



HMIPS

HM INSPECTORATE OF
PRISONS FOR SCOTLAND

INSPECTING AND MONITORING

REPORT ON HMP LOW MOSS

FULL INSPECTION
29 MAY–9 JUNE 2017

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INTRODUCTION AND BACKGROUND

HM Chief Inspector of Prisons for Scotland (HMCIPS) assesses the treatment and care of prisoners across the Scottish Prison Service estate against a pre-defined set of standards. These Standards are set out in the document 'Standards for Inspecting and Monitoring Prisons in Scotland', published March 2015 which can be found at <https://www.prisoninspectatescotland.gov.uk/>.

The Standards reflect the independence of the inspection of prisons in Scotland and are designed to provide information to prisoners, prison staff and the wider community on the main areas that are examined during the course of an inspection.

The Standards provide assurance to Ministers and the public that inspections are conducted in line with a framework that is consistent and that assessments are made against appropriate criteria.

While the basis for these Standards is rooted in International Human Rights treaties, conventions and in Prison Rules, they are the Standards of Her Majesty's Inspectorate of Prisons for Scotland (HMIPS).

This report is set out to reflect the performance against these standards and has 10 main sections:

Standard 1	Lawful and transparent custody
Standard 2	Decency
Standard 3	Personal safety
Standard 4	Health and wellbeing
Standard 5	Effective, courteous and humane exercise of authority
Standard 6	Respect, autonomy and protection against mistreatment
Standard 7	Purposeful activity
Standard 8	Transitions from custody to life in the community
Standard 9	Equality, dignity and respect
Standard 10	Organisational effectiveness

HMIPS assimilates information resulting in evidence based findings utilising a number of different techniques. These include:

- obtaining information and documents from the Scottish Prison Service (SPS) and the prison inspected;
- shadowing and observing staff as they perform their duties within the prison;
- interviewing prisoners and staff on a one-to-one basis;
- conducting focus groups with prisoners and staff;
- observing the range of services delivered within the prison at the point of delivery;
- inspecting a wide range of facilities impacting on both prisoners and staff;

- attending and observing relevant meetings impacting on both the management of the prison and the future of the prisoners such as Case Conferences; and
- reviewing policies, procedures and performance reports produced both locally and by SPS headquarters specialists.

HMIPS is supported in our work by inspectors from Healthcare Improvement Scotland, Education Scotland, Scottish Human Rights Commission and the Care Inspectorate.

The information gathered facilitates the compilation of a complete analysis of the prison against the standards used. This ensures that assessments are fair, balanced and accurate. In relation to each standard and quality indicator, Inspectors record their evaluation in two forms:

1. A colour coded assessment marker.

Rating	Definition
Good performance 	Indicates good performance which may constitute good practice.
Satisfactory performance 	Indicates overall satisfactory performance .
Generally acceptable performance 	Indicates generally acceptable performance though some improvements are required.
Poor performance 	Indicates poor performance and will be accompanied by a statement of what requires to be addressed.
Unacceptable performance 	Indicates unacceptable performance that requires immediate attention.
Not applicable 	Quality indicator is not applicable .

2. A written record of the evidence gathered is produced by the Inspector allocated each individual standard. This consists of a statement against each of the indicators contained within the standard inspected. It is important to recognise that although standards are assigned to Inspectors within the team all Inspectors have the opportunity to comment on findings at a deliberation session prior to final assessments being reached. This emphasises the fairness aspect of the process ensuring an unbiased decision is reached prior to completion of the final report.

KEY FACTS

Location

HM Prison Low Moss is situated north of Bishopbriggs, East Dunbartonshire.

Role

HMP Low Moss provides 700 cells, which can accommodate up to 782 prisoners as well as facilities to help prisoners address their reoffending and re-integrate back into the community on their release from prison. It holds adult male convicted and remand prisoners primarily from the North Strathclyde area.

Population held at time of inspection

At the time of inspection a total of 751 prisoners were in custody. See Annex A for a data provided by Low Moss giving a breakdown by age, category and sentence length.

Date of last inspection

May 2013

Healthcare Provider

NHS Greater Glasgow and Clyde

Learning Provider

New College Lanarkshire

Social Work Provider

East Dunbartonshire Council

Overview by HM Chief Inspector of Prisons for Scotland

Introduction

HMP Low Moss is one of the newest prisons in Scotland, having been opened in 2012. In the five years since then, the prison has developed a strong sense of identity and purpose. The Governor and senior management team have provided clear leadership, communicating a compelling set of priorities for all who work in the prison and are well supported by the partner agencies. Low Moss is a modern, well designed and equipped prison, which is readily placed to provide a decent, humane and engaging environment.

The last inspection of Low Moss was conducted in 2013. This inspection was carried out in May and June 2017. I am grateful to the guest inspectors from Healthcare Improvement Scotland, the Care Inspectorate, Education Scotland, the Scottish Human Rights Commission and the Scottish Prison Service who assisted with this inspection.

Inspection Findings

In relation to the ten Standards for Inspecting and Monitoring Prisons in Scotland used to inspect Low Moss, one was assessed as **good performance**, eight as **satisfactory** and one as **poor**.

Overall, we found a prison that was operating effectively, with a number of areas of innovation and excellence. It was described to us as a safe prison, where prisoners felt that they were treated with dignity and respect. Staff, too, felt safe and confident. Relationships between staff and prisoners appeared to be positive throughout the prison. Engagement with the chaplaincy team was particularly valued by prisoners; we found that the chaplaincy team played a key role in supporting prisoners more widely than just around faith based issues.

The main area of concern related to the provision of healthcare for prisoners in Low Moss, which was assessed as **poor**. On-going staff shortages in the nursing team meant that the requirement to prioritise cover for basic healthcare provision impacted on the range of interventions and treatments offered to patients. There was little opportunity or capacity to offer health promotion in respect of addictions and substance or alcohol misuse. We were concerned that Naloxone had not been given to prisoners since July 2016. Prisoners could wait up to four weeks to see the General Practitioner (GP) for a routine appointment and nurse treatment clinics were regularly cancelled. Apart from the Blood Borne Virus (BBV) service, no chronic disease management clinics were held in the prison.

It is worth noting however that the healthcare staff and management were clearly dedicated to delivering the best possible service but unable to deliver this as a result of persistent and enduring staffing shortages.

The mental health team and the addiction team had good response times to assessments, but their follow up of patients assessed as being suitable for treatment

and support was inconsistent. Mandatory training and training reviews for staff were not up to date. Although an established system for managerial supervision was in place, staff did not receive regular supervision. As a consequence of these findings, HMIPS will return to Low Moss with colleagues from Healthcare Improvement Scotland early in 2018 to check progress on these and other healthcare matters.

Partnership working in Low Moss was a strong and prominent feature with a wide range of organisations providing support and services for prisoners. As part of the inspection process, we held a partners forum, in order to gauge the extent and value of such work. Two clear messages emerged from this forum. Firstly all parties were universal in their admiration for the way in which the Governor and senior management team embraced and encouraged partnership working. Partner organisations felt welcome at Low Moss and appreciated the joint initiatives in order to make a difference for prisoners. Secondly the participants highlighted their frustrations about the challenges they faced in securing the coordination and collaboration of other organisations which provided services to people leaving prison. In particular, difficulties were identified with the issues of housing and the provision of benefits, both of which were frequently delayed, if provided at all.

One example of positive partnership working was the Prisoner Support Pathway, set up and funded as a Public Social Partnership (PSP). This provided support for prisoners serving short sentences both before release and for several months afterwards. It was concerning to note that at the time of the inspection there was uncertainty about the future funding of the programme.

The quality of purposeful activities in the learning centre and in work parties was of a high standard and most prisoners who participated in them were fully engaged. There was strong and effective leadership in the learning centre, which encouraged high quality teaching and learning. The implications of the impending transfer of the learning contract from New College Lanarkshire to Fife College were unclear at the time of the inspection.

In relation to supporting prisoners through their sentence, there were robust Integrated Case Management (ICM) processes in place, with prisoners and their families invited to participate. The prison based psychology team had developed a Short Term Intervention Programme aimed specifically at short term prisoners, covering problem solving, motivation and goal setting, offending behaviour and substance misuse. This programme had been deemed a success and was being rolled out at HMP Perth.

There was good evidence that equality and diversity issues were taken seriously at a senior level in the prison. The Governor provided positive leadership, which was supported by good levels of co-ordinating work on equalities and human rights issues. Prisoners were represented on the equality and diversity (E&D) group, where their participation was encouraged and valued.

Finally, Low Moss had introduced a section of the residential accommodation for prisoners over the age of 45, in an attempt to provide a suitable environment for older prisoners. This was appreciated by the prisoners who were located in this

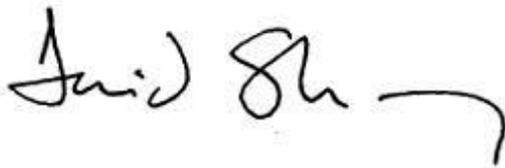
section and was an encouraging example of a staff initiative being supported by senior management.

Next Steps

This report identifies a number of areas of good performance which are worthy of sharing and which I hope will be taken up by other prisons in Scotland. It also highlights where improvements can be made. I look forward to seeing these improvements introduced through the prison's future plans.

HMIPS will continue to monitor the progress in Low Moss, through regular monitoring visits by Independent Prison Monitors (IPMs).

In relation to the provision of healthcare, we will revisit the prison with colleagues from Healthcare Improvement Scotland early in 2018.

A handwritten signature in black ink, appearing to read 'David Strang', with a long horizontal flourish extending to the right.

David Strang
HM Chief Inspector of Prisons for Scotland
October 2017

Summary of Inspection Findings

Standard 1 Lawful and transparent custody

Satisfactory Performance	
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Standard 2 Decency

Satisfactory Performance	
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Standard 3 Personal safety

Satisfactory Performance	
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Standard 4 Health and wellbeing

Poor Performance	
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Standard 5 Effective, courteous and humane exercise of authority

Satisfactory Performance	
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Standard 6 Respect, autonomy and protection against mistreatment

Satisfactory Performance	
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Standard 7 Purposeful activity

Good Performance	
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Standard 8 Transitions from custody to life in the community

Satisfactory Performance	
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Standard 9 Equality, dignity and respect

Satisfactory Performance	
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Standard 10 Organisational effectiveness

Satisfactory Performance	
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Good Performance

There were 23 good performance Quality Indicators: 1.7, 2.7, 3.3, 3.6, 3.11, 3.13, 3.14, 5.2, 5.11, 6.8, 7.5, 7.8, 7.9, 7.11, 7.13, 7.14, 7.15, 7.16, 7.18, 7.21, 7.25, 8.1 and 10.9.

STANDARDS, COMMENTARY AND QUALITY INDICATORS

STANDARD 1 - LAWFUL AND TRANSPARENT USE OF CUSTODY

The prison complies with administrative and procedural requirements of the law and takes appropriate action in response to the findings and recommendations of official bodies that exercise supervisory jurisdiction over it.

Commentary

The prison ensures that all prisoners are lawfully detained. Each prisoner's time in custody is accurately calculated; they are properly classified, allocated and accommodated appropriately. The prison co-operates fully with agencies which have powers to investigate matters in prison.

Inspection findings

Overall Rating: Satisfactory performance 

Low Moss evidenced a good standard in the processing of individuals into custody adhering to the administrative and procedural requirements in a humane and caring manner.

Individuals were admitted and processed by staff who displayed a good level of care, correctly identifying the individuals via their warrant and taking into account all aspects of the individual before allocating them to an appropriate area and cell. Records were correctly updated and within the legal timeframe. Interview and allocation processes were robust including completion of the Cell Sharing Risk Assessment (CSRA).

There was a robust governance and assurance process in place that enabled the establishment to respond to audit and inspection in a punctual manner and provide assurance to the establishment, SPS HQ and the SPS Board. This was evidenced by various management information systems using SharePoint folders, audits, action plans and trackers, as well as regular meetings at various levels.

Critical dates were calculated on the input of the warrant to PR2, the manual sentence calculation was not completed until the next day and responsibility for communication of these dates was unclear. At the time of inspection Reception staff did not inform the prisoner and hall staff would apparently only confirm if requested.

Home Detention Curfew (HDC) qualification dates were communicated to prisoners, however, it would appear only if the individual requested them, management should ensure that a system is established to ensure that all prisoners are informed of their HDC status.

Quality Indicators

1.1 Statutory procedures for identification and registration of prisoners are fully complied with.

Rating: Satisfactory performance ●

Due to the high occupancy of Low Moss and court activity at the time of the inspection the opportunity to witness the admission process was limited. However of those witnessed all were undertaken in an appropriate manner. Individuals were identified and all warrant checks completed prior to taking responsibility from the escorting officer. The SPS prisoner records management system (PR2) was completed and the prisoners received an initial interview including Talk to Me¹ assessment to identify any further requirements.

1.2 All prisoners are classified and this is recorded on the prisoner's electronic record.

Rating: Satisfactory performance ●

Low Moss only received adult male offenders with all prisoners at the time of inspection admitted, classified and located appropriately. All relevant information was entered on to PR2, this included characteristics, risks, supervision level and the completed CSRA.

1.3 All prisoners are allocated to a prison or to a location within a prison dependent on their classification, gender, vulnerability, security risk or personal medical condition.

Rating: Satisfactory performance ●

Low Moss received adult male prisoners directly from local courts as well as transfers, for operational reasons, from other establishments. The allocation process began in Reception where any initial risks were identified. There were two residential areas, Kelvin Hall which accommodated untried prisoners, short term prisoners and included a First Night in Custody (FNIC) section; and Clyde Hall which held long term prisoners and included the Positive Impact Programme (PIP) section for first offenders.

There were good communication and information sharing processes in place across all functions, prisoner management, tactical management, operations and NHS that informed and facilitated the appropriate location of individuals.

¹ Talk to Me is SPSs suicide prevention strategy which replaced ACT2Care.

1.4 A cell sharing risk assessment is carried out prior to a prisoner's allocation to cellular accommodation.

Rating: Satisfactory performance 

The system in place sought to enhance the process by establishing information on the prisoner prior to him arriving in the hall. This enabled staff to provisionally allocate a cell, with the final decision not taken until the individual was interviewed and all risks (where possible) identified. The CSRA was completed on PR2 and the appropriate cell allocated. Low Moss had the ability to offer single cell accommodation for the majority of individuals.

1.5 Release and conditional release eligibility dates are calculated correctly and communicated to the prisoner without delay.

Rating: Generally acceptable performance 

Warrants were recorded to PR2 on admission in Reception and confirmed by the Administration Manager. Critical dates were calculated on the input of the warrant to PR2, the manual sentence calculation was not completed until the next day when the warrant was confirmed, therefore critical dates could not be confirmed until then. The Administration Manager checked and confirmed all critical dates. Responsibility for communication of these dates was unclear. Reception staff at the time of inspection did not inform the prisoner and hall staff would apparently only confirm if requested. **This was a weakness.**

Home Detention Curfew (HDC) qualification dates were communicated once the process began. It would appear that unless the individual requested these dates there was no clear communication process for informing them.

1.6 The statutory duties and powers granted to the governor or director are performed as required by law.

Rating: Satisfactory performance 

There was a robust structure in place in relation to governance and assurance. With specific delegated authority in areas of Equality & Diversity (E&D), Health and Safety (H&S), infection control and HDC. There was significant information available on SharePoint to evidence compliance and assurance within these areas. Audit action plans were available identifying actions, responsible persons and completion dates.

1.7 Appropriate action has been taken in response to findings or recommendations of monitoring, inspectorial, audit or judicial authorities that have reported on the performance of the prison since the last full inspection.

Rating: Good performance 

Low Moss had comprehensive systems in place to respond to audits and inspections. The monthly business meeting was informed by the Board Report and covered in depth analysis of all aspects of the establishment business and was

attended by a range of managers and various partner agencies. An action log was developed from this meeting which identified the responsible person and completion dates. A risk register was in place with mitigation and review dates.

STANDARD 2 - DECENCY

The prison supplies the basic requirements of decent life to the prisoners.

Commentary

The prison provides to all prisoners the basic physical requirements for a decent life. All buildings, rooms, outdoor spaces and activity areas are of adequate size, well maintained, appropriately furnished, clean and hygienic. Each prisoner has a bed, bedding and suitable clothing, has good access to toilets and washing facilities, is provided with necessary toiletries and cleaning materials, and is properly fed. These needs are met in ways that promote each prisoner's sense of personal and cultural identity and self-respect.

Inspection findings

Overall Rating: Satisfactory performance ●

Low Moss was a modern, well designed and equipped establishment providing a decent, humane and engaging environment. The availability of in cell facilities created a decent living environment for prisoners and a modern working environment for staff. With this in mind the following section should be viewed in context, the comments made were relative to a higher baseline standard than would be achievable in an older Victorian establishment.

Whilst the establishment was generally clean and tidy, not all residential areas had sufficient stocks of cleaning equipment. This situation resulted in prisoners improvising by keeping mops and buckets within their cells to ensure they had what they needed to do their work. This situation has the potential of creating infection control issues arising from keeping potentially contaminated equipment in their cells. Hall management should ensure that passmen have the equipment they require to undertake their tasks and also that they do not place themselves in danger by storing equipment in their cells.

As has been mentioned in previous inspection reports the SPS should review the quality of the mattresses and pillows provided to prisons. It is vital that individuals are suitably rested so that they can fully participate in the regime. Full participation is necessary to improve their chances of becoming successful citizens upon release and therefore a good night's sleep is essential, the current mattresses and pillows potentially conspire against this aim.

Decency is not only a product of the facilities and services but also a result of the type and nature of engagement. In this regard inspectors witnessed positive staff prisoner relationships across the establishment, with good staff morale evident in all areas. It was encouraging to note that prisoners stated they felt safe and confident in Low Moss. Management and staff should be commended for the manner in which they have developed the regime and their approach to setting the 'vision' for the establishment.

Quality Indicators

2.1 The prison buildings, accommodation and facilities are fit-for-purpose and maintained to an appropriate standard.

Rating: Generally acceptable performance 

Low Moss opened in 2012 and as such it was a modern facility designed to accommodate and facilitate a 21st century approach to offender management.

The buildings appeared to have been reasonably well maintained since opening, however, there were indications that some elements of the fabric were starting to show signs of age and damage. For instance, it was noted that the structure of the external walkways were starting to flake and corrode and it appeared that water ingress, in some areas, had resulted in damage to finished surfaces. Staff informed inspectors that faults or issues reported to the Estates Department for rectification took quite some time to be acted upon. Whilst there was a planned preventative maintenance programme, the SPS must ensure that sufficient funds are invested, on an on-going basis, in the care and maintenance of the building.

It was noted that there was a prisoner painting party deployed in the residential halls, to maintain the general areas as well as the cells. This is an excellent activity, overseen by VT painting instructor, to ensure that the quality of finished work is of an appropriate standard.

2.2 Good levels of cleanliness and hygiene are observed throughout the prison ensuring procedures for the prevention and control of infection are followed.

Rating: Generally acceptable performance 

The establishment was cleaned by a sizable, prisoner staffed, industrial cleaning party with passmen allocated to specific tasks in individual residential halls. The establishment was generally clean and tidy.

It was however disappointing to note that, in a number of residential areas, whilst cleaning materials were freely available items such as mops, mop handles and buckets were in short supply. In a number of 'cleaners stores' there were no mop handles available and a limited number of mop heads. A number of the passmen spoken to stated that they deployed different strategies to address such shortages, in the main they retained a small store of mop handles and heads in their cell, to ensure that they could undertake their duties.

It was worthy of note that the passmen and cleaners spoken to clearly took pride in the work that they did and wanted to do a good job.

Prison management must ensure that cleaning stores are properly equipped and that prisoners do not routinely store mops and buckets in their cells. Storage of equipment in cells could potentially result in cross contamination with infection control issues arising as a direct but unintended consequence.

The situation within the work and activity areas was noticeably better, with both cleaning materials and equipment freely available and well stored.

Cleaning schedules were not universally found in each area nor was there any evidence that the quality of the cleaning being undertaken was checked by appropriately qualified staff. Management should look to introduce a system of spot checking the work of those prisoners charged with maintaining the cleanliness of the establishment.

2.3 Cleaning materials are available to all prisoners to allow them to maintain their personal living area to a clean and hygienic standard.

Rating: Generally acceptable performance 

As noted in 2.2 the availability of cleaning equipment was variable across the residential areas. Whilst this was clearly an issue, it was noted that personal areas such as cells were clean.

It was surprising to note that graffiti was evident in a good number of cells, indeed in some areas the graffiti was quite extensive, which in a number of cases contained offensive or inflammatory comments. Additionally it was found that many of the cell walls were extensively covered in posters, photographs and other personal items. The clearly marked areas for displaying personal items were not being adhered to nor being enforced by staff during their regular cell certification checks.

2.4 All prisoners have a bed which is fit for purpose and in good condition.

Rating: Satisfactory performance 

Beds were of robust construction and were in good condition. Approximately 10% of the cells within the establishment contained bunk beds, these cells were bigger than standard and of a sufficient size and containing appropriate facilities to accommodate two prisoners.

As has been mentioned in a number of previous reports the quality of the mattresses and pillows were such that it was difficult to see how individuals could be assured of a decent and appropriate quality of sleep. The prison places an emphasis on prisoner involvement in purposeful activity, it was therefore vital that the prisoners were well rested in order to be able to fully participate in the regime designed for them. We would encourage SPS HQ to ensure that improved quality mattresses and pillows are procured as a matter of some urgency.

2.5 All prisoners are given sufficient bedding or are allowed to supply their own. Bedding is in good condition, clean and can be laundered regularly.

Rating: Generally acceptable performance 

A good number of prisoners complained about the quality of the bedding, stating that much of it was damaged in particular by what appeared to be deliberate cigarette

burns. This was checked with the laundry staff who confirmed that they were aware of a higher than usual level of damage by what they concluded was deliberate burning of the bedding.

It was noted that the laundry officer would condemn bedding that was beyond use, however, as they did not control the budget they did not have a replacement process in place. This meant that staff in the residential areas were unaware of the gradual reduction in bedding and towels available to them and as a result stocks were gradually denuded. We were informed by staff, in some areas of the establishment, that it was not unusual to find there was insufficient bedding available, requiring them to “go hunting for kit” on other flats, which was time consuming and invariably occurred at busy times within the hall. Management should ensure that they identify a process that ensures that stocks of bedding and towels are maintained at appropriate levels in all areas of the establishment.

2.6 A range of toiletries and personal hygiene materials are available to all prisoners to allow them to maintain their sense of personal identity and self-respect.

Rating: Satisfactory performance ●

Each residential area had stocks of a suitable but basic range of toiletries and personal hygiene materials. A wider range of less basic and branded items could be purchased from the canteen, however, a number of prisoners complained that the level of wages meant that they often and reluctantly had use the soap and shampoo provided by the prison.

2.7 All prisoners have access to washing and toileting facilities that is either freely available to them or readily available on request.

Rating: Good performance ✓

Being a modern establishment all cells were equipped with ‘in cell’ toilets, showers and washing facilities. Prisoners commented upon this in positive terms, readily recognising that they enjoyed a decent living environment.

2.8 All prisoners have supplied to them or are able to obtain for themselves a range of clothing suitable for the activities they undertake. The clothes available to them are in good condition, fit for purpose and allow them to maintain a sense of personal identity and self-respect. Clothing can be regularly laundered.

Rating: Generally acceptable performance ●

Prisoners in some areas of the prison, especially those areas housing individuals on remand, complained of difficulty in accessing sufficient clothing. A number of staff, within those areas, stated that on occasions they had no clothes to provide to new admissions. This situation required them to go out of the hall to other levels to “beg for kit” from other areas. Management should introduce a system that ensures that all residential areas have sufficient clothing to meet their individual needs.

Prisoners were able to wear their own clothing whilst within the hall, but were required to wear prison issue clothing when outwith the residential areas. There was a good system in place for laundering prisoners' personal clothing.

2.9 The meals served to prisoners are nutritionally sufficient, well-balanced, varied, served at the appropriate temperature and well presented.

Rating: Generally acceptable performance ●

A three week rotational menu choice system was in place that operated on a winter and summer format. Most prisoners spoken to made positive comments in relation to the quality of the food and there appeared to be a regular food focus group where suggestions for alternatives could be aired and considered.

Catering staff ensured the nutritional balance of the diet by utilising the SPSs approved recipe system. However, the much delayed Athena computerised recipe system would make it far more straightforward for catering staff to provide a balanced diet at the optimal cost. SPS management should ensure that the Athena system is introduced at the earliest opportunity.

It was noted that despite the fact that Low Moss is only 5 years old almost all of the 25 heated food trolleys originally supplied in 2012 had been replaced. SPS management should review the standard for food trolleys ordered by the catering department to ensure that they are fit-for-purpose.

The new trolleys had a heated and a cooled section, allowing for the safe transportation of food that required to be kept at a lower than ambient temperature as well as maintaining hot food at an appropriate temperature. It was however disappointing to note that on at least one occasion during the inspection heated trolleys were left outside the residential halls without being plugged into the mains sockets provided. This could result in unnecessary cooling/ warming to occur. The catering manager should ensure that clear instructions are given regarding the correct procedure to follow when trolleys are left outside residential areas. Management must ensure that food temperature, at the point of delivery, is routinely taken and appropriately recorded, this was not the case during the inspection.

2.10 The meals served to each prisoner conform to their dietary needs, cultural or religious norms.

Rating: Satisfactory performance ●

The catering department had robust systems in place to ensure that religious, cultural or medical needs were being met. At the time of the inspection it was Ramadan and the kitchen was providing food in flasks in order that individuals could enjoy a hot meal in their cell during the hours of darkness and after the evening 'lock up' a provision that was positively commented upon by the prisoners involved.

STANDARD 3 - PERSONAL SAFETY

The prison takes all reasonable steps to ensure the safety of all prisoners.

Commentary

All appropriate steps are taken to minimise the levels of harm to which prisoners are exposed. Appropriate steps are taken to protect prisoners from harm from others or themselves. Where violence or accidents do occur, the circumstances are thoroughly investigated and appropriate management action taken.

Inspection findings

Overall Rating: Satisfactory performance ●

Low Moss had in place robust and comprehensive processes (Risk Assessments, Safe Systems of Work, and Contingency Plans) that assisted in ensuring the safety of the prisoners within their care. There was good communication across the functions that assisted in identifying actual and potential issues and allowed preventative and remedial actions to be put in place. These included relocation to the SRU and where required transferring to another establishment. Effective use of the SRU was used in the management of those individuals placed on Rule 95 and occasionally Rule 41. Whilst located there, there was positive interaction with each individual to challenge and address their behaviours.

A protection regime was not operated, however the prison was able to maintain an individual's safety until a transfer to an appropriate establishment could be arranged, which was usually achieved within a couple of days. The only negative aspect to this was the fact that there was no regime in place for this period and individuals had access to only the essential requirements of the Prison Rules.

The PIP was an interesting initiative aimed at supporting those in custody for the first time.

The FNIC provided the opportunity to gather further information, through an interview process, on individuals in order to assess risk and allowed the individual to settle in custody prior to being located in an established population.

In discussion with staff and prisoners the overall general feeling was that Low Moss was a safe place to work and live. It was noted that staff tended to congregate at the desk, rather than being routinely in the sections, management should monitor this situation to ensure that it does not become the norm.

Quality Indicators

3.1 All reasonable steps are taken to minimise situations that are known to increase the risk of aggressive or violent behaviour. Where such situations are unavoidable, appropriate levels of supervision are maintained.

Rating: Satisfactory performance 

There were robust systems of control and supervision in place regarding prisoner movement and prisoner activities. Daily meetings were held between Head of Operations, the Tactical Manager and Intelligence Management Unit (IMU) Manager to discuss and analyse all relevant information or intelligence from the previous day. This informed any actions required to reduce or remove any identified risks of aggressive or violent behaviour. The incident reporting process ensured that all violent incidents were automatically reported to SPS HQ.

Rule 95 was utilised to manage individuals who presented a risk to others or to themselves, during the inspection there were seven individuals subject to this rule, four within the SRU and three in Kelvin Hall. There were also four individuals subject to Special Security Measures (SSM).

3.2 The requirements of Health and Safety legislation are observed throughout the prison.

Rating: Generally acceptable performance 

Low Moss had a trained H&S coordinator and a comprehensive SharePoint site that contained all relevant documentation and records. H&S quarterly meetings were chaired by the Governor with minutes published on SharePoint. There was a comprehensive process of safety critical features completed by First Line Managers (FLMs) monthly and Unit Managers quarterly. It was noted that Healthcare has yet to transfer across to this process. The H&S action plan had some issues that had overrun by quite a period with some significant issues contained on it. **This was a concern.**

All relevant signage was on display throughout the establishment including fire notices, exit signs, warning signs (work areas), legislative requirements (displayed in staff area) and wet floor signs distributed during cleaning sessions.

3.3 All activities take place according to safe systems based on realistic risk assessments.

Rating: Good performance 

Risk assessments were available for activities within the establishment. Each area had its own folder on SharePoint and individual areas had hard copies with read and sign sheets to ensure all staff were aware of the requirements. Prisoners in industries areas were provided with the relevant personal protective equipment. Prisoners received training specific to the task they were required to complete. All

prisoners interviewed stated that they felt safe in the work place and had received sufficient training to allow them to operate safely.

3.4 The behaviour of staff contributes to the lowering of the risks of aggression and violence.

Rating: Satisfactory performance ●

Staff were trained and maintained competence in the relevant areas such as Control and Restraint (C&R) and professional boundaries. This contributed to staffs ability to act in a positive manner that assisted in the reduction of risk. This was further supported by positive relationships between staff and prisoners. An incident witnessed by an inspector evidenced a positive, proactive intervention in a situation that could have escalated if not managed in the manner that it was.

During interviews with staff and prisoners it was fed back that overall there were positive staff-prisoner relationships across the establishment particularly in the SRU.

Within the Low Moss SharePoint site there was an Anti-Violence Policy. However management acknowledged that it was never introduced. The lack of a National anti-bullying strategy is a concern as the result is a patchy and inconsistent approach within the establishment and throughout the SPS estate. This situation should be addressed as a matter of urgency by SPS HQ.

3.5 Care is taken during the period immediately following the admission of a prisoner to ensure their safety.

Rating: Satisfactory performance ●

During the admission process individuals were interviewed to determine any level of risk that may be presented to them within establishment, this included the Talk to Me reception risk assessment. During observation of this process an individual requested protection status as he believed he may be at risk. The manager took cognisance of this and made relevant enquiries to corroborate the claims. On this occasion the information was verified and the prisoner was granted protection status.

Low Moss also had a FNIC facility. This facility was utilised for all individuals initial period in custody. The FNIC process involved a further interview process which took account of the individual's personal circumstances, this may further inform any level of risk and allow any action required to be taken to support and protect the individual. Individuals located there reported that they found it very beneficial as it gave them the opportunity to settle in custody before being transferred to an area with an established population. There was also a PIP section within Clyde Hall. This area was designed for those individuals in custody for the first time and provided a further protection for those who may be at risk or are vulnerable due to being new to the system. The only negative aspect to this was that as part of the agreement to be located within the PIP attendance at education was compulsory. Failure to attend would mean being relocated to another section.

3.6 The prison implements thorough and compassionate practices to identify and care for those at risk of suicide or self-harm.

Rating: Good performance 

Staff training levels in the Talk to Me process were very high with Core at 100%, Conversion at 99% and Refresher 100%. During interviews with staff they were able to evidence a good knowledge and understanding and were also fully aware of their responsibilities to individuals who presented in this manner. The required paperwork was available in the residential areas. During the Inspection there were 2 individuals on high risk and 4 on low risk. All PR2 records were up to date with scheduled case conferences.

A case conference for an individual who presented as high risk was attended. During the main case conference the FLM took considerable time to ensure the individual, who had limited English, was able to understand not only the process but the overall situation he was in. The case conference was carried out with compassion and was very supportive. The conclusion and decision was arrived at after significant and substantial discussion between all parties. An appropriate Care Plan was discussed that afforded the individual as much access to a normal regime as was felt safe at that time and the result communicated to the individual. The FLM, officer and nurse evidenced genuine compassion and care for the individual.

3.7 The prison takes particular care of prisoners whose appearance, behaviour, background or circumstances leave them at heightened risk of harm or abuse from others.

Rating: Satisfactory performance 

This process was initiated in Reception with further details confirmed within the FNIC interview. Appropriate actions would be taken if required including protection status for the individual. Although prisoners and staff both report low instances of any form of bullying or harassment, the establishment had a variety of mechanisms they could utilise to support and provide care for those individuals who may be at risk due to ethnicity, culture, religion or behaviours. Low Moss did not have the facility to locate protection prisoners therefore anyone identified as being at risk would be offered protection status with a very limited regime and then be transferred as soon as possible with the primary destination being HMP Barlinnie.

3.8 The allocation, management and supervision of prisoners known to present a risk takes into account the nature of the risk they present.

Rating: Satisfactory performance 

The identification of these individuals was primarily managed by the IMU and Tactical Managers. Through the Tactical Tasking Group and daily briefings all areas of significant intelligence were discussed including those who presented a risk. Anyone identified may be placed on a Rule 95 and relocated to the SRU where a management plan was put in place for them. This was a relatively new initiative and involved one-to-one meetings with the individual and staff called "Buzz Sessions"

and was based around Airmaps² with the intention of involving the individual with his management during the period of separation. Staff and prisoners have reported this to be very positive and beneficial. Prisoners also reported on the positive relationships between themselves and the staff in the SRU.

3.9 Where bullying or harassment of prisoners is suspected or known to have taken place, steps are taken to isolate those responsible from their current or potential victims and to work with them to modify their behaviour.

Rating: Satisfactory performance ●

When individuals were suspected of bullying or harassing other prisoners an investigation would take place to ascertain the victim(s) and perpetrator(s) identify motive and any potential for incident. Low Moss had a very pro-active Tactical & Co-ordination Group who reviewed individual prisoner profiles establishing links and threats. The SRU would be utilised to locate those who presented the risk and possibly those at risk. There were good relationships with other local establishments, such as HMP Barlinnie and HMP Greenock, which enabled prisoners to be transferred out when required. Whilst located in Lomond Hall work was done with these individuals, to help identify the motives for their behaviour and to work with them to modify these.

The lack of a national policy document addressing bullying is a concern and something that SPS management should address as a matter of urgency.

3.10 Those who have been the victims of bullying or harassment are offered support and assistance.

Rating: Satisfactory performance ●

Low Moss offered various support services for those individuals who were identified as victims of bullying or harassment which ranged from the personal officer, mental health team, social work and chaplaincy. The chaplaincy team were held in very high regard by both staff and prisoners due to the very supportive service they provided throughout the establishment.

Whilst Low Moss did not have a protection regime the individual would be offered protection status if the risk was felt to be sufficient. This would be for short period only with the intention being to move the perpetrator(s) to another establishment or alternatively transfer the victim although this would be the least favourable option.

² The Airmaps concept has been developed to assist prolific offenders and is a participatory assessment framework designed to assist case managers to work with those in prison to help them to position themselves within their own desistance journey, and to locate their journey in its social and relational context.

3.11 Allegations or incidents of mistreatment, intimidation, hate, bullying, harassment or violence are investigated by a person of sufficient independence and lead to appropriate management action.

Rating: Good performance 

Allegations were investigated in conjunction with the IMU and Tactical Managers. Both areas were found to be very proactive in pursuing the prevention of bullying or violence. The adjudication process was very robust. Low Moss had a good working relationship with Police Scotland and reported all allegations/ acts of violence for investigation.

Any allegations or complaints of mistreatment were scrutinised for any element of breaching E&D policy. E&D reporting forms were readily available to prisoners. If an E&D issue arose during adjudication then it would be referred to the E&D manager for further investigation or action.

3.12 Systems are in place throughout the prison to ensure that a proportionate and rapid response can be made to any emergency threat to safety or life that might occur.

Rating: Satisfactory performance 

Low Moss had a detailed set of contingency plans in place for major incidents and these were reviewed on a rolling basis by the tactical manager. The plans were located in the appropriate areas. In support of the contingency plans and giving the ability to manage lower level incidents there were comprehensive Standard Operating Procedures (SOPs) throughout the establishment, including for alarm responses. During the inspection there was a live alarm response which was witnessed by an Inspector and the response was prompt and controlled. In discussion with several managers regarding Code blue/ red responses they were able to provide a very detailed verbal response as to how they would respond. However there was no evidence provided of a specific SOP for this type of incident.

3.13 There are emergency means of communication and alarms throughout the prison; they are tested regularly and are working satisfactorily.

Rating: Good performance 

Staff carried personal alarms which were registered with the Electronic Control Room (ECR) prior to departing the key vend. Operational staff also carried radios, again these were registered with the ECR prior to and departing from duty.

Tests on the personal alarms were carried out on a weekly basis with any faults reported to the Estates Department for action. There were no tests carried out on the radios, with any faults identified by the user reported as per the alarms. Prisoner cell call alarms were checked as part of the cell certification process.

3.14 There is an appropriate set of plans for managing emergencies and unpredictable events and staff are adequately trained and exercised in the roles they adopt in implementing the plans.

Rating: Good performance 

As noted in 3.12 there were up to date contingency plans in place as well as a comprehensive range of SOPs including alarm response and emergency escorts in place. Staff were appropriately trained. Low Moss participates in a local incident management exercise annually and were able to evidence nationally trained role holders.

STANDARD 4 - HEALTH AND WELLBEING

The prison takes all reasonable steps to ensure the health and wellbeing of all prisoners.

Commentary

All prisoners receive health care and treatment which takes account of all relevant NHS standards, guidelines and evidence-based treatments. Healthcare professionals play an effective role in preventing harm associated with prison life and in promoting the health and wellbeing of all prisoners.

Inspection findings

Overall rating: Poor performance 🟡

Our inspection of Low Moss in May 2017 identified a number of concerns and areas that required improvement.

Staff shortages in the nursing team meant that the requirement to prioritise cover for basic healthcare provision impacted on the range of interventions and treatments offered to patients.

There was little opportunity or capacity to offer health promotion in respect of addictions and substance, or alcohol misuse. We were concerned that Naloxone training had not been given to prisoners since February 2017. Records indicated there had been no Naloxone kits distributed since July 2016. **This was a concern.**

Spot checks of patients with in-possession medication were not being regularly carried out. As a result the prison could not provide assurance that patients were complying with the 'in-possession medication contract' they had signed.

Patients could wait up to four weeks to see the General Practitioner (GP) for a routine appointment and nurse treatment clinics were cancelled regularly.

Apart from the Blood Borne Virus (BBV) service no chronic disease management clinics were held in the prison.

The mental health team and the addiction team had good response times to assessments, however, their follow up of patients assessed as being suitable for treatment and support was inconsistent. We were advised that staff were unable to commit time to regular appointments and support because they were frequently required to cover essential and core duties.

Mandatory training and annual training reviews for staff was not up to date. Although an established system for managerial supervision was in place staff did not receive regular supervision.

The inspection team recognised that since the transfer from SPS in 2011 NHS GG&C and Glasgow City HSCP had made a significant investment and secured additional funding for 7 full-time posts. Four posts had been filled: 3 primary care nurses and 1 addiction nurse and were undertaking their induction at the time of inspection. With the NHS board unable to fill some vacancies together with staff on long term sick leave, it was unclear at the time of inspection whether in the long term, this additional staffing will have a positive impact on service delivery and lead to a wider range of services being offered to patients.

It is worthy of note that the healthcare staff and management were dedicated to delivering the best possible service but what they were able to deliver was severely constrained by the persistent and enduring staffing shortages.

Quality Indicators

4.1 There is an appropriate level of healthcare staffing in a range of specialisms relevant to the healthcare needs of the prisoner population.

Rating: Poor performance 

The healthcare team had faced many challenges in sustaining a consistent workforce to deliver services. Staff sickness, challenges in recruiting to key posts and retaining staff had impacted on the range of interventions and treatments offered to patients. The mental health, addictions and primary care teams did not have their full complement of staff. This had resulted in an on-going dependence on the use of bank nurses to cover core duties. To address the staffing issues inspectors were told that managers had taken on board feedback from staff who had left the service, and made changes to the way in which staff were inducted and supported within the prison environment.

Healthcare managers told us that using bank nurses was challenging. Typically bank nurses required a period of induction and training to work in a prison environment. In addition, approval from SPS was required before they were permitted to work within the prison. Managers told inspectors that there had been occasions when SPS had denied bank nurses access to the prison for security reasons without discussion or explanation to healthcare managers. **This was a concern.** Local SPS and NHS management need to develop a solution that ensures that delays in allowing bank staff access to the establishment are minimised.

The prison healthcare team had additional support from a professional nurse advisor and a pharmacy advisor. At the time of the inspection they were supporting clinical managers to develop a work plan to improve service delivery and to use resources more efficiently across the health centre. This included plans to unify documentation systems and processes across the three prisons in the NHS board area. This was good practice but delivering change was proving to be challenging as senior staff were frequently pulled away from their role to support the nursing team in order to cover core duties. This meant that time to focus on service development was limited. **This was a concern.**

During the inspection we saw little evidence to indicate the mental health team and addiction team took a collaborative approach to the management of patients identified as having addictions as well as mental health issues. **This was a concern.**

Podiatry, optician and dental services were provided by community providers. Although there was access to a dentist and dental nurse, there was no provision of a dental hygienist. At the time of the inspection, 143 patients were waiting for a routine dental appointment. The number of weeks patients would need to wait to see the dentist was not provided. Psychiatry and BBV consultants held clinics within the prison and worked closely with the health care team.

There were challenges in recruiting to key posts such as the GP. NHS Greater Glasgow and Clyde had difficulty in filling GP vacancies due to a national shortage of

GPs. Temporary agency doctors were used to fill vacant sessions. During the inspection we were told that there was a four week wait for prisoners to get a routine appointment with a GP. GP's in Low Moss saw all new admissions and transfers, something that is no longer required under the Prison Rules and may not be the best use of this valuable resource.

As the grading for this indicator is 'Poor' Healthcare improvement Scotland will be asking NHS GG&C and Glasgow City HSCP to complete an action plan in relation to our concerns.

4.2 Prisoners have direct confidential access to a healthcare professional.

Rating: Generally acceptable performance 

There were clear processes in place to collect, triage and record self-referrals. Referral forms had pictures of services for ease of use by prisoners. **This was practice worthy of sharing.**

Prisoners were given initial information about healthcare services in the prison at reception by the reception nurse. The induction process was used as a further opportunity to provide more detailed information about the types of services available and how they can be accessed. This is done by the healthcare team via a presentation and gives the prisoner the opportunity to ask any questions. Staff shortages have prevented members of the healthcare team from being able to attend every new prisoner's induction.

4.3 Appropriate confidentiality of healthcare consultations and records is maintained in the prison.

Rating: Generally acceptable performance 

Confidentiality was maintained at the clinics and consultations we observed. The patient's electronic health record (Vision) was updated at the time of the consultation. The psychiatrists also recorded their consultations onto Vision which enabled healthcare staff to easily review and note any changes to medication or care planning. **This was practice worthy of sharing.**

Confidentiality was generally maintained with regards to the retention of patients' health records. Appointment slips and results information were given to patients in a sealed envelope marked 'confidential'.

We were told that if a patient made a complaint, healthcare staff would record the discussion with the patient in the patient's Vision record. Only in exceptional circumstances would it be appropriate to document a prisoner's complaint within their medical records. This should not be common practice. Complaints records should be kept separate from health records to safeguard patient confidentiality. The clinical health record should only record information which is strictly relevant to the patient's health. **This was a concern**

4.4 Healthcare provided in the prison meets accepted professional standards.

Rating: Poor performance 🟡

Due to the pressure faced by clinical nursing staff to deliver core services, inspectors observed that some of the established systems and processes to support staff undertake their roles were not taking place as required. **This was a concern.**

We were concerned that records showed that the clinical nursing team did not receive regular line management supervision; this was frequently cancelled due to staffing levels. **This was a concern.**

Although formal one-to-one clinical supervision was provided to the mental health team by the clinical psychologist the uptake was poor. We were again told this was due to the pressure on staff to deliver core services.

NHS Greater Glasgow and Clyde had developed an annual programme of mandatory training for staff including fire safety, moving and handling, infection control and administering medicines. However not all staff were up to date with completing their mandatory training. **This was a concern.**

The NHS Knowledge and Skills Framework was used to identify staff training and development needs. Once again we were informed that the on-going staff shortages impacted on staff being able to complete their personal and professional development plans, complete reviews and set objectives. **This was a concern.**

Staff told us that they learnt from experience or by drawing on previous job knowledge. The registered general nurses had not had their clinical competence assessed for clinical decision making or clinical examinations. **This was a weakness.**

There were clear systems in place to validate Nursing and Midwifery Council (NMC) registrations. The administration of medicines was in line with the NMC guidelines and NHS Greater Glasgow and Clyde policy.

On reviewing the DATIX³ system, inspectors noted that there had been an increase in medication errors relating to the administration of in possession medication. Healthcare assistants were employed as pharmacy assistants within the prison. Inspectors were told that challenges with staffing levels meant that appropriately trained staff were not always available to support the pharmacist to process prescriptions and give out in possession medication. Health care managers had been made aware of the issue and had put in place a plan to ensure that suitably trained staff were available.

³ NHS Greater Glasgow and Clyde's electronic incident reporting system.

As the grading for this indicator is Poor Healthcare improvement Scotland will be asking NHS GG&C and Glasgow City HSCP to complete an action plan in relation to our concerns.

4.5 Where the healthcare professional identifies a need, prisoners are able to access specialist healthcare services either inside the prison or in the community.

Rating: Generally acceptable performance 

A range of specialist services were delivered by community based providers. The self-assessment information submitted by the healthcare team provided waiting list information for all clinics and specialist services within the prison. Four dental sessions a week were provided in Low Moss but these did not support cover for leave or sickness/ absence. Waiting times for routine GP and dental appointments were lengthy. At the time of the inspection, 143 patients were waiting for a routine dental appointment. The dental appointment delay was mainly due to the high numbers of prisoners accessing the dental service and the dentist having to deliver services that would normally be provided by a dental hygienist or technician.

As there was no sexual health clinic any prisoner who wished to discuss issues relating to their sexual health had to access the treatment room clinic or request a GP appointment.

The waiting times for patients to access the mental health team mirrored that of NHS Greater Glasgow and Clyde's community model. Unlike the community model, there was no direct discussion with the patient about their referral to ascertain and assess whether the referral was urgent. The urgency of the self-referral was assessed only by what was written down on the form by the patient. No consideration was given as to whether the patient could articulate their symptoms on the referral form. **This was a concern.**

Mental health nurses were unable to provide regular structured treatment and interventions to their existing caseload due to prevailing clinical demands. Covering duty rotas for sick leave, assessments and case conferences frequently took priority. In some cases, although prisoners would be allocated a mental health nurse, appointments would be irregular and held when time permitted. **This was a concern.** Lower level interventions such as anxiety management or mindfulness groups were not provided.

A weekly mental health team review meeting was chaired by the clinical psychologist and demonstrated a collaborative approach to care planning. These meetings however were limited to discussing solely new assessments due to the volume of new referrals and the psychiatrist did not attend.

The psychiatrist did meet the mental health nurses separately on a weekly basis to discuss patients. Cross referral pathways between the mental health team and addictions team were not clearly identified. In some instances we found that assessments were being duplicated which not only made it challenging for staff to

prioritise a referral based on clinical need, but also led to delays in patients being referred to the appropriate services.

To be referred to the psychology services patients were required to have undergone a mental health assessment by a mental health nurse or have been reviewed by the psychiatrist. This resulted in a delay in referral and duplication of assessment. Arrangements were made to transfer prisoners who required admission to a psychiatric unit for assessment or in-patient treatment.

NHS Greater Glasgow and Clyde had secured funding through the Mental Health Innovation fund to improve access to psychological therapies for prisoners across all three estates within their board area. Inspectors were advised that staff were being recruited specifically to deliver these interventions and that Low Moss would be the pilot site to support the work of the mental health team.

At the point of admission, if a prisoner had on-going investigations or treatment in secondary services they would be supported for this to continue.

4.6 Prisoners identified as having been victims of physical, mental or sexual abuse are supported and offered appropriate treatment. The relevant agencies are notified.

Rating: Satisfactory performance ●

If a prisoner suffered an injury within the prison during the day they were seen by the healthcare team: at other times it was via the out of hours forensic practitioners. If the injury was serious the prisoner would attend the local accident and emergency department.

Prisoners could self-refer to the Open Secret service (a service contracted and funded by SPS) which offered a supportive listening service. The service did not offer evidence-based treatments for complex trauma. Within the prison there was a 'Listeners' peer support service, and prisoners could telephone the Samaritans and 'Breathing Space'. For prisoners with complex trauma, access to clinical psychology was available.

4.7 Care is taken during the period immediately following the admission of a prisoner to ensure their health and wellbeing.

Rating: Satisfactory performance ●

Following admission to prison a primary care nurse or mental health nurse would attend reception and assess whether the prisoner was fit to be in custody. They would place any health care markers as necessary. All nurses had received 'Talk to me' training. In addition, Inspectors were told that all primary care nurses were offered mental health first aid training to support them in their role. However, the numbers of primary care staff who had completed this training was not provided. Nursing staff had access to the patients' GP emergency care summary.

Prisoners were screened for alcohol and drug use on arrival and had the opportunity to discuss any particular issues. For those prisoners in withdrawal, a detoxification programme would be offered. Consent to share patient details was obtained on admission, and where appropriate, a medication treatment agreement was put in place. Patients with a long term condition were identified at the reception screening and this was recorded on Vision. Patients were then seen the next day by the GP who would confirm their medical history and prevalence of any long term conditions. As there were no nurse-led chronic disease clinics long term conditions such as asthma would be followed up at the next available GP clinic.

Healthcare staff could access interpreter services through language line for prisoners whose first language was not English.

Only four members of the nursing team were trained and approved for Patient Group Directions. Those staff not trained would phone the out of hours forensic practitioners to discuss prescription and if appropriate this would be faxed to the health centre.

4.8 Care plans are implemented for prisoners whose physical or psychological health or capacity leave them at risk of harm from others.

Rating: Generally acceptable performance 

Care plans were in place for those patients with complex care needs and who were in disabled cells. Cells were available for prisoners with physical and mental disabilities. Primary care nurses completed care plans for prisoners who required social care support and carers were employed by SPS. Health care staff noted there were difficulties obtaining occupational therapy assessments for patients who required support with activities of living. There was no formal arrangement to outsource occupational therapy services. **This was a concern.** The prison healthcare service was exploring ways to identify funding for occupational therapy.

When a prisoner was considered at risk of self-harm a joint care plan between SPS and healthcare was agreed through the 'Talk to me' process. For patients under the care of the mental health team care plans and clinical risk assessments were in place and recorded on Vision. These were not outcomes focused and did not provide timescales for care plan review dates. **This was a weakness.**

As noted in 4.5 the weekly mental health team review meeting only discussed new assessments due to the volume of new referrals. As noted in 4.3 the psychiatrists did record interventions onto Vision ensuring clear communication and chronology of events.

4.9 Healthcare staff offer a range of clinics relevant to the prisoner population.

Rating: Poor performance 

Apart from the BBV service no chronic disease management clinics were held in the prison. There was no provision for well man or sexual health clinics. Inspectors

were told that patients with chronic health conditions were supported through the normal GP service. As discussed in 4.1 patients would need to wait four weeks for a routine appointment.

Primary care nurses ran a 'one stop shop' clinic where a wide variety of treatments would be undertaken such as wound dressings, blood pressure checks and venepuncture. Patients could self-refer to this clinic. During the inspection we observed the cancellation of this clinic. We were also told by healthcare staff that the clinic was frequently cancelled because staff were required to undertake core duties. As a result, with the exception of essential dressings, all treatments were delayed. **This was a concern.** Moreover staff told us that they had not received any specific training, supervision or education to run the clinic. As noted in 4.4, staff told us that they learnt from experience or by drawing on previous job knowledge. The registered general nurses had not had their clinical competence assessed for clinical decision making or clinical examinations. **This was a weakness.**

4.10 Preventive healthcare practices are implemented effectively in relation to Transmissible diseases.

Rating: Satisfactory performance ●

The BBV clinic had recently been increased from three days per week to five and was run by a specialist BBV nurse and a healthcare assistant. All new admissions were offered dried blood spot testing. Patients could progress from initial blood testing to treatment within a few months. The prison had access to a portable Fibroscan® which allowed for a comprehensive assessment of liver health without the need to visit hospital.

Information materials promoting public health based prevention such as condom distribution were not visible throughout the prison, and prisoners could only access condoms by request from a nurse during a clinic. **This was a concern.**

Staff were aware of infection control measures and procedures and when asked could discuss the use of isolation measures and Prison Rules in relation to medical isolation. Following a period of isolation the cell would be deep cleaned by the industrial cleaning party.

4.11 Preventive healthcare practices are implemented effectively in relation to the maintenance of hygiene and infection control standards.

Rating: Generally acceptable performance ●

From an infection control perspective the health centre was fit for practice. While standard infection control precautions audits were carried out within the health centre, the audit sheets were not always completed by nursing staff. **This was a concern.**

Nitrile gloves and single use aprons were available in the health centre and the halls. Hand washing sinks and hand gel were available in the health centre and triage rooms. Not all the sinks had mixer taps and these had been risk assessed.

Inspectors observed that boxes of latex gloves supplied by SPS were being stored in the clinical rooms in the halls. SPS should remove these in the event that a prisoner had a latex allergy.

Staff were clear about the correct procedure for cleaning up blood spillages.

With the exception of the dental room, white dust was seen on both low and high level surfaces within the GP consulting room, treatment clinic room as well as clinical rooms in the halls.

The health centre had frequent communication with the infection prevention and control team at NHS Greater Glasgow and Clyde.

4.12 Preventive healthcare practices are implemented effectively in relation to the assessment, care and treatment of those at risk of self-harm or suicide.

Rating: Generally acceptable performance 🟡

For prisoners assessed as being at risk, 'Talk to Me' case conferences were held that reflected their health and safety needs in relation to custody. We observed a case conference at which a family member was in attendance. It was clear their attendance was valued by the prisoner and the family member. The family member was able to share and receive information as well as being reassured of the steps being taken to promote safe management. This was **practice worthy of sharing**.

Staffing deployment meant that a mental health nurse was not always available to attend 'Talk to Me' case conferences. The Talk to Me process indicates that a mental health nurse is "preferable" to attend Case Conferences but is not compulsory. In these instances, a member of the primary care nursing staff would take on this role. All staff were trained in 'Talk to Me' and primary care nursing staff received additional support through mental health first aid training.

Psychiatry clinics were held on the halls and when appropriate there was engagement and discussion with SPS staff. This was **practice worthy of sharing**.

As previously discussed in 4.5, clinical demands on mental health nurses time meant they were unable to provide regular and structured treatment and interventions to their existing caseload.

4.13 Preventive healthcare practices are implemented effectively in relation to the care and treatment of those exhibiting self-harming and addictive behaviours.

Rating: Poor performance 🟠

At the time of inspection on-going staffing shortages meant the addictions team was unable to offer its normal range of interventions and treatments. Harm reduction groups had ceased and prevention focussed groups were no longer running. We were informed that there were no plans to start any other groups. Health assessments were being completed within acceptable timeframes, however a

multidisciplinary team approach for the substance misuse team to discuss assessments did not exist. **This was a concern.**

Naloxone training had not been given to prisoners since February 2017. Records indicated there had been no naloxone kit distributed since July 2016. We saw no posters providing naloxone information in the halls. **This was a concern.** Ensuring prisoners have access to equipment at liberation is the responsibility of both the NHS and SPS.

At the time of the inspection, only 60 of the 140 prisoners on methadone, were within the current orange guideline recommended dose range of 60-120 mg of methadone. For some of these patients this dosage may be clinically appropriate but the numbers still remain high. This practice could be potentially dangerous for the prisoner on release, as under-prescribing could lead to the person “topping up” with illicit substances, both within and out with the prison setting.

The addiction team did have a specialised post for a nurse to support prisoners with alcohol addiction but at the time of inspection NHS Greater Glasgow and Clyde had been unable to recruit to this post.

Alcoholics Anonymous and Narcotics Anonymous did provide peer led substance misuse groups at Low Moss

We saw little evidence to indicate the mental health team and addiction team took a collaborative approach to the management of patients identified as having addictions as well as mental health issues. **This was a concern.**

Spot checks of patients with in-possession medication were not being regularly carried out. As a result the prison could not provide assurance that patients were complying with the use of in-possession contract they had signed.

As the grading for this indicator is Poor, Healthcare Improvement Scotland will be asking NHS GG&C and Glasgow City HSCP to complete an action plan in relation to our concerns.

4.14 Health education activities for both prisoners and staff are implemented throughout the prison.

Rating: Generally acceptable performance 

Health improvement events were frequently held for staff and prisoners and both groups made good use of them. All prisoners were invited to participate in the oral health group intervention within the Link Centre as part of their induction. This was **practice worthy of sharing**. Peer supporters had been trained to NHS Greater Glasgow and Clyde’s Level 2 conversations about change, health behaviour training and mouth matters intervention. This was **practice worthy of sharing**.

As noted in 4.13 harm reduction groups were not available and there were no plans for other groups to be held. Likewise prevention focussed groups were also not available due to staff limitations. **This was a concern.** Smoking cessation was

available to prisoners but waiting times were lengthy, with waits of 16 weeks at the time of the inspection. There were clear processes to ensure that prisoners were identified and given access to both bowel and abdominal aortic aneurysm screening.

4.15 Healthcare professionals working in the prison are able to demonstrate an understanding of the particular ethical and procedural responsibilities that attach to practice in a prison and to evidence that they apply these in their work.

Rating: Satisfactory performance ●

Staff understood the demands of delivering healthcare within a prison setting. When asked they were able to explain the need for, and how to maintain, professional and ethical boundaries. Regular meetings were held with prison management to discuss issues relating to professional and ethical boundaries, review incidents and to improve practice.

4.16 Every prisoner on admission is given a health assessment, supplemented where available, by the health record maintained by their community record. Care plans are instituted and implemented timeously.

Rating: Generally acceptable performance ●

As noted in 4.7 during the reception process patients were offered an initial assessment by a nurse. Prisoners would then be seen by a GP the day after admission. Prisoners who had been transferred from another prison were seen within 72 hours of admission. Prison GPs could access patient health assessment information on Vision. If the patient originated from within NHS Greater Glasgow and Clyde area the GP could also access the clinical portal.

Care plans as stated in 4.8 were initiated for patients with social care needs or complex mental health issues, although mental health care plans had no review date.

4.17 Healthcare records are held for all prisoners. There are effective procedures to ensure that healthcare records accompany all prisoners who are transferred in or out of the prison.

Rating: Satisfactory performance ●

The health records for patients were mainly stored on Vision. Healthcare staff could access NHS Greater Glasgow and Clyde health records via the clinical portal. All referrals for treatment within NHS Greater Glasgow and Clyde were made through Vision while those out with the board area were made by letter.

Like all prisons in Scotland, Low Moss did not have an electronic prescribing system therefore a paper drug kardex accompanied a prisoner on transfer. Once this had

been discontinued it was scanned onto docman⁴. Likewise any paper based case notes were also transferred onto docman. There was a clear process in place for recording patient records coming in and out of the prison.

4.18 Healthcare professionals exercise all the statutory duties placed on them to advise the governor or director of any situations in which conditions of detention or decisions about any prisoner could result in physical or psychological harm.

Rating: Generally acceptable performance 

There had been a change in the process of how prisoners reported sick. This was due to the suspension of the Emergency Nurse Assessment (ENA) Clinic. This clinic had been introduced to replace the previously existing practice of “sick parade”. The role of the ENA clinic was to identify patients who had been acutely unwell overnight. Following an audit, it appeared that a high number of inappropriate referrals were being made to this clinic. This clinic was not only time consuming but took nurses away from more clinically appropriate duties. The system currently operating is that prisoners complete Nurse Referral forms which are triaged on a daily basis (Monday – Friday) and any urgent cases are seen in the Treatment Room. On a daily basis emergency appointments were available within the Treatment Room and GP clinic. This allows nurses and doctors to see health related issues as opposed to prisoners who do not want to go to work for other reasons.

Inspectors were told by SPS staff that this change had led to a significant increase in prisoners reporting sick for work parties.

Notifications about prisoner health concerns were made by healthcare staff to SPS in relation to restraint and confinement concerns. Staff were clear in their duty to pass on any intelligence that may compromise the health and wellbeing of a prisoner or the safe running of the prison.

4.19 Healthcare professionals fully undertake their responsibilities as described in the law and in professional guidance to assess, record and report any medical evidence of mistreatment of prisoners and to offer prisoners treatment needed as a consequence.

Rating: Satisfactory performance 

Healthcare staff had a clear understanding of their duty of care and escalated concerns through the local intelligence reporting system. Regular communication between the healthcare and SPS management teams ensured concerns were discussed.

Prisoners who complained of mistreatment would be medically assessed and supported. Information would be passed on to the appropriate SPS manager who would initiate an investigation and involve Police Scotland if necessary. Prisoners

⁴ Docman is an electronic data system used by NHS Greater Glasgow and Clyde.

would be offered counselling and appropriate protective measures if required. Incident reporting would also be recorded by healthcare staff onto DATIX.

4.20 Effective measures that ensure the timeous attendance of appropriate healthcare staff in the event of medical emergencies are in place and are practised as necessary.

Rating: Poor performance 

Nursing staff carried radios and responded immediately to emergencies. Joint incident reviews between healthcare staff and SPS were held.

Emergency bags each contained medication, equipment and a defibrillator were stored within both halls and the health centre. Several items in all three emergency bags were out of date. Staff were expected to check the contents of each bag on a weekly basis, and a checklist to do this for all three bags was located in the health centre. On reviewing the checklist, we noticed that the form was not reliably completed on a weekly basis. **This was a concern.**

Medical emergency training had been offered to all qualified nursing staff but a review of staff training records revealed that only 8 out of 31 staff had attended this training and there was not a system in place to ensure that a member of staff who had completed the training was on each shift. **This was a concern.**

As noted in 4.4 not all staff were up to date with completing their mandatory training due to the on-going staffing issues which meant that delivering core services took priority.

4.21 Appropriate steps are taken prior to release to assess a prisoner's needs for on-going care and to assist them in securing continuity of care from community health services.

Rating: Generally acceptable performance 

Healthcare staff were committed to ensure that once liberated, a prisoner received the necessary on-going treatment and support in the community. A discharge summary would be e-mailed to the prisoner's GP surgery and a copy given to the prisoner. Prisoners were given a five-day supply of their medication on release. Staff described good links with community mental health teams the majority of which were based within NHS Greater Glasgow and Clyde. The addiction team would link in with community addiction teams and arrange follow up appointments in the community. As discussed in 4.13, Naloxone training had not been given to prisoners since February 2017. Records indicated there had been no naloxone kits distributed since July 2016. **This was a concern.**

When a prisoner was to be released to another NHS board area the appropriate healthcare team was contacted and referrals made for prisoners on release.

STANDARD 5 - EFFECTIVE, COURTEOUS AND HUMANE EXERCISE OF AUTHORITY

The prison performs the duties both to protect the public by detaining prisoners in custody and to respect the individual circumstances of each prisoner by maintaining order effectively, with courtesy and humanity.

Commentary

The prison ensures that the thorough implementation of security and supervisory duties is balanced by courteous and humane treatment of prisoners and visitors to the prison. Procedures relating to perimeter, entry and exit security, and the personal safety, searching, supervision and escorting of prisoners are implemented effectively. The level of security and supervision is not excessive.

Inspection findings

Overall Rating: Satisfactory performance 

The Head of Operations was clear about their role in working with partner agencies to support public protection, and the identification and management of risk within the establishment. There was also a clear focus on governance and audit, and a very real sense of ensuring that appropriate levels of assurance were provided to the governor.

Staff, and in particular FLMs were found to be enthusiastic about their role, how their work related to, and impacted on, the wider work of the establishment. In the main, the Operations Group had primary responsibility for the physical security of the establishment, and for ensuring that standards relating to security were adhered to in a way that would be expected, ie effective, but in the main, not excessive.

There were a range of SOPs which supported the vast majority of work undertaken within the Operations Group.

During the inspection, staff were noted to be polite and courteous to visitors to the establishment, and a good relationship appeared to exist between staff and prisoners. Where a lack of clarity arose, staff were clear about how they could gain clarification, ie through the use of SharePoint, reading SOPs or asking FLMs for guidance.

Various aspects of the work of the Operations Group were observed during the inspection, and these tasks appeared to be carried out appropriately.

Quality Indicators

5.1 Prison staff discharge all supervisory and security duties courteously and in doing so, respect the individual circumstances of prisoners and visitors to the prison.

Rating: Generally acceptable performance 

Within the atrium, staff were observed to be courteous and professional when dealing with visitors. When speaking with staff, they demonstrated a good understanding of the various policies in place to support their work. This included a photographic ID system which was observed to be working well.

There were a couple of issues during the Inspection in relation to the management of mobile telephones, and it appeared that there was an inconsistency in practice in relation to how this was managed, and it would be helpful for the establishment to develop a process which was transparent, robust and consistent.

5.2 The procedures for monitoring the prison perimeter are suitable and working effectively.

Rating: Good performance 

Both the internal and external perimeter of the establishment were checked regularly by officers. To aid this task they had a "checklist" which allowed the officer to clearly identify what they required to do when carrying out the patrol. This was considered an area of **practice worthy of sharing**.

The processes for checking the perimeter alarms and CCTV were viewed, together with the documentation maintained to support this and were found to be robust, complete and up to date.

5.3 The systems and procedures for the admission and release of prisoners are implemented effectively and courteously.

Rating: Satisfactory performance 

During the inspection, time was spent with the prisoner administration manager who explained the processes for managing warrants, including calculation, reconciling warrants on PR2, training and how the liberation scroll and diary were managed. The manager demonstrated an excellent understanding of not only process and policy, but also of their responsibilities in ensuring that relevant staff were trained to carry out their roles.

HDC was co-ordinated within the criminal administration team, with a Unit Manager taking the decision in relation to suitability for release on HDC. The systems and procedures were found to be appropriate.

Processes within the Reception were observed; staff were found to be courteous and polite, aware of their responsibilities in relation to the checking of warrants and the various admission and liberation procedures.

5.4 The systems and procedures for access and egress of all other people are implemented effectively and courteously.

Rating: Satisfactory performance ●

Within the Atrium, there were a number of signs and notices displayed which highlighted the various security requirements for entering the establishment. Staff ensured that the appropriate individuals were entering and leaving the establishment by making good use of staff identification cards and the visitor photographic identification system. We found staff to be consistently polite, friendly and courteous towards visitors.

5.5 The systems and procedures for controlling the entry and departure of goods to and from the prison are working effectively.

Rating: Satisfactory performance ●

Within the ECR there were a number of SOPs which detailed how vehicles, drivers and goods should be received at the establishment. It was noted on a number of occasions that all items coming into the establishment were subject to security screening via the X-Ray machine. The establishment 'Gate Pass' system was observed and appeared to be working well. Searching of vehicles and drivers was observed, and this was considered to be appropriate. The vehicle lock was well equipped with search equipment and if considered appropriate, further searching equipment was available within the wider establishment. Documentation to record searching of vehicles was viewed, and found to be appropriate and up to date.

5.6 The risks presented to the community by any prisoner are assessed and appropriate security measures are adopted.

Rating: Satisfactory performance ●

Both the Heads of Psychology and of Prison Based Social Work (PBSW) commented on the positive relationships within the Risk Management Team (RMT) structure which they believed encouraged open and frank discussion allowing foreseeable risks to be acknowledged and managed appropriately.

The processes for completing Escorted Days Absence (EDA) were reviewed and found to be appropriate.

5.7 The risks presented to others in the prison by any prisoner are assessed and appropriate supervision is enforced.

Rating: Satisfactory performance ●

All prisoners were assessed using the Prisoner Supervision System (PSS). PSS reviews were managed utilising a business objects report which captured the date of all upcoming reviews helping to ensure that no PSS review was carried out later than it should be. It was also likely that 'significant incidents' (eg violence) may trigger a PSS review. If necessary, an appropriate risk assessment and safe system of work would be put in place to manage specific identified risks. Prisoners being managed under Rule 95 were primarily located in the SRU.

5.8 The risks presented by any prisoner to themselves are assessed and appropriate supervision is applied.

Rating: Satisfactory performance ●

Within the establishment, a Unit Manager fulfilled the role of co-ordinator in relation to the Talk to Me strategy. In respect of training, it was noted that 100% of staff had undergone the Prevention of Suicide in Prison Strategy core training programme. At the time of the inspection, there were 4 prisoners who were being managed via the Talk to Me Strategy. Documentation was viewed, and this was found to be appropriate in its content and the way it was being kept up to date.

The Management of an Offender at Risk Due to any Substance policy was led primarily by the NHS in consultation with prison staff, and staff spoke positively about the collaborative approach of both the SPS and NHS in managing prisoners.

5.9 The systems and procedures for monitoring and supervising movements and activities of prisoners inside the prison are implemented effectively.

Rating: Satisfactory performance ●

There were number of SOPs which supported the movement and activities of prisoners within the establishment. On a number of occasions during the inspection, the main prisoner route movement was observed at different times of the day, and no issues were noted with this process.

Staff within the ECR were aware of their responsibilities in relation to the monitoring of CCTV, and demonstrated a good understanding of not only what they should be doing, but also why things were being done the way they were, and how any problems or issues should be reported.

5.10 The systems and procedures to maintain the security of prisoners when they are outside the prison are implemented effectively.

Rating: Satisfactory performance ●

As noted in 5.6, the processes for RMT and EEDA were found to be appropriate. A random sample of Prisoner Escort Records (PER) forms were viewed and found to be completed appropriately with the exception of a couple of occasions where signatures had not been annotated to the forms.

Where required, separate procedures were in place to manage risks to the community posed by high risk offenders, and would typically involve the use of SSMs and close working with Police Scotland when appropriate.

5.11 The prisoner disciplinary system is used appropriately and in accordance with the law.

Rating: Good performance ✓●

The prisoner disciplinary system was managed via the SRU. A number of hearings were observed and on each occasion it was clear that the adjudicator had no prior knowledge of the cases being laid before them. The adjudicator presented an authoritative manner which was appropriate to this setting, but balanced this well with a caring attitude which aimed to address the specific prisoners issues.

When the 'report package' was being prepared, a prisoner management officer from the residential hall where the prisoner was located would complete a hall report document which provided background to the disciplinary history of the prisoner, and recorded the general behaviour of the prisoner within the hall, and allowed for comment on any specific issues that may have been affecting the prisoner at the time of the disciplinary report to be made known to the adjudicator. While this information was not routinely required within the disciplinary hearing process, completing the form ensured that there was no delay in getting the information, and demonstrated that the 'hall report' from staff was current, informative and appropriate. Use of this form was viewed as an area of **practice worthy of sharing**.

5.12 The law concerning the searching of prisoners is implemented thoroughly.

Rating: Satisfactory performance ●

A number of property searches were observed, and these were carried out professionally whilst maintaining the prisoner's dignity. Property cards were also observed to be used when searches are carried out.

During the admission of prisoners in Reception (including those returning from Court, and inter-prison transfers), a number of body searches were observed. It was noted that whilst there were two officers in the general area, only one was actually beside the prisoner during the search, with the second officer elsewhere in the room, ie organising replacement clothing (where appropriate) or completing documentation.

A number of rub down searches that took place during the route movement were seen to be carried out to the appropriate standard.

5.13 The law concerning the testing of prisoners for alcohol and controlled drugs is implemented thoroughly.

Rating: Satisfactory performance ●

There were a number of drug testing areas within the prison which were of a good standard, with all the appropriate documentation and equipment expected. A random sample of documentation was viewed and found to have been completed appropriately.

Prisoner Management Officers used their good relationships with prisoners to engage as positively as possible with the Mandatory Drug Testing (MDT) process. Only when all other options have been utilised would prisoners be placed on a disciplinary report. It was evident that the Prisoner Management Officers had an excellent knowledge and understanding of the MDT process.

5.14 Searches of buildings and grounds and other security checks are carried out thoroughly.

Rating: Satisfactory performance ●

The tactical managers maintained an establishment wide search plan that clearly laid out what areas of the prison were to be searched when, and by whom. A list of staff trained in advanced searching techniques was maintained. When searches were carried out, this was recorded on the appropriate search database and also on PR2. Electronic records allowed a variety of information to be recorded, including who carried out the search, when the search was conducted and what (if any) productions were recovered. The establishment had robust production procedures in place which helped to maintain the chain of custody for each production.

5.15 The systems and procedures for tracking the movements of prisoners and reconciling prisoner numbers are implemented effectively.

Rating: Satisfactory performance ●

Prisoner numbers were checked and reconciled as a minimum 3 times per day. This process was observed and found to be undertaken appropriately. Occurrence books and 'boards' were viewed and found to be maintained to a high standard. On a number of occasions, staff were observed to be recording various prisoner movements as they occurred and without prompting from any third party.

5.16 The integrity of locking systems is audited effectively and with appropriate frequency.

Rating: Satisfactory performance ●

A Traka⁵ key vending system was in use, which was checked and maintained twice yearly by the Estates Department, which records confirmed. Chubb Atlas serviced the system on a yearly basis. The system allowed reports to be run and this process was observed, with the Security & Integration Manager being able to demonstrate where individual bunches of keys were and the reports viewed also provided which members of the local incident command team were on duty, and what role they performed. The reporting system produced nightly reports which were signed off by the Duty Manager. A random sample of these reports were checked and found to be appropriate.

5.17 Powers to confine prisoners to their cell, to segregate them or limit their opportunities to associate with others are exercised appropriately, with humanity and in accordance with the law.

Rating: Satisfactory performance ●

A sample of Rule paperwork in respect of separation was checked and found to be in order. This decision where to locate a prisoner in either the halls or SRU would be taken on a case-by-case basis. Case conferences were chaired by a Unit Manager with appropriate FLMs in attendance, also present may be a member of the health care team and Personal Officer of the prisoner, if considered appropriate.

Staff spoke positively about the way in which case conferences were managed, with a focus being on developing an individualised management plan that would consider the best way to move forward with the prisoners' management and how to return him back to full circulation.

5.18 The management of prisoners segregated from others is effected in accordance with the law and with regard to their continuing need for a stimulating programme of activities and social contact and for treatment aimed at enabling their return to normal conditions of detention as soon as can be achieved safely.

Rating: Satisfactory performance ●

Details of case conferences are noted in 5.17 for prisoners segregated under Rule 95. Whether located under Rule 95, or as a result of the Talk to Me strategy, there was a clear view from staff that prisoners required to be managed as individuals, with their needs being considered when developing management plans. In discussion with a Unit Manager and FLM, it was clear that all options would be considered when developing management plans, and this may include the

⁵ Traka is an automated key vend system which gives a full audit trail of who has used them (or attempted to remove them), the time and date when.

involvement of education and chaplaincy provision, or continued participation in visits from family members.

Where concerns were raised in relation to security or order, these would be carefully considered and appropriate actions taken to mitigate these where possible.

5.19 Powers to impose enhanced security measures on a prisoner are exercised appropriately and in accordance with the law.

Rating: Satisfactory performance ●

At the time of the inspection, there was one prisoner who was being managed utilising SSM. The SSM documentation was viewed, and had been completed to a good standard, clearly indicating the reasons for the measures, and the restrictions that were in place and was in accordance with the law.

All prisoner management officers spoken to were aware of this prisoner and had a good understanding of measures in place. As well as the actual SSM documentation being located in the hall, information regarding those prisoners being managed under SSM conditions were recorded on the establishment SharePoint site. When reviewing the SSM measures, a case conference approach was described, which would include appropriate managers and staff.

5.20 Force is used only when necessary and strictly in accordance with the law.

Rating: Satisfactory performance ●

Training records were inspected which showed that at the time of the inspection, there were 97% of operational staff trained in Control and Restraint (C&R) Phase 1. Discussion with staff that would fulfil the role of supervising officer during the deployment of a C&R Team noted that there was a clear emphasis on de-escalation when managing prisoners under restraint.

A random selection of 'use of force' forms viewed confirmed that the Head of Operations reviewed 100% of all forms, and where applicable commented on these. There was a video recording policy which was utilised during planned C&R removals, which was consistent with policy. In the case of a planned removal, it was noted that these were authorised by a Unit Manager, and this was recorded on the Use of Force forms.

5.21 Physical restraints are only used when necessary and strictly in accordance with the law.

Rating: Satisfactory performance ●

At the time of the inspection, there were no instances of physical restraints being used. The last recorded use was in July 2016. Documentation from this time was made available during the inspection, and had been completed to the required standard. Through discussion with staff and those in the role of Supervising Officer,

there was a general good understanding of the law governing the use of physical restraints, ie adherence to timescales and the requirement to involve the GP.

During a review of completed PER forms, it was noted that the organisational escort certificate and risk assessment (introduced in December 2016) was being completed and demonstrated the rationale for the use of handcuffs. It was noted that on two of the forms, signatures were missing.

5.22 Prisoners personal property and cash are recorded and, where appropriate, stored.

Rating: Satisfactory performance ●

A small sample of property cards were checked on a weekly basis by the Duty Manager and the results of these checks annotated on specific documentation located in Reception. All documentation viewed appeared to have been completed appropriately.

Valuable property was located in the Reception and documentation was seen to be appropriate in this regard. It was noted that the valuable property was located in a store room which was accessible only by reception officers, but the room also contained other items, including the handcuff safe. Management should review this situation to satisfy themselves that it provides the desired level of security for valuable property retention.

In relation to cash, there was a clear, auditable recording system which showed when cash has been handed into the establishment, and passed up to the General Office. A sample of this documentation was viewed during the inspection and it was clear that money handed in at the Atrium matched the value of money later passed to the Office. On a monthly basis, a Unit Manager carried out a 'spot' cash check. Again, a random sample of documentation recording these checks was viewed, and found to be appropriate.

STANDARD 6 - RESPECT, AUTONOMY AND PROTECTION AGAINST MISTREATMENT

A climate of mutual respect exists between staff and prisoners. Prisoners are encouraged to take responsibility for themselves and their future. Their rights to statutory protections and complaints processes are respected.

Commentary

Throughout the prison, staff and prisoners have a mutual understanding and respect for each other and their responsibilities. They engage with each other positively and constructively. Prisoners are kept well informed about matters which affect them and are treated humanely and with understanding. If they have problems or feel threatened they are offered effective support. Prisoners are encouraged to participate in decision making about their own lives. The prison co-operates positively with agencies which exercise statutory powers of complaints, investigation or supervision.

Inspection findings

Overall rating: Satisfactory performance ●

Relationships between staff and prisoners appeared to be positive throughout the prison. This was particularly evident with interaction involving the chaplaincy team, inspectors commented that it was clear that the chaplaincy team played a key role within the establishment. This was **practice worthy of sharing**.

It was felt that prisoners' views were both welcomed and listened to where matters in regard to their management were concerned. Having said that where prisoners had complaints or issues there were satisfactory forms of redress, be it, through the Independent Prison Monitors (IPMs) or the prison complaints process. The complaints process was well embedded and viewed as fair by the vast majority of the population.

Where breaches of Prison Rules did occur this was managed as expected through the Orderly Room. This was however conducted in more of a supportive rather than fully disciplinarian fashion and was viewed as positive. When there was a requirement to restrict a prisoner's access to aspects of the regime this was done in an appropriate and just manner allowing prisoners the right to representation as part of the process.

There were satisfactory systems and processes in place to allow prisoners access to legal or consular advice should the need arise.

In particular the process by which prisoners applied for and were subsequently allocated work was viewed as good practice. This involved in depth meaningful discussion around skills and preference with a focus on future plans on release where appropriate.

Quality Indicators

6.1 Relationships between staff and prisoners are respectful. The use of disrespectful language or behaviour is not tolerated.

Rating: Satisfactory performance ●

Throughout the course of the inspection there were numerous examples of positive relationships between staff and prisoners. In the halls in particular it was clear that the atmosphere was relaxed but controlled. There were some indications from a small minority of prisoners that they were uncomfortable with the attitudes of some staff in the long-term hall, however no evidence to support this was found. As noted in 3.4 residential staff must ensure that they do not become confined to the desk area. In the Links Centre where large numbers of prisoners were observed interacting with a range of staff throughout the day it was obvious that the staff were in control but in a manner which promoted positive interactions with prisoners encouraging their participation in education and other forms of purposeful activity. This was also true of the many workplaces visited. Overall relations were observed as positive.

6.2 Staff respect prisoners' needs for privacy and personal life.

Rating: Satisfactory performance ●

Staff were conscious of the need to hold some conversations other than the day to day interactions with prisoners in private. This was observed on a number of occasions throughout the inspection. In particular where conversations around work opportunities, progression, health concerns or for example housing needs in preparation for release were required these were done in an appropriate setting.

6.3 Staff respect prisoners' rights to confidentiality in their dealings with them.

Rating: Satisfactory performance ●

As noted in 6.2 staff were aware of the need to hold appropriate conversations in private. There were a number of offices available throughout the prison and were seen to be routinely used. Prisoners also reflected the fact that they felt they were afforded the right degree of privacy when the situation required a private conversation to take place.

6.4 Staff achieve an environment within the prison that is orderly and predictable. Their use of authority in achieving this is seen by prisoners as legitimate.

Rating: Satisfactory performance ●

The prison was seen to be run in an orderly and predictable manner. It was impressive how the staff and management were able to manage two very distinct and separate elements of the population either completely separately or as part of a

mixed regime. It cannot be overestimated how difficult this was to achieve. To have both short and long term prisoners mixing on a daily basis in some areas of the prison takes a controlled and predictable approach from staff. This degree of control was exercised in a manner which was both expected and well received by the prisoner population. A number of examples were observed however probably the most notable was the series of route movements which occurred throughout the day in order to maximise attendance at purposeful activity. Observations of staff interactions with prisoners in the residential environment revealed a setting which appeared both relaxed and controlled.

6.5 Staff challenge prisoners' unacceptable behaviour or attitudes whenever they become aware of it. They do this in a way that is assertive and courteous.

Rating: Satisfactory performance ●

The formal mechanism for challenging prisoners' unacceptable behaviour was the Orderly Room. A number of adjudications viewed were handled in both an appropriate and supportive manner rather than a strictly disciplinarian fashion. Prisoners were appropriately challenged for either their language or the manner of their behaviour. There was no negative evidence found in relation to this indicator. The overall picture during the inspection was one where staff were comfortable challenging prisoners in a measured and appropriate way when the need arose.

6.6 Any limitations imposed on prisoners' freedoms or access to facilities are justified and the reasons for them are courteously communicated to the prisoners.

Rating: Satisfactory performance ●

Throughout the course of inspection it was obvious that where limitations were imposed on a prisoner this was done so as a last resort. It was also communicated by a number of managers that there was a real focus on evidence and appropriateness where restrictions were to be imposed. The numbers in the SRU were relatively low (6). Staff and management in this area were able to evidence both meaningful and purposeful dialogue with prisoners aimed at facilitating inclusion in the main prison regime if not in Low Moss then in another setting. Another example of limitations which were imposed was that of closed visits which at the time of inspection applied to six prisoners. Those involved were given the chance to make representations and kept fully aware of the decisions which were taken and the reasons for those decisions. There was no evidence of limitations being imposed in a manner which was not consistent or fair either in terms of procedural justice or from the prisoners perspective.

6.7 The operation of the system of privileges promotes a climate of activity and purpose, prisoners' responsibility for their own affairs and good face to face relationships with staff.

Rating: Not applicable ○

Low Moss did not operate a system of Incentives and Earned Privileges.

6.8 The system by which prisoners may apply and be selected for paid work reflects as fully as possible systems of job application and selection within the community.

Rating: Good performance 

The system by which prisoners were selected for paid work was both fair and thorough. A purposeful activity allocation interview was carried out by a member of staff in the Links Centre in a one-to-one setting. At this interview the prisoner was given the opportunity to apply for a job of their choice and where possible this was met. Evidence was provided which demonstrated that prisoners were allocated dependent on choice, skills, previous work experience and the desire to gain new skills and experience. This was balanced with the needs of the establishment in a fair and reasonable manner. If a prisoner was unhappy with his place of work he could apply for a change and this was generally accommodated following interview and discussion around a new work place opportunity. The system in place was thorough and professional and left inspectors feeling that the prisoner was involved in all aspects of the decisions which affected them in regard to the allocation of work placement.

6.9 Prisoners are consulted about the range of recreational activities available to them.

Rating: Satisfactory performance 

Prisoners were consulted about a range of aspects in relation to the regime. Consultation had taken place on for example access to outside football. Whilst there was the feeling that prisoners could consult with staff on what was available there were limits on what staff could do to meet the wishes of the prisoners. This was not only applicable to Low Moss but other prisons.

6.10 Prisoners are consulted about the range of products available through the prison canteen.

Rating: Satisfactory performance 

As with all SPS prisons the products provided through the canteen were done so via a national contract. A consultation event was held quarterly with prisoners regarding the products available however there was an opportunity for prisoners to submit a suggestion for change regarding canteen provision. One issue raised was the price of tobacco available and the comparison with the wages available. This was a concern for a number of prisoners. This was not solely an issue for Low Moss. On a positive note there was a value range of products such as toiletries for prisoners who had access to less earnings than others which ensured a degree of choice commensurate with personal cash available.

6.11 The systems for reserving places on recreational and cultural activities are equitable between prisoners and allow them to exercise personal choice.

Rating: Satisfactory performance ●

It was clear that staff in both the residential and Links Centre areas were aware of the need for fair and equitable access to any events that took place within the prison. This was done so in a manner which facilitated the need to keep prisoners separate who required to be managed in this manner for any reason. Essentially the flat co-ordinator put a flyer up advertising events and staff working in the area encouraged prisoners who were interested to put their names down for inclusion. The lists were then managed by a FLM who ensured appropriate co-ordination prior to the event taking place.

6.12 The systems for regulating prisoners' access to money held in their prison account and their own property allow them to exercise personal choice within the constraints of the law.

Rating: Satisfactory performance ●

Prisoners accessed their own personal cash in line with other SPS establishments. The system appeared to be well embedded with no issues. When cash was handed in to the establishment for prisoners it was securely managed and appropriately receipted. Prisoners were allowed appropriate access to their own property in line with other establishments.

6.13 The limits on the actions staff can take in implementing security procedures are observed.

Rating: Satisfactory performance ●

Where limits were imposed on prisoners such as those held outwith normal circulation these were done in a manner consistent with fair and procedural justice. A number of prisoners were held in the SRU under Rule conditions during the inspection, all paperwork was checked from this cohort and was found to be in order. It was observed that interactions between this group of prisoners and the staff charged with managing them were of a positive nature with an emphasis on calm orderly engagement between both parties.

6.14 The rules in relation to medical supervision of activities and persons in circumstances of increased risk of harm or mistreatment are observed.

Rating: Satisfactory performance ●

Where rules were applied in relation to medical supervision this was done so in a fair and consistent manner. A positive example in relation to this was the work done by the Physical Training Instructors (PTIs) who encouraged and supervised prisoners subject to Rule 41 conditions to take part in activities in smaller groups known as 'pathways' in order to build confidence and esteem. This consisted of activities such as walking or activities that required hand-eye co-ordination, where the emphasis

was placed on the individual rather than getting large groups of prisoners involved in an activity. It was apparent that where medical rules were applied this was done so with the best interests of the prisoner.

6.15 Procedures and decisions conform to established standards of natural and administrative justice.

Rating: Satisfactory performance ●

A number of examples were provided which confirmed that procedures and decisions conformed to natural and administrative justice. The Orderly Room was observed on a number of occasions chaired by a variety of senior managers and found to be compliant in this regard. Paperwork applying to prisoners subjected to rule conditions was reviewed and found to be in order as was the process for the application of closed visits and the right to representation throughout.

6.16 Prisoners' international human rights as asserted in law are respected.

Rating: Satisfactory performance ●

In relation to materials which could be viewed by prisoners regarding human rights law they were not available without the prisoner having to ask for them. It was not however viewed that this was done in a manner preventing prisoners from accessing such materials. Low Moss affirmed that they were consistent with the application of the law in relation to all groups of prisoners and where a disenfranchised group existed appropriate support would be utilised.

6.17 Prisoners are kept well informed about prison procedures and how to access services available to them.

Rating: Satisfactory performance ●

Prisoners were kept informed about prison procedures by staff and via notices around the prison. In relation to Prison Rules it was refreshing to note that copies were readily available throughout the prison. There appeared to be a climate where staff were approachable and keen to sort out any issues or questions prisoners may have in relation to regime or aspects of their sentence management.

6.18 Prisoners are kept well informed about events taking place in the prison.

Rating: Satisfactory performance ●

Prisoners were kept informed about events taking place within the prison. This was done either by word of mouth from hall staff or via key members of staff such as the chaplaincy team. Notices were also displayed advertising forthcoming events.

6.19 The prison reliably passes critical information between prisoners and their families.

Rating: Satisfactory performance ●

Where critical information came into the prison via a family member the prison ensured this was communicated timeously. This was conveyed either by prison staff, however in many cases, especially sensitive ones, excellent use was made of the chaplaincy team with whom it was apparent a number of prisoners had a very positive relationship.

6.20 Prisoners' access to information necessary to safeguard themselves against mistreatment or arbitrary decisions is observed.

Rating: Satisfactory performance ●

Prisoners from all groups within the prison confirmed they were happy to talk to staff about information they required if it was not readily displayed within their living environment. Copies of Prison Rules and a range of complaint forms were readily available on all flats in the residential halls. There was also a means by which prisoners could raise concerns around their medical treatment and staff were fully aware of this mechanism and happy to talk prisoners through this.

6.21 The prison complaints resolution system works well.

Rating: Satisfactory performance ●

The prison complaints resolution system worked well within Low Moss. A number of complaints and responses were reviewed and found to be both appropriate and within the required timescales. The Internal Complaints Committee (ICC) was attended during the inspection process. Three prisoners chose to attend and a further four cases were held where the prisoner chose not to attend. In the three cases where the prisoner did attend they were given appropriate opportunity to explain their grievance and a full discussion ensued. In all of these cases a fair and reasonable response was given. In the cases where the prisoner chose not to attend an equally full review of all documentation took place and the complaint was dealt with in a fair and reasonable manner. Inspectors were satisfied that the process for raising complaints and their subsequent management worked well.

6.22 The NHS complaints resolution system works well in the prison.

Rating: Generally acceptable performance ●

Patient feedback and complaint forms were available in each Hall. There was a clear process in place for responding and managing complaints and feedback from patients. Complaints were allocated to a primary care, addictions and mental health nurse as appropriate. The response in writing would be within 3 working days. Nursing staff told us that this was an additional burden on them to comply with the tight time lines.

We were told that if a patient made a complaint, healthcare staff would record the initial discussion with the patient in the patient's Vision record. **This was a concern.** Complaints records should always be kept separate from health records to safeguard patient confidentiality. The clinical health record should only record information which is strictly relevant to the patient's health. On reviewing training records we noted that only 3 out of 31 staff had received complaints training.

6.23 The system for allowing prisoners to book interviews with independent prison monitors works well.

Rating: Satisfactory performance ●

There was a means by which prisoners are able to contact Independent Prison Monitors. This could be done by either leaving request forms which were readily available in the box provided on each of the residential flats or by contacting the team via the free phone telephone line. There was also information displayed informing prisoners how to contact the Scottish Public Services Ombudsman (SPSO) on each of the residential flats.

6.24 The prison gives every assistance to agencies which exercise statutory powers of complaints, investigation or supervision.

Rating: Satisfactory performance ●

The prison had good relations with external agencies such as the SPSO and the Information Commissioner's Office. Decisions were appropriately communicated to prisoners and subsequent information from external bodies was available throughout the prison.

6.25 Prisoners are afforded unimpeded and confidential access to legal advice, the courts and agencies which exercise statutory powers of complaints, investigation or supervision.

Rating: Satisfactory performance ●

Prisoners' access to legal advice was unimpeded. Legal visits could be booked via the dedicated booking line or prisoners could contact their legal representative via the telephone. There was adequate provision in terms of time, space and availability of staff to facilitate agents visiting their clients. These visits were conducted in accordance with Prison Rules in sight but out of earshot. A video conferencing facility was also available.

6.26 Citizens of states other than the UK are afforded confidential access to their states' representatives. Refugees and stateless persons are afforded privileged access to a consular office of their choice and to organisations or agencies that protect their interests.

Rating: Satisfactory performance ●

Evidence provided indicated that refugees and stateless persons would be afforded the required access. Although no such instances were in motion at the time of the inspection satisfaction was gained from the person responsible for ensuring this would happen should the need arise. The manager competently spoke through the persons who would be contacted and the method used for managing any such cases.

6.27 Prisoners are afforded confidential access to members of national and international parliaments who represent them.

Rating: Satisfactory performance ●

As above no such requirement was in place at the time of the inspection however information provided indicated this would be quickly instigated should the need arise.

STANDARD 7 - PURPOSEFUL ACTIVITY

All prisoners are encouraged to use their time in prison constructively. Positive family and community relationships are maintained. Prisoners are consulted in planning the activities offered.

Commentary

The prison assists prisoners to use their time purposefully and constructively. Prisoners' sentences are managed appropriately to prepare them for returning to their community. The prison provides a broad range of activities, opportunities and services based on the profile of needs of the prisoner population. Prisoners are supported to maintain positive relationships with family and friends in the community. Prisoners have the opportunity to participate in recreational, sporting, religious and cultural activities.

Inspection findings

Overall rating: Good performance



A good range of purposeful activity was on offer which encouraged prisoners to engage in the prison regime.

A visits programme was in place to promote family contact specifically encouraging children's visits. Visits were facilitated in a large, bright and welcoming room with access to an external seating area.

The Family Case Management Team (FCMT) had worked closely with Early Years Scotland to secure funding to further develop the Family and Friends Centre.

There were robust Integrated Case Management (ICM) processes in place with prisoners and their families invited to participate. HDC arrangements were in place. The short term prisoner case management model was supported by Airmaps.

The prison based Psychology Team had developed a STIP aimed specifically at short term offenders covering problem solving, motivation and goal setting, offending behaviour and substance misuse. This programme had been deemed a success and was now being rolled out as a pilot at HMP Perth.

A range of programmes were delivered. Recent revised guidance from SPS HQ had meant changes to the existing prioritisation policy for prisoners seeking to access the Constructs programme. Although this was a concern during the transitional period this new procedure was being reviewed on a quarterly basis to ensure that prisoners were able to access identified offending behaviour programme at the appropriate stage in their sentence.

Prisoners could access 1 hour a day exercise in the open air with appropriate clothing provided during inclement weather.

The chaplaincy team provided a range of religious, spiritual and pastoral services which were integrated into the wider prisoner management regime, which was highly regarded by the prisoners who accessed their support.

Quality Indicators

7.1 The prison maximises the opportunities for prisoners to meet with their families and friends.

Rating: Satisfactory performance ●

Visits were booked by visitors by phoning the booking line, some prisoners complained that it was difficult for their visitors to book visits due to the telephone line always being busy.

The FCMT offered support and advice for those who may have concerns about their friends or family whilst they are in custody, connecting visitors with support agencies as and when required.

A variety of events and activities were offered to promote family contact including baby massage classes, dedicated children's visits and the Father's Programme delivered in partnership with Early Years Scotland. The visitors' information booklet was a helpful resource for families visiting the prison and was **practice worthy of sharing**.

7.2 The arrangements made for admitting family members and friends into the prison are welcoming and offer appropriate support.

Rating: Satisfactory performance ●

Family access was positive with visits being facilitated in a large, bright and welcoming room with access to an external seating area. Visitors were subject to appropriate administration and security measures. There was a recently refurbished Family and Friends Centre where visitors could wait prior to the start of their visit. Low Moss had secured funding to work in partnership with Early Years Scotland to further develop this facility.

Visitors could purchase snacks and soft drinks during the visit from a canteen facility run by the Low Moss Community Volunteer group who worked in the Family and Friends Centre and the visit area to help ensure that families had a positive visiting experience. They also helped in the homework club, storytelling and play area.

The visits programme included dedicated children's visits encouraging children to visit between 17:30 and 18:30 on a Tuesday, Wednesday and Thursday and between 14:00 and 15:00 on a Sunday. The children's visits in the early evening provided a hot evening meal to those who visit - this was **practice worthy of sharing**. During the inspection visitors praised the facilities and overall visits programme.

7.3 Any restrictions placed on the conditions under which prisoners may meet with their families or friends take account of the importance placed on the maintenance of good family and social relationships throughout their sentence.

Rating: Satisfactory performance ●

Generally visits were held in open conditions within the main visit room. However when restrictions applied a closed visit would be held. At the time of inspection there were 6 prisoners subject to such conditions. During the inspection the closed visits review system was observed as being applied, as was the identification and management of banned visitors.

7.4 The atmosphere in the visit room is friendly and, while effective measures are adopted to ensure the security of the prison and safety of those taking visits, supervision is unobtrusive.

Rating: Satisfactory performance ●

Visits staff were observed to be courteous, professional and unobtrusive while visits were taking place. The Family Contact Officer (FCO) was seen as being helpful and a source of support for families visiting the prison. Although the post of Family Contact Management Officer was currently vacant this was actively being recruited.

The atmosphere within the visits area was relaxed and as noted in 7.2 visitors had the opportunity to purchase snacks and soft drinks from the canteen area during visits.

7.5 Opportunities are found in the prison for prisoners to interact with family members in a variety of parental and other family member roles.

Rating: Good performance ✓

Regular family events were run within the visits area to promote family contact including baby massage classes, dedicated children's visits and the Father's Programme in partnership with Early Years Scotland. Father's Day activities were scheduled as part of the children's visit programme – this was **practice worthy of sharing**.

Low Moss also had a dedicated Scout/Guide group for children aged 5-16 run by qualified leaders from the local community. These sessions were fun and educational and encouragement was given for children to join a similar group in their local community. Various other initiatives were available during the children's visit on other nights, ie Book Bug Club, Homework Club and Arts and Crafts. An area of concern brought to the inspectors attention was that the soft play area had been removed. This was apparently due to concerns that it was not conducive to promoting positive family relationships when some children spent the duration of the visit in the area and not with the parent.

7.6 Where it is not possible for families to use the normal arrangements for visits, the prison is proactive in taking alternative steps to assist prisoners in sustaining family relationships.

Rating: Satisfactory performance ●

Prisoners could access Exceptional Escorted Days Absence (EEDAs), accumulated visits, inter-prison visits and inter-hall visits in accordance with national criteria. Virtual visits via video-conferencing were not in place at the time of inspection but they were being considered.

7.7 The arrangements to facilitate a free flow of communication between prisoners and their families help the prisoners to sustain family ties.

Rating: Satisfactory performance ●

Prisoners could access telephones and communicate by letter to sustain family relationships. Through the learning centre prisoners were involved in creating art work and on occasion anthologies of creative writing which could be sent out to family members. The 'email a prisoner' scheme enabled incoming emails however a hand written reply was required. Consideration was being given on how this scheme could be further developed.

7.8 Prisoners and where appropriate their families, participate in their case management. Prisoners are consulted about case management decisions reached.

Rating: Good performance ●

Prisoners and their families where appropriate were invited to participate in their case management. Information on the ICM process was available for families and was included in the invitations sent to families requesting their attendance. Last year 425 ICM case conferences took place, of which 344 were attended by the prisoner and 85 by a family member which was an improved performance from the previous year.

7.9 Prisoners are encouraged to maintain and develop a range of social relationships that will help in their successful return to their communities on release.

Rating: Good performance ●

Prisoners were encouraged to participate in the prison regime including work parties and learning opportunities; physical education; chaplaincy and throughcare programmes; behavioural change programmes and interventions; visits and family contact and recreation where a range of social relationships to support their release was demonstrated.

The Family Contact Programme promoted events to develop and maintain family bonds, including baby massage, dedicated children's visits and in partnership with

Early Years Scotland a Father's Programme had been introduced to enhance the and strengthen the bond between the Father, Mother and Child through interactive learning. Father's Day activities were scheduled as part of the Children's visit programme - this was **practice worthy of sharing**.

The Self Change Programme (SCP), delivered by Psychologists and Programmes Officers provided the opportunity to promote positive relationships with community social work services to support re-integration and follow up. SCP had recently been audited by the National Offender Management Service⁶. The criteria achieved for delivery and treatment management was set at ACHIEVED (the highest rating possible) - this was **practice worthy of sharing**.

The Low Moss Prisoner Support Pathway (PSP⁷) promoted social interaction through a multi-agency partnership with Turning Point Scotland, Action for Children, SACRO and SPS preparing prisoners for community re-integration. Concern was raised about on-going funding of this initiative not being safeguarded.

7.10 The prison operates an individualised approach to effective prisoner case management.

Rating: Satisfactory performance ●

There were established ICM processes and procedures in place to support the assessment of prisoners individual risk and needs with referrals generated appropriately. Long term prisoner case management was facilitated by the Enhanced ICM process. Prisoners were allocated a personal officer who was rostered case management time from the residential function to provide individualised case management. Some officers raised concerns that staff shortages resulted in a reduction in allocated case management time. This should be monitored by line managers.

A new system for the completion of core screening was being tested at the time of the inspection due to the lack of prisoner engagement in the Links Centre. The Programmes Officer visited the residential halls to encourage prisoner engagement and this had led to a significant increase in core screen completions within 72 hours.

⁶ National Offender Management Service (NOMS) was an executive agency of the Ministry of Justice responsible for the correctional services in England and Wales was replaced on 1 April 2017 by Her Majesty's Prison and Probation Service (HMPPS).

⁷ Low Moss PSP is a partnership involving a number of third sector organisations and the SPS (and previously the Community Justice Authorities for Glasgow and North Strathclyde), which has been supported by funding from Scottish Government, charitable grant funding, and SPS resources. The PSP partners co-designed, piloted and are delivering a service to coordinate support services to offenders from third and public sector organisations, supported by PSP case workers and peer mentoring. Turning Point Scotland is the lead third sector organisation, alongside SACRO, Action for Children and Y People, whose staff work in partnership with SPS staff to provide throughcare support.

The short term prisoner case management model was supported by Airmaps which was being piloted at Low Moss as part of the case management 'test of change' being carried out by SPS HQ.

7.11 The systems and procedures operated by the prison to identify or select prisoners for release or periods of leave outside the prison are implemented fairly and effectively.

Rating: Good performance 

HDC arrangements were in place with systems to identify eligible prisoners. The RMT was multi-disciplinary, although NHS did not always attend, with responsibility for considering conditions of lower security and temporary release in line with national guidance. We observed an RMT meeting which was well managed with relevant information available, including informal input from Healthcare.

In 2016/ 17 the total number of prisoners released on HDC was 150 and the total number recalled during the same period was 25. Low Moss had recently received substantial assurance from the SPS HQ Audit and Assurance Team for standards of HDC delivery.

7.12 Sentence management procedures are implemented as prescribed and take account of critical dates for progression, release on parole or licence.

Rating: Generally acceptable performance 

The Behavioural Change Team were responsible for identifying critical dates for progression eligibility, parole and release in accordance with national prioritisation guidance. Offending behaviour programmes selection and allocation took cognisance of critical dates.

Revised guidance from SPS HQ had meant changes to the prioritisation policy for prisoners seeking to access spaces on the Constructs programme. This meant that the number of prisoners whose critical dates were not being met had increased from 5 to 20. Low Moss was at the time of inspection engaging with the prisoners affected to gauge motivation and willingness to transfer to another establishment to enable them to undertake this programme. This was a concern specifically during this initial transition period until the list stabilises. Staff briefings were issued and prisoner focus groups held to ensure information regarding this new procedure was understood. This situation should continue to be monitored to ensure that prisoners were able to access the appropriate offending behaviour programme taking account of critical dates. Whilst it is acknowledged that the SPS, at a corporate level are reviewing this situation on a regular basis it is imperative that work is undertaken to ensure that all prisoners access identified programmes and interventions identified for them in line with their critical dates.

7.13 The risk management measures that have to be observed in respect of prisoners serving Orders for Lifelong Restriction (OLR) and those subject to Multi-Agency Public Protection Arrangements are implemented.

Rating: Good performance 

During the inspection 5 prisoners subject to an OLR were in custody at Low Moss. These cases were managed by the Lifer Liaison Officer in accordance with national guidance and timescales.

Multi-Agency Public Protection Arrangements (MAPPA) arrangements were being co-ordinated for a high profile individual being released from Low Moss at the time of the inspection. Risk management planning with key partners had been developed for pre-release implementation in accordance with national guidance.

Staff and partners involved demonstrated a good knowledge of these processes and reported good working relationships between the prison and community.

7.14 There is an appropriate and sufficient range of employment and training opportunities available to prisoners.

Rating: Good performance 

There was a good range of employment activities available to prisoners. Many of the activities included the opportunity for prisoners to undertake relevant qualifications whilst gaining practical skills. For example, many prisoners gained useful employability certificates in industrial cleaning and food hygiene. In vocational training, the prison offered National Progression Awards in Construction and Cosmetology. In the last 12 months 2,057 vocational awards from Scottish Qualification Authority (SQA) and other awarding bodies were achieved by prisoners.

The prison has re-introduced external work placements for prisoners nearing the end of their sentence. A number of employers had guaranteed prisoners employment following their release if they successfully completed their work placement.

7.15 There is an appropriate and sufficient range of educational, including physical and health educational, activities available to the prisoners.

Rating: Good performance 

Overall the prison offered an appropriate range of educational and physical activities for prisoners which met their needs well. Currently SPS contracts with New College Lanarkshire to deliver educational activity at Low Moss. The learning centre timetabled around 103 classes each week. Much of the learning was self-directed and supported well by tutors where required. A number of classes, such as communications and philosophy had direct input from tutors and involved group work and lively discussion. Prisoners participated well in a suitable range of subjects. Some prisoners studied flexible learning units by distance learning and a few prisoners were studying programmes with the Open University.

Staff in the learning centre were using classes such as creative writing and philosophy to provide wider learning experiences for prisoners and prisoners were responding positively to these approaches. The teaching team were particularly skilful at developing strong partnerships with external organisations and these resulted in meaningful live projects which prisoners were able to contribute to. For example, a current initiative with the Paisley 2021 Committee to assist Paisley in its bid to become City of Culture 2021 resulted in the learning centre's *Passion for Paisley* project which prisoners were enjoying contributing towards.

Almost all learning centre activities were certificated and in the last 12 months 220 awards from SQA and other awarding bodies were achieved by prisoners.

7.16 There is an appropriate and sufficient range of therapeutic, treatment and cognitive development opportunities available to prisoners.

Rating: Good performance 

The Psychology Team had completed the development of the STIP which was offered to adult prisoners who were motivated to address their offending behaviour. The programme aimed to reduce rates of reoffending and promote pro-social life choices and covered modules relating to problem solving, motivation and goal setting, offending behaviour and substance misuse. During 2016-2017 the programme was delivered to 150 short term prisoners. At the time of inspection 46 prisoners were on the waiting list for the programme. The programme was also being implemented as a test of change at HMP Perth with Low Moss supporting staff training and supervision during the pilot phase. The STIP programme was **practice worthy of sharing**.

A range of programmed interventions were delivered. In addition, prisoners could access Alcoholics Anonymous and Narcotics Anonymous peer support meetings with Open Secret⁸ delivering trauma support. The chaplaincy team also offered a range of services to support prisoners. Prisoners with complex mental health problems were supported through a weekly group called Talking Heads.

The completion of the Generic Programme Assessments (GPA) was supported by multi-agency working. All programme recommendations were made through a multi-agency Programmes Case Management Board (PCMB) which was observed during the inspection as fulfilling its role effectively.

The establishment monitored purposeful activity performance via a dashboard that recorded booked activities, attendance and non-attendance. This monitoring tool was introduced in January 2017 and did not include therapeutic and behavioural programmes. The establishment should consider further developing the dashboard to encompass all aspects of purposeful activity.

⁸ Open Secret provided confidential counselling services to survivors of childhood abuse.

7.17 There is an appropriate and sufficient range of social and relational skills training activities available to prisoners.

Rating: Satisfactory performance 

As outlined in 7.9 there was a range of social and relational skills training activities available to prisoners through participation in the prison regime and behavioural change programmes. In addition the establishment had hosted a number of events to promote social interaction including a project on Robert Burns, Holocaust Memorial Day, White Ribbon '16 Days of Action' against domestic violence and a Health Improvement event focussing on NHS smoking cessation services.

7.18 All purposeful activities provided are of good quality and encourage the engagement of prisoners. Prisoners are consulted in planning the activities offered.

Rating: Good performance 

The quality of purposeful activities in the learning centre and in work parties was of a high standard and most prisoners who participated in them were fully engaged. Prisoner/staff relationships were positive and respectful and this created a purposeful environment for learning and working. In the learning centre, staff teaching was of a high standard with all staff responding well to prisoners' learning styles and needs. This was accompanied by high quality learning material which was prepared to a professional standard. Leadership for learning was strong. The Learning and Skills Manager led her team effectively and encouraged her staff to be innovative within the classroom.

The Head of Offender Outcomes and managers of Employability and Services adopted a positive strategic view on the development of employability programmes and opportunities for prisoners. For example, two employability events had taken place supported by over 100 employers who shared their views and expertise on employment opportunities for prisoners. A third event, to be held soon, would focus on how prisoners, as citizens, could gain work after release. Prisoners were actively engaged in the busy workshops and production areas and were appreciative of the support provided by staff.

7.19 The scheduling of activities and individual prisoner's access to them is organised so that each prisoner takes part in the activities agreed for them.

Rating: Generally acceptable performance 

Generally prisoners were able to access and participate in the purposeful activities that were agreed for them. Prisoners who were involved in work parties were able to attend education classes without it impacting negatively on their wages.

A purposeful activity allocation board met weekly and assigned prisoners to an appropriate work party. There were short waiting lists for some of the more popular groups but they were kept to a minimum level.

Recent changes to the certification of prisoners' fitness for work had resulted in a higher number of prisoners not attending work parties and education classes. Attendance at work parties over the longer term was a concern. Managers of work parties had over-subscribed places to combat non-attendance, which often resulted in the unintended consequences of higher levels of prisoners being returned to the halls.

7.20 All prisoners have the opportunity to take exercise for at least an hour in the open air every day. Provision is made for this to be realistically available in all seasons and conditions of weather.

Rating: Satisfactory performance ●

Prisoners could access at least 1 hour a day exercise in the open air with waterproof clothing provided for use during inclement weather. Evening exercise was scheduled for convicted prisoners between 17:30 and 18:30 Monday to Friday to accommodate the purposeful activity regime. Some prisoners expressed concern regarding this exercise period with a preference for daytime exercise periods. The residential halls had secure hard surface exercise areas which were well attended by prisoners. Outdoor football facilities were available for organised football sessions facilitated by sports and games officers and PTIs.

7.21 Prisoners are assisted in their religious observations.

Rating: Good performance ●

The chaplaincy team provided a wide range of religious, spiritual and pastoral services as well as a varied programme of courses. Prison Fellowship also met on a weekly basis. A number of chaplaincy related events were scheduled throughout the year.

The chaplaincy co-ordinator was responsible for the local management of chaplaincy services and during the inspection was observed as being highly proficient in his role, demonstrating effective prisoner management and positive relationships with staff, partners and management. A high number of referrals to chaplaincy were made by staff and partner agencies to support prisoners in times of emotional distress, bereavement, for the provision of volunteer visits, mental health support and advice, faith and throughcare, and for general spiritual guidance. This was **practice worthy of sharing**.

The multi-faith room was large and functional and utilised effectively for delivering group work and related multi-faith services. During the inspection period Muslim prisoners choosing to take part in Ramadan were provided the opportunity to do so.

7.22 Prisoners are afforded access to a library which is well-stocked with materials that take account of the cultural and religious backgrounds of the prisoner population.

Rating: Generally acceptable performance 

Prisoners were able to access the library on request and a planned timetable allowed prisoners to attend from work parties, halls and the learning centre. The library contained a reasonable range of books including a fiction section, autobiographies, and other non-fiction texts. It contained a small number of foreign language books, but these did not fully meet the needs of the current prison population. The library had legal texts which prisoners could request and read on the library premises. However, there were no daily newspapers available and a very limited stock of magazines. There were no audio books available and prisoners were unable to book out DVDs for personal viewing. The small stock of DVDs were shown on a bespoke channel which prisoners could access in their cells.

The library was managed by a part-time librarian who worked two and a half days each week. He was supported by a full-time passman who was able to oversee the borrowing and returning of loaned items. Library staff encouraged prisoners to be involved in initiatives such as the Six Book Challenge, author visits and World Book Day events.

7.23 Prisoners are afforded access to participate in sporting or fitness activities relevant to a wide range of interests, needs and abilities.

Rating: Generally acceptable performance 

Prisoners were able to access good quality indoor and outdoor sporting and fitness facilities. The gym was well equipped with a suitable range of exercise and training equipment, although at the time of the inspection a number of exercise machines were awaiting repair. An indoor games hall was used well by prisoners for activities such as badminton and yoga and an outdoor all-weather football pitch was also available for prisoner use. Gym and outdoor football facilities were available to prisoners in the evening and at weekends. Prisoners were also able to access a range of cardio equipment in each residential hall. All prisoners completed an induction prior to accessing the fitness equipment.

A few initiatives, such as an over-45s session and a Pathways programme, were on offer to prisoners and these targeted classes were better meeting the needs of more prisoners. The PTIs had been proactive in liaising with external links and programmes, such as Show Racism the Red Card and the Homeless World Cup. However, currently no links were being pursued.

The number of prisoners able to access the facilities was restricted due to the impact of reduced staffing levels within the gym. The reduced staffing complement was also contributing to no certificated programmes being offered to prisoners in the gym.

7.24 Prisoners are afforded access to participate in recreational, self-help or peer-support activities relevant to a wide range of interests and abilities.

Rating: Generally acceptable performance 

Prisoners were given access to and a number of prisoners participated in a suitable range of recreational activities which promote wider skills and attributes. For example, the library and learning centre had supported prisoners to extend their reading range by taking part in the Six Book Challenge.

In most vocational workshops, some prisoners acted as peer tutors, supporting the vocational trainers as appropriate, and provided practical assistance to prisoners new to the programmes. In the learning centre, some prisoners also provided informal peer support to other prisoners with their learning activities. However, currently there were no formal peer-tutoring schemes operating within the prison and no training or awards to support the process.

7.25 Prisoners have access to a variety of cultural activities and events and are encouraged to participate in them.

Rating: Good performance 

Prisoners participated in a wide range of cultural activities and events which made a positive contribution to prison life. Strong and effective partnership working between prison staff and a range of national and local organisations resulted in a varied array of activities and events which promoted prisoner involvement in cultural activities.

Within the learning centre, prisoners took part in art and music classes. The music class was particularly popular and prisoners enjoyed the opportunity to learn new skills and play music together. A number of prisoners had also entered art items for the annual national Koestler Trust awards and last year Low Moss prisoners were awarded the highest number of Koestler Trust awards in Scotland.

Examples of activities and events included author visits as part of the Scottish Book Trust's Live Literature Funding scheme. A successful Robert Burns project included a visit to the learning centre by the actor John Cairney, a Burns Supper, involving recitals and readings and the publication of prisoners' poem supported by the Jean Armour Trust. A joint project with pupils from a local secondary school resulted in prisoners' work being shared at a national event to commemorate Holocaust Memorial Day.

Some prisoners were involved in a science project and fair with activities designed and delivered by researchers from the University of St Andrews. The science fair provided an opportunity for prisoners, staff, children and visitors to take part in science activities in a fun, engaging and meaningful way.

STANDARD 8 - TRANSITIONS FROM CUSTODY TO LIFE IN THE COMMUNITY

Prisoners are prepared for their successful return to the community.

Commentary

The prison is active in supporting prisoners for returning successfully to their community at the conclusion of their sentence. The prison works with agencies in the community to ensure that resettlement plans are prepared, including specific plans for employment, training, education, healthcare, housing and financial management.

Inspection findings

Overall rating: Satisfactory performance ●

There was a cohesive range of resettlement provision available for short-term prisoners returning to their community which was well co-ordinated through the PSP. Prisoners had access to some of the support while still in the establishment which meant that for those involved in the programme relationships were well established prior to release. All prisoners were offered interviews with key support agencies prior to their release and this helped to identify the level and kind of support they would need into the future.

In the main, programme work was prioritised and completed by prisoners while in custody. Although there had been a backlog for GPAs actions to improve access were in place. The ICM process was well established, well led and engaged key people that included good involvement from families. The establishment worked hard to get prisoners engaged with this process.

Access to employment and training generally worked well. Prisoners were supported to gain vocational and other qualifications to support access to employment on release. There was a good network of employers and well-coordinated access to the third sector to support access to employment.

Prisoners being released on statutory supervision were managed well although this could be improved for some by better communication between health and social work staff to help plan care within the community more effectively.

Quality Indicators

8.1 The prison encourages government agencies, private and third sector organisations who offer services relevant to the community integration needs of each prisoner to jointly agree an appropriate plan.

Rating: Good performance 

A wide range of organisations were involved and engaged to support short term prisoners pre-release. The ICM process effectively supported prisoners to plan for their release and coordinate agencies involved in providing continued support.

PSP staff worked well with prisoners as they approached their liberation date. Staff were actively engaged in planning for release and supporting prisoners to attend the range of appointments with housing staff, Department of Work and Pensions as well as community based social work when licence and supervision arrangements were in place. This service was working with around 100 prisoners as they neared liberation and a further 80 in the community. We found positive relationships in place between prison staff and PSP staff that supported good communication about prisoner needs and aspirations.

Staff in the work sheds often worked with prisoners who had not engaged with the PSP but had links to other third sector organisations including the Shaw Trust who were contracted to help prisoners with health problems and disabilities to move into work on release. In addition the establishment worked with and supported a number of employers who were willing to offer job opportunities to ex-prisoners. SPS staff provided valuable support, mainly by telephone, to some prisoners on release to encourage attendance at interviews and develop a positive work pattern.

8.2 Where there is a statutory duty on any agency to supervise a prisoner after release, all reasonable steps are taken to ensure this happens.

Rating: Satisfactory performance 

Notifications were sent at release to community based social work staff and Police Scotland in relation to prisoners who were subject to MAPPA arrangements. There were clearly linked approaches to considering risk that included appropriately shared risk assessments. Prison staff including the ICM coordinator along with PBSW attended pre-release MAPPA meetings that helped ensure that the most up to date information on risk was shared.

The high level of attendance of community based social work staff at the various ICM meetings helped provide continuity between Low Moss and the community. The ICM process was used well to identify and plan for continued prisoner support. Availability of NHS staff to attend ICMs or provide information to inform arrangements had sometimes hindered planning. Health and social work staff did not always share information appropriately to help inform support needs for the prisoner on release.

Where appropriate, prisoners were encouraged to be involved in voluntary supervision although those who had good engagement with the PSP did not generally seek this additional support.

8.3 Where prisoners have been engaged in development or treatment programmes during their sentence, the prison takes appropriate action to enable them to continue or reinforce the programme on their return to the community.

Rating: Satisfactory performance ●

The establishment was generally meeting targets for programme delivery for long term prisoners. Prisoner access to programmes and groups was prioritised through the PCMB and based on critical dates. The prison population had a high number of people with addictions which meant that programmes were in great demand. There was waiting list of around 40 prisoners for the Pathways programme.

Short term prisoners could access a range of vocational courses aimed at helping them gain employment on release. This included employment in waste management where they have seen successful progression. The development of skills in bakery and the development of the Freedom Bakery gave access to alternative careers.

There was the opportunity to continue with programmes in a community programme on release for prisoners. Community based social workers were provided with a post programme report to help link prisoners to appropriate community programmes.

8.4 As prisoners near release all reasonable steps are taken to ensure appointments and interviews are in place with relevant agencies.

Rating: Satisfactory performance ●

Staff were proactive in starting processes early in a prisoner's remand period or sentence to try to reduce the risks of losing tenancies and housing benefit. This included appointments with key agencies based within the Links Centre. Clear arrangements were in place to promote attendance at key appointments with systems in place to follow up those who failed to attend prison based appointments.

The role of the PSP provided valuable support to prisoners to attend appointments on the day of release and subsequently. Their involvement provided a high level of support to promote good engagement with housing and benefit providers as well as supporting individuals on a day to day basis. Where supported accommodation had been identified prior to release PSP staff accompanied prisoners to their new tenancy to introduce them to support workers. It was positive that vocational training staff sometimes supported prisoners to their first appointment with employers to help settle them into work.

Prisoners were provided with clear information about reporting arrangements to community based social work that included reinforcement of their licence conditions so that they had a clear understanding of the impact of their behaviour when they return to the community. Where social care support was needed for an individual

with disabilities contact was made with the relevant assessment and support agency prior to release.

8.5 As prisoners near release all reasonable steps are taken to ensure that accommodation will be available.

Rating: Satisfactory performance ●

Prisoners could access a range of local authority housing services within the prison. A housing group promoted by the PSP brought together these services in an attempt to streamline practice. Access to accommodation for those prisoners who were released to other local authorities was significantly patchier. Shelter Scotland was available to support these prisoners. Around 65% of prisoners were released to secured accommodation although this was often to short term and hostel accommodation. This meant that a substantial number of prisoners had to register as homeless on the day of release.

Staff working on PSP used personal mapping tools with prisoners to identify key goals and begin preparation prior to release to help prisoners plan for accommodation and how they will manage.

The supported accommodation provided by Y People as part of the PSP offered a good housing solution for some prisoners. However the cost of supported accommodation could be a disincentive to access employment where the level of housing benefit may not cover the housing support elements of rentals when in employment.

8.6 As prisoners near release all reasonable steps are taken to help them find work or enrol for training or education.

Rating: Satisfactory performance ●

Skills for employment staff worked well with prisoners to plan for employment on release. This included skills and learning within vocational training which involved qualifications that would support improved access to employment. The Shaw Trust provided support that helped reduce the risk of reoffending through sustaining individuals in employment.

The use of Airmaps as a skills mapping tool was beginning to generate focused referrals for employment skills training. This enabling approach had helped prisoners to identify skills or experience that they could build on to help them enter the jobs market. Staff recognised that many prisoners were not ready to access training or employment on release as other areas of their lives were too unsettled. However the range of agencies within the Links Centre worked with prisoners to be realistic on what they could do in relation to job searching and training to try to reduce the risks of failure at an early stage. Building confidence in relation to employment was a key focus and included working with prisoners to identify skills and develop a CV.

8.7 As prisoners near release all reasonable steps are taken to help them manage their financial affairs.

Rating: Satisfactory performance ●

There was a good range of support on offer to prisoners to manage their finances and to try to ensure that they were in order prior to release. PSP staff provided good support to prisoners to plan and manage their finances as they approached their release date as well as monitoring their progress when back in the community.

As part of the pre-release planning prisoners were supported to access documents such as photographic identity cards to enable them to open bank accounts if appropriate. Citizen's cards could be part funded by the establishment to encourage prisoners to secure this form of identity verification, which helped ensure ease of payment for those who would be in receipt of universal credit.

8.8 The prison reliably discharges its statutory duties to assist the resettlement of prisoners on release.

Rating: Satisfactory performance ●

The development of the services provided through the PSP as well as the range of support provided by staff and other agencies through the Links Centre meant that there was a good choice of enabling options to assist resettlement. The partnership with a variety of third sector organisations, which in the main provided support to short term prisoners, was well regarded by staff and prisoners.

The ICM process offered a staged approach to planning for resettlement. Reports to ICMs clearly set out what was working well and areas where improvement or continued work by the prisoner was needed. Staff involved in this process worked well together to help plan with the prisoner for their release. Clear efforts were made to help maintain family relationships as well as support fathers to continue to provide support to their children.

8.9 Where the prison offers any services to prisoners after their release, those services are well planned and effectively supervised.

Rating: Satisfactory performance ●

Community based social workers were generally engaged in the process for planning for release and attending pre- release ICMs so that prisoners had an awareness of their reporting requirements. Arrangements for prisoners who were subject to statutory release were well planned with supervision and case management in place. Robust arrangements to share information with community based colleagues to ensure awareness of licence conditions as well as the impact of any programmes completed in the establishment were in place.

In relation to short term prisoners a range of support was available that saw them receiving consistent support from the PSP during and after completion of their

sentence. Clear links had been made with support organisations based in the majority of local authorities responsible for the supervision of prisoners on release.

There was a clearly structured timetable to support planning for release throughout a prisoner's sentence. The range of services including PSP, housing, Department of Work and Pensions and vocational training all provided information to prisoners at induction. This helpfully set the scene for making the best use of support to plan for return to the community.

STANDARD 9 - EQUALITY, DIGNITY AND RESPECT

The prison employs fair processes whilst ensuring it meets the distinct needs of all prisoner groups irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation.

Commentary

The prison ensures that all prisoners experience equality of opportunity and outcomes whilst ensuring that the law that applies to any specific group of prisoners is implemented in ways that recognise and respect particular needs.

Inspection findings

Overall Rating: Satisfactory performance 

Equality & Diversity (E&D) appeared to be taken very seriously at a management level. There was leadership by the Governor, supported by a functional head with lead responsibility for co-ordinating work on equalities and human rights issues, assigned to a Unit Manager. Prisoners were represented on the E&D group and their participation encouraged through Community Forums.

However, beyond this structure, the individualised approach to identifying E&D issues depended heavily on the quality of individual relationships and may lead to differential treatment among those who do not benefit from such strong relationships. While we encountered a number of examples of good practice, there were a number of prisoners who were not aware of much of the assistance available to them and for whom issues appeared to have been missed.

Prisoners were clear that staff treat them with dignity and respect. From both our interviews and observations, there appeared to be a positive atmosphere between staff and prisoners. The issues raised were in relation to providing assistance or facilitating prisoners to access entitlements and processes, which was variable depending on staff.

The provision of information about entitlements and processes is fundamental to enabling prisoners to access their rights. The induction process was a positive structure for conveying information however, despite having attended these sessions, many of the prisoners we interviewed were not aware of basic information, such as the existence of IPMs or processes for raising an E&D issue. They appeared to rely much more heavily on other prisoners for information and assistance than on staff. We consider that prisoners who have additional needs, such as those with a learning disability or who are not proficient in English would struggle to follow the information provided at inductions, which may explain the gaps in knowledge among some prisoners. This was reflected in our interviews with non-English speakers. A number of adjustments are required to ensure that all prisoners have access to the information they require. Awareness of E&D complaints procedures was acknowledged to be low and steps should be taken to increase awareness.

While issues regarding the lack of information and communication were raised by a broader range of prisoners, we were concerned with the impact in particular on foreign nationals, who faced more difficulty in navigating the system and who were more isolated. This constituted a barrier for access to legal representation, medical services, complaint procedures, and other services.

There was positive evidence that the needs of prisoners with physical disabilities, those in the process of transforming from one gender to another and older prisoners were identified and provided for.

The chaplaincy was widely commended for the support it provided to all prisoners, particularly its use of innovative practices to approach issues facing the population, regardless of religion.

Understanding and support for protected characteristics was encouraged by a wide range of events held.

Quality Indicators

9.1 The prison's Equality and Diversity Strategy meets the legal requirements of all groups of prisoners including those with protected characteristics.

Rating: Satisfactory performance 

E&D appeared to be taken very seriously at a management level. There was leadership by the Governor, supported by a functional head with lead responsibility for co-ordinating work on equalities and human rights issues assigned to a Unit Manager. Quarterly E&D meetings were held, chaired by the Governor, with participation from senior management. Importantly, the meetings involved prisoner representation from both halls. While the minutes of the last two consecutive meetings were unavailable, we were able to view the E&D Action Plan which identified priorities, lead individuals with responsibility and relevant timescales.

The principal means for prisoners to raise E&D issues was through Community Forums. The Forums had raised positive E&D suggestions, such as the establishment of a section for older prisoners, which led to the development of the Over 45s section (see 9.3). The Forums do not, however, have an E&D focus. Prisoners who faced the most marginalisation would benefit from a forum to discuss their particular issues.

However, beyond this structure, there were challenges in ensuring E&D issues follow through to the experience of prisoners in the halls. We were advised that the approach to dealing with E&D issues was highly individualised. Often, rather than structured mechanisms for identifying issues, they arise from relationships between staff and prisoners and from general case management. This approach depends heavily on the quality of individual relationships and may lead to differential treatment among those who do not benefit from such strong relationships. We spoke to a number of prisoners who were not aware of much of the assistance available to them and for whom issues appeared to have been missed. Many of those prisoners did not know who their Personal Officer was and felt that, when they did raise issues, nothing was done. On the positive side, we encountered many examples of good practice where E&D issues had been formally identified, such as the tailored support provided to a prisoner whose first language was British Sign Language. The situation of foreign nationals demonstrated an example where the individualised approach did not appear to be working in practice.

We note that there has been only one E&D complaint in the last quarter and it was acknowledged that there was a lack of awareness of this process among both prisoners and staff. This was supported by our interviews with prisoners.

The role of the E&D Manager was carried out as an additional responsibility for a Unit Manager. In order for the gaps identified to be filled and for more proactive management of E&D issues to be taken, we consider that more resource should be devoted to the role. We recommend that steps are taken to raise awareness of E&D issues which might arise and the appropriate steps staff should take in those circumstances, including the complaints process.

Data on protected characteristics was collected during the reception process and added to from information gathered during first night in custody, the Links Centre etc. Gaps in the data on sexual orientation have already been identified and action was being taken to collect fuller information.

Understanding and support for those with protected characteristics was encouraged by a wide range of events, including the observance of religious festivals, Black History Month and Lesbian, Gay, Bisexual and Transgender History Month.

9.2 Staff understand and play an active role in implementing the prison's Equality and Diversity Strategy.

Rating: Satisfactory performance 

Prisoners were clear that staff treat them with dignity and respect. The issues raised were in relation to providing assistance or facilitating prisoners to access entitlements and processes, which was variable depending on staff.

The provision of information about entitlements and processes is fundamental to enabling prisoners to access their rights. The primary means for conveying this information was the induction process. It was positive that prisoners were offered a week of induction upon their arrival. Despite these sessions, many of the prisoners we interviewed were not aware of basic information, such as the existence of IPMs or processes for raising an E&D issue. They appeared to rely much more heavily on other prisoners for information and assistance than on staff.

We attended an induction session and examined the written information. We considered prisoners who had additional needs, such as those with a learning disability or who were not proficient in English would struggle to follow the information provided, which may explain the gaps in knowledge among some prisoners. This was reflected in our interviews with non-English speakers.

9.3 Prisoners of all ages are treated with dignity, respect and according to their individual needs.

Rating: Satisfactory performance 

The needs of prisoners in older age groups was explicitly considered and accommodated (see 9.1). Low Moss had established an "Over-45s" section, which arose from a wish from some older prisoners to have a quieter environment and a regime more suited to their needs. This was an initiative welcomed by both prisoners and staff and reports from that section were entirely positive. Staff were described as helpful and friendly and prisoners commented on the marked difference this initiative had had on their experience of prison life. We note that the section was not exclusively open to those over 45, which flexibility allowed for the most tailored responses to prisoners' needs. We applaud this initiative and to innovative approaches to house prisoners in a way that meets their needs.

9.4 Prisoners with disabilities are treated with dignity, respect and according to their individual needs.

Rating: Satisfactory performance 

Low Moss had six accessible cells which were of a high design standard. Social care was provided in line with prisoners' assessed needs and prisoners were provided with mobility aids as needed (or brought from home). Disabled prisoners were also able to access the rest of the prison. Efforts were underway to join up NHS care planning with social care planning processes within 72 hours of admission to the establishment, to ensure individuals' needs were met.

Our concerns in relation to the availability and accessibility of information may present a barrier to those with a learning disability. See 9.2.

9.5 Prisoners who have undergone or are in the process of transforming from one gender to another are treated with dignity, respect and according to their individual needs.

Rating: Satisfactory performance 

There were no prisoners within this category at the time of inspection, however, the information available suggests best practice was being followed.

We reviewed the case conference notes for an individual with whom discussions had taken place as to the potential of living in the opposite gender. These appeared to demonstrate good practice. We noted that the individual's wishes were explored and a clear offer of on-going support was made. In previous cases, the Transgender Alliance had been involved. In a particular instance, the chaplaincy offered on-going support to a transgender prisoner following their move to a female prison, in the absence of chaplaincy services at their receiving prison. A high degree of sensitivity was evident from such examples.

9.6 Prisoners who are married or who have entered into civil partnership unions are treated with dignity, respect and according to their individual needs.

Rating: Satisfactory performance 

Low Moss had performed one wedding with another one in preparation. Provision for weddings appeared to respect prisoners' wishes as far as possible and to offer an appropriate celebration.

It is important that SPS and Low Moss enabled and supported the right to private and family life for foreign nationals or those prisoners whose family were not able to attend visits. Alternatives to visits to include video messaging should be considered where appropriate.

9.7 Women prisoners are treated with dignity, and their individual needs are met including those associated with pregnancy and maternity.

Rating: Not applicable ○

Not applicable as only male prisoners were held in Low Moss.

9.8 Prisoners of all racial groups and nationalities are treated with dignity, respect and according to their individual needs.

Rating: Satisfactory performance ●

Prisoners reported being treated with dignity and respect, regardless of their racial group or nationality. There were no reports of racial tension or incidents among those we interviewed, including a number of foreign nationals.

Low Moss had a population of just over 30 foreign nationals at the time of our inspection. As had been noted in other inspection report, foreign nationals were a marginalised group whose isolation could be exacerbated by language barriers. We were concerned with the lack of information and communication provided to foreign nationals. This issue was raised by a broader range of prisoners, who spoke of requests for information or assistance not being responded to or not being followed up. Many prisoners did not find it worthwhile to seek assistance from staff and instead relied on other prisoners. This, however, appeared to impact in particular on foreign nationals who faced more difficulty in navigating the system and who were more isolated. This constituted a barrier for access to legal representation, medical services, complaint procedures, and other services.

9.9 Prisoners of all religious groups are treated with dignity, respect and according to their individual needs.

Rating: Satisfactory performance ●

The chaplaincy was widely commended for the support it provided to all prisoners, particularly its use of innovative practices to approach issues facing the population, regardless of religion. Regular services took place for those of Protestant, Catholic, Muslim and Buddhist faiths. Particular arrangements were made for those of less common faiths, including Sikhism and Judaism. Articles of faith and religious texts were available or obtained to enable the practice of all religions.

The chaplaincy ran a wide range of courses which contributed to rehabilitation. Many of these courses were innovative in their approach and efforts were clearly made to make them as accessible as possible to everyone, regardless of their religion. A particular example was the move away from traditional bible study classes towards classes based on ideas grounded in religion but relating to prisoners' lives in a broader sense eg redemption. This practice was respectful of prisoners' right to freedom of religion or, indeed, to not have a religion (Article 9 European Convention on Human Rights). We noted also that the principle of participation had been respected as prisoners' views were sought in the development of new courses. The chaplaincy also made efforts to facilitate

understanding between religions, including an Interfaith course to develop understanding between Muslim and Christian prisoners.

9.10 Prisoners of all genders are treated with dignity, respect and according to their individual needs.

Rating: Satisfactory performance ●

Only male prisoners were held in Low Moss. While a number of prison, medical and care staff were female, there were no gender-related issues raised.

9.11 Prisoners of any sexual orientation are treated with dignity, respect and according to their individual needs.

Rating: Satisfactory performance ●

As noted information on sexual orientation was incomplete and efforts were being made to gather more accurate information. No issues in relation to sexual orientation were raised.

STANDARD 10 - ORGANISATIONAL EFFECTIVENESS

The prison's priorities are consistent with the achievement of these standards and are clearly communicated to all staff. There is a shared commitment by all people working in the prison to co-operate constructively to deliver these priorities.

Staff understand how their work contributes directly to the achievement of the prison's priorities. The prison management team shows leadership in deploying its resources effectively to achieve improved performance. It ensures that staff have the skills necessary to perform their roles well. All staff work well with others in the prison and with agencies which provide services to prisoners. The prison works collaboratively and professionally with other prisons, and other criminal justice organisations.

Inspection findings

Overall Rating: Satisfactory performance ●

In the five years since Low Moss opened, the prison has developed a strong sense of identity and purpose. The governor and senior management team have provided clear leadership, communicating a compelling set of priorities for all who work in the prison. It was apparent that there was a shared sense of ownership amongst the leadership team, an ethos which was evident throughout the prison. Effective leadership was provided in a range of areas of the prison such as in the learning centre, the chaplaincy and vocational training and work parties.

Whilst there was visible leadership provided by the senior management team, a number of FLMs indicated that they felt that they had so many administrative responsibilities that they were not able to fulfil their supervisory and staff developmental duties as much as they would have liked. The levels of staff vacancies and staff turnover in the health centre presented challenges for the provision of healthcare services in the prison. These need to be addressed by NHS Greater Glasgow and Clyde as a matter of priority.

Low Moss had engaged with a wide range of partner organisations in the provision of services and support for the men in the prison. It was clear that these partner agencies felt that their work was valued and their presence welcomed. The PSP, in particular, was an excellent example of partnership working. The PSP provided support for prisoners serving short sentences in the weeks before and the months after liberation. This enabled prisoners to receive vital support in the allocation of accommodation, registering for health services and applying for welfare benefits. At the time of the inspection there was uncertainty about the future funding of the PSP programme.

Low Moss had developed good links with the local community and encouraged constructive engagement with community groups and organisations. Local and national media had reported on positive aspects of life for prisoners in Low Moss.

Quality Indicators

10.1 The prison successfully implements plans to improve performance against these standards. The management team gives clear leadership by communicating the prison's priorities and what is expected of all staff.

Rating: Satisfactory performance ●

Low Moss had well-developed business plans both for business as usual and for improvements. These had been developed through a consultative process and included realistic action plans. There were regular performance review meetings held each month, which had a particular focus on improvement and innovation.

There was a strong lead provided by the management team, with a clear sense of direction communicated to all who worked in the prison. The governor and senior staff were visible within the prison and made themselves available to consult and communicate with staff at all levels. There was evidence of committed leadership within different areas of responsibility in the prison such as the learning centre and chaplaincy.

10.2 The management team makes regular and effective use of information in improving the prison's performance against these standards.

Rating: Satisfactory performance ●

Regular meetings were held in Low Moss to review performance and to seek to address areas where improvement was required. The weekly dashboard provided the management team with information on essential functions. Progress against the Annual Delivery Plan was reviewed on a monthly basis and action taken to make improvements where required. Staff were encouraged to be involved in suggesting improvements and changes to current practices where appropriate.

10.3 Staff are clear about the contribution they are expected to make to the priorities of the prison and each is trained to fulfil the requirements of their role. Succession and development training plans are in place.

Rating: Satisfactory performance ●

Low Moss had comprehensive training plans in place for all staff. These were monitored closely to ensure a high level of completion. There were comprehensive training records in support of this. There was a good level of understanding of all staff of the roles they were expected to undertake. Many said that they felt supported by their line managers. Individual objectives were set for each member of staff to ensure that they contributed to the overall delivery of the prison's performance.

Staffing levels were maintained at a good level, with effective recruitment plans in place. Sickness levels were constantly monitored, particularly in relation to recent rises in levels of sickness absence. A new occupational health service provider for the SPS had recently taken on responsibility for the contract.

10.4 Good performance at work is recognised by the prison in ways that are valued by staff. Effective steps are taken to remedy inappropriate behaviour or poor performance.

Rating: Satisfactory performance ●

Performance of staff was managed through the annual performance appraisal processes. The local staff recognition committee considered nominations from members of staff for recognition of particularly good performance by other members of staff. At a local level such good performance was recognised through the award of certificates and recognition lunches with the governor. A local newsletter also highlighted staff achievements and good performance.

Low Moss has nominated suitable members of staff for the Butler Trust Awards, with two being put forward in the last year. Positive achievements have also been reported in the local press.

Arrangements were in place to manage poor performance through the appraisal system and through action by line managers. At the time of the inspection, there was one member of staff being managed through the Charter for Help process, designed to support underperformance.

10.5 Staff at all levels understand the value of work undertaken by others.

Rating: Satisfactory performance ●

In Low Moss, there was a good awareness and understanding of the work of staff at different levels in the prison. The relationship between the senior management team and the Partnership Liaison Representatives (PLR) was described by both sides as positive and constructive. There was informal contact on a regular basis, as well as formal meetings. The PLRs were able to raise any issues with the management team that were appropriate.

10.6 Each functional staff group understands and respects the work undertaken by each of the other functions.

Rating: Satisfactory performance ●

There was a good level of awareness of the responsibilities and functions of other groups working in the prison. There was a staff rotation policy in place which allowed operational staff to experience working in a wide range of areas. Interdisciplinary working was effective between, for example, psychologists and social work staff, with a strong sense of shared endeavour. Similarly the learning centre staff worked well with those responsible for the provision of vocational training and work parties.

In relation to the provision of healthcare, there was less of a shared understanding of the challenges facing both healthcare staff and operational prison staff.

10.7 The prison is effective in fostering supportive working relationships with other parts of the prison system.

Rating: Satisfactory performance ●

Low Moss was well integrated with other prisons in Scotland and had built good working relationships with other prisons. There were good arrangements in place to facilitate the transfer of prisoners between prisons when this was necessary. Prisoners from Low Moss were regularly transferred to HMP Open Estate as part of their progression through their sentence.

10.8 The prison works effectively in partnership with agencies which share responsibility for managing and supporting prisoners.

Rating: Satisfactory performance ●

Low Moss worked with a wide range of partner organisations with responsibility for managing and supporting prisoners. The ICM processes were well supported by partner agencies. There was evidence of good relationships with Police Scotland, local authorities, G4S and third sector partners. In particular, both prison based and community based social workers were actively involved in the management processes for prisoners progressing through their sentence. Police officers regularly attended the prison's tactical tasking meetings.

10.9 The prison works effectively in partnership with organisations that provide services either during their sentence or on release.

Rating: Good performance ●

There was an impressive range of partner organisations with responsibility for delivering services to prisoners in Low Moss. As part of the inspection we undertook a partners forum. It was clear from this that the partner organisations felt that their contribution was welcomed and encouraged. The Governor and senior management team had established a very positive culture of encouraging partnership working.

The clearest example of this was the PSP, a multidisciplinary team providing support to prisoners both within Low Moss and after their liberation. This was a joint venture between Turning Point Scotland, SACRO, Action for Children and the SPS. There was strong evidence that this service was effective in supporting prisoners both in preparation for release and in the months following their liberation. There was a strong team ethos, with seamless working between the members of staff employed by the different organisations.

10.10 The prison is effective in communicating its work to the public and in maintaining constructive relationships with local and national media.

Rating: Satisfactory performance ●

Since it opened in 2012, Low Moss has worked hard to develop links with the local community and to encourage constructive engagement with community groups and

organisations. It has developed a positive profile, both locally and nationally. Art work produced by prisoners has been displayed in local schools, museums, libraries and local authority buildings.

Low Moss featured in the recent television programme series "Prison: First and Last 24 Hours". Positive stories highlighting the work of prisoners have been reported in local and national media. Good relationships have been developed with news organisations.

Prison population profile on 29 May 2017

Status	Number of prisoners
Untried Male Adults	89
Untried Female Adults	0
Untried Male Young Offenders	0
Untried Female Young Offenders	0
Sentenced Male Adults	610
Sentenced Female Adults	0
Sentenced Male Young Offenders	0
Sentence Female Young Offenders	0
Recalled Life Prisoners	16
Convicted Prisoners Awaiting Sentencing	36
Prisoners Awaiting Deportation	0
Under 16s	0
Civil Prisoners	0
Home Detention Curfew (HDC)	37

Sentence	Number of prisoners
At Court	0
Untried/ Remand	125
0 – 1 month	0
1 – 2 months	1
2 – 3 months	3
3 – 4 months	6
4 – 5 months	7
5 – 6 months	17
6 months to less than 12 months	66
12 months to less than 2 years	96
2 years to less than 4 years	152
4 years to less than 10 years	182
10 years and over (not life)	15
Life	76
Order for Lifelong Restriction (OLR)	5

Age	Number of prisoners
Minimum age:	20
Under 21 years	1
21 years to 29 years	243
30 years to 39 years	276
40 years to 49 years	145
50 years to 59 years	71
60 years to 69 years	14
70 years plus	1
Maximum age:	73

Total number of prisoners	751
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Acronyms

ACT2Care	SPS suicide prevention strategy – now replaced by ‘Talk to me’.
BBV	Blood Borne Virus
CCTV	Close Circuit Television
C&R	Control and Restraint
CSRA	Cell Sharing Risk Assessment
E&D	Equality and Diversity
ECR	Electronic Control Room
EEDA	Exceptional Escorted Days Absence
FCMT	Family Case Management Team
FCO	Family Contact Officer
FLM	First Line Manager
FNIC	First Night in Custody
GP	General Practitioner
GPA	Generic Programme Assessment
HDC	Home Detention Curfew
HMCIPS	HM Chief Inspector of Prisons for Scotland
HMIPS	Her Majesty’s Inspectorate of Prisons for Scotland
HMP	Her Majesty’s Prison
H&S	Health and Safety
ICC	Internal Complaints Committee
ICM	Integrated Case Management
IMU	Intelligence Management Unit
IPM	Independent Prison Monitor
MAPPA	Multi-Agency Public Protection Arrangements
MDT	Mandatory Drug Testing
NMC	Nursing and Midwifery Council
OLR	Order for Lifelong Restriction
PBSW	Prison Based Social Worker
PCMB	Programmes Case Management Board
PIP	Positive Impact Programme
PLR	Partnership Liaison Representative
PR2	The SPS electronic Prisoner Records system – version 2
PSP	Public Social Partnership
PSS	Prisoner Supervision System
PTI	Physical Training Instructor
RMT	Risk Management Team
SCP	Self-Change Programme
SOP	Standard Operating Procedure
SPS	Scottish Prison Service
SPSO	Scottish Public Services Ombudsman
SQA	Scottish Qualification Authority
SRU	Separation and Reintegration Unit
SSM	Special Security Measures
STIP	Short Term Intervention Programme



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