

Expectations

Criteria for assessing the treatment of and conditions for men in close supervision centres

Version 2, 2023

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Introduction

This is the second edition of our *Expectations for men in close supervision centres* (CSCs), which will be used to undertake thematic inspections of the treatment and conditions experienced by prisoners held in CSCs in line with our approach to inspecting other similar units. The *Expectations* draw from those we use in adult men's prisons and in separation centres.

They provide the framework against which HM Inspectorate of Prisons will fulfil its responsibility for delivering independent and objective assessments of outcomes. This is in accordance with the UK's responsibilities as a signatory to the Optional Protocol to the Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT).

CSCs accommodate small numbers of the most dangerous prisoners who cannot be safely managed within the mainstream population. The *Expectations* focus on the treatment and conditions experienced by the men held in the centres and emphasise the importance of progression.

We have agreed four main tests to measure outcomes for prisoners in the centres, underpinned by a focus on leadership. The four tests are: management of the centres, progression, safety, and respect. Each test has been carefully developed to reflect the unique role of the centres, located as they currently are within a small number of long-term high security prisons. We do not intend to judge the wider provision in each prison, as this will be assessed within our inspections of those establishments, but we will make judgements about access to services and support for men in the centres and whether this meets their assessed risks and needs.

In these *Expectations*, the term 'leader' refers to anyone with leadership or management responsibility in the separation centre. We will direct our narrative at the level of leadership which has the most capacity to influence a particular outcome.

Charlie Taylor Chief Inspector of Prisons October 2023

Section 1: Leadership

National and local leaders provide the direction, encouragement and resources to enable good outcomes for prisoners.

Expectations

1. Direction: National and local leaders work collaboratively with staff, stakeholders and prisoners to set and communicate strategic priorities that will improve outcomes for prisoners.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- There is a clear leadership structure with responsibility for close supervision centres, including good partnership working between the prison governor and the national leadership team.
- Effective oversight is provided through a national management committee that meets regularly, provides scrutiny, support and challenge and is attended by senior leaders from each centre.
- A comprehensive strategy, underpinned by research, shapes the role and purpose of the CSCs nationally.
- Leaders and staff understand the centres' strengths and weaknesses and where outcomes need to improve.
- Governors of host prisons understand and accept the specialist nature of the centres and the need to provide tailored opportunities as required.
- Leaders have a good understanding of the experiences of prisoners and staff in the centres.
- Leaders understand and are committed to the primary objectives of close supervision and have an ambitious vision for the centres.
- Realistic, aspirational plans are in place to improve outcomes for prisoners.
- Staff understand and share the aims and priorities of the centres.
- Leaders foster and develop multidisciplinary ways of working which are essential to delivering the national aims of the centres.
- 2. Engagement: National and local leaders create a culture in which staff and other stakeholders willingly engage in activities to improve outcomes for prisoners.

- National and local leadership is responsive to the unique demands placed on staff by working in the close supervision centres.
- Leaders at every level are visible and approachable.

- Leaders take time to listen to staff and prisoners and follow up issues raised.
- Effective communication is used to promote understanding of current priorities, information sharing, collaboration and multidisciplinary working.
- Leaders set, model and enforce standards of staff behaviour and prisoner care that support rehabilitation.
- Leaders actively promote the well-being of staff.
- Staff feel motivated and supported in their work.
- Leaders show and encourage innovation and creativity to solve problems and meet the needs of prisoners.
- Effective practice is recognised and shared.
- The organisational culture encourages staff to reflect on and learn from their mistakes.

3. Enabling: National and local leaders provide the necessary resources to enable good outcomes for prisoners.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Staffing levels are sufficient to delivers the aims of the centres.
- Staff have the knowledge, skills and attitudes necessary to work safely and meet the needs of prisoners.
- Leaders make good use of the staff and buildings at their disposal.
- Leaders identify resource constraints and seek to resolve them.
- The senior management team has the experience and skills necessary to improve outcomes for prisoners.
- Line managers support their staff, challenge where necessary and provide suitable professional development opportunities.
- Information and communication technology systems support effective working practices.

4. Continuous improvement: National and local leaders focus on delivering priorities that support good outcomes for prisoners. They closely monitor progress against these priorities.

- Data is used effectively to understand the impact and fairness of policies, and to track progress against improvement plans.
- Feedback from prisoners, staff and other stakeholders is used to generate ideas, create plans and measure progress.
- Decisions are made and plans are amended in response to new information.
- Leaders welcome and encourage external scrutiny.

- Inspection recommendations, audit findings, serious incident reports and best practice ideas are used to encourage improvement.
- Leaders use quality assurance processes to drive continuous improvement.
- Collaboration with policy teams and colleagues in other centres or partner organisations supports improvement.

Section 2: Management of the centres

The risks and needs of prisoners are thoroughly assessed, managed and monitored. Deselection takes place when appropriate and safe.

Expectations

5. Oversight of the use of close supervision centres is comprehensive and ensures prisoners' risks and needs are met.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- There is ongoing analysis of the risks and needs of prisoners in CSCs and action is taken to address them.
- A comprehensive strategy, underpinned by research, shapes the role and purpose of the CSC.
- Close attention is paid to identifying and responding appropriately to the individual needs of all prisoners, including those who are vulnerable.
- The potential for discrimination in the use of the centres and in progression and reintegration opportunities is kept under review and prevented.
- The impact of separation on prisoners is monitored frequently. Separation is not used as, and does not become, solitary confinement (when detainees are confined for 22 hours or more a day without meaningful human contact).
- There is an independent advisory board, which is well attended, meets regularly and has a good understanding of how the centres work.

6. Prisoners are assessed for placement in the centres in accordance with published procedures and criteria.

- There are clear, published criteria for the selection of prisoners for the centres and the reasons for selection are documented.
- Prisoners are selected for the centres only when it is in the best interest of protecting others from harm and after all other relevant options have been considered.
- The selection process is subject to scrutiny by an independent person to make sure it complies with prisoners' rights and published procedures.
- Unless there are national security reasons which cannot be mitigated, prisoners are able to receive a copy of their assessment/selection report.
- Prisoners who are selected for the centres are entitled to challenge their selection and raise complaints.
- Prisoners are informed of the national governance structures for the centres.

7. Prisoners are deselected from close supervision centres when the risks no longer require their separation. This follows a thorough and robust assessment of risks and progress made.

- Prisoners' progress is formally and regularly reviewed to inform decisions about deselection. Reviews are clearly documented, and decisions are recorded.
- Any significant change in risk and/or need triggers a multidisciplinary review.
- Prisoners are given sufficient and timely information about their assessment and/or review and the opportunity to make representations and express their views in person.
- Prisoners have access to necessary support to present their own case or have their case presented.
- Prisoners are able to challenge their continued allocation to the centres.
- When deselection is agreed the prisoner is moved out of the centre promptly.

Section 3: Progression

Prisoners benefit from constructive time out of cell and opportunities to access support to explore their attitudes, thinking and behaviour. There is a clear focus on how prisoners can be deselected from close supervision centres. Prisoners are supported to maintain contact with family and friends.

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- Individual case management
- Time out of cell and purposeful activities
- Education, skills and work
- Children and families and contact with the outside world
- Planning for reintegration or release

Individual case management

Opportunities to progress are clearly promoted and prisoners are able, and expected, to engage in them. All prisoners have a robust individual plan which is based on an assessment of their offending-related risks and needs. This is regularly reviewed and implemented to reduce reoffending.

Expectations

8. Prisoners receive the support they need to address the risks that led to their selection to the centres.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- All prisoners have a comprehensive care and management plan, developed by a multidisciplinary team, which promotes risk reduction.
- Prisoners can contribute to the development and delivery of their plan.
- Where safe and appropriate, a prisoner's family member or other significant person is invited to attend a care plan review if it is deemed beneficial.
- Comprehensive reviews of care and management plans are based on a wide range of information, and are undertaken at agreed intervals and following any significant change in risk or need.
- There is effective, routine management oversight of the quality of the care and management plan.
- 9. Prisoners have a comprehensive sentence plan aimed at reducing reoffending and are supported in their efforts to achieve the targets.

- Prisoners, together with the offender manager and other relevant staff, are involved in drawing up and reviewing sentence plans. These are based on a comprehensive assessment of offending behaviour.
- The level of contact between prisoners and their designated offender manager in the prison or community reflects the assessed levels of offending-related risk and need. Contact is structured and clearly focused on reducing reoffending.
- Contact with key workers, for example centre officers, psychologists, and other staff, is regular and meaningful and supports the delivery of the sentence plan.
- Staff conduct offence-related work on a one-to-one basis where needed.
- There is good cooperation and communication between all organisations and departments delivering rehabilitative work.
- Prisoners are encouraged and motivated to engage with interventions and are prepared thoroughly for them.

 Prisoners can access tailored interventions and support which promotes a reduction in reoffending.

10. Prisoners' risk of harm to others is minimised through the proper application of public protection requirements in custody. Prisoners are informed of any relevant decisions.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Prisoners are informed of the arrangements for managing the risk of harm they pose to others, the implications for them personally and the opportunities available to them for challenge, unless there are wellevidenced security considerations.
- Multi-agency structures for protecting and safeguarding the public (such as MAPPA) are used effectively.
- Contact restrictions are implemented effectively and are regularly reviewed.
- Mail and telephone monitoring are up to date and effective.
- Applications for contact with children are managed robustly and completed without unnecessary delay.
- The best interests of the child are paramount when assessing a prisoner's access to children and consideration of best interests includes consultation with relevant agencies.

Time out of cell and purposeful activities

Prisoners have sufficient time out of cell and are encouraged to engage in recreational and social activities which support their well-being and promote effective rehabilitation.

Expectations

11. Prisoners have regular and predictable time out of cell which is sufficient to promote rehabilitation and well-being.

- Prisoners are allowed as much time as possible out of their cell every day.
 This should be at least 10 hours, including time in the evening for association.
- Wherever they are located, prisoners are never subjected to a regime which amounts to solitary confinement (when prisoners are confined alone for 22 hours or more a day without meaningful human contact).
- There is sufficient time for prisoners to complete domestic tasks, such as showering, collecting medication, cell cleaning and telephone calls, in addition to attending employment and education.

- Prisoners unable to attend learning or work activities are unlocked during the day and are provided with suitable activities.
- Prisoners have the opportunity to telephone or video call their children, families and significant others at a time convenient to them and their family.

12. Prisoners are expected and encouraged to use time out of cell constructively, including at weekends.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Staff and prisoners have daily opportunities to interact proactively.
- Prisoners engage in a variety of activities throughout the day and can have at least one rest day a week.
- Based on risk assessments prisoners are able to socialise with each other.
- Prisoners have properly equipped areas for association.
- Prisoners are encouraged to take part in sociable recreational activities which promote well-being subject to a risk assessment.

13. Prisoners can spend as much time as possible – and no less than one hour – in the open air every day.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Exercise areas are clean, spacious, inviting and include enough seating and equipment.
- Prisoners do not have to choose between access to the open air and other important regime activities.
- Prisoners are encouraged by staff to spend time in the open air to benefit mental and physical well-being.
- Outside exercise is only cancelled in extreme weather conditions and waterproof clothing is available.

14. Prisoners have regular access to suitable library materials and additional learning resources that meet their needs.

- Prisoners have ready access to a good range of library materials and can influence the selection offered.
- Library materials reflect the diverse needs of the prisoners held and include a range of formats and languages, including those for poor readers.
- Prisoners can easily access documents relating to their management, rights and entitlements.

 Prisoners can access services provided by the library to promote literacy effectively and encourage engagement with children, families and other people who are significant to prisoners.

15. Prisoners are encouraged to participate in physical education and fitness provision that meets their needs.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Prisoners participate safely, at least twice a week, in a range of physical education, fitness and associated activities, based on an effective assessment of their risks and needs.
- Physical education and fitness staff engage with prisoners and have appropriate qualifications and expertise.
- Opportunities are provided for prisoners to participate in physical education with each other.
- Prisoners benefit from structured training programmes and opportunities.
- Health promotion information and material is provided to prisoners and is incorporated into an individualised programme.

16. Prisoners can access creative, recreational and social activities which promote learning, well-being and support rehabilitation.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Prisoners have access to a range of activities which build positive relationships, self-esteem and confidence, and improve health and wellbeing.
- Prisoners help to develop the range of recreational activities on offer and are, with staff oversight, involved in the delivery and review of activities.
- Prisoners are actively encouraged to take part in recreational activities, including in-cell provision.
- Art and cultural experiences are used to enhance the centre's environment, making it more conducive to rehabilitation.

Education, skills and work

17. Prisoners have access to learning, skills and work provision that meets their needs and supports progression.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

 Prisoners have access to a range of education, training and work opportunities.

- Prisoners are able to gain knowledge and develop skills that will be useful to them after release or on return to the mainstream prison population.
- Prisoners can complete short and, where appropriate, more substantial, units of education and training.
- All prisoners can undertake paid work during the working day.
- Prisoners are helped to prepare for their next phase of education, training or work on transfer or release.
- Staff understand the importance of education, training and work and encourage attendance.

Children and families and contact with the outside world

The centre supports prisoners' contact with their families and friends. Access to programmes aimed at developing parenting and relationship skills is facilitated. Prisoners not receiving visits are supported in other ways to establish or maintain family support.

Expectations

18. Prisoners are encouraged to re-establish or maintain relationships with their children and families where it is appropriate, and are supported in doing so.

- If a risk assessment supports it, there are opportunities for families to be involved in supporting prisoners, particularly those at risk of self-harm, for example during ACCT care plan reviews.
- Prisoners and their families can access interventions for improving parenting and relationship skills.
- There are imaginative methods for encouraging family contact (for example, audio recordings of stories) and opportunities for prisoners to celebrate their successes with their family and friends.
- Prisoners' distance from home, frequency of visits, parental status and number of dependants (a person who relies on another, especially a family member, for financial support) are monitored.
- If judged appropriate by a risk assessment, appropriately skilled family support workers provide structured support to prisoners and their families.
- Prisoners who do not receive visits are identified and receive individual support and help to maintain relationships.
- Unused visiting orders can be exchanged for phone credit.
- Prisoners' families and friends know how to share concerns they have about a prisoner and how to seek support.

19. The centre supports the rights of children visiting their parent in prison, subject to a risk assessment for public protection concerns.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- There is a welcoming visitors centre, which has activities to keep children entertained.
- Children are allowed to have physical contact with their imprisoned parent.
- Access to special/enhanced visits is in line with the rest of the prison and is not linked to the incentives policy.
- Children are safe and can enjoy age-appropriate activities with the prisoner they are visiting.
- Prisoners receive advice on how to support their child through the experience of parental imprisonment.

20. Prisoners have regular and easy access to mail, telephones and other methods of communication, subject to a risk assessment for public protection concerns.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Prisoners can make a free phone call on their first night in the centre.
- Prisoners' telephone numbers are added to their PIN account within 24 hours of arrival at the centre.
- Telephones can be used every day and in private, ideally in cell.
- Prisoners' outgoing mail is posted within 24 hours (48 hours when received on a Saturday) and incoming mail is received by prisoners within 24 hours of arrival at the centre, including registered and recorded mail.
- Prisoners are enabled and encouraged to use a range of electronic options (including email and video calls) to maintain family contact.
- Foreign nationals receive additional help and resources to keep in touch with family abroad.
- Prisoners can easily find the telephone numbers of outside organisations and know which numbers they are permitted to call.

21. Prisoners can maintain contact with the outside world through regular and easy access to visits. They are aware of the prison procedures and their visits entitlements.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

 Convicted prisoners can receive a visit within one week of admission and thereafter at least once a week for a minimum of one hour, including at weekends.

- Unconvicted prisoners can receive visits at least three times a week, including at weekends.
- The visits booking system is accessible and efficient.
- Visitors are given information about how to get to the prison, visiting hours, what to expect and how to complain.
- Where public transport is poor, the prison provides transport from local stations.
- Visitors can book future visits during their current visit.
- Prisoners without outside contact and support can access approved schemes whereby trained volunteers provide support through visits or other forms of communication (such as letters).
- Visitors who travel long distances are able to have accumulated, extended or consecutive visits.

22. Prisoners and their visitors attend visits in a clean, safe and respectful environment which meets their needs.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- There are effective systems to collect and respond to feedback from prisoners and visitors (including children) about their visits experience.
- Prisoners and visitors can access toilet facilities at all times.
- Visits areas are comfortable, friendly and welcoming.
- Staff are trained in child safeguarding arrangements and visits staff are aware of children with particular safeguarding needs.
- Security arrangements and restrictions on physical contact are not excessive.
- Visitors can buy a good range of refreshments during visits.

Planning for reintegration or release

Prisoners are supported when they move to another centre, to mainstream prison locations or to secure health facilities. Resettlement support is provided for release into the community.

Expectations

23. Prisoners are safe and supported when they move between centres and are deselected, including on release into the community.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

 Prisoners being transferred know where they are going and why they are moving. They are able to inform someone of their transfer at the earliest opportunity unless there are security concerns.

- Staff in the receiving centre or prison are thoroughly briefed about prisoners' risks and needs.
- Prisoners have a care and management plan for their new location.
- Transfer arrangements are appropriate and all property travels with prisoners.
- Prisoners are given the necessary support to prepare for their return to a mainstream prison regime.
- Prisoners being released into the community have access to all resettlement services that are available in the wider prison.
- Appropriate accommodation arrangements for prisoners are made well ahead of release into the community.
- Prisoners at the point of release have access to suitable clothes, and bags are available if needed.
- Facilities are available before release into the community to launder clothes and charge mobile phones that have been in storage.
- Prisoners being released into the community receive all their property, including their money, and any grants owed to them.

24. Prisoners are directly involved in developing and reviewing their release plan and receive proactive help to overcome obstacles to successful resettlement.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Resettlement plans are comprehensive and developed early enough before release to offer prisoners a good range of help and support.
- Prisoners have a named person in the prison or the community who is responsible for supporting their reintegration/release plan.
- Prisoners can easily arrange an appointment with their offender manager in the prison and are able to meet with their offender manager in the community in preparation for release.
- Prisoners are meaningfully engaged in the development and regular reviews of their plans and have opportunities to make choices about their reintegration.
- Prisoners can access a range of community-based agencies prior to release to improve their chances of successful resettlement.

25. Prisoners being released into the community have a robust risk management plan to support them and protect the public from harm.

- When prisoners are likely to be released from custody directly from a close supervision centre, arrangements are discussed at the earliest opportunity and overseen by the central management committee.
- Community-based offender managers and offender managers in prison work closely together to develop a risk management plan for release,

- including confirmation of the multi-agency public protection arrangements (MAPPA) management level.
- Centre staff are aware of plans to manage risk of harm on release and, where relevant, participate in or contribute to multi-agency planning meetings (such as MAPPA).
- Staff make sure that prisoners understand their licence conditions, including their rights and responsibilities.

Section 4: Safety

Prisoners, particularly the most vulnerable, are held safely.

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Escorts and early days

Prisoners transferring to and from the centres are safe and treated decently. On arrival prisoners are safe and treated with respect. Risks are identified and addressed at reception. Prisoners are supported on their first night. Induction is comprehensive.

Expectations

26. Prisoners travel in safe, decent conditions during escort. They are treated with respect and attention is paid to their individual needs.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Prisoners are given notice or information about the centre to which they are being sent, unless individual security constraints prevent sharing this information.
- Escorting staff are aware of prisoners' individual needs. All necessary information about risks and needs accompanies prisoners on their journey. Escorting staff provide an effective briefing to receiving staff, including the digital person escort record.
- Escort vehicles are clean and meet the diverse needs of prisoners.
- Prisoners are given adequate comfort breaks and refreshments during transfer.
- Prisoners' personal belongings accompany them.
- Prisoners are not kept waiting on vehicles after arrival.
- Prisoners arrive in sufficient time to allow first night procedures to be conducted effectively, to settle into the centre, and to have a shower.

27. Prisoners are treated respectfully when they arrive at the centre and during their first night. Risks are identified and prisoners are supported according to their individual needs.

- Staff are fully briefed about a prisoner before they arrive.
- The needs of newly arrived prisoners are promptly assessed to make sure they are kept safe, with particular attention to the risk of suicide and selfharm.
- Prisoners are treated respectfully by staff at the receiving establishment in a welcoming and supportive environment.
- Interviews take account of all available information, identify vulnerability and risk, and are conducted confidentially.
- Prisoners are reunited with their property on arrival and are moved quickly to their accommodation.

- A free telephone call is offered and additional support is provided to those who have no external support.
- Prisoners receive basic equipment and supplies.
- Regular welfare checks are carried out on new arrivals.

28. Prisoners understand the centre's rules, regime and how to access available services.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Staff make sure prisoners are informed about the reasons for their transfer to a close supervision centre, in a format and language they understand.
- Prisoners receive comprehensive information about the centre's rules and regime in a format and language they understand.
- Induction includes a private conversation with an officer to identify and address any concerns.
- Prisoners are meaningfully occupied during induction and are allocated to education, skills and work activity swiftly.
- Prisoners are supported to arrange their first visit.

Promoting positive behaviour

Prisoners live in a safe, well-ordered and motivational environment where their positive behaviour is promoted and rewarded. Unacceptable conduct is dealt with in an objective, fair, proportionate and consistent manner.

Expectations

Encouraging positive behaviour

29. Prisoners are encouraged to behave well.

- The centre's strategy to motivate good behaviour is not limited to the formal incentives framework, violence reduction schemes or the adjudication process.
- Good behaviour is encouraged through the delivery of a safe, decent and purposeful regime.
- There are rewards in place for prisoners who behave well and these are consistently applied.
- Opportunities available to prisoners and a clear description of how to progress is promoted throughout the centre.

- Staff understand their role in supporting prisoners to change their behaviour. They offer them advice, support and praise and encourage them to behave well.
- Behaviour is reviewed frequently and fairly, taking account of individual needs and prisoners are able to demonstrate progress.
- Consultation with prisoners about what works to motivate good behaviour is frequent and responsive.

30. Centres use a clear and coordinated approach to make sure prisoners and staff feel and are safe from victimisation, violence and other antisocial behaviour.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Staff promote positive and supportive relationships, identify and challenge problematic behaviour and model pro-social behaviour.
- Mediation is used appropriately to help resolve disputes.
- Allegations of violence and antisocial behaviour are investigated promptly and thoroughly and action is taken where required.
- Data on disorder and violence against prisoners and staff is regularly analysed and used to improve outcomes.
- Perpetrators of violence and antisocial behaviour receive support to change their behaviour.

31. Restrictions put in place to manage behaviour are necessary, proportionate, properly authorised and reviewed regularly.

- All restrictions are necessary and proportionate and are authorised by a governor grade.
- Decisions to impose restrictions take into account the impact on the prisoner, given their particular circumstances.
- Restrictions do not deter or prevent prisoners from accessing the full regime provided by the centre.
- Unlock levels and use of personal protective equipment (PPE) and handcuffs are proportionate to the individual risk posed, are properly risk assessed and are reviewed every day by a senior manager.
- High control cells are properly authorised by a senior manager and are only used for the shortest possible time and for appropriate reasons. They take into account any vulnerabilities the prisoner may have.
- Reviews of the use of high control cells are carried out by a senior manager at least every seven days to make sure their continued use is necessary and proportionate.

<u>Adjudications</u>

32. Prisoners are subject to disciplinary procedures which are fair and proportionate, timely and follow due process. Prisoners understand the charges and procedures they face.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Wherever possible, antisocial behaviour is challenged effectively without the use of formal disciplinary procedures, which are only used as a last resort.
- Prisoners who lack capacity to obey a prison rule as a consequence of mental illness or disability are not adjudicated.
- No unofficial or collective punishments are used.
- Adjudications are conducted in non-intimidating surroundings.
- Prisoners are routinely offered legal advice.
- The governor conducts adjudications regularly and routinely quality assures a proportion of adjudications conducted by other managers.
- Adjudication data is monitored and any emerging patterns are identified and acted on.
- Adjudications are completed as soon as possible after the alleged offence.

Use of force

33. Force is only used against prisoners as a last resort and never as a punishment. When used, force is legitimate, necessary, proportionate, and subject to rigorous governance.

- Staff have up-to-date training in approved use of force methods, which emphasise the routine use of de-escalation techniques.
- Restraints are used as a last resort and for the shortest possible time.
- Planned use of force is properly authorised.
- Batons and PAVA incapacitant spray are used appropriately in response to a risk of serious injury or threat to life and each use is subject to scrutiny by senior managers.
- All staff involved in the use of force are debriefed and complete appropriate reports promptly.
- Prisoners are debriefed verbally after an incident and receive an explanation of why force was used on them with a view to preventing recurrence.
- Prisoners with challenging behaviour as a result of physical disability, learning disability or personality disorder have care plans which highlight

- risk factors and set out alternative management protocols which reduce the likelihood of restraint techniques becoming necessary.
- Health staff recognise risks associated with restraint, attend all planned use of force situations, brief staff appropriately, comprehensively assess prisoners' well-being during and after the incident, and initiate all required treatment/interventions promptly.
- Use of force data is monitored and any emerging patterns are identified and acted on.
- Use of force documentation and associated body-worn video camera, CCTV or video footage is retained appropriately. Evidence clearly explains events leading to the use of force and is scrutinised by senior managers to establish justification and identify good practice, opportunities for improvement and possible ill-treatment.
- 34. Prisoners are not located in unfurnished accommodation, or placed in mechanical restraints or anti-rip clothing, except as a last resort and with proper authorisation.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Unfurnished accommodation, mechanical restraints or anti-rip clothing are properly authorised by a senior manager and only used for the shortest possible period.
- The use of any cell from which normal furniture, bedding or sanitation has been removed or in which a person is held in anti-rip clothing is authorised and recorded as a use of unfurnished accommodation.
- Prisoners with severe mental illness and prisoners at risk of suicide or self-harm are not held in special or unfurnished accommodation except in clearly documented exceptional circumstances on the authority of the governor and in consultation with the mental health team.
- Monitoring of prisoners in unfurnished accommodation is carried out at frequent and irregular intervals.
- Staff encourage prisoners to return to a normal cell at the earliest opportunity.

Segregation

35. Prisoners are only held in designated cells in segregation units under prison rule 46 for appropriate reasons, with proper authority and for the shortest period. They are kept safe and their individual needs are recognised and given proper attention.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

 Decisions to move prisoners to designated cells are based on a risk assessment and are for a specific purpose and timescale. They are held for the minimum possible time and only exceptionally for longer than three months.

- Prisoners with severe mental illness and those at risk of suicide or selfharm are not segregated except in clearly documented exceptional circumstances on the authority of the governor.
- Prisoners moved to designated cells are given the reasons for this in writing.
- Prisoners are held in appropriately designed, well maintained and clean cells.
- Unlock protocols are based on individualised risk assessments and are reviewed daily.
- Prisoners in designated cells have care planning that is equivalent to what is available in the main CSC units.
- Prisoners held in designated cells have a predictable daily regime in line with their individual care and management plan, which mitigates the impact of isolation and psychological deterioration.

Security

Security and good order are maintained through an attention to physical and procedural matters, including effective security intelligence and positive staff-prisoner relationships. Prisoners are safe from exposure to substance misuse and effective drug supply reduction measures are in place.

Expectations

36. Prisoners are held in a safe environment where security is proportionate.

- Security measures are necessary and proportionate to the assessed risks.
- Staff provide good supervision of prisoners during association and movement around the centre and the prison.
- Prisoners have the reasons for any specific restrictions on their access to activities/services explained to them.
- Escape is prevented, including while prisoners are being escorted.
- Completed person escort documentation provides information that will allow the prisoner's physical and emotional needs to be met during escort.
- Security facilitates positive relationships and open and active regimes.

37. Prisoners' well-being is safeguarded by effective intelligence and proportionate searching measures.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Effective and responsive intelligence and security measures are in place.
- Decisions made on the basis of intelligence are proportionate to the risk posed and take account of the reliability of the evidence.
- Security systems are sufficient to identify current and emerging threats, including those from prisoners with extremist ideologies.
- Prisoners are not strip- or squat-searched unless there is sufficient specific intelligence and proper authorisation.
- Prisoners are made aware that their cells or personal property are being searched and cells/property are left in the condition in which they were found.
- Routine searching is not excessive.
- Searches are thorough and systematically recorded.

38. Effective processes are in place to protect prisoners from misconduct or illegal conduct by staff.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Prisoners know how to make confidential complaints about staff and are confident that the system works effectively.
- Prisoners and staff know the identity of the local corruption prevention manager.
- Immediate protection from reprisals is provided to prisoners and staff who report misconduct or ill-treatment by staff.
- Reports of misconduct and ill-treatment are investigated by a competent and appropriately independent authority.
- Where inappropriate or abusive practice is found, staff are held to account.
- Staff know about 'whistleblowing' arrangements and feel confident about using them.

39. There is an effective drug supply reduction strategy.

- The centre's approach to reducing drug and alcohol supply reflects emerging trends and links effectively with the substance misuse demand reduction strategy.
- Where problems are identified, remedial action is taken promptly and evaluated.

- Mandatory drug testing (MDT) takes place in a suitable environment and is conducted consistently in line with protocols which ensure the procedures are valid.
- Prisoners who test positive, refuse to be tested on MDT, or are involved in suspected drug-related incidents are referred to substance misuse services.
- The criteria to ban or otherwise restrict visitors are subject to individual risk assessment and are reviewed regularly. Decisions show that proper consideration is given to any potential impact on mental health or other risk factors, in particular those linked to risk of self-harm and suicide.

Safeguarding

The centre provides a safe environment which reduces the risk of self-harm and suicide. Prisoners at risk of self-harm or suicide are identified and given appropriate care and support. All vulnerable adults at risk are identified, protected from harm and neglect and receive effective care and support.

Expectations

Suicide and self-harm prevention

40. The centre provides a safe and secure environment which actively reduces the risk of self-harm and suicide.

- Staff are clear about their responsibility to preserve life, when to enter a locked cell and what to do in an emergency.
- Staff are trained in suicide prevention processes and know how to support prisoners who self-harm.
- Staff are trained to identify and support prisoners who may have mental health problems, or who have been affected by trauma.
- Prisoners' family and friends know how to raise a concern about the risk of self-harm or suicide, can ask for assessment, care in custody and teamwork (ACCT) processes to be initiated, and are kept appropriately informed.
- Appropriate first aid equipment is readily available and sufficient discipline staff are trained to use it.
- Self-harm data is monitored and any emerging patterns are identified and acted on.
- Investigations into serious 'near-miss' incidents are thorough and appropriately independent and identify opportunities for improvement, which are rigorously pursued.
- Staff respond quickly and comprehensively to Prisons and Probation Ombudsman (PPO) investigations.

- PPO and coroner's court recommendations are prioritised, acted on and regularly reviewed.
- Prisoners at risk of suicide or self-harm are only held in unfurnished accommodation or given anti-rip clothing in clearly documented exceptional circumstances, on the authority of the governor and in consultation with the mental health team.
- Personal possessions are only removed in documented exceptional circumstances, following a multidisciplinary review.

41. Prisoners at risk of self-harm or suicide receive individualised care from a multidisciplinary team and have unhindered access to help, including from their families, where deemed appropriate.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Staff use multidisciplinary care and support plans, developed in consultation with the prisoner, to identify risks and needs and implement strategies for reducing risk.
- Consistent case managers are allocated for all prisoners at risk and are responsible for oversight of care plans between reviews.
- Prisoners with complex self-harm/suicidal behaviours are managed using enhanced multidisciplinary case reviews.
- Assessment, care in custody and teamwork (ACCT) procedures are used properly and are rigorously quality assured.
- Staff engage in a supportive and constructive way with prisoners in crisis.
- Prisoners have access to a range of support when in crisis or at risk of self-harm, based on a risk assessment.
- Constant supervision is infrequent. When necessary, staff create a
 positive environment which encourages and facilitates access to a
 purposeful regime.
- Prisoners can access a range of support services, including education, skills and work activity and staff encourage prisoners to involve their family or friends in their care and support.
- Information about prisoners at risk of self-harm or suicide is communicated to the supervising officer in the community, when release is imminent.

Protection of adults at risk of abuse and neglect

42. Prisoners, particularly vulnerable adults at risk – as defined in the Care Act 2014 – are provided with a safe and secure environment which protects them from harm and neglect.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

• Staff are aware of the local safeguarding strategy to protect adults at risk, and the nominated local manager.

- Staff are aware of their responsibility to protect adults at risk and know how to recognise signs of harm and neglect.
- Prisoners are protected from extremist ideologies.
- Consistent case managers are allocated for all prisoners at risk and are responsible for oversight of care plans between reviews.
- Prisoners can access a range of support services and staff encourage prisoners to involve their family or friends in their care, if deemed appropriate through a risk assessment.
- Where harm or abuse is alleged or suspected, prompt action is taken to protect the individual and to investigate.
- Prisoners who have been victims of human trafficking and other organised abuse can and know how to access specialist support, including from trained staff.
- Prisoners whose health is likely to be injuriously affected by their imprisonment are safeguarded (Prison Rules 1999, Rule 21 (a)).
- There is clear understanding about when to liaise with the safeguarding adults board and its partner agencies for advice and guidance.
- When required, prisoners can access advocates and/or appropriate adults to help them understand and give informed consent.
- Staff engage with all relevant agencies to make sure prisoners are appropriately cared for and supported.

Section 5: Respect

Prisoners are treated with respect for their dignity.

Contents

- Legal rights
- Health, well-being and social care
- Staff-prisoner relationships
- Fair treatment and inclusion
- Faith and religion
- Daily life
 - Living conditions
 - Residential services
 - Prisoner consultation, applications and redress

Legal rights

Prisoners can access legal services and are made aware of their rights.

Expectations

43. Prisoners' legal needs are met without delay and they can exercise their legal rights.

- Prisoners know what resources are available to help meet their legal needs and are supported to find a legal representative if necessary.
- Prisoners can communicate with their legal and political representatives in confidence by telephone, email and letter.
- Where necessary and subject to a risk assessment, prisoners have access to a computer and printer to prepare legal correspondence and documents.
- Video link is used for eligible court cases and for other legal consultations.
- Legally privileged correspondence is not opened by staff unless there are documented exceptional circumstances and the prisoner is present.
- Private and confidential legal visits are supported and accommodated without delay in suitable facilities.
- Facilities are available for legal representatives to review CCTV evidence with prisoners.
- Prisoners are promptly given a copy of their care plan, which is completed after each review. Legal representatives can attend care and management plan reviews.
- Foreign nationals understand their immigration status and what will happen when they complete their custodial sentence. They can readily contact the relevant consulate or embassy and are informed without delay of their right to do so.
- Prisoners who are eligible to vote are on the electoral register if they wish to be and can freely exercise their right to vote.

Health, well-being and social care

Patients are cared for by services that assess and meet their health, social care and substance misuse needs and promote continuity of care on release. The standard of provision is similar to that which patients could expect to receive elsewhere in the community.

Expectations

44. Prisoners have equal access to health and social care services that meet their needs, regardless of location, regime, disabilities, language barriers or other risk or need.

- Partnership working between the prison, commissioners and providers ensures that health, social care and addictions services meet the assessed needs of the centre's population.
- The delivery of safe health and social care provision in the centres is monitored through effective leadership and robust governance structures.
- Prisoners have prompt access to all clinical and non-clinical health services that diagnose, treat and support patients based on assessments of individual need, which are undertaken by appropriate clinicians. This includes referrals and effective treatment by allied health professionals and dental teams.
- Patients requiring support for addictions, primary mental health or serious and enduring mental health problems have prompt access to registered clinicians.
- Appropriately competent and supervised staff deliver a comprehensive range of health services within community-equivalent timescales.
- Patients can complain about their treatment in confidence, without recrimination. Responses are timely, easy to understand, address all the issues raised, and are apologetic when required.
- Clinical consultations are conducted safely in private, in a manner that preserves dignity and medical confidentiality.
- Health information is shared appropriately, within the bounds of medical confidentiality, to promote continuity of care and maintain patient safety.
- Patients are always involved in decisions relating to their own care and are consulted on service delivery and health improvement plans.
- There are effective joint emergency response plans to respond to medical emergencies in line with national guidelines. Competent health staff respond promptly to medical emergencies with appropriate emergency equipment.
- Patients receive secondary care services within community-equivalent waiting times and care is not disrupted or impeded by prison restrictions.

- All health treatment and care plans started prior to or during an allocation to the centre continue seamlessly throughout the prisoner's time there and on departure.
- The environment and regime of the centre contributes to the physical and psychological well-being of the prisoners. In particular, mental health teams closely monitor the psychological impact of separation on individuals.
- Health staff attend and make meaningful contributions to multidisciplinary case reviews.
- All mental health and addiction needs are managed through comprehensive written assessments, care plans, risk assessments and interventions. These are regularly reviewed by appropriately skilled, registered professionals and include continuity of care on arrival and departure.
- Patients have equitable access to medicines in line with national prescribing guidelines, which optimises their health outcomes.
- Patients who require assessment or treatment under the Mental Health Act are assessed and transferred promptly, within national guidelines.

Staff-prisoner relationships

Prisoners are treated with respect by staff throughout their time in custody, and are encouraged to take responsibility for their own actions and decisions.

Expectations

45. Prisoners are supported to progress by carefully selected, trained and supervised staff.

- Staff are trained appropriately and are clear about the role of the centres and their responsibilities to support progression.
- Staff working in the centres are selected for their aptitude, resilience, skills and abilities. They uphold the values and standards required of them.
- Staff are confident and have the skills to engage with prisoners and assess their progress against care and management plans.
- Staff feel supported in managing the emotional demands of their work.
- Staff receive regular supervision and appropriate support.

46. Prisoners are treated with humanity and respect for their human dignity. Relationships between prisoners and staff are positive and courteous.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Staff engage proactively with prisoners and seek to know them as individuals.
- Staff and prisoners are fair and courteous to each other.
- Senior managers lead by example and regularly engage with prisoners.
- When staff need to relay sensitive or unwelcome news to prisoners, this is done in private and with compassion.
- Staff treat prisoners' cells and possessions with respect.
- Staff and prisoners address each other using their preferred name or title and never use insulting nicknames or derogatory or impersonal terms.
- Staff understand the impact on behaviour of life experiences such as trauma, abuse and mental illness.
- Staff actively engage with prisoners, including during association and exercise time, and contribute to the quality of prisoners' free time.
- When rules are breached, staff take time to explain how and why to the prisoner concerned.

47. Prisoners are encouraged and supported to take responsibility for their rehabilitation and to contribute positively to the centre.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- The centre and all staff provide a psychologically and trauma-informed environment, which encourages safe and supportive relationships.
- Prisoners take responsibility for meeting their own needs.
- Staff support and motivate prisoners to get involved in activities designed to reduce their risk of reoffending and help them prepare for reintegration back into the mainstream prison population or the community.
- Prisoners are consulted about the basic routines and facilities of the unit.
 They are informed of the outcomes of consultations and provided with justifiable reasons for decisions.

48. Prisoners have a named member of staff who supports them emotionally and practically and helps them make positive changes in their lives.

- Prisoners have a named member of staff who knows them well.
- Staff know the personal circumstances of prisoners and encourage contact with the outside world.
- Staff are consulted on matters relating to prisoners and provide support with prisoners' care and management and progression plans.

- Staff encourage prisoners to reflect on the consequences of their behaviour and use mediation to resolve conflict within the centre.
- Staff are caring and compassionate and support prisoners to make good choices and manage their emotions.
- Staff are aware of the services available in the wider prison and use them to help close supervision centre prisoners.
- Staff maintain an accurate chronological record of contact with prisoners and use these to inform interactions accordingly.

Fair treatment and inclusion

There is a clear approach to promoting equality of opportunity, eliminating unlawful discrimination and fostering good relationships. The distinct needs of prisoners with protected characteristics, or those who may be at risk of discrimination or unequal treatment, are recognised and addressed. Prisoners are able to practise their religion. The chaplaincy plays a full part in prison life and contributes to prisoners' overall care, support and rehabilitation.

Expectations

49. There is a coordinated approach to eliminating all forms of discrimination and promoting equality within the centres.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- The centre has a designated person acting as a single point of contact for equality and diversity.
- Staff actively promote a culture which respects difference and individuality.
- Staff receive specialist and comprehensive training on protected and minority characteristics. They understand and respond appropriately to prisoners from all backgrounds.
- Clear systems are in place to minimise all forms of discrimination or disadvantage.
- There is a system to report and investigate incidents and complaints of discrimination. Prisoners are aware of it and able to use it.
- Investigations of and responses to incidents and complaints are timely, based on full consideration of the facts, deal directly with the concern raised and seek advice where needed.
- There is independent external scrutiny of equality and diversity complaints processes.

50. Prisoners with protected and minority characteristics are treated equitably and according to their individual needs.

- The needs of prisoners with protected and minority characteristics are identified and met. Remedial action to improve outcomes is taken promptly and evaluated to make sure appropriate interventions and support are in place.
- Subject to relevant security considerations, prisoners can speak to staff from the wider prison and external agencies to seek advice and support.
- The centre's accommodation meets the needs of all prisoners.
- The centre's regime and activities meet diverse needs.

 Awareness of the needs of people with protected and minority characteristics is promoted by educational and celebratory events.

Faith and religion

In this section, religion should be understood to include 'religion and belief' as they are understood in the context of the Equality Act 2010 and related case law.

51. Prisoners can practice their religion fully and in safety. The chaplaincy plays a full part in the centre's life and contributes to prisoners' overall care, support and resettlement.

- Prisoners have easy access to corporate worship and faith-based classes and groups and can meet with chaplains in private.
- Staff supervision of faith services is respectful and proportionate.
- If a prisoner is excluded from corporate worship due to concerns about risk, alternative provision is provided where possible.
- Worship areas are equipped with facilities and resources for all faiths, are accessible and permit contemplation, reflection and prayer.
- Prisoners can obtain, keep and use artefacts that have religious significance.
- Prisoners can fulfil religious lifestyle requirements, including dietary requirements.
- Prisoners can celebrate all major religious festivals.
- Chaplains work closely with other staff in the unit for the benefit of prisoners and maintain links with faith communities outside the prison and family members, according to prisoners' individual needs.
- Chaplains are consulted about prisoners they are involved with, for example when reviewing individual care and management plans.
- Prisoners can seek support from chaplains.

Daily life

Prisoners live in a clean and decent environment and are provided with essential basic services. They are consulted regularly and can apply for additional services and assistance. The complaints process is efficient and fair.

Expectations

<u>Living conditions</u>

52. Prisoners live in a clean and decent environment which is in a good state of repair and fit for purpose.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Cells and communal areas are clean, free of graffiti/offensive displays, well lit (including adequate natural light) and well decorated.
- Accommodation meets agreed minimum standards (size, heating, ventilation) and provides adequate space.
- As a minimum, prisoners have their own bed, chair, table and lockable cupboard and sufficient space to store personal belongings.
- All in-cell toilets have lids and are screened.
- Prisoners have access to drinking water, a toilet and washing facilities at all times.
- Staff respond to emergency cell call bells within five minutes.
- Observation panels in cell doors remain free from obstruction.
- The centre is as quiet as possible at night with appropriate lighting to enable rest and sleep.
- Outside areas are well maintained and clean.

53. Prisoners are encouraged to keep themselves, their cells and communal areas clean.

- Prisoners can shower or bathe in private every day.
- Prisoners are provided with basic hygiene items for their personal use.
- Clean bedding is provided for each new prisoner on arrival and can be replaced or laundered weekly.
- Mattresses are replaced when needed.
- Prisoners have access to sufficient cleaning materials to keep their cells and communal areas clean.

54. Prisoners have enough clean clothing of the right kind, size, quality and design to meet individual needs.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Prison issue clothing is dignified, fits and is in good repair.
- Prisoners are provided with enough clean underwear and socks to be able to change them daily.
- Prisoners are issued with enough warm, weatherproof clothing and shoes to go outside in all weather conditions.
- Prisoners have opportunities to wear their own clothes.
- Prisoners have at least weekly access to laundry facilities to wash and iron their clothes.

55. Prisoners' property held in storage is secure, and prisoners can access it on request.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Prisoners can receive parcels subject to security and volumetric control considerations.
- The amount of property held in possession and storage takes account of individual needs.
- The list of possessions that prisoners are allowed to keep is adequate to meet the needs of the population.
- Prisoners' valuable property is routinely security marked before it is issued.
- All property is returned to prisoners on release or transfer.
- Prisoners are fairly compensated for clothing and possessions which are lost or damaged in storage.

Residential services

56. Prisoners have a palatable, varied, healthy and balanced diet which meets their individual needs. Meals are prepared and served in line with religious, cultural and other special dietary requirements and conform to hygiene regulations.

- Meal times match those in the general community.
- Prisoners can eat outside their cells, with others, if deemed appropriate through a risk assessment.
- Breakfast is served when it is intended to be eaten.
- Prisoners have a choice of meals and can make lifestyle choices about diet.

- Prisoners returning from court do not miss out on their main meal.
- Prisoners can make a hot drink after evening lock up.
- Prisoners are consulted about the menu and their feedback about food is routinely considered.
- Prisoners (especially long-term prisoners) can cater for themselves.
- Staff supervise the serving of food to prevent tampering and to ensure appropriate portion control.

57. Prisoners have a weekly opportunity to purchase a suitable range of goods at reasonable prices.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Prisoners can buy items within 24 hours of arrival at the centre.
- Prisoners arriving without private money are offered an advance to use for purchases, with repayment staged over an agreed period of time.
- Prisoners can place orders at least once a week.
- Prisoners can access accurate and up-to-date records of their finances, free of charge.
- Prisoners can purchase newspapers and magazines and place catalogue orders
- Prisoners can purchase a wide range of approved hobby materials.

Prisoner consultation, applications and redress

58. Prisoners can take an active role in influencing decisions about services, routines and facilities in the centre and in managing their own day-to-day life.

- Prisoners are regularly consulted about prison life and given the opportunity to present areas of grievance or dissatisfaction directly to managers.
- Prisoners can raise issues or concerns for discussion.
- Prisoners can challenge decisions appropriately and are confident that their views are taken seriously.
- Prisoners are informed of the outcomes of consultation and are provided with justifiable reasons for any decisions made.

59. Staff and prisoners are encouraged to resolve requests informally. When this is not possible prisoners understand how to apply for available services, and can do so easily.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Staff and prisoners are encouraged to resolve requests informally, before making a formal, written application or complaint.
- Prisoners know how to make applications and can do so confidentially.
- Staff help prisoners to make applications, as requested.
- Prisoners do not have to make repeated applications for services they access or receive on a regular basis.
- Prisoners receive timely responses to their applications which are fair, respectful, easy to understand and address the issues raised.

60. Prisoners have confidence in the complaints procedures, which are effective, timely and well understood.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Prisoners know how to complain and have access to information about complaints procedures in a range of formats and languages.
- Prisoners have easy access to complaint forms and can submit them confidentially.
- Mediation services are available.
- Responses to complaints are easy to understand, comprehensive, respectful and prompt and address the issues raised.
- Where necessary, prisoners receive help to make their complaint.
- There is an effective quality assurance process for complaints responses, ideally with external validation.
- Prisoners are consulted regularly about the internal complaints system to monitor and maintain confidence in it.
- Prison staff respond quickly and comprehensively to Prisons and Probation Ombudsman (PPO) complaint investigations and implement PPO recommendations promptly.

61. Prisoners feel safe from repercussions when using complaints procedures and can appeal decisions easily.

- Prisoners are not encouraged to withdraw complaints.
- Complaints about staff are investigated by an appropriately senior and independent person.

- Prisoners and visitors who make complaints against staff and/or other prisoners are protected from possible recrimination.
- Prisoners know how to appeal against decisions.
- Prisoners have access to recognised external organisations offering support in pursuing a complaint.
- Prisoners can easily speak to members of the Independent Monitoring Board (IMB) in confidence.
- Prisoners know how to contact the PPO in confidence.
- Information about the Legal Ombudsman is available.
- Prisoners receive help to pursue complaints and grievances beyond the prison/with external bodies, if they need to do so. They receive help in contacting legal advisors or making direct applications to the courts.