

Annual Report of the Independent Monitoring Board at HMP Send

For reporting year 1 April 2024 to 31 March 2025

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Contents

Intr	oductory sections 1 – 3	Page
1.	Statutory role of the IMB	3
2.	Description of the establishment	4
3.	Key points	5
Evi	dence sections 4 – 7	
4.	Safety	15
5.	Fair and humane treatment	18
6.	Health and wellbeing	21
7.	Progression and resettlement	23
The	e work of the IMB	
Boa	ard statistics	26
App	olications to the IMB	26
Anı	nex A	
Ser	vice providers	27

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Introductory sections 1 – 3

1. Statutory role of the IMB

The Prison Act 1952 requires every prison to be monitored by an independent Board, appointed by the Secretary of State from members of the community in which the prison is situated.

Under the National Monitoring Framework agreed with ministers, the Board is required to:

- satisfy itself as to the humane and just treatment of those held in custody within its prison and the range and adequacy of the programmes preparing them for release
- inform promptly the Secretary of State, or any official to whom authority has been delegated as it judges appropriate, any concern it has
- report annually to the Secretary of State on how well the prison has met the standards and requirements placed on it and what impact these have on those in its custody.

To enable the Board to carry out these duties effectively, its members have right of access to every prisoner and every part of the prison, and also to the prison's records.

The Optional Protocol to the Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT) is an international human rights treaty designed to strengthen protection for people deprived of their liberty. The protocol recognises that such people are particularly vulnerable and aims to prevent their ill-treatment through establishing a system of visits or inspections to all places of detention. OPCAT requires that States designate a National Preventive Mechanism to carry out visits to places of detention, to monitor the treatment of and conditions for detainees and to make recommendations for the prevention of ill-treatment. The Independent Monitoring Board (IMB) is part of the United Kingdom's National Preventive Mechanism.

2. Description of the establishment

HMP Send is a closed prison for adult women and transgender prisoners, with no remand prisoners or prisoners sent directly following sentencing. At the end of the reporting year, Send had an operational capacity (the maximum number of prisoners that can be held without serious risk to safety, security, good order and the proper running of the planned regime) of 255¹. The prison had 247 prisoners at the beginning of the reporting year and 245 prisoners at the end. Six had imprisonment for public protection (IPP) sentences. At the end of the year, there were 25 foreign national prisoners, 88 prisoners serving life sentences, and several transgender prisoners. At the end of the reporting year, minority ethnic prisoners represented approximately 24% of the prison population at Send (25% in 2023-24).

10 prisoners were released under the conditional early release scheme, SDS40, in September and October 2024. There were also 11 releases on home detention curfew (HDC), mostly as a result of SDS40 sentence recalculations.

The large number of arrivals, combined with pressure from HM Prisons and Probation Service (HMPPS) to transfer prisoners to open prisons, meant there was a high turnover of prisoners during the year. This situation placed greater pressure on staff in the delivery of the regime.

Send is the only women's prison to have a democratic therapeutic community (DTC). It also offers a preparation psychologically informed planned environment (pre-PIPE) unit and a progression PIPE unit (a residential environment designed to support the progression of prisoners with complex needs and personality related difficulties).

The prison is situated in the Surrey countryside. All wings in use have single cells (the majority with a shower and a toilet), while ten single cells in one block share bathrooms.

Salaries of the prison's staff do not attract the London weighting allowance. This, combined with a lack of public transport to the prison, affects the prison's ability to recruit and retain staff.

At the end of the reporting year Send was subject to an inspection by His Majesty's Chief Inspector of Prisons (HMCIP). The prison received the highest rating on the scale of 1 (Poor) to 4 (Good) in three of the four categories (the scores awarded at the last inspection in 2021 are shown in brackets):

Safety: 4 (4)Respect: 4 (4)

Purposeful activity: 3 (2)

Preparation for release: 4 (3)

¹ Figures included in this report are local management information. They reflect the prison's position at the time of reporting but may be subject to change following further validation and therefore may not always tally with Official Statistics later published by the Ministry of Justice.

3. Key points

3.1 Main findings

Safety

- The Board continues to consider Send to be a prison in which the management and staff make a great effort to try and ensure the safety of prisoners, including those who have complex needs (see section 4).
- However there have been some concerning trends this year: there are more prisoners who need to be kept apart for safety reasons; self-harm has risen by approximately 20%; there was a significant increase in the number of assaults, particularly prisoner-on-prisoner (4) (4.2) (4.3).
- The number of newly opened assessment, care in custody and teamwork (ACCT) documents (used to support prisoners who are at risk of self-harm and suicide) increased this year to 234 from 158 in 2023/24 (4.2).
- There were 101 use of force incidents in the reporting year, compared with 45 incidents in reporting year 2023-2024 (4.4).
- Prisoners told members of the Board that drugs are available in one particular wing (4.5).

Fair and humane treatment

- The 64 new rapid deployment cells, in the incentivised substance free living (ISFL) area, continue to be very popular with the prisoners (5.1).
- Enhanced prisoners do not have a dedicated area in the prison and do not consider that their accommodation is significantly different from that of other prisoners (5.1).
- In March 2025, one wing which comprises 10 cells was designated for use by prisoners aged over 50 (5.1).
- There seems to be a tendency for prisoners to elect to eat in their cells despite efforts made by the prison to encourage prisoners to eat in the dining room (5.1).
- The arrival of more prisoners during the year with complex needs led to an increase in the challenges faced by staff (5.2).
- Overall, the Board has seen positive relationships between staff and prisoners, who have been observed being treated with respect, kindness and compassion (5.3).
- Some prisoners have told the Board that the policy concerning healthy relationships between prisoners is unfair or inconsistent (5.3).
- Prisoners continued to report that they did not always have confidence in the discrimination incident report form (DIRF) process. During the year there was a renewed focus on the management of DIRFs (5.4).
- Statistics concerning those prisoners with disabilities were not regularly reported at the monthly diversity and inclusion meetings (5.4).
- Prisoners complained to the IMB about the incentives policy (IP) process as unfair, and one that was viewed as a punishment and not used to encourage reward (5.6).
- The timeliness of the prison's response to complaints improved (5.7).
- Problems persist with missing property when prisoners arrive at Send from other prisons (5.8).

Health and wellbeing

- Prisoners' feedback to the Board on the healthcare service was variable, but with many reporting that the GPs and specialist staff were very helpful (6.1).
- Healthcare complaints to the prison represented approximately 10% of total complaints. We do not have access to healthcare complaints so can give no assurance on how they are handled or comment on what they relate to (6.1).
- There has been erratic, and sometimes poor, communication between prisons regarding the transfer of prisoner health information (6.1).
- The Board continues to be concerned at the number of prisoners who decline breast screening (6.1).
- The Board believes that the use of an escort chain² for a prisoner to a member of staff during a healthcare appointment outside the prison, where the appointment involves an intimate examination and/or confidential consultation, should be the exception rather than the norm (6.1).
- The Board strongly believes that the needs of complex individuals with multiple mental health issues cannot be adequately met in prison (6.2).
- Prisoners complain that they have less access to the gym than at other prisons (6.3).

Progression and resettlement

- Many prisoners are very positive about the courses they are studying and the impact it has had on them and how it will help them in their future (7.1).
- An education, training and employment needs analysis was conducted in August 2024 based on a survey of 150 prisoners (60%) (7.1).
- 45% of prisoners surveyed were assessed at entry level and below for maths (7.1).
- In January 2025, an increase in capacity in classrooms, and change from cohorts to 'roll on roll off', aimed to increase provision and attendance (7.1).
- Findings from the needs analysis carried out by the prison showed that only 44% of respondents reported feeling confident in using IT (7.1).
- 118 prisoners had neurodiverse conditions identified or showed signs that called for further evaluation (7.1).
- Railtrack training was discontinued after only two courses due to lack of funding (7.2).
- The hair salon extended its training provision to include a module on African Caribbean hair (7.2).
- Pay rates were increased by 12.5% in July 2024, but prisoners still think pay is unfair and less than they received at other prisons (7.2).
- There were additional demands on offender management unit (OMU) staff with an increase in the number of prisoners with complex needs, and the need to handle the release of prisoners under SDS40 (7.3).
- There were fewer prisoners on ROTL (release on temporary licence) due to pressure from HM Prisons and Probation Service (HMPPS) to move eligible prisoners to open prisons. Send is focusing on preparing prisoners for employment on leaving prison (7.3).

6

² Where a prisoner is attached via a long chain to an escort.

• There were six IPP prisoners at the end of the reporting year, which included four on recall. Two IPP prisoners were released during the year (7.3).

3.2 Main areas for development

TO THE MINISTER

- The Board reiterates that the needs of complex individuals with multiple mental health issues are not served well in prison. Such prisoners also take up a disproportionate amount of staff time (4.2) (6.2).
- The Board continues to believe that the continued detention, and repeated recalls of IPP prisoners for relatively small breaches of licence conditions, is unfair and inhumane (7.3).

TO THE PRISON SERVICE

- Consistent volumetric control would help to address problems with property on inter-prison transfers. Many prisoners report missing property on arrival at Send (5.3)
- Poor communication has led to delays in the provision of medication to newly arrived prisoners (6.1).
- The Board would like to see a policy which states that the use of escort chains for prisoners during intimate medical examinations or confidential consultations outside the prison be the exception rather than the norm (6.1).
- Action is required to ensure the availability of sufficient gym staff, taking into account the needs of the women's estate (6.3).
- Prisoners need access to digital technology to prepare themselves for re-entry to life in the community (7.1).
- The Board would like to see longer-term funding for training initiatives such as the Railtrack training programme (now discontinued) where needs analysis shows that they provide relevant skills for employment in the community (7.2).
- The inconsistency in pay rates in different prisons, particularly between those in the private and public sector, is unfair and needs to be addressed (7.2).

TO THE GOVERNOR

- The Board is concerned that prisoners have reported that drugs are available on one particular wing (4.5).
- The Board would like to see a differentiation in accommodation for those enhanced prisoners who do not qualify for the ISFL wings (5.1).
- Data reviewed in the diversity and inclusion meetings should include information concerning prisoners with disabilities (5.4).
- The perception of prisoners is that the IP policy is still unfair (5.6).
- The Board would like to see a process in place for healthcare professionals to record why prisoners decline breast screenings (6.1).
- The shortage of gym staff needs to be addressed (6.3).

3.3 Response to the last report

Issue raised	Response given	Progress
To the Minister	Full details of responses are in a letter from Minister of State for Justice, dated 3 December 2024	
1. The Board reiterates that the needs of complex individuals with multiple mental health issues are not served well in prison. Such prisoners also take up a great deal of staff time.	1. I am committed to improving mental health outcomes for individuals in contact with the criminal justice system, to ensure that those with acute mental health needs receive timely support, in the most appropriate setting. We at the Ministry of Justice are working with the Department of Health and Social Care to introduce the Mental Health Bill as soon as possible. This will include a range of reforms to support people suffering with severe mental illness in the criminal justice system and aims to speed up access to specialist inpatient treatment so that those affected are able to access the timely care they need. NHS England are also working strategically across the system to improve the pathways into treatment.	1. No progress to report on this subject.
2. The Board continues to believe that the continued detention of IPP prisoners is unfair and inhumane.	2. The IPP sentence was recently reformed in the Victims and Prisoners Act which gained Royal Assent on 24 May 2024. The changes will provide a clear pathway to a definitive end to the licence and sentence by reforming the termination of the licence for IPP offenders. On 5 September 2024 the Secretary of State announced the timings for these changes. I can confirm that the government commenced the IPP measures in the Act in a phased approach from 1 November. This means the IPP sentence automatically ended for	2. There were six IPP prisoners at the end of the reporting year, which included four on recall. Two IPP prisoners were released during the year (7.3).

Issue raised	Response given	Progress
	around 1,800 people on 1 November and c.600 referrals will be made to the Parole Board for consideration of licence termination following commencement of phase two on 1 February 2025. There is also support for those in custody, with the HM Prisons and Probation Service (HMPPS) director general of operations commissioning executive directors for England and Wales, including the women's estate to develop operational IPP delivery plans. These directly target frontline delivery to support those serving IPP sentences to work to achieve the objectives within their sentence plans and move towards a future sustainable release. At HMP Send there is small cohort of IPP prisoners. This cohort has been identified as a priority in relation to key work and are provided with specialist support from IPP keyworkers, which ensures that the individuals are fully informed regarding how their sentences are managed as well as reducing risk.	
To the Prison Service	Full details of responses are in a letter from Minister of State for Justice, dated 3 December 2024	
1. The Board is concerned about the practice of potentially using an escort chain or handcuff of a prisoner to an officer during a breast screening.	1. Prior to any external escort taking place, HMPPS will undertake a robust risk assessment, which is a multidisciplinary approach. This will ensure that all relevant information is gathered and used to inform the decision-making process. Healthcare staff are always included in the escort risk assessment process and security departments work collaboratively with healthcare to inform their	1. Prisoners continue to raise concerns with us about the use of escort chains during medical appointments in the community. We have been assured that this is subject to individual risk-assessment, and is relaxed where it is impractical or the risk of escape is particularly low, but believe that use of escort chains during intimate examinations or consultations

Issue raised	Response given	Progress
	decisions. The need for the prisoner's privacy must be considered as part of the escort risk assessment, with the decision clearly documented, particularly where the prisoner is to undergo an intimate examination or procedure. Privacy should be accommodated in so far as it does not compromise the security of the escort. HMP Send is exploring the possibility of escorting prisoners to mobile breast screening buses that are visiting HMP Downview and HMP Bronzefield, where no restraints would be needed.	of confidential nature should be exceptional rather than the norm (6.1).
2. The Board remains concerned about the absence of in-cell technology at Send. There has been no progress on this subject and no evidence available of plans for future change.	2. HMPPS is keen to deliver incell technology across the estate, which is subject to funding being available. However, in the interim prisoners are able to access IT via the education provider, allowing prisoners to complete distance learning along with other courses. Additionally, HMP Send have also sourced 10 laptops, which are available to prisoners to use as part of their education.	2. No progress to report.
3. There have been persistent comments to the Board from prisoners about low local levels of pay. There is a lack of consistency of pay across the female estate.	3. The national minimum and flat pay rates for prisoners have been in place for a number of years and are set through the Prisoners' Pay PSO 4460. However, budgetary pressures for prisons does mean that there is little scope to significantly improve the prisoner pay budget. Nevertheless, Governors do have the discretion to pay above the nationally set minimum rates of pay and are required to review their local pay policy annually. At HMP Send prisoner pay was reviewed earlier this year,	3. In July 24 all prisoner wages at Send were increased by 12.5%. This uplift followed a review and comparison of prisoner wages in other prisons (7.2).

Issue raised	Response given	Progress
	resulting in an increase of 12.5% across all activities. In September 2022, a national approach to the rising cost of living was implemented and a 10% uplift in private cash allowances was introduced to help mitigate against price increases. In November 2022, several new value brand product lines were made available through the Prison Retail service which give prisoners the choice to purchase less expensive, non-premium branded items just as people in the community are doing. Purchases of the value brands are becoming increasingly popular.	
4. The shortage of offender managers, both at Send and in the community, has a damaging effect on prisoners and on their ability to successfully reintegrate into society.	4. Recruitment and retention remains a priority across the Probation Service. HMPPS has launched various initiatives to deliver more robust supervision, recruit more staff as well as reducing caseloads. Between 20 June 2021 – 31 March 2024, overall staffing numbers have increased by 17% across the entire Probation Service. In addition to this, HMPPS remains committed to recruiting 1,000 new trainee probation officers by March 2025. Kent Surrey Sussex (KSS) regional probation director (RPD) continues to work proactively on recruitment of probation staff at HMP Send. There are firm plans to utilise probation service officers (PSOs) to support the team at HMP Send.	4. Some prison offender manager (POM) vacancies still exist (probation POMs), but we have been told the position has improved since last year. We have been advised that the resource shortage in the community persists, but that this does not have a major impact on progression and release planning at Send due to the efforts of POMs and the strategic housing specialist.

Issue raised	Response given	Progress
To the Governor		
1. The Board would like to see a consistent approach to induction paperwork.	1a). The induction process will be reviewed to ensure that it is comprehensive and provides prisoners with the correct information to enable them to integrate into our community. b) The induction unit will move to a different wing. Plans to be drafted with an anticipated move in mid-January 2025. c) Quality assurance of all induction will be completed, and this will be checked monthly by the head of residential services. d) A questionnaire will be introduced for all prisoners on completion of their induction to seek best practice and gaps in provision. e) A Bus to Bed journey will be completed and report completed. f) The early days / induction audit baselines will be completed and reviewed every quarter.	1. A new inductions book was introduced in January 2025. This sets out the induction process for all new prisoners (4.1).
2. The Board is concerned about the increased number of applications received concerning delays in refunds from DHL.	2. Negotiations will take place between HMP Send and DHL to agree a timeframe for refunds to be actioned.	2. We have been assured that the need for refunds from DHL (relating to purchases on canteen – the system to enable prisoners to buy items such as food and toiletries) is now minimal, and they are handled on a weekly basis.
3. The handling of DIRFs changed frequently in the reporting year. This limited the amount of work the Board was able to do in connection with the management and fairness of DIRFs.	3. Responsibility for DIRFs has been moved to the head of safer custody and equalities, who will liaise with the IMB to enable them to provide appropriate oversight. DIRFs are internally and externally scrutinised by the senior leadership team (SLT) PC leads and the Zahid Mubarek Trust (ZMT) respectively. All quality assurance (QA) will be open to IMB. Additionally, a	3. The Board has seen a significant improvement in the management and reporting of DIRFs during 2024-25 (5.4).

Issue raised	Response given	Progress
	prisoner scrutiny panel meets monthly chaired by the deputy Governor. DIRFS will be included in the weekly extended morning meeting monitoring and all DIRFS will be managed within the timelines. Regular comms will be published to prisoners and staff about the importance of DIRFS, the process and our expectations. DIRFS will be discussed and added to the agenda at every diversity and inclusion (D & I) meeting. Trends and narrative provided in the bimonthly D & I meeting minutes.	
4. The initiative to tackle obesity in prisoners needs to be followed through	4. A local working group will be established involving key stakeholders, including members of the Send community to develop a holistic approach to tackle obesity.	4. There continues to be an integrated initiative across healthcare, kitchens and the gym.to try to address this issue (6.1).
5. The Board would like to see more prisoners in education	5. A review of class sizes will be undertaken to maximise community participation. Work will be underpinned with a review of pay rates to incentivise educational achievement. Educational attendance will be monitored and reported weekly to all members of the senior leadership team (SLT). Celebration awards events will capture all prisoners who complete qualifications. The reading strategy will be embedded across the whole prison and all learning opportunities across work areas maximised. The gym will start to deliver qualifications. Prisoners' pay will incentivise educational activity spaces and	5. In January 2025, class capacity increased in the education building (7.1). A pay increase of 12.5% has been applied to all activities (7.2). English and maths attendance is incentivised with a higher rate of pay than other educational and work activities. £3 bonus is awarded on completion of all accredited courses across education and work. The Prisoner Performance Recognition event happens every three months.

Issue raised	Response given	Progress
	completion of qualifications. This will encourage, motivate and deliver tangible outcomes which will be reported in the monthly EPM.	
6. The long-term absence of a computer in the library impacts on the provision of this valuable service.	6. The prison to continue to negotiate with Surrey County Council to provide appropriate IT within the library.	6. This has not yet been resolved.
7. Staff shortages within OMU need to be addressed.	7. As above regarding POM vacancies.	7. As per point 4 in Prison Service section.

Evidence sections 4 – 7

4. Safety

The Board continues to consider Send to be a prison in which the management and staff make a great effort to try and ensure the safety of prisoners, including those who have complex needs.

Safety data is presented and discussed at the monthly safer custody meeting and an action plan is monitored. In addition, the weekly safety intervention and high risk meetings focus on individuals who require a high level of support.

The number of prisoners who need to be kept apart for safety reasons has increased during the year. We have also noted an increase in use of GOoD (good order or discipline) for isolating prisoners for their own protection.

4.1 Reception and induction

There were 216 arrivals during the reporting year, compared with 178 in 2023-2024. This increase has placed pressure on staff in the delivery of the regime.

A new and comprehensive inductions book was introduced in January 2025. This sets out the induction process for all new prisoners. The 'Life on the Inside' prisoner booklet, also introduced at that time, has been written to assist prisoners with the initial questions they may have upon arrival at Send.

A revised induction timetable, given to all new arrivals, detailing what is covered during the weeklong Induction process, came into force in March 2025.

Arrivals are still accepted on a Friday, although the prison makes every effort to ensure this is a final resort due to the impact this may have on a prisoner's access to healthcare on the day if the prisoners arrive late.

The prisoner-led induction process was observed by the Board to be helpful and effective.

4.2 Suicide and self-harm, deaths in custody

In common with the rest of the female estate, Send is a prison where the prisoners direct most violence at themselves rather than others.

Self-harm has increased by approximately 20%. The total number of incidents was 590, compared to 479 in the previous reporting year. The main triggers reported for self-harm have been linked to mental health, prison rules and adjudications.

The monthly average of self-harm incidents in the reporting year was 24.8 non-prolific (increased from 15 in 2023/24) and 20.5 prolific (a reduction from 24 in the 2023/24 reporting year). Behaviour defined as prolific is prisoners who self-harm five or more times a month.

The Board strongly believes that the needs of individuals with complex multiple mental health issues are not served well in prison. The staff are to be commended for their compassionate care and support of these prisoners.

The number of newly opened assessments, care in custody and teamwork (ACCT) documents (used to support prisoners who are at risk of self-harm and suicide)

opened during the year increased from 158 in the 2023/24 reporting year to 234 this year.

There were no deaths in custody this year. The Prisons and Probation Ombudsman (PPO) reported on 18 August 2024 on the death from a terminal illness of a former prisoner in hospital in January 2024, as it had occurred within 14 days of release. It concluded that prison staff made a timely and appropriate application for early release on compassionate grounds but might have given further consideration for release on temporary licence (which would have allowed the prisoner to be unaccompanied in hospital by prison staff) while the application was being considered.

4.3 Violence and violence reduction

Send continues to be a prison where the levels of violence are low and the Board has observed a culture of respect between most staff and prisoners. Notwithstanding that, there has been a significant increase in the number of assaults during this reporting year and this is concerning. There were 45 assaults during the reporting year compared with 20 in the previous year: 14 on staff (nine in the previous reporting year) and 31 prisoner-on-prisoner (up from 11 in the previous reporting year).

The prison continued to increase its use of the challenge, support and intervention plan (CSIP), the aim of which is to ensure that low level poor behaviour is dealt with before it becomes entrenched or escalates. There were 353 CSIP referrals during the reporting year compared to 277 in 2023/24 and 42 CSIPs were opened, up from 24 in the 2023/24 reporting period. Bullying continues to be the main contributing factor in referrals. During the year some prisoners have raised concerns with the Board about bullying by other prisoners.

4.4 Use of force (UoF)

There were 101 UoF incidents in the reporting year, compared with 45 in the reporting year 2023-2024. The significant rise has been attributed by the prison to the increase in the incidents of aggression between some prisoners. The higher number of new arrivals and the rise in prisoner turnover has led to a more unstable population. In the previous year, the most common reason reported for the UoF was to prevent self-harm. By contrast, in the reporting year, there have been more instances of fighting between prisoners and refusal to return to cell. The Board believes that some instances where UoF was employed could possibly have been de-escalated, had more experienced staff been involved.

Board members observed some of the UoF weekly meetings through the year and were satisfied that incidents were appropriately reviewed. The meetings were conducted with an openness to improve de-escalation techniques to further reduce UoF.

4.5 Preventing illicit items

As reported in previous years, the Board understands that illicit substances and the trading of prescribed medication continued to be major factors in prisoner bullying and at the root of debt issues. While we have seen no evidence, prisoners have told members of the Board this year that drugs could be obtained in one particular wing in the prison.

Random mandatory drug testing (MDT) has been carried out regularly, as well as specific suspicion drug testing:

	Current reporting year	Previous reporting year
Number of random MDTs	306	231
Those of the above which were positive	49 (16%)	27 (12%)
Those <u>confirmed</u> as positive after all tests	3 (1%)	5 (2%)
Number of Suspicion drug tests	22	49
Those of the above which were positive	10 (45%)	17 (35%)
Those confirmed as positive after all tests	6 (27%)	4 (8%)

Post is no longer photocopied. The prison believes problems arise through incoming transfers and possibly visits, rather than drugs coming in through the mail.

5. Fair and humane treatment

5.1 Accommodation, clothing, food

The 64 new rapid deployment cells continue to be very popular with the prisoners and during the year garden furniture, a greenhouse and outdoor exercise equipment have been added. This accommodation provides an incentivised substance free living (ISFL) area.

Enhanced prisoners, by contrast, do not have a dedicated area in the prison and they have reported they do not consider that their accommodation is significantly different from that of other prisoners.

In March 2025, one wing which comprises 10 cells was designated for use by enhanced prisoners aged over 50. This decision was favourably received by the prisoners who are taking the initiative to arrange their own craft and social activities.

Prisoner feedback about the food was generally positive. The Board considers the daily budget allowed per prisoner for food is low but the recent addition of fresh produce from the prison gardens is beneficial.

Sometimes due to staff shortage, prisoners are obliged to eat in their cells and not to have the choice to eat in the dining room. Overall, there seems to be a tendency by prisoners to elect to avoid eating in the dining room despite the efforts made by the prison to enhance the dining room environment to encourage prisoners to have their meals there.

The Board reported last year that Way Out TV (a TV platform for communication and education) did not appear to be used effectively as a means of communicating with prisoners. This service has now been discontinued due to the cost and the fact that many prisoners did not use it.

5.2 Segregation and enhanced engagement

Send does not have a segregation wing. Prisoners who are segregated for disciplinary reasons are confined to their cells: cellular confinement (CC). There are two enhanced engagement (EE) cells for those prisoners at risk of self-harm.

The Board believes that the arrival of more prisoners who had complex needs led to an increase in the challenges faced by staff regarding discipline and management of self-harm. During the reporting year, there were several prisoners in CC for a total of 47 days, of which 20 days were in the final quarter.

Prisoners were segregated under good order or discipline (GOoD) for seven days, five of those occurring in the last three months of the reporting year.

Over the year, the EE cells were occupied for a total of 158 nights, which is a slight increase from the previous year (147). During the last two months of the reporting year one prisoner accounted for 42 of the 50 nights. The Board has been impressed with the level of care and compassion provided to prisoners on EE.

5.3 Staff and prisoner relationships, key workers

Overall, the Board has seen positive relationships between staff and prisoners who have been treated with respect and compassion. The Board has witnessed staff

showing considerable patience and consideration to many time-consuming prisoners.

We understand that low keywork figures during the reporting year were due to redeployment of staff for EE, hospital escorts and bed watch.

The average time from a prisoner arriving in reception to when a key worker is allocated is twelve days, which is a two day increase on the previous reporting year. The average time from reception to the first key worker session is 28 days: this is an increase of seven days. Some prisoners have told members of the Board that they value the relationship they have with their key workers; others say they do not know who their key workers are.

During the year, a wedding took place between a prisoner and a member of the community. The Board was impressed with the effort made by the prison to make this a happy occasion.

Some prisoners have told the Board that the policy concerning relationships between prisoners is unfair or inconsistent. The new Healthy Relationships Guidance was issued by the prison in September 2024.

5.4 Equality and diversity

Prisoners continued to report that they did not always have confidence in the discrimination incident report form (DIRF) process. There were 48 DIRFs submitted in the year compared to 60 in 2023-24, although there was a significant increase for the month of December. Race was the protected characteristic most frequently identified, closely followed by disability.

During the year, however, there was a stronger focus on the management of DIRFs. A comprehensive and digital file of all DIRFs is maintained and a review of DIRFs is included in each month's diversity and inclusion meeting. It has been noted, however, that statistics concerning those prisoners with disabilities are not available in this meeting.

The Zahid Mubarek Trust (ZMT) has been appointed to carry out an independent review of DIRFs (although at the end of the reporting year, a review only up to 16th August had been completed). ZMT also provided training for the review and completion of DIRFs; some prisoners attended this training.

The Board has observed and been impressed with the DIRF scrutiny panel that consists of one member of staff and a small number of prisoners who meet monthly to assess whether DIRFs (appropriately anonymised) have been dealt with fairly.

There has also been a recent and renewed focus on the importance of holding prisoner equality forums (for each respective protected characteristic). The Board has observed that prisoners were provided the opportunity to raise a variety of subjects in a well-managed and receptive environment.

For the reporting year, five applications were submitted to the Board concerning equality. This was a drop in number compared to 2023-24 (13) and represented 2% of the total applications for the year (5% in 2023-24). Race and disability were the protected characteristics featured in these applications.

5.5 Faith and pastoral support

The Board continued to receive positive feedback from prisoners about the support provided by chaplaincy.

The Board has witnessed chaplaincy staff providing pastoral care and offering a safe space to discuss concerns related to family, prison life, or personal struggles. Chaplains visit all new arrivals and any prisoners in CC or EE.

An average of 110 prisoners attended faith-related activities weekly, including worship and study groups. Equal access is provided to faith services for all prisoners, ensuring fair and equitable participation. At the time of reporting, there is recruitment to fill gaps in faith provision for Quaker and Rastafarian representation.

In addition to regular services, structured faith-based education and no-faith based courses are offered, as well as social and creative activities including quizzes, a movie night, card-making, over-50s craft club, visiting speakers and choirs.

5.6 Incentives schemes

Prisoners complained to the IMB that the incentives policy (IP) process was unfair, and one that was viewed as a punishment and not a reward. A revised and comprehensive policy was issued in January 2025 with clear guidelines, including response deadlines for appeals. A process for managing appeals had not been implemented at the end of the reporting period, and the paper-based system still meant that some appeals could not be tracked.

5.7 Complaints

During the year, the Board received monthly data from the prison on its performance in responding to prisoner complaints. The timeliness of the prison's response to complaints improved, relative to the previous year, with 80% of complaints responded to on time. A few complaints, all of them directed to other prisons, were significantly late, despite repeated chasing by staff at Send.

Complaints are now stored digitally. Sample monitoring by the Board suggested that most responses were courteous and helpful.

5.8 Property

The Board has witnessed an improvement in the staffing of reception. In the previous year, reception was frequently closed due to staff being cross deployed to other departments.

Problems continued to be reported by prisoners regarding receipt of property on inter-prison transfers, particularly for transfers from Bronzefield. 42 applications were submitted to the Board concerning property: 29 external (30 in 2023-24) relating to property during transfer, and 13 internal (24 in 2023-24).

Send receives incoming transfers with varying levels of property: some prisoners arrive with three bags each, as per the escort company rules, whilst some arrive with less or many more. Many transferring prisons are not enforcing volumetric control consistently.

6. Health and wellbeing

6.1 Primary healthcare

In conversations with prisoners, feedback received on the healthcare service was variable, but with many prisoners reporting that the GPs and specialist staff were very helpful.

There were more applications submitted to the IMB concerning healthcare in the year than on any other subject: 34 representing 14% of the total, compared to 30 representing 11% in the previous year. There was a spike in applications in Q2 with 17 submitted (50% of the year's total). This coincided with a number of resignations and new hires of healthcare staff which followed changes in working hours.

Approximately one third of healthcare applications to the IMB related to medication, with nearly half of the healthcare applications in Q2 concerning this subject. On occasion, prisoners reported delays in getting medication, which staff attributed in part to the absence of an on-site pharmacy. In one instance, a prisoner received medication clearly labelled and intended for a different person.

On several occasions, slowness in the handing out of medication in the morning has impacted on the rest of the regime. Traka boxes, designed to make the supply of inpossession medication more efficient, have been installed in two locations but were not yet in use at the end of the reporting year.

Healthcare complaints to the prison represented approximately 10% of total complaints. Prisoners also sent 146 complaints direct to healthcare. Some of these would have been duplicates, but the combination of prison and direct-to-healthcare complaints is a significant proportion of total complaints. We do not have access to healthcare complaints so can give no assurance on how they are handled or comment on what they relate to.

There has been erratic, and sometimes poor, communication between prisons regarding the transfer of prisoner health information. On one occasion a disabled prisoner arrived to find, not only no wheelchair, but that a suitably adapted cell had not been prepared for her. Prisoners arriving on a Friday afternoon are sometimes deprived of their medication until the following week if information is not communicated in advance.

We continue to be concerned at the number of prisoners who decline breast screening. Reasons for declining are not recorded. Screening, which is always carried out outside the prison, is promoted via Wellbeing days and in other initiatives, but a report in Q4 indicated that of 21 women eligible, 14 had declined. The Board has questioned whether the use of escort chains during screening might discourage participation, but there is no clear evidence that this is a decisive factor. We understand that the provision of a mobile unit to the prison to enable screening to be undertaken on site (thereby eliminating the need for security measures) is not financially viable given the number of prisoners typically eligible for screening.

Escorting prisoners to health appointments outside the prison takes a lot of staff resource. As reported to us by prisoners and escorting officers, prisoners are handcuffed during transit and then attached to an officer on a long escort chain during the appointment. We have been assured that this is subject to individual risk-assessment and is relaxed where it is impractical or the risk of escape is particularly

low, but we believe that use of escort chains during intimate examinations or consultations of a confidential nature should be exceptional rather than the norm. By contrast, HMPPS policy for pregnant prisoners states that restraints must be removed when the pregnant prisoner arrives at hospital (if cuffed during transit).

Our perception is that levels of obesity amongst prisoners at Send remain high, despite continuing efforts by the prison to encourage healthy eating.

6.2 Mental healthcare

The Board strongly believes that the needs of individuals with multiple mental health issues are not served well in prison.

The Democratic Therapeutic Community (DTC) at Send - which is the only DTC for women prisoners in the UK - celebrated its 20th anniversary in May 2024. It has space for 20 participants but has not been fully subscribed this year: the cells not in use by DTC have been allocated to other prisoners. Many of the prisoners who have gone through the DTC attest to its transformative effect on their lives.

PIPE (psychologically informed planned environment) has space for 40 prisoners. At the end of the reporting year, there were 14 prisoners on progression PIPE and eight on preparation PIPE, with five other prisoners actively engaged on a non-residential basis.

6.3 Exercise, time out of cell, gym

The gym is well equipped and welcoming and evidently valued by those prisoners who make use of it. But prisoners complain that they have less access to the gym than at other prisons. Availability of gym sessions has been affected both by a shortage of gym staff, and by wider staff shortages impacting on the regime.

Parkrun continues to be popular, although it is restricted to enhanced prisoners. While we understand why the prison policy is to treat parkrun as a privilege, we regret that other prisoners do not have a chance to participate.

6.4 Drug rehabilitation

Drug rehabilitation is managed by the Forward Trust. It had 131 active clients at the end of the reporting year, of whom 26 were on medication (methadone, buvidal, or espranor).

6.5 Soft skills

There has been a number of activities to help support the wellbeing of prisoners. These have included:

- The Watts Gallery ran a weekly art class and the participants took part in an exhibition in June 2025. One prisoner commented 'you can forget where you are when you're doing this'.
- Send is now a platinum centre for the Koestler Arts Awards.
- The Liberty Choir was made up of prisoners and volunteers.
- A mural was created on the PIPE wing with the support of Create (arts) charity. Prisoners were all supplied with Create t-shirts.

7. Progression and resettlement

7.1 Education, library

The Board has spoken to many prisoners who are very positive about the courses they are studying and the impact it has had on them, and how it will help them in their future. We have observed classes where prisoners are engaged and tutors supportive and encouraging.

An education, training and employment needs analysis was conducted in August 2024 based on a survey of 150 prisoners (60%). Maths levels are lower than English, with 45% being assessed at entry level and below. There is currently no provision for progression beyond level 2 maths (except through distance learning).

A functional skills strategy was published in October 2024 to improve the standards of English and maths to a minimum level 1 and embed reading skills across the prison. This was supported by a Reading Strategy, a regional literacy programme run through the Shannon Trust including 2 active mentors, a weekly book club within education, creative writing activities, and comparative activities run by the library. The needs analysis noted that 38% of prisoners reported that they do not feel encouraged to read at Send and 39% did not feel they benefited from using the library, highlighting the importance of this work. In January 2025, an increase in capacity in classrooms, and change from cohorts to 'roll on roll off', aimed to increase provision and attendance.

The Board welcomes the focus on functional skills as these are essential for employment for those leaving prison. However, we believe that this should include information and communication technology (ICT) skills. Findings from the needs analysis showed that only 44% of the respondents reported feeling confident at using ICT/a computer. In addition, prisoners studying distance learning courses were given print outs of the main course material but told us that they found it frustrating not being able readily to access secondary sources. The Board has repeatedly highlighted the lack of progress in the provision of ICT at Send and concludes, again, that the prison is failing to prepare prisoners for life in a digital society. In previous years, we have urged HMPPS to speed up the plans to implement in-cell technology but can see no evidence that anything is likely in the foreseeable future.

Lack of a computer in the library impacts skills development for library orderlies as well as resulting in inefficient time management: stock control is difficult and checking out items and managing overdue items takes an excessive amount of time.

There have been two 'celebrating success' events, in which approximately 60 of prisoners received a certificate from the Governor for educational achievement over the past three months. These events are extremely positive, where prisoners appear happy, energised and supporting of each other in celebrating successes, alongside staff.

As of August 2024, 118 prisoners either had neurodiverse conditions that had been identified or showed signs that called for further evaluation. This was equivalent to approximately half of the establishment's 249 total population. We have observed creative approaches used to aid learning.

7.2 Vocational training, work

Courses with qualifications included those in horticulture, hairdressing and business administration.

New courses offered this reporting year included a Railtrack programme covering track maintenance, first aid, and fire safety. Of the seven prisoners who completed the course in November, five were released and of those, two were in employment and two were in the process of on-boarding with Railtrack. Sadly, due to lack of central funding, this Railtrack training was discontinued after only two courses. Such cuts also meant that plans for digital marketing training were shelved.

The hair salon extended its training provision to include a module on African Caribbean hair, which many prisoners considered essential for their employment after leaving Send.

Pay rates were increased by 12.50% in July 2024. There have continued to be persistent comments from prisoners regarding local pay levels, which they report, are lower than in other women's prisons, particularly Bronzefield from which many of them transfer to Send.

Prisoners complained to members of the Board about the allocation of jobs, particularly those roles carried out by orderlies.

7.3 Offender management, progression

Staff shortages within the OMU have reduced in the reporting year. However, there were additional demands on OMU staff with an increase in the number of prisoners with complex needs, and the need to handle the release of prisoners under SDS40.

The continued pressure from HMPPS to move eligible prisoners to open prisons had an impact on the release on temporary licence (ROTL) numbers. Typically, there was only one prisoner on ROTL working in the community during the year. Prisoners in kitchens raised concerns with us about the lack of ROTL opportunities at Send versus other prisons. The focus now, however, is that Send concentrates on preparing prisoners for employment on leaving prison. There is a Work Ready programme provided by CXK as part of the career, information and guidance provision (CIAG). Three work ready courses were commissioned as part of the CIAG contract. 21 prisoners took part in the programme and 10 were offered employment on release.

There were six IPP prisoners at the end of the reporting year, which included four on recall. Two IPP prisoners were released during the year, one of whom had been in prison for many years beyond her tariff. The Board commends the work of OMU in managing the progression of IPP prisoners at Send. The Board continues to believe that the continued detention, and repeated recalls of IPP prisoners for relatively small breaches of licence conditions, is unfair and inhumane.

There were 88 prisoners with life sentences at Send at the end of the reporting year. Newly appointed lifer orderlies conducted a questionnaire for prisoners with life sentences to find out which courses and mentoring they would like. In March there was a lifer forum and an open day with outside organisations coming into the prison.

Events to inspire prisoners on life and success after prison, with speakers with lived experience, received positive feedback and included Gethin Jones (keynote speaker and founder of Unlocking Potential), and TV Chef Jon Watts.

7.4 Family contact

Five prisoners went out on child resettlement leave (CRL) during the reporting year. The prison reports that the low number on CRL in comparison to the population is due to the fact that those categorised as eligible are frequently transferred to open prisons. Also a large proportion of prisoners (higher than in comparator prisons) is high risk and not eligible for CRL until in open conditions.

7.5 Resettlement planning

A total of 130 prisoners were released from Send during the reporting year (compared to 88 in 2023-24) and over 96.5% had accommodation on their first night (90% for 2023-2024). Approved premises (which provide intensive supervision for those who present a high or very high risk of serious harm) were the most common accommodation. There is no reliable evidence about longer-term accommodation outcomes.

There is now a pre-release satellite provision from HMP Bronzefield. The pre-release POM attends Send once a week and is responsible for all pre-release prisoners within their 12-week window before release. The aim is that with this dedicated focus the service provision will improve.

The employment hub allows access to services provided by the National Careers Service, CXK, the Department for Work & Pensions (DWP) and IDBA (regarding ID and banking). At a resettlement fair in December, stands included DWP, New Futures Network, Making Connections, CXK (sustainable education and training), Hestia (homelessness and category 3 accommodation). There was also a prisoner work coach from the DWP at Send each week from December onwards.

In terms of employment on release, compared with the rest of the female estate, Send is bottom of the table. This must be viewed considering the small number of releases direct from Send. 16 prisoners were offered employment out of 130 releases; 10 of these offers came from Iceland. Some prisoners choose not to be employed, either because of their age or the wish to return to full-time parenting.

8. The work of the IMB

Board statistics

Recommended complement of Board members	12
Number of Board members at the start of the reporting period	11
Number of Board members at the end of the reporting period	12
Total number of visits to the establishment	282

Total applications to the IMB

Code	Subject	Current reporting year	%	Previous reporting year	%
Α	Accommodation, including laundry, clothing, ablutions	25	10%	19	7%
В	Discipline, including adjudications, incentives scheme, sanctions	18	8%	15	6%
С	Equality	5	2%	13	5%
D	Purposeful activity, including education, work, training, time out of cell	9	4%	16	6%
E1	Letters, visits, telephones, public protection, restrictions	21	9%	24	9%
E2	Finance, including pay, private monies, spends	11	5%	22	8%
F	Food and kitchens	6	3%	11	4%
G	Health, including physical, mental, social care	34	14%	30	11%
H1	Property within the establishment	13	5%	24	9%
H2	Property during transfer or in another facility	29	12%	30	11%
Н3	Canteen, facility list, catalogues	5	2%	5	2%
I	Sentence management, including HDC (home detention curfew), ROTL (release on temporary licence), parole, release dates, re-categorisation	20	8%	19	7%
J	Staff/prisoner concerns, including bullying	18	8%	17	6%
K	Transfers	4	1%	4	1%
L	Miscellaneous	21	9%	21	8%
	Total number of applications	239		270	

Annex A

Service providers

- Education: Milton Keynes College
- Escort contractor: Serco
- Healthcare and pharmacy: Central and North West London (CNWL) NHS Foundation Trust (with support from other providers for dentistry, optometry, physiotherapy, podiatry and other services)
- Library: Surrey County Council
- Maintenance: Gov Facility Services Limited (GFSL)
- Mental health: CNWL NHS Foundation Trust
- Resettlement support: the Probation Service and the Commissioned Rehabilitative Services
- Substance misuse programme: The Forward Trust
- Social Care: Surrey County Council
- Visitors' centre: Prisoner advice and care trust (PACT)



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