

Ruth Jones MP
Chair, Welsh Affairs Committee, House of Commons, London, SW1A 0AA
Sent via e-mail: welshcom@parliament.uk

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Dear Chair

I want to thank you again for the invitation to provide oral evidence to the inquiry on prisons, probation and rehabilitation in Wales. In reply to your letter I am providing a written answer to the questions that time prevented me from answering on the 21 May. However, before turning to the unanswered questions, I want to provide additional detail and assurance on the work to improve the sustainability of IMBs.

IMBs play a vital and unique role as the public's eyes and ears, independently monitoring prisons and immigration detention to highlight issues affecting detained people. They provide timely, impartial, and evidence-based insights that are essential to ministerial oversight in both England and Wales, helping to shape decisions, inform public policy, and drive meaningful reform.

Their sustainability, however, is increasingly under threat not only through the shifting landscape of the voluntary sector across England and Wales, but also a lack of clarity and standardisation in the requirements of the role and the way in which individual IMBs carry out their function. The Committee will be particularly aware of the challenges facing Welsh IMBs - such as Parc - but this is a challenge facing all. To operate effectively and have impact, each IMB needs sufficient members to carry out their duties, however, both the ability to recruit and retain volunteers is severely hampered by a change to the way in which people want to volunteer. Since Covid, many wish to volunteer on an ad-hoc basis and remotely.

While new recruits are asked to commit to no more than two to three visits per month, this can feel at odds with some IMBs who continue to expect daily visits. This is unsustainable and contributes to high attrition. These challenges also have implications for the equality, diversity, and inclusion (EDI) of IMB membership and raise concerns about the ability of some Boards to monitor effectively, either due to being significantly under-resourced or through over-monitoring, which risks blurring the line between oversight and management.

To address urgent concerns about the medium to long-term sustainability of the IMB, the National Chair, National Board and IMB staff team have engaged extensively with members across England and Wales through a variety of channels to develop a

'Strategy for Sustainability'. This strategy aims to work collaboratively with members to improve consistency, raise standards, shift the culture towards 'One IMB', and reduce risk by enhancing assurance and oversight, all while recognising the membership is reducing (as mirrored by the voluntary sector more widely). By tackling these challenges, Boards can focus on what matters most: monitoring effectively and independently.

How satisfied are you with the ability for prisoners to access services using the Welsh language, whether serving sentences in England or Wales?

Whilst there are variations, Independent Monitoring Boards (IMBs) within Welsh prisons and prisons holding Welsh women report that Welsh is somewhat embedded. However, most note that the number of individuals wishing to speak Welsh whilst in prison is low, even amongst Welsh speakers. There is a Welsh speaking member on the IMB at HMP Berwyn for instance, and they have only been approached a few times each year to hear prisoner's issues in Welsh.

IMBs report that Welsh language classes are usually available through prison education departments with the stated aims of promoting Welsh, increasing the number of people speaking Welsh and increasing the general fluency of those who use Welsh less frequently.

At Eastwood Park a Welsh orderly (orderlies are usually paid prisoner roles) has recently been installing bilingual signage and we find that this is generally already in place across Welsh prisons.

At Berwyn, Welsh speaking prisoners, staff and volunteers can wear a lanyard to indicate their ability to converse in Welsh.

However, IMBs note that access to forms and paperwork is frequently a problem for Welsh speakers. For example, at Swansea forms on wings (such as complaint and discrimination forms) are only available in English, with Welsh forms available only upon request, which IMBs view as a blocker to the ease and confidential nature of the complaints' process.

Generally, IMBs are concerned with translation services. Boards frequently see prisons using other prisoners to translate for them, which may lead to inaccuracies, not to mention confidentiality issues. Technological solutions, such as accessing online translation tools or communicating with contracted providers like Big Word, have certain barriers within the prison environment and more work is needed to embed access to these important tools to ensure prisoners, prison staff and volunteers are able to easily and reliably communicate in any language.

Both the MoJ and HMPPS have a Welsh language scheme and this forms part of IMB monitoring when on visits. IMBs will continue to monitor the support for and use of Welsh in prisons holding Welsh prisoners.

What are the main physical infrastructure challenges facing the Welsh prison estate, and how do these compare with the estate in England?

Generally, IMBs find that the Welsh prison estate is comparable to the English estate, with common issues found across prisons in both countries.

For years IMBs have highlighted the alarming physical decline of the prison estate. This has not occurred overnight but is the result of chronic underinvestment and short-termism, which have severely compromised the resilience of the estate, resulting in prisoners having to work, eat and sleep in appalling and sometimes inhumane conditions.

Infrastructure issues are not exclusive to the older or Victorian prisons, they are also seen in the newest establishments, such as HMP Berwyn which has been beset with maintenance issues since opening. There have been extensive heating and hot water problems, which have only just been resolved in the Board's last reporting year, approximately seven years after opening. Furthermore, the Board has for several years been reporting on the remedial works required to refurbish each cell, as the plaster and paint was incorrectly applied during the initial build. This work has now been largely paused, due to the inability to take cells offline during the current population pressures.

In November last year, the IMB released a dedicated report on the crumbling prison estate which set out the national picture.¹ The main points raised in this thematic report were that:

- Delayed maintenance and repairs had serious safety implications in prisons. Unsafe building design, faulty fire alarms and environmental hazards such as flooding and sewage leaks posed considerable health and safety challenges.
- Heating, ventilation and flooding issues led to uncomfortable and, at times, intolerable living environments for prisoners.
- Laundry and kitchen equipment frequently broke down and repairs and replacements took far too long to source. Stop-gap measures were inefficient and expensive, with prisoners sometimes needing to go without clean clothes and bedding or hot food as a result.
- Vermin and waste mismanagement led to extremely unhygienic and occasionally dangerous conditions for prisoners.
- There was also limited contractual accountability when maintenance providers' performance fell short, and Governors felt they did not have enough autonomy.

Aside from vital fire safety improvement works, what maintenance works should prison governors in Wales prioritise?

¹ Breaking point: the impact of a crumbling prison estate on prisoners (available at <https://imb.org.uk/national-thematic-reports/>)

It is hard to argue that fire safety improvements should not take place and IMBs understand why these are prioritised over other works. However, this is having a noticeable impact on other infrastructure issues which are now taking too long to resolve, all while prisoners live and work in often unsuitable conditions.

Most Welsh prisons have some form of in-cell refurbishment project, and IMBs would want to see these projects completed, despite the current population pressures. Too many prisoners, such as those at Swansea and Cardiff, are forced to eat meals together in a cell designed for one, with limited or no screening of the toilet, and Boards find this unsanitary and undignified.

IMBs would also like to see works to increase the accessibility of prisons, which given the ageing prisoner population and the fact that over fifties are the fastest growing cohort of detained individuals, is something that is a necessity sooner rather than later.

For instance, at Swansea there is only one accessible cell in the entire prison and a limited number of lifts to take prisoners with accessibility issues to higher floors, with some temporary external ramps installed as an interim measure. Additionally, the IMB at Cardiff has for several years expressed its concern over Cardiff's suitability for prisoners with disabilities or mobility issues.

As mentioned in my oral evidence on the 21st of May, the IMB national annual report was soon due to publish. The report was published on the 19th of June and a copy was sent to the committee.

I would also be happy to meet with you again in the future, to provide updates on the work of the IMB and our progress in transforming the organisation into a more sustainable and viable mode of operation.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Elisabeth Davies', with a stylized flourish at the end.

Elisabeth Davies – IMB National Chair