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Use of force in prisons and YOIs

Dear Lord Timpson,

I am writing to bring to your attention the serious concerns the Independent Monitoring Board (IMB) has about the current trajectory of use of force practices in the prison estate and the implications of recent expansions to the weapons available to prison officers. This letter draws upon IMBs' observations in response to a call for evidence, 2024-25 annual reports, and findings submitted through our internal quarterly reporting process. It also references data drawn from the HMPPS Performance Hub and Use of Force Dashboard.

At the time of writing this letter, prisons in England and Wales are facing serious challenges in terms of unrest and violence. IMBs monitoring the prison estate are well aware of these issues – indeed, they have been sounding the alarm about increased violence and disorder for several years. No one is likely to deny the pressure the Prison Service is under, or the public scrutiny regarding violence in prisons.

However, the IMB has significant apprehensions about the direction in which the use of force in prisons is moving. The roll-out of PAVA to the youth estate and the introduction of tasers to the adult male estate represent an escalation which is likely to have serious consequences for the overall culture of prisons and their ability to deliver meaningful rehabilitation.

I fully recognise the importance of keeping officers safe while they carry out their vital roles. I also understand the particular dangers of group assaults and mass fights and the need to bring these incidents under control as quickly as possible. However, there is currently little evidence showing that weapons such as PAVA make prisons safer, and too much evidence indicating that it has the capacity to do real and lasting damage to prison culture. The introduction of body armour is also a step in the wrong direction, one that could further erode relationships between staff and prisoners. To improve safety, prisons need confident, experienced staff who are able to perform

their duties with consistency and gain the trust and respect of prisoners. Such a visible reminder of the seeming lack of trust staff have in prisoners and the expectation of violence, is likely to have the opposite effect.

There are worrying indications that new weapons have been introduced in response to public outcry and union lobbying rather than being led by evidence. Given the context of the real financial strain the Prison Service is under, and alarming reports of education budgets across the country being slashed by 40% or more, the decision of the Lord Chancellor to invest £15 million into body armour and tasers is a revealing one. When the trial of tasers was first announced in July 2025, the Ministry of Justice stated that it would run until enough data had been collected to make an informed decision about any further roll-out; the data collection period was a very short one indeed, with the expansion of tasers announced less than two months later. HMPPS data shows that there was not a single taser use during the trial, which means that no information has been collected and no lessons learnt – yet the government plans to expand the number of officers with tasers by up to 2400%. IMBs question whether the limited resources available are being prioritised correctly and for the right reasons.

I am particularly alarmed by the government's decision to roll PAVA out to young offender institutions (YOIs) in light of the clear evidence that PAVA is disproportionately used on both young people and black and mixed ethnicity prisoners. The government's Child Rights Assessment³ revealed that children were afraid that it would be misused and that it would lead to escalation. All current evidence indicates that these fears are well-founded. Young adults were the cohort which IMBs most commonly reported as being overrepresented in the use of force. Indeed, of the ten prisons with the highest use of PAVA per 1000 average prison population (with the highest seeing 769 PAVA uses per 1000 average prison population over the 27-month period analysed), seven had a specialist young adult function.⁴ These prisons are theoretically tailored to young adults' unique needs, in recognition of their maturity levels and additional challenges relative to older adults; these figures indicate that they are failing to do so. It is difficult, then, to believe the YCS' claim that PAVA use in YOIs is likely to be low or non-existent.

The violence and disorder in the prison estate is not an issue that has arisen in isolation. It is accompanied, and exacerbated, by a crowded, often chaotic estate, by staffing shortages and high numbers of inexperienced staff, and by regimes which are still unpredictable and unfulfilling in far too many prisons. In an analysis of the

¹ Press release: Prisons Taser trial to protect staff and tackle violence, 28 July 2025

² Press release: Major safety boost for frontline prison staff, 21 September 2025

³ Child Rights Impact Assessment Summary: Partial Deployment of PAVA in Public Sector YOIs - GOV.UK, 13 August 2025

⁴ The prisons with the highest PAVA use are, in descending order: Feltham B, Brinsford, Isis, Swinfen Hall, Whitemoor, Hindley, Woodhill, Manchester, Deerbolt, Swaleside. This is based on data from 24 May 2023-1 September 2025, when it was confirmed by the then-Prisons Minister that PAVA had been fully rolled out.

ten prisons with the highest reported use of PAVA, IMBs highlighted staff shortages, restricted regimes, and little or no key work. Especially concerning was the impact of staff inexperience, also a common theme among these prisons. IMBs reported PAVA being deployed by inexperienced staff who were unable to de-escalate situations appropriately or who simply saw PAVA as the first, rather than the last resort in challenging situations; officers who were quick to take prisoners to the floor without attempting to de-escalate and kept them restrained for too long without testing for compliance; and inconsistent, confusing enforcement of rules and discipline, leading to chaotic and sometimes explosive environments. The IMB believes that targeting these problems with the resources and careful planning they require is the correct path towards making prisons safer, and the one that promises the best results.

Instead, there is an apparent shift towards more intense forms of force becoming the 'new normal' in certain prisons. Since PAVA has been fully rolled out in the prison estate, over a third of all incidents have occurred at three prisons (Feltham B, Brinsford and Isis), pointing towards a cultural acceptance of PAVA as an everyday occurrence in these environments; other prisons with similarly high levels of violence did not use PAVA in the same way, and the IMB at Isis noted that the use of force increased at a faster rate than the increase in violence. In April 2025, PAVA usage stopped being treated as a National Incident by HMPPS. The IMB considers this a troubling development.

Additionally, there is no convincing evidence that PAVA is effective as a de-escalation tool, or that it works as a deterrent – once its use becomes common in a prison, it tends to remain so. For example, at Feltham B PAVA was used against 21 prisoners, three of them on multiple occasions, in May 2025 alone, three years after it was introduced to the prison. At Isis it was used against 32 prisoners, three of them on multiple occasions, in September 2024, and then against 31 prisoners, two of them on multiple occasions, in November 2024. PAVA is also consistently deployed far more often than it is drawn and not used – in the Isis example, it was drawn and not used only four times in November 2024, and not at all in September 2024. In the prison estate as a whole, PAVA has been used 68% of the times it has been drawn since its initial introduction in 2022.

When force is stepped up in the prison estate, it poses particular risks for prisoners who are already the most vulnerable. Boards continue to highlight that black, Muslim, disabled and young adult prisoners are significantly overrepresented in the use of force. This is not news to the Ministry of Justice, which recently published a review on the use of force showing unacceptable inequalities, especially for black, mixed ethnicity and Muslim prisoners. However, awareness is no substitute for effective action, and Boards across the estate continue to report failures to make any meaningful progress in reducing these disproportionalities.

⁵ Use of Force review: An Exploratory Analysis of Use of Force in prisons 2018 to 23, 24 April 2025

Boards have also observed glaring shortfalls in the oversight of disproportionate force, such as the omission of disability in use of force trends at Norwich, despite at least 30% of the prisoners there having a disability, or the absence of effective analysis of disproportionality in the context of the prison's demographic breakdown at Aylesbury. This bodes poorly for the mitigation measures put in place in response to the Child Rights Impact Assessment.

IMBs have seen harrowing incidents where force was used on severely unwell prisoners, many of whom belong in suitable mental health facilities rather than prison. This includes the use of PAVA to subdue prisoners attempting to self-harm, or when prisoners were removed from their cells in order for them to be cleaned. In the women's estate the use of force on women suffering from acute mental illness is a priority concern for IMBs: one woman in Eastwood Park was subject to 45 physical interventions, 35 of which were to prevent self-harm, in September 2024 alone.

IMBs also found that prisoners with disabilities were significantly overrepresented, with HMPPS data indicating that prisoners with a recorded disability are 30% more likely to experience force. At Brixton, the IMB reported that 74% of prisoners who had force used on them were registered as having some kind of disability, despite this group comprising only 39% of the population. This is particularly concerning in the context of the additional challenges that prisoners with learning disabilities and neurodivergence face within the prison estate and its limited ability to provide more suitable environments for these prisoners.

The IMB must condemn the expansion of force measures, particularly while the prison estate remains unable to deliver consistent, effective training and mentorship, or to identify and successfully rectify patterns of disproportionality. It is also crucial that the government and Prison Service focus on getting prisoners where they need to be: small units for children, mental health facilities for those with severe mental illness, and appropriate environments for people with disabilities or neurodivergence. Equally important is equipping staff with the jail craft they need to maintain discipline and de-escalate where necessary, rather than diverting resources into reactive measures with little evidence behind them. Strong relationships between staff and prisoners, where there is mutual respect and prisoners trust that they will be treated fairly, are the backbone of successful rehabilitation in prisons – and a far more effective protection for staff than body armour. Until these fundamentals have been put in place, the expansion of force will be a sticking plaster at best and corrosive at worst.

Yours sincerely

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