts, escorts and transfers

- 3.15 Reception should remain open during lunch times when new arrivals are expected. (2.14)

First days in custody

- 3.16 A single log system should be used by all staff involved in tracking missing property. (2.17)
- 3.17 All new arrivals should be offered and receive a free telephone call before they are locked up on their first evening and this should be documented. (2.22)

- 3.18 Reception interviews should be conducted in private. (2.23)

Residential units

- 3.19 A regular programme of good quality refurbishment work should be carried out throughout the prison. (2.26)
- 3.20 Toilets should be deep cleaned and regularly descaled. (2.27)
- 3.21 In-cell toilets or an alternative system to the current unsatisfactory arrangements should be introduced in order to provide 24-hour access to toilet facilities. (2.28)
- 3.22 While the current night sanitation arrangements persist, more prisoners should be unlocked for 24 hours a day, and additional night staff should be deployed when there are technical problems with the night sanitation system to ensure that prisoners can access toilets without undue delay. (2.29)
- 3.23 Prisoners should have better access to hot and cold water. (2.30)

Staff-prisoner relationships

- 3.24 Wing staff should receive training to help them understand the distinct needs of foreign national prisoners. (2.31)

Personal officers

- 3.25 The role of the personal officer should be extended to include more active involvement in specialist areas of work. (2.32)
- 3.26 Personal officers should see prisoners promptly after allocation and regularly thereafter, detailing this in history sheet entries. (2.34)

Bullying and violence reduction

- 3.27 Staff should be trained in the revised bullying policy and violence reduction policy. (2.36)
- 3.28 Mediation and restorative justice programmes delivered by trained staff should be developed to underpin the violence reduction strategy. (2.38)

Self-harm and suicide

- 3.29 Use of the constant observation cell should routinely be considered at the safer community team meeting. (2.54)
- 3.30 All staff should have ACCT foundation training and there should be a programme of refresher training. (2.56)
- 3.31 The night-time peer support arrangements for prisoners in crisis should be widely publicised. (2.61)

- 3.32 The constant observation cell should be a suitable therapeutic environment for prisoners in crisis. (2.62)

Applications and complaints

- 3.33 Application logs held on wings should provide a proper audit trail so that managers can check for timeliness and staff are able to deal with prisoners enquiries about the progress of their application. (2.67)
- 3.34 Events that give rise to complaints should not be investigated by witnesses to the event. (2.69)
- 3.35 Prisoners should be able to make complaints in their first language on freely available translated complaints forms. Subsequent responses should be written legibly in the language of the original complaint. (2.70)

Legal rights

- 3.36 In consultation with the Legal Services Commission, the prison should seek to expand access to independent specialist immigration legal advice to meet the identified needs of the population. (2.71)
- 3.37 The Prison Service should develop a training pack for staff in basic immigration law and procedure. (2.72)
- 3.38 Legal visits should take place every weekday in a confidential environment. (2.75)

Faith and religious activity

- 3.39 Buddhist prisoners should have regular access to a Buddhist chaplain. (2.84)

Substance use

- 3.40 Random mandatory drug tests should take place across all days of the week. (2.87)

Diversity

- 3.41 The diversity strategy should be completed as an integrated whole, covering all the main aspects of equality including issues of sexuality. (2.91)

Diversity: race equality

- 3.42 Cultural awareness training should be delivered regularly to all staff. (2.102)
- 3.43 The race equality officer should be given enough time to complete race equality work. (2.104)
- 3.44 Racist incident report forms should be freely available on all residential units. (2.110)
- 3.45 Senior managers should consider the possibility of indirect as well as direct discrimination in their consideration of ethnic monitoring. (2.115)

- 3.46 Managers should carry out or commission analysis of nationality monitoring data, especially through use of the NOMS short-term monitoring tool. (2.116)
- 3.47 Managers should meet with prisoners of significant nationality groups, using professional interpreters as appropriate, to identify needs and issues specific to that particular group. (2.117)

Diversity: foreign national prisoners

- 3.48 Professional telephone interpreters should be used in adjudications, assessment, care in custody and teamwork (ACCT) reviews and first night assessments as well as in health care consultations. Subject to informed consent, prisoner interpreters should supplement and not replace this provision. (2.8)
- 3.49 A foreign national prisoner strategy should be drawn up in consultation with prisoners and based on a needs analysis reflecting and informing all aspects of their management. (2.120)
- 3.50 Decision documents, including reasons for detention and documents presented for signature by the prisoner/detainee, should be issued and explained in a language the detainee understands. (2.125)
- 3.51 Detainees should not be pressured into signing documents that affect their rights, but given a copy and encouraged to seek prior legal advice. (2.126)

Diversity: disability and older prisoners

- 3.52 The cells identified for prisoners with disabilities should be properly assessed and made suitable. (2.94)
- 3.53 Issues relating to prisoners with disabilities and older prisoners should be a standing agenda item at the community development meetings. (2.100)

Health services

- 3.54 Skill mix arrangements should be implemented to enhance health care services for prisoners and minimise the reliance on temporary staff. (2.134)
- 3.55 Nursing staff should have access to a computer in reception to complete the electronic reception screen on SystmOne. (2.142)
- 3.56 Regular pharmacist-led clinics should be held to allow patients to discuss their medication. (2.143)
- 3.57 The pharmacist should visit the prison at least once a month to oversee pharmacy functions and undertake pharmacist-led clinics, clinical audit and medication review. (2.144)
- 3.58 All administration of medications should be carried out in accordance with professional bodies' guidance and administration should be documented contemporaneously. (2.146)
- 3.59 Action should be taken to ensure medicines can be administered safely from the electronic system. (2.148)

- 3.60 Health trainers should be appointed to enhance the health promotion initiatives in the prison. (2.162)

Learning and skills and work activities

- 3.61 Planned library opening hours should be provided in the evening and weekends. (2.171)
- 3.62 Use of IT should be monitored and its development planned. (2.172)
- 3.63 Library guidance materials should be translated into relevant languages. (2.173)

Security and rules

- 3.64 An accurate analysis of security information reports should be used to set security targets for staff. (2.189)
- 3.65 Information about security requirements should be distributed in languages other than English. (2.191)
- 3.66 Strip searching following visits should be conducted only if there is intelligence to support it. (2.194)

Discipline

- 3.67 Adjudications should clearly state why charges are proved and record any mitigation. (2.196)
- 3.68 Use of force should be separately monitored by senior managers to ensure that all usage is appropriate and to identify any patterns. (2.200)
- 3.69 Use of the special cell should always be monitored and authorised. (2.201)
- 3.70 Documents authorising use of the special cell should be fully completed and should justify any strip search and the length of time the prisoner remains there. (2.202)
- 3.71 A video camera should be purchased and used at all planned interventions. (2.203)
- 3.72 A recorded risk assessment should take place before any strip search. (2.204)
- 3.73 All prisoners held in the care and separation unit should have access to in-cell electricity. (2.206)
- 3.74 The care and separation unit telephone should have a privacy hood. (2.209)
- 3.75 Prisoners found guilty of offences on adjudication should not also be demoted to the basic incentives and earned privileges (IEP) regime without an IEP review meeting. (2.215)

Incentives and earned privileges

- 3.76 Incentives and earned privileges (IEP) levels should be reviewed automatically. (2.217)

- 3.77 More should be done to ensure that prisoners with little or no English understand how the IEP scheme works. (2.219)
- 3.78 All prisoners should be able to wear their own clothes regardless of privilege level. (2.223)

Catering

- 3.79 Prisoners on the induction unit should be able to pre-select their meals. (2.226)
- 3.80 To ensure adequate space between meals, breakfast should be served on the morning it is eaten, lunch between noon and 1.30pm and dinner between 5pm and 6.30pm. (2.228)

Strategic management of resettlement

- 3.81 The resettlement policy should include needs-based support for resettlement abroad. (2.6)

Offender management and planning

- 3.82 Offender supervisors should have sufficient allocated time to complete their duties. (2.235)
- 3.83 All prisoners serving sentences of 12 months and over should have an offender assessment system assessment. (2.236)
- 3.84 Multidisciplinary sentence/custody planning boards should be run for all prisoners. (2.241)
- 3.85 With prisoners' consent, families should be invited to contribute to sentence planning boards. (2.242)
- 3.86 Progress against identified targets through each resettlement pathway should be relayed back to the offender management unit by personal officers. (2.245)
- 3.87 Managers should take action to ensure that practical resettlement support and advice is available to those who will be discharged to countries outside the UK. (2.250)

Resettlement pathways

- 3.88 Professional accommodation advice should be available for those prisoners who will be discharged overseas. (2.251)
- 3.89 Managers should continue to develop and improve the labour market information for prisoners released outside the UK. (2.253)
- 3.90 The updated health needs assessment and substance use needs assessment should identify the needs of prisoners who are problematic alcohol users. (2.256)
- 3.91 An accumulated visits scheme should be available to facilitate prisoners' contact with their families and friends. (2.260)
- 3.92 There should be a qualified family support worker to develop all aspects of family contact. (2.261)

- 3.93 Telephones with hoods that offer limited privacy should be enclosed in privacy booths. (2.262)
- 3.94 Prisoners should be able to maintain contact with family and friends in different time zones. (2.263)
- 3.95 Prisoners should have access to email facilities. (2.264)
- 3.96 A needs analysis should be undertaken to ascertain whether the arrangements for weekend and daytime-only visits are adequate to meet the needs of prisoners and their families. (2.265)
- 3.97 Visitors should be able to book their next visit before they leave the prison. (2.266)
- 3.98 The visitors' centre should be large enough to meet the needs of the people using it. (2.269)
- 3.99 All foreign national prisoners should be offered a free monthly telephone call regardless of whether they receive visits. (2.275)
- 3.100 Offending behaviour programmes should be delivered on the basis of the most recent needs assessment. (2.277)

Housekeeping points

First days in custody

- 3.101 The telephone in reception should be fitted with a privacy hood. (2.24)
- 3.102 The induction programme should be delivered in a properly equipped environment and completed within reasonable timescales. (2.25)

Bullying and violence reduction

- 3.103 Safer community orderlies should be given formal training in bullying and violence reduction. (2.46)

Applications and complaints

- 3.104 Standardised replies should not be used when responding to complaints. (2.64)

Legal rights

- 3.105 Bail application forms and Bail for Immigration Detainees 'Handbook on Bail' should be freely available to immigration detainees and notices advertising this widely displayed. (2.76)
- 3.106 Notices promoting the community legal advice helpline should be posted around the establishment. (2.77)

- 3.107 Notices about the Legal Complaints Service (LCS) and the Office of the Immigration Services Commissioner (OISC) should be widely displayed and prisoners should be able to request and receive LCS and OISC complaint forms from staff. (2.78)

Faith and religious activity

- 3.108 Information on services should be available in languages other than English. (2.80)

Substance use

- 3.109 Health promotion information should be made available in the mandatory drug testing holding areas. (2.89)

Diversity: race equality

- 3.110 Separate secure boxes should be provided for completed racist incident report forms. (2.118)

Health services

- 3.111 The resuscitation equipment in the health care department should be checked daily, out-of-date equipment in first aid kits should be replaced and there should be sufficient staff trained to use emergency equipment. (2.137)
- 3.112 The pharmacy should be kept clean and tidy and comply with relevant security regulations. (2.150)
- 3.113 The in-possession policy should be updated. (2.152)
- 3.114 The GP should sign the patient group directions and all clinical staff should sign that they have read them. (2.154)
- 3.115 The radiation protection supervisor should receive regular radiation protection update training. (2.158)
- 3.116 Health care staff should sign that they have read and understood all updated policies and procedures. (2.163)
- 3.117 There should be comprehensive arrangements to monitor internal and external health care appointments. (2.164)
- 3.118 Up-to-date health promotion posters should be displayed around the prison and available in a range of languages. (2.165)

Learning and skills and work activities

- 3.119 The outside area for use by bricklaying learners for practical work should be covered to allow better use of the facility in poor weather. (2.170)
- 3.120 Library staff should make effective use of the internet facility to provide a wider variety of materials for prisoners. (2.175)

- 3.121 Guidance materials, signs and notices should be made clearer so that all prisoners are able to read and understand them. (2.182)
- 3.122 Processes should be established to record, analyse and use management information and data on library usage and book loss. (2.183)

Physical education and health promotion

- 3.123 Better use should be made of the gym facilities, particularly during daytime sessions. (2.187)

Security and rules

- 3.124 Minutes of security and prison intelligence executive meetings should outline discussions that take place. (2.190)

Discipline

- 3.125 Use of force paperwork and F213s should be thoroughly and fully completed following any use of force. (2.199)
- 3.126 Toilets in the care and separation unit should be cleaned and de-scaled regularly. (2.211)
- 3.127 Paperwork authorising location in the care and separation unit for reasons of protection or good order should always be fully completed and behaviour targets should be individualised and meaningful to the prisoner being segregated. (2.216)

Prison shop

- 3.128 Prisoners should be made aware that they can request changes to the shop product list. (2.230)

Appendix I: Inspection team

Hindpal Singh Bhui	Team leader
Colin Carroll	Inspector
Martin Kettle	Inspector
Kellie Reeve	Inspector
Helen Carter	Health services inspector
Neil Edwards	Ofsted
Jane Robinson	Ofsted
Geoff Dobson	Guest inspector (Prison Reform Trust)

Appendix II: Prison population profile

Please note: the following figures were supplied by the establishment and any errors are the establishment's own.

Population breakdown by:

Status	21 and over	%
Sentenced	211	95
Recall	2	0.9
Detainees	8	3.6
Total		

Sentence	21 and over	%
Unsentenced	8	3.6
Less than 6 months	17	7.7
6 months to less than 12 months	25	11.3
12 months to less than 2 years	73	33
2 years to less than 4 years	66	29.8
4 years to less than 10 years	31	14
10 years and over (not life)	1	0.4
Total	221	

Age	Number of prisoners	%
Minimum age: 21		
Under 21 years		
21 years to 29 years	90	40.7
30 years to 39 years	78	35.2
40 years to 49 years	43	19.4
50 years to 59 years	9	4
60 years to 69 years	1	0.4
Maximum age: 64		
Total	221	

Nationality	21 and over	%
British	12	5.4
Foreign nationals	209	94.5
Total	221	

Security category	21 and over	%
Uncategorised unsentenced	4	2
Uncategorised sentenced	12	5
Category C	205	93
Total	221	

Ethnicity	21 and over	%
White		
British	1	0.4
Other white	63	28.5
Mixed		
White and black Caribbean	1	0.4
White and black African	1	0.4
Other mixed	5	2.2
Asian or Asian British		
Indian	9	4
Pakistani	5	2.2
Bangladeshi	4	2
Other Asian	17	7.7
Black or black British		
Caribbean	17	7.7
African	37	16.7
Other black	11	4.9
Chinese or other ethnic group		
Chinese	12	5
Not stated	38	17.1
Total	221	

Religion	21 and over	%
Church of England	13	5.8
Roman Catholic	48	21.7
Other Christian denominations	18	8.1
Muslim	69	31.2
Sikh	2	0.9
Hindu	9	4
Buddhist	25	11.3
Jewish	1	0.4
Other	20	9
No religion	16	7.2
Total	221	

Main offence	21 and over	%
Violence against the person	16	7.2
Burglary	14	6.3
Robbery	5	2.2
Theft and handling	8	3.6
Fraud and forgery	44	19.9
Drugs offences	62	28
Other offences	72	32.5
Total	221	