



Ministry  
of Justice

# Review of Bermuda Department of Corrections – Panel Report

6 – 14 October 2025

## Executive Summary

This review of the Bermuda Department of Corrections, conducted by a panel of experts from the Overseas Territories and the UK, found significant challenges exist within the Department of Corrections that has resulted in a regime for prisoners that is inconsistent and lacking in purpose. While this is particularly true at Westgate, the Co-Educational and Farm facilities demonstrated significant good practice, providing a positive and hopeful regime, underpinned by effective programmes, for prisoners. Similarly, healthcare provision at Westgate was found to be particularly positive. The panel encourages the Department of Corrections to ensure that the consistent, positive regime demonstrated at the Co-Ed and Farm is replicated at Westgate.

The panel observed notable inconsistency in policy and practice, particularly at the main Westgate site. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The panel noted that improvements in communication at all levels is necessary. Better engagement with external stakeholders, a refreshed strategic vision, and communication between staff and management, and staff and prisoners is required. Clearer guidelines, regular staff briefings, and open channels between management and frontline staff would help reduce perceived divides and foster a more cohesive operational culture.

## Introduction

A four-person panel, formed of representatives from the Overseas Territories and the UK, reviewed Bermuda's Department of Corrections from 6 – 14 October 2025. This review took place across all three facilities including Westgate, the Co-Educational facility and the Farm. The review assessed the standards and conditions across these Correctional facilities against the Overseas Territories Detention Standards Framework. The panel consisted of:

- Jenny Louis (Governor, HMP Belmarsh, HM Prison and Probation Service, UK)
- Daniel Greaves (Director of Prisons, HM Cayman Islands Prison Service)
- Leeroose Lewis (Senior Officer/Rehabilitation Manager, HMP Grand Turk, Turks and Caicos Islands)
- Glenn Manley (Overseas Territories Prison Security Adviser, Ministry of Justice, UK)

This report sets out the panel's findings by providing a narrative outlining the key findings within each theme. This is accompanied by recommendations in the 'Stop, Start, Keep' format. More details on 'Stop, Start, Keep', and how the panel sourced and triangulated information is included in annex A.

## 1. Treatment

**Detained individuals are treated with respect and protected from harm, and they have access to appropriate care as necessary.**

### 1a. Rights Awareness

Across the Westgate facility the panel found that a significant proportion of prisoners lacked awareness of their rights. Around half of the prisoners that the panel spoke to indicated a lack of understanding of their rights. Prisoners consistently reported that their understanding of their rights was based either on previous custodial experience or information shared informally by other prisoners. Foreign national prisoners were aware of their right to contact their consulate, but this knowledge was typically acquired before incarceration or through peer networks, rather than from staff or official materials.

The Inmate Handbook is informative and contains the necessary information to support a new prisoner during their time in custody. However, the Handbook was last updated in February 2016 and is not routinely distributed. While some long-term prisoners recalled receiving it years ago, newer arrivals had no access. During the review period, four new prisoners were received — two in Westgate, and two young offenders in the Co-Ed facility. Both prisoners in Westgate confirmed they had not received any information about their rights.

Westgate has an Intake Programme designed to introduce facility rules, classification levels, release dates, and available programmes. However, due to staff shortages, this programme is not currently being delivered. As an interim measure, staff should issue basic documentation to new arrivals to ensure they receive essential information upon entry. In contrast, the Co-Ed facility demonstrated effective delivery of its Intake Programme, supported by visible, relevant, and rehabilitative materials in communal areas. Staff engagement in this facility was positive and reflected good practice.

Between January and September 2025, the facility received 126 new prisoners, with monthly intakes ranging from eight to 21. During the review, two staff were assigned to intake duties despite no active admissions, highlighting inefficiencies in resource allocation. Until the Intake Programme is reinstated, issuing basic documentation should be prioritised to ensure that new arrivals are supported to understand their rights, routines, and available services.

Communal areas in Westgate lacked relevant and up-to-date displayed materials. Some of the information found was outdated or inappropriate (Annex B, Image #1). The Co-Ed facility presented a clear contrast, with informative and current materials that promoted hope and a rehabilitative culture (Annex B, Image #2).

### **Recommendations:**

- 1. START** - Implement interim documentation issuance for new receptions at Westgate until staffing stabilises and the Intake Programme resumes.
- 2. START** - Update and reintroduce the Inmate Handbook as a mandatory induction resource. Establish a process for regular review and distribution.
- 3. START** - Ensure communal areas display rules and information for prisoners, and current, relevant, and rehabilitative materials across all facilities.

### **1b. Use of Force and Restraint**

Use of Force is not currently governed by an agreed policy in the Department of Corrections. [REDACTED]

[REDACTED] While it outlines lawful use as ‘necessary, reasonable, and proportionate’, it lacks clarity on authorisation for full relocation and search under restraint. Staff were unaware of procedures for planned use of force, and incident management appears reactive rather than regulated. When this policy is implemented, there will need to be a concerted focus on ensuring all staff are effectively informed and trained in the management and reporting of use of force incidents.

Use of force records are maintained via F35 forms, though details are limited and inconsistent. Between March and September 2025, four staff use-of-force incidents and six prisoner-on-prisoner assaults were recorded. There is no evidence of disproportionate

use, but limited data prevents full assessment. A Use of Force Coordinator would support better oversight and monitoring.

All staff received initial control and restraint training, but no refresher sessions were held in 2025 due to staffing shortages. [REDACTED]

[REDACTED] The panel observed routine handcuffing of remand prisoners during movement within the facility. [REDACTED]

### Recommendations:

**4. STOP** - Avoid routine handcuffing of remand prisoners; restraint use should be risk-based and evidence-informed.

**5. START** - Approve and publish the Use of Force policy. Clarify in policy who can authorise full search and relocation under restraint and ensuring staff understand planned use of force and authorisation procedures; include in training. Policy frameworks within HMPPS or the Cayman Islands or Turks and Caicos Islands prisons can inform the Department of Correction's Use of Force policy.

**6. START** - Staff should provide more information in their UoF reports, detailing what part they played in the restraint of any prisoners and how the force was necessary, reasonable and proportionate. If not already included, report writing should be covered in UoF training.

**7. START** - Introduce a policy for the use of special accommodation, detailing authorisation and justification, including 24-hour review intervals.

**8. START** - Assign a manager as Use of Force Coordinator to oversee the logging, recording and reviewing all uses of force.

### 1c. Discipline

[REDACTED] The relevant standard requires an up-to-date and accessible record of disciplinary actions, but the current process lacks consistency, transparency, and managerial oversight. [REDACTED]

Prisoners are directed to use Form 60 (Complaint) or Form 76 (Treatment of Offenders) to appeal disciplinary decisions; however, outcomes are delivered verbally, leaving no documented record. Acts subject to discipline typically include breaches of prison rules or behaviour that undermines order and safety, but the absence of recorded adjudications and poor record-keeping make it difficult to verify how these standards are applied in practice.

[REDACTED]

Restraint was used only for movement and not as a disciplinary measure. There was no evidence of family contact being restricted as punishment. However, staff awareness of disciplinary procedures and prohibited sanctions was limited, and there was no indication that behaviour linked to mental illness or disability was treated differently.

### Recommendations:

**9. STOP** - Immediate action is needed to ensure segregation is lawful and transparent. It must be authorised by a competent authority, reviewed regularly, used only when necessary and proportionate, and never applied as routine discipline.

**10. START** - The disciplinary process should be updated to include a clear centralised record of the use of discipline and written outcomes provided to prisoners.

### 1d. Searches of Detained Individuals and Living Accommodation

Searches of prisoners and their living accommodation were generally conducted in line with policy and professional standards. While searching is part of initial staff training, no documentation was provided to confirm ongoing or refresher training.

The panel were pleased to observe that search practices are gender appropriate. Intrusive searches are carried out by two same-sex officers, one of which must be a senior officer, in a private area and with professionalism. Body cavity searches are authorised only when there are reasonable grounds and are conducted by qualified medical professionals, with X-rays performed by certified technicians. This process was confirmed by both staff and prisoners.

The panel were informed that routine strip searches are scheduled every three months in line with policy. This practice may not meet the requirement that intrusive searches be

strictly necessary and intelligence led. Immediate review is recommended to ensure clarity here around compliance and standards.

The panel were informed by staff that cell searches are conducted daily to detect contraband or security threats, though the panel did not observe a routine search take place while visiting the Westgate facility. One cell block's record showed four daily searches between January and October 2025, with no contraband found.

The panel agree that searches are not used as punishment, and restraint is applied only for movement. Staff and prisoners reported no formal complaints about search practices. The panel were content that search procedures are religiously sensitive, with staff reporting no complaints related to religious or cultural insensitivity. Past practices, such as cutting Rastafarian hair on intake, have been discontinued.

### Recommendations:

**11. STOP** - Strip searches should not be routine searches as they are invasive and should only be done when necessary. The search policy should be updated to reflect this so that strip searches are intelligence-led and only carried out when strictly necessary.

**12. KEEP** - Ensuring searches are conducted by same-sex staff and in private, with professionalism and respect for dignity.

### 1e. Complaints Procedures

There is an established complaints process within the Department of Corrections, but the panel were not confident in the overall effectiveness of the system. The process is long and slow, with prisoners submitting requests only on Sundays. Complaints are collected by the Divisional Officer, passed to the Principal Officer, and then reviewed by the Chief Officer. If deemed valid, a Form 60 or 76 is then issued, completed by the prisoner, typed by Administration, and returned for signature before further processing. Outcomes are delivered verbally by the Chief Officer, with no written feedback or formal appeals process in place, which means that obtaining records of complaint resolution was not possible. While complaints are recorded in prisoners' files and a digital database, there is no analysis of trends or systemic issues

Confidence in the system by prisoners is low. Prisoners reported that complaints often go unanswered or "never reach" the intended recipient. The Chair of the Treatment of Offenders Board confirmed that prisoners frequently bypass the formal process and raise concerns directly during visits.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

There are no posters, leaflets, or written guides explaining complaints procedures, and the inmate handbook that once included this information is no longer issued. Prisoners vocalised that on arrival they learned about the complaint's procedures and processes informally from peers.

### Recommendations:

**13. STOP** - Delivering complaint outcomes verbally. All responses should be provided in writing, with clear reasons for the decision.

**14. STOP** - Allowing complaints to pass through multiple staff without confidentiality safeguards. Introduce secure complaint boxes accessible only to designated administrative staff or an independent oversight body. Provide staff training on complaint procedures, confidentiality, and ethical standards.

**15. START** - Install notice boards on each wing explaining how to make a complaint, where to submit it, and expected response times. Update the inmate handbook to include this information with clear timelines for each stage of the process.

**16. START** - Create a centralised complaints log to record all submissions, outcomes, and timeframes. Regularly review the log to identify patterns or recurring issues and share findings with senior management and oversight bodies such as the Treatment of Offenders Board.

**17. KEEP** - Recording complaints in inmate files and the digital database.

### 1f. Investigations into Deaths, Escape, Disappearance, or Serious Injury

Policy 613 outlines the Department's investigation procedures, including which incidents require investigation and who commissions Priority 1 and Priority 2 cases. Additional clarification is needed in this policy in key areas such as specific procedures for investigating deaths, escapes, disappearances, or serious injuries.

[REDACTED]

## Recommendations:

**18. START** - The facility should keep a central record log of all investigations into deaths, escapes, disappearance or serious injury. For deaths and escapes the prison should consider using an investigator that is independent of the Bermuda Correctional Service.

**19. START** - At least one senior manager should undertake investigation training, which can be facilitated by the UK Ministry of Justice.

### 1g. Contact with outside world

Overall, contact with the outside world was found to be adequate, though the panel noted concerns around consistency, particularly when an unexpected staff absence led to the cancellation of scheduled visits for prisoners on that day. The panel observed an in-person visit in the designated visiting room, which was found to be spacious and suitably equipped, with adequate seating for visitors. Weekly visits are permitted, both in person and virtually, and children are allowed to visit their parents in custody, provided they are accompanied by an adult. Records of in person and virtual visits were kept up to date.

Measures are in place to ensure prisoners have access to legal representation. Calls to lawyers are free of charge and do not require phone credit. Prisoners can make phone calls using the PIN phone system, with each call limited to 20 minutes. However, prisoners reported issues with phones being out of service. Applications must be submitted for phone calls, although Policy 901 does not specify which types of calls require approval by the Principal Officer of Operations/Housing. Prisoners are also able to send and receive mail, and legal communication is facilitated through telephone calls, legal visits, and video conferencing.

Prisoners in the remand section have access to mail and telephones; however, there are concerns over their ability to exercise their right to contact family. Remand prisoners raised concerns about their inability to work due to a lack of available jobs and, unlike sentenced prisoners, remand prisoners do not receive the daily allowance of one dollar. This limits their ability to purchase phone credit and maintain contact with family members. This issue is particularly pronounced among foreign nationals, who face higher costs for overseas calls and additional challenges due to time zone differences, as there is no designated calling time for international regions. Importantly, foreign nationals do have access to consular and diplomatic support and are permitted one virtual visit per week to maintain contact with family and friends abroad.

## Recommendations:

**20. START** - Consider introducing a basic allowance or subsidised phone credit for remand prisoners, particularly foreign nationals, to ensure equitable access to family contact.

**21. START** - Establish scheduled time slots for overseas calls to accommodate time zone differences and improve access for foreign nationals.

**22. KEEP** - Continue providing free lawyer calls without requiring phone credit, ensuring prisoners can access legal representation without financial barriers.

**23. KEEP** - Preserve the quality of the visit room, which is spacious, well-equipped, and conducive to safe and respectful interactions.

## 1h. Healthcare

Access to healthcare at Westgate was considered by the panel to be one of the strongest areas observed during the review. The prison's health facility is of a high standard; the medical area is clean, well maintained, and appropriately equipped. There are sufficient treatment rooms to accommodate both the doctor and nursing staff, allowing for private and confidential consultations. Confidential consultation spaces are also available at the Co-Ed and Farm facilities.

All prisoners are seen by a nurse within 24 hours of reception into the facility. This initial screening follows a standard healthcare proforma used across the estate and covers both physical and mental health needs. After the initial assessment, prisoners apply to access further medical care. On arrival, prisoners are given a form explaining how to request medical treatment, and those interviewed demonstrated awareness of the process, although some expressed frustration at not receiving responses to their applications.

Dental care is provided by a visiting dentist once a week and a hygienist once a month. At the time of the inspection, the visiting dentist was attending monthly; however, this service is only available to convicted prisoners. Remand prisoners do not have access to routine dental care and can only receive emergency treatment. Outside of standard working hours, a nurse is on call, and an out-of-hours doctor is available. While prison healthcare can liaise with public health services, the system is not integrated. Although the standard of healthcare provided is considered equivalent to that available in the community, community health providers do not operate on a shared platform, and prisoner health records must be requested manually. This lack of interoperability impairs continuity of care between prison and community services.

Mental health needs are identified during the initial screening, and those with serious conditions receive treatment. However, support for individuals with less acute mental health issues is limited at Westgate, and the healthcare team reported that this was placing strain on resources. There is no formal policy in place to support or identify

prisoners at risk of suicide or self-harm. Those identified as high risk are referred to healthcare, which may recommend increased monitoring on the wing or placement in segregation under 15-minute observations. In some cases, anti-tear clothing and bedding are issued. In limited circumstances the Minister may direct prisoners suffering from mental illness, severe personality disorder, mental impairment or severe mental impairment to be detained at the Mid-Atlantic Wellness Institute under the Mental health Act (1968).

At the Co-Ed facility, women who have recently given birth may keep their child with them until the child is 12 months old. Medical screenings for female prisoners are gender-sensitive and conducted by nurses, all of whom are female. However, the only attending medical officer is male, and there is no option for women to see a female doctor.

Substance misuse is identified during initial health screenings, and a two-week detoxification programme is available for individual's dependent on alcohol or other substances. Beyond this, support for substance misuse at Westgate is limited. Narcotics Anonymous and Alcoholics Anonymous sessions are held weekly but are only accessible to convicted prisoners and are not well publicised. The Right Living House Therapeutic Community, located at the Co-Ed facility, provides structured support for convicted category C prisoners assessed as suitable for the programme. However, access is restricted due to eligibility criteria and low enrolment.

### **Recommendations:**

**24. STOP** - Inequalities in access to healthcare between remand and convicted prisoners. With particular focus on access to routine dental care and substance misuse programmes.

**25. START** - Offering access to female doctors for female prisoners. While female nurses conduct screenings, the absence of a female doctor limits gender-sensitive care. Options for female medical officers should be explored.

**26. KEEP** - All prisoners are seen by a nurse within 24 hours of arrival, which is a strong practice that supports early identification of health needs.

**27. KEEP** - The cleanliness, organisation, and availability of private consultation spaces at Westgate and other sites reflect good practice and should be sustained.

**28. KEEP** - The Right Living House TC model provides structured support for substance misuse and should be maintained and expanded where possible.

### **1i. Contact with Visiting Board/Committee**

Conversations with prisoners across various wings, including members of the inmates' committee, indicate that they are aware of the Treatment of Offender Board, however, contact with the Board could be made more accessible. The Treatment of Offender Board holds individual and group meetings with prisoners. However, it was noted by both

prisoners and the Chair of the board that conversations during these visits are not held in private. The associated standard calls for prisoners to be able to contact the Board easily and confidentially outside of their visits. Prisoners can contact the board outside of visits by submitting a Form 76, although this form is vetted before being passed to the Chair, which may impact confidentiality. A secure drop box on each residential unit for prisoners to contact the Board would help maintain easy and confidential contact.

Board visits to the facility are recorded in the Gate Diary, and prisoners have confirmed their interactions with board members. While the last recorded visit was on 20th September 2025, the gate officer mentioned that board members are not always logged in, which could affect the visibility and accessibility of the board's presence.

The panel were particularly concerned about the role that the Treatment of Offenders Board plays in disciplinary adjudications. This dual role of monitoring the welfare and rights of prisoners, while also playing a disciplinary function creates a conflict of interest and should be discontinued.

### **Recommendations:**

**29. STOP** - Treatment of Offenders Board should be fully removed from the adjudication process to eliminate conflicts of interest and strengthen its role as an independent oversight and advocacy body for prisoners. Its primary focus should shift toward monitoring welfare, investigating complaints, and ensuring that prisoners' rights are upheld.

**30. START** - Establish clear and confidential channels for communication between prisoners and the Board, such as private meeting spaces during visits and secure drop boxes or sealed envelopes for correspondence. The Board should also ensure its visits are consistently logged and publicly scheduled.

### **1j. Respect for Religion and Beliefs**

The panel concluded that respect for religion and beliefs is positively practiced across the prison facilities. Prisoners are generally permitted to practice their religious beliefs, and religious leaders regularly visit to support various faith communities. However, the prison sometimes lacks adequate preparation and understanding of specific religious requirements. For example, staff reported that when Westgate housed an Orthodox Jewish prisoner, essential provisions for clothing and cooking items were not met. Religious services are held in chapels that are not tailored to any faith, and Friday mass services have not been established due to scheduling issues.

Under the Prison Rules of 1980, prisoners' religious affiliations are recorded upon reception, and provisions are made for spiritual care, including access to religious texts, services, and chaplain visits—especially during illness or prior to discharge. Chaplains are appointed vendors, not full-time staff, and are limited to 30 working hours per month without additional compensation. Religious books are available in the library, though

personal copies are only distributed upon request and depend on donations from local religious bodies.

**Recommendations:**

**31. START** - Hire chaplains as full-time staff to increase their availability within the prison, as opposed to the current limit of 30 hours per month. This change would enable them to become more deeply involved in rehabilitation programmes for prisoners, fostering a more supportive environment.

**32. KEEP** - The facility should continue to enable prisoners to observe the needs of their religion by maintaining access to religious services, texts, and spiritual support. Regular visits from religious leaders across denominations, the availability of religious books in the library, and the recording of religious affiliation upon reception reflect good practice.

## 2. Living Conditions

**Living conditions in places of deprivation of liberty are such that they respect the inherent dignity of individuals.**

### 2a. Accommodation

The panel found critical issues within the accommodation, infrastructure, and environmental conditions at Westgate. The challenges that exist with living conditions at Westgate (as outlined in themes 2a – 2d) indicate systemic gaps in governance and resource allocation, which require immediate strategic intervention to ensure compliance with standards and to provide humane conditions for prisoners and staff. Accommodation at the Co-ed and Farm facilities was maintained to a higher standard and was generally in a better state of repair.

The panel were pleased to see that all prisoners are housed in single cells, which in turn, removes the requirement for cell-sharing risk assessments. While the facility has adequate space for prisoners, the panel found that significant underinvestment in the facility's infrastructure over a long period of time has resulted in areas that are not fit for purpose (Annex B, Image #6).

Cell windows can be opened, but ventilation remains poor, and the lack of effective airflow prevents heat extraction. Both prisoners and staff reported that high temperatures have led to prisoners removing outer clothing and lying on the floor in attempts to cool down. In some cases, prisoner-led efforts to maintain cell conditions have demonstrated what can be achieved with minimal financial input (Annex B, Image #7).

**Recommendations:**

**33. START** - Implement a structured maintenance program with a dedicated budget, supported by a low-cost initiative involving prisoner contributions, to improve living conditions and uphold dignity.

**34. START** - Upgrade ventilation systems to meet health and safety standards, ensuring cells are fit for purpose and support wellbeing.

**35. START** - Conduct quarterly audits on accommodation standards and supply chain performance to maintain compliance and accountability.

**36. START** - Train staff to ensure regular Accommodation Fabric Checks (AFCs) effectively identify and fix issues with prisoner accommodation and hygiene facilities.

**37. KEEP** - Single-cell accommodation, which removes the need for cell-sharing risk assessments.

## **2b. Personal Hygiene**

The panel found that all prisoners were able to maintain appropriate standards of personal hygiene, supported by a regime that provides frequent access to shower facilities. This arrangement reflects positively on operational practices and demonstrates a clear commitment to upholding basic standards of care.

Though routine access to the showers was present across all sights, the panel raised significant concerns regarding the overall condition of the shower facilities at Westgate. Observations included broken tiles and rusted vents within the unit (Annex B, Image #8 and #9). These deficiencies underscore the urgent need for a structured and regular maintenance programme to ensure that facilities remain safe, decent, and fit for purpose. Shaving facilities were also available, enabling male prisoners to shave regularly if they chose to, which contributes to maintaining personal cleanliness and dignity.

In addition, the panel noted that women accommodated within the Co-Ed facility have consistent and easy access to sanitary items. This aspect of the current arrangements represents good practice in meeting essential needs and contributes positively to the overall wellbeing of those in custody. Together, these provisions support a respectful and humane custodial environment.

## **Recommendations:**

**38. START** - Implement a proactive maintenance schedule for shower facilities to address current issues and prevent future deterioration.

**39. KEEP** - Frequent access to shower facilities that supports personal hygiene and meets climate-appropriate standards.

## **2c. Clothing and Bedding**

Upon admission, individuals are issued three sets of prison clothing that are clean, in a good state and appropriate to the climate. All prisoners receive a mattress upon arrival. However, the panel found instances where prisoners were without pillows. A follow-up visit to the main stores revealed that Westgate had no mattresses in stock, although Co-Ed and the Farm facilities had sufficient supplies due to different sizing requirements. The panel were informed that the facility is currently in discussions to procure a new supplier, but no contract has yet been secured.

While the main stores had a good level of pillow stock, this was not communicated effectively to the facility, indicating a breakdown in coordination. The panel also found that underwear stock was critically low, corroborating prisoner reports that they were either forced to purchase items externally or, in extreme cases, borrow from others. This has a significant negative impact on the personal hygiene and dignity of prisoners. The panel concluded that management oversight was insufficient, contributing to operational delays and resource gaps.

Laundry services are available on site, but feedback suggests that some prisoners perceive the process to be ineffective, with clothing sometimes returned in poor condition. As a result, individuals often resort to washing items themselves. This indicates a lack of confidence in internal laundry operations and highlights the need for improved oversight to ensure service quality. Additional quality assurance may be beneficial here.

One prisoner escort was observed by the panel during the visit. On this occasion, the prisoners were remand inmates dressed in orange prison attire. The panel could not determine whether this was standard practice. It is recommended that prisoners be allowed to wear their own clothes or appropriate attire for court and other hearings.

## **Recommendations:**

**40. START** - Establish a centralised policy and inventory management system for mattresses, pillows, and essential clothing. Set minimum stock thresholds and trigger alerts for replenishment.

**41. START** - It is advised that prisoners be permitted to wear their own clothing or other appropriate attire when attending court or formal hearings. This approach supports fairness, dignity, and the principle of avoiding undue prejudice.

**42. KEEP** - Issuing three sets of clean, climate-appropriate prison clothing upon admission, which meets basic standards of decency and health.

## **2d. Food and Water**

Prisoners across all facilities reported having adequate access to drinking water, with new, functioning water fountains installed on all units. However, there are limitations during lockdown hours, which disproportionately affect remand prisoners, who are locked in their cells from 16:30 and cannot access clean drinking water after that time. This means access is not consistent for all individuals.

Meals are based on a three-week rolling menu and generally provide a healthy and balanced diet. Special dietary needs, including vegan and vegetarian diets, are adequately met. The Westgate facility has recently benefited from the purchase of industry-standard bread ovens, allowing bread to be made on site. Medical diets are also provided, and meal provisions are adapted for Muslim prisoners during Ramadan. The Co-Ed facility can accommodate the dietary needs of pregnant prisoners in its meal planning.

Mealtimes differ slightly between sites. At Westgate, meals are served at 07:30, 11:30, and 15:30, creating a long gap between dinner and breakfast. In contrast, the Co-Ed and Farm facilities serve dinner later, at 16:00, which is considered more appropriate. Westgate does not have a dedicated kitchen manager, and the kitchen lacks a formal cleaning schedule, relying instead on officer and prisoner knowledge. No kitchen officers held catering or hygiene qualifications. Nonetheless, the kitchen facilities met basic hygiene standards, though there remains scope for further improvement.

### **Recommendations:**

**43. STOP** - Remand prisoners' access to drinking water is limited during lockdown hours. As they are locked in their cells from 16:30 onwards, consideration should be given to providing bottled water or personal water containers to ensure they have access to drinking water throughout the evening and overnight.

**44. START** - Appoint a dedicated kitchen manager at Westgate to oversee daily operations, ensure hygiene compliance, and provide consistent oversight of kitchen staff and procedures.

**45. START** - Provide catering and hygiene training, or facilitate access to relevant qualifications, for officers and prisoners working in kitchen areas to enhance food safety and quality assurance.

**46. START** - Align the timing of the hot evening meal at Westgate with other facilities by serving it at 16:30, thereby reducing the extended gap between dinner and breakfast.

**47. KEEP** - Continue to accommodate special dietary needs, including vegan, vegetarian, and medical diets, and maintaining the practice of adapting meals and mealtimes to support religious observance, such as during Ramadan.

## **3. Activity and Rehabilitation**

**Persons deprived of their liberty can engage in activity that is likely to benefit them, and assist, as far as possible, reintegration into their family and society.**

### **3a. Education, Training and Work**

While frameworks exist to support education, work, and rehabilitation, significant operational challenges limit their effectiveness. Improvements in staffing, volunteer engagement, inclusive access, and oversight are needed to ensure these provisions promote personal development and positive behaviour. It is also worth noting that those on remand are not granted access to work, training, or education.

The institution offers a structured educational program overseen by an in-house teacher and Education Officer. Classes are provided by vendors and supported by volunteers. Case plans that are developed are those containing court recommendations; other plans are intended to be developed but are not consistently in place. Individualised education plans are designed to follow each inmate's case plan, incorporating these recommendations. A library is available, providing access to recreational and instructional materials; however, access is severely limited due to the teacher's irregular presence and lack of substitute coverage. During the visit, the teacher was on leave, resulting in no

access to the library or class register. Engagement with educational resources remains low, and prisoners enrolled in online studies are often left unsupported.

Access to computers for educational purposes is restricted and dependent on staff availability. Several prisoners expressed frustration at being unable to continue their studies, and the supervising officer was unable to offer solutions, highlighting operational gaps. While the programme is intended to support rehabilitation and personal development, its effectiveness is undermined by staffing shortages and limited resources. There is no integration with the broader education system of the territory, and no accommodations exist for prisoners with disabilities. This was evident during our visit, where a prisoner on crutches was housed without any special provisions to support participation in educational or vocational activities.

Work within the institution is voluntary and not punitive. Prisoners are entitled to equitable remuneration. Despite this, actual opportunities for work and vocational training are extremely limited. Staff availability and the absence of volunteers are the primary barriers. The prison also operates an impressive farm facility which intends to promote rehabilitation through structured work, here prisoners were seen making good use of the wood workshop and completing courses on computers.

### **Recommendations:**

**48. START** - Integrate prison education programs with the territory's formal education system to ensure continuity, recognition, and access to accredited learning pathways.

**49. START** - Create individualised education plans for all sentenced prisoners, based on case assessments. Plans should outline learning goals, vocational interests, and any disability accommodations to support rehabilitation and reintegration.

**50. KEEP** - Structured work programmes like the farm that support rehabilitation.

### **3b. Exercise and Recreation**

Prisoners have regular and predictable time out of their cells, with routines differing between remand and convicted prisoners. Remand prisoners are typically unlocked at 07:30hrs and locked up again at 16:30hrs, while convicted prisoners remain unlocked until 19:30hrs. This schedule provides a consistent structure and sufficient time out of cell to support well-being. While remand prisoners benefit from extended periods out of cell, there is a notable lack of structured activity available to them, which limits the rehabilitative value of their time. Gym access is the only activity permitted for remand prisoners, and they are not allowed to use the sports field.

All prisoners have access to one hour of outdoor exercise daily. No concerns were raised regarding access to this entitlement, and prisoners in segregation confirmed they regularly received their exercise allocation. This indicates that the minimum standard for outdoor exercise is being met across the establishment.

Prisoners are aware of the availability of gym and sports field facilities, although there were no visible notices promoting these activities. While this suggests a basic level of awareness, the absence of proactive encouragement or promotion may impact participation levels.

The Westgate gym, despite its size, is poorly equipped, lacking free weights and containing outdated and poorly maintained weight machines, some of which appeared unsafe. The gym in Co-Ed contained free weights and functioning cardio machines, however, the room could benefit from installation of adequate ventilation. These conditions raise concerns about the safety and decency of indoor exercise facilities.

### **Recommendations:**

**51. START** - Invest in new gym equipment to replace damaged or dangerous items, prioritising safety and functionality. Ensure all gym equipment across all sites is subject to regular safety checks and maintenance.

## **4. Detainee Management**

**Persons deprived of their liberty are treated according to their needs, without discrimination, and a secure and safe environment is maintained**

### **4a. Leadership and Governance**

Leaders within the Department of Corrections, the Ministry of Justice, and senior external stakeholders were in broad agreement over the challenges that exist within the Department of Corrections. This focused on staffing, infrastructure, and programmes available for prisoners.

Effective leadership is essential for driving improvement and achieving better outcomes for prisoners. The panel noted that senior managers demonstrated a strong desire to deliver positive results; however, they lacked a clear understanding of how to implement effective change. While some strategic direction was evident, the overall immaturity of the team, based on the length of time in their roles reflected in limited collective knowledge and experience which posed a significant barrier to their own development and that of others. Senior managers faced numerous challenges beyond their control, including insufficient investment in infrastructure and weaknesses in recruitment processes. Nevertheless, the panel concluded that failures in oversight and accountability within the senior team were the primary causes of many poor outcomes observed.

The panel noted a lack of visible leadership, which has hindered the senior team's ability to maintain a clear understanding of emerging issues within the facility. However, the panel was encouraged to learn that the team were receptive to leadership and

management development opportunities aimed at strengthening their effectiveness both collectively and individually.

The panel, however, was not certain that the collective leadership team within the Department of Corrections has a clear understanding of the prison's strengths and weaknesses, and, more importantly, how to solve the challenges that exist. Discussions with senior managers yielded inconsistent responses, although all acknowledged that staff shortages are currently their primary concern. This issue was also consistently raised by line officers, and across the staff survey that was distributed, (Annex C) indicating a shared recognition of staffing challenges. It was clear to the panel that this has had a significant negative impact on staff morale, especially at Westgate. The panel acknowledges these staffing challenges and recommends that a staff profiling exercise, using the HMPPS staff profiling team, is undertaken urgently. This will ensure that staff roles align with operational needs.

Beyond interactions with the court and other government agencies, the prison does not seem to actively engage with relevant external stakeholders to address institutional needs or improve prisoner outcomes. This is particularly acute when it comes to purposeful activity and programmes for prisoners. The prison has not effectively explored and engaged with community or government organisations to build partnerships and enhance service provision.

There is also concern regarding the effective deployment of available staff. Line officers reported that senior managers, often referred to as “white shirts,” are not making full use of the personnel at their disposal. Additionally, senior managers confirmed that no data is currently collected, resulting in a lack of information to support decision-making, performance monitoring or evidence of issues raised by staff and their corresponding resolution.

### **Recommendations:**

**52. START** - Undertake a staff profiling exercise to ensure roles and responsibilities are aligned with operational needs and staff capacity.

**53. START** - Implement an annual staff engagement survey to gather valuable data on employee satisfaction, needs, and suggestions. This initiative will provide insights into staff morale, highlight areas for improvement, and foster open communication between management and employees.

**54. KEEP** - Continue displaying positive messages and staff recognition throughout the facility using images and posters to boost morale (Annex B, Image #2, #3, #4, and #5)

### **4b. Training**

Training opportunities are made equally accessible to both male and female staff across the institution. However, the overall effectiveness and consistency of training delivery are

limited by staffing shortages, the absence of a formal training and development plan, and inadequate record-keeping. [REDACTED]

[REDACTED] Despite these challenges, staff expressed a clear willingness to engage in further training, indicating a positive foundation for future capacity-building efforts.

Training activities are currently organised on an ad hoc basis. A training manual is under development and expected to be in draft form by March 2026. A list of training sessions completed during the current year was provided, along with materials for new recruits. [REDACTED]

[REDACTED] Specialist training for staff working with vulnerable or at-risk prisoners is limited. While initial training includes instruction on national legislation and detainee rights, no refresher training is currently offered in these areas.

Gender-specific training is provided to officers assigned to the Co-Ed Facility through sessions titled *“Understanding the Female Offender,”* facilitated by the institutional psychologist. [REDACTED]

## Recommendations:

**55. START** - Develop and implement a comprehensive staff training and development plan that includes mandatory and specialist modules, refresher timelines, and professional development opportunities.

**56. START** - Appoint a permanent, qualified, Training Manager to oversee the development, coordination, and monitoring of all staff training activities. This position should have administrative support for scheduling, record-keeping, and evaluation of training outcomes.

**57. KEEP** - Providing gender-specific training for staff working with female detainees, such as *“Understanding the Female Offender”*.

## 4c. File Management System

Prisoner records are stored using a fireproof filing cabinet and a virtual filing system. Physical files typically include personal and criminal details such as name, date of birth, address, spouse’s name, number of children, nationality, offenses, and criminal history. The virtual system contains adjudication records, complaints, awards, and personal items like graduation photos and poems. The file administration officer is responsible for creating and maintaining the virtual platform. However, the information collated virtually is not

standardised, and there is no oversight of this system. As a result, there is no process in place to measure its accuracy.

Medical files are held separately in the clinic with limited access, ensuring confidentiality. Access to records is restricted to file managers, clerks, divisional officers, and principal officers, with basic officers requiring permission to access files. Despite monthly audits, prisoners are not informed of the reasons for collecting or recording their personal information.

The absence of a formal file management policy means the system is not fully standardised. Prisoner records are not consistently accurate, up to date, or complete. In some cases, key legal documents — such as court orders — were not systematically included. These gaps in documentation and oversight raise concerns about the reliability and integrity of the current record-keeping system.

### **Recommendations:**

**58. START** - Develop a standardised file management policy – to meet compliance and operational standards.

**59. KEEP** - Maintaining separate, confidential medical files.

### **4d. Separation and Assessment of Detained Individuals**

Westgate is a male-only facility, while the Co-Ed facility houses male, female, and juveniles in separate areas. Westgate lacks a structured classification system to group individuals by risk, offence type, or rehabilitation needs. The institution does not have formal written procedures for categorising or separating prisoners, and placement decisions are typically made based on accommodation availability and staff discretion, rather than standardised assessment protocols or validated tools.

Upon admission, individuals charged with capital offences are placed in segregation for security reasons, while others enter general population without a formal risk or needs assessment. Case Managers are expected to complete assessments within 72 hours, but delays are common due to staff shortages. There is no gender-sensitive or age-specific screening, and no process to identify substance use issues at entry, limiting access to appropriate support.

Risk assessments are informal and undocumented, with no system for regular review. vulnerable individuals, including those at risk of abuse or self-harm, are identified reactively rather than through structured tools. Healthcare staff, particularly the psychiatrist, play a key role in monitoring individuals at risk of self-harm, advising on confinement duration and reintegration. However, there is no institutional suicide prevention policy or staff training framework in place. The management of individuals at risk of suicide or self-harm thus requires improvement. The panel recommends the adoption of a simplified version of the ACCT system as a more suitable tool for this setting.

## Recommendations:

**60. STOP** - Immediate action is needed to ensure segregation is lawful and transparent. It must be authorised by a competent authority, reviewed regularly, used only when necessary and proportionate, and never applied as routine discipline.

**61. START** - Develop and Implement a Formal Classification and Assessment Policy. Establish standardised admission procedures, including risk and needs assessments to be completed within 72 hours. Ensure robust record-keeping to support transparency and accountability.

**62. START** - The panel recommends the adoption of a simplified version of the ACCT system as a more suitable tool for this setting. HMPPS can provide a revised version of this document which already operates in other OT prisons.

**63. START** - Authorise medical professionals to make binding recommendations regarding the placement, continued separation, or reintegration of prisoners based on clinical evaluation.

**64. START** - Provide ongoing training in risk assessment, mental health awareness, and rights-based approaches to detainee management.

## 4e. Removal and Transfer Procedures

During the review, the panel observed a court escort departing from Westgate. Prisoners are restrained with handcuffs secured to a floor-anchored chain during transport, though restraints are removed before any judicial or administrative appearance. An occurrence book is regularly updated to record all transfers from the facility to court. The Co-Ed facility operates with a single transport vehicle, and it remains unclear whether appropriate separation is consistently maintained between men, women, and young individuals. Transfers from Westgate use a secured van with two compartments to support separation by age, gender, and vulnerability. Two smaller, unsecured vans are used for hospital transfers.

While policy requires a two-to-one staff-to-inmate ratio, officers report this is often unmet due to staffing shortages. Concerns were also raised about poor ventilation in the transport vehicle, particularly in the inmate seating area, which lacks air conditioning. The vehicle, now six years old, is only replaced when it becomes unusable, leading to frequent breakdowns.

Prisoners are typically notified of transfers at least a day in advance, allowing time to inform family members. They are also advised of court dates in advance and may contact their lawyers by phone or receive visits at the facility. Escorting officers are briefed on individual inmate needs, though this is not formally documented.

When prisoners are transferred to external medical institutions, full medical files are not sent. Instead, a King Edward Memorial Hospital (KEMH) consultation form accompanies the inmate, containing basic identifiers and a hospital record number used to retrieve their medical history. Upon return, a discharge summary is added to the inmate's medical file.

### **Recommendations:**

**65. START** - Acquire new escort vehicles that are purpose-built for the safe and comfortable transport of prisoners. These vehicles should include secure compartments and proper air conditioning in the inmate seating area. The new fleet should replace both the current outdated escort vehicle and the unsecured vans currently used for hospital transfers.

#### **4f. Encouraging Good Behaviour – Incentivisation and Earned Privileges (IEP)**

A formal incentivisation and earned privileges scheme does not operate within the Department of Corrections. This is a missed opportunity to encourage good behaviour within the facilities. During the review period, there was limited evidence of proactive staff practices aimed at encouraging positive behaviour. Interactions between staff and prisoners were largely transactional, focusing on routine operational matters and responding to general requests. A formal IEP scheme would support both staff and prisoners in encouraging good behaviour.

In theory, obtaining a job inside the prison—such as working in the kitchen or gardening—was considered a privilege earned through a sustained period of good behaviour. These privileges could, in principle, be revoked in response to sanctionable behaviour. However, the absence of documented policies or guidance relating to Earned Privileges means this process isn't transparent or consistent.

When questioned, both staff and prisoners demonstrated an understanding of how good conduct was managed in practice, with a strong perception that it relied on positive relationships between staff and prisoners.

**Recommendations:**

**66. START** - Introduce a formal IEP scheme (basic, standard, enhanced). Experience from other OTs and the UK can inform this process.

[REDACTED]

[REDACTED]

[REDACTED]

**Recommendations:**

[REDACTED]

[REDACTED]

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**Recommendations:**

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[REDACTED]

## **Annex A – Details on ‘Stop, Start, Keep’ and how the panel sourced, evidenced and triangulated information**

### *Evidence*

The panel was able to triangulate different sources of information effectively. The methodology identifies five sources of evidence:

1. Documentation
2. Observation
3. Prisoners
4. Leadership & Staff
5. Other stakeholders

**Start:** What should the institution start doing?

- The activities that the institution should learn to do or start doing. These policies, or activities are recommended to improve work processes, prisoner outcomes, and staff confidence and wellbeing.

**Stop:** What should the institution stop doing?

- Any policies, activities, and behaviours that are not working, resulting in inefficiency, and poor prisoner outcomes or staff wellbeing, should be eliminated.

**Keep:** What should the institution keep doing?

- Policies, activities, and behaviours that have positively contributed towards prisoner and staff outcomes should be continued.

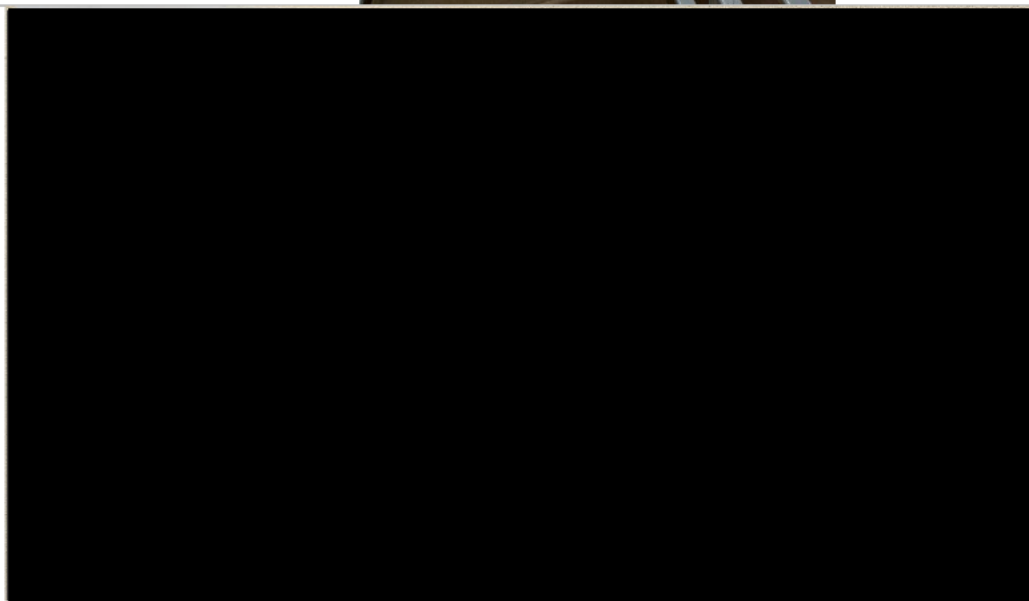
**Annex B – Pictures**

| Image Number | Corresponding Image                                                                 |
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| ■            |   |
| #2           |  |

#3



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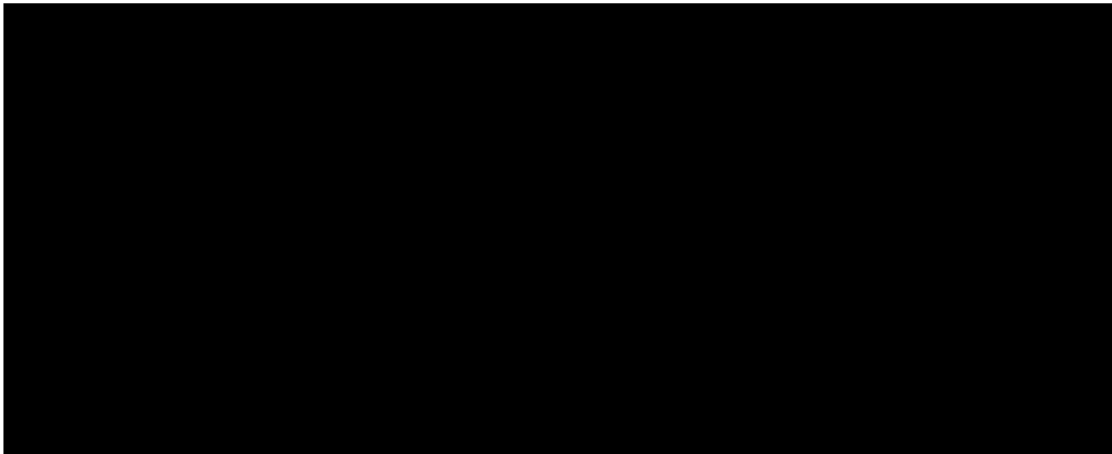
#5



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| <div data-bbox="204 1155 244 1189" data-label="Image"></div> | <div data-bbox="529 824 1106 1545" data-label="Image"></div> |

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**Annex C – Staff Survey – Bermuda (21 responses total) – 09/10/2025**



2. Wellbeing and Leadership - Please indicate to what extent you agree or disagree with the following statements.

● Strongly Agree ● Agree ● Neutral ● Disagree ● Strongly Disagree

The prison establishment supports staff wellbeing

Top priorities of the prison establishment are clearly communicated to you

Senior leaders in this establishment are approachable (e.g. they take time to listen)

My knowledge and skills are sufficient to do my job well (e.g. training and development opportunities)

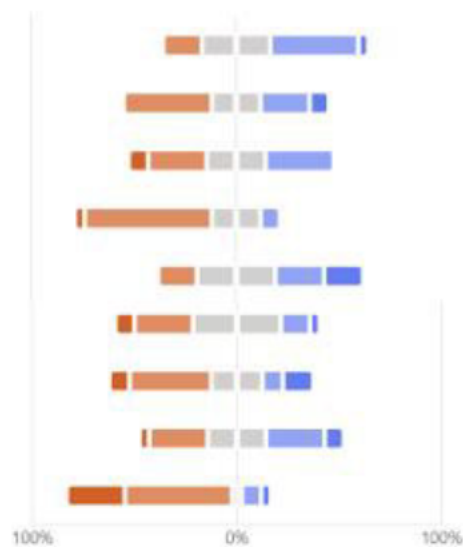
I am confident that any complaints I raise to seniors will be adequately dealt with.

My morale at work is high

I feel supported by my line manager

The prison establishment provides a safe and secure environment for its prisoners

I understand what is required of me in my role and how this fits into the wider prison objectives



**Annex D – All recommendations****1a. Rights Awareness**

1. **START** - Implement interim documentation issuance for new receptions at Westgate until staffing stabilises and the Intake Programme resumes.
2. **START** - Update and reintroduce the Inmate Handbook as a mandatory induction resource. Establish a process for regular review and distribution.
3. **START** - Ensure communal areas display rules and information for prisoners, and current, relevant, and rehabilitative materials across all facilities.

**1b. Use of Force and Restraint**

4. **STOP** - Avoid routine handcuffing of remand prisoners; restraint use should be risk-based and evidence-informed.
5. **START** - Approve and publish the Use of Force policy. Clarify in policy who can authorise full search and relocation under restraint and ensuring staff understand planned use of force and authorisation procedures; include in training. Policy frameworks within HMPPS or the Cayman Islands or Turks and Caicos Islands prisons can inform the Department of Correction's Use of Force policy.
6. **START** - Staff should provide more information in their UoF reports, detailing what part they played in the restraint of any prisoners and how the force was necessary, reasonable and proportionate. If not already included, report writing should be covered in UoF training.
7. **START** - Introduce a policy for the use of special accommodation, detailing authorisation and justification, including 24-hour review intervals.
8. **START** - Assign a manager as Use of Force Coordinator to oversee the logging, recording and reviewing all uses of force.

**1c. Discipline**

9. **STOP** - Immediate action is needed to ensure segregation is lawful and transparent. It must be authorised by a competent authority, reviewed regularly, used only when necessary and proportionate, and never applied as routine discipline.

10. **START** - The disciplinary process should be updated to include a clear centralised record of the use of discipline and written outcomes provided to prisoners.

#### 1d. Searches of Detained Individuals and Living Accommodation

11. **STOP** - Strip searches should not be routine searches as they are invasive and should only be done when necessary. The search policy should be updated to reflect this so that strip searches are intelligence-led and only carried out when strictly necessary.

12. **KEEP** - Ensuring searches are conducted by same-sex staff and in private, with professionalism and respect for dignity.

#### 1e. Complaints Procedures

13. **STOP** - Delivering complaint outcomes verbally. All responses should be provided in writing, with clear reasons for the decision.

14. **STOP** - Allowing complaints to pass through multiple staff without confidentiality safeguards. Introduce secure complaint boxes accessible only to designated administrative staff or an independent oversight body. Provide staff training on complaint procedures, confidentiality, and ethical standards.

15. **START** - Install notice boards on each wing explaining how to make a complaint, where to submit it, and expected response times. Update the inmate handbook to include this information with clear timelines for each stage of the process.

16. **START** - Create a centralised complaints log to record all submissions, outcomes, and timeframes. Regularly review the log to identify patterns or recurring issues and share findings with senior management and oversight bodies such as the Treatment of Offenders Board.

17. **KEEP** - Recording complaints in inmate files and the digital database.

#### 1f. Investigations into Deaths, Escape, Disappearance, or Serious Injury

18. **START** - The facility should keep a central record log of all investigations into deaths, escapes, disappearance or serious injury. For deaths and escapes the prison should consider using an investigator that is independent of the Bermuda Correctional Service.

19. **START** - At least one senior manager should undertake investigation training, which can be facilitated by the UK Ministry of Justice.

### 1g. Contact with outside world

20. **START** - Consider introducing a basic allowance or subsidised phone credit for remand prisoners, particularly foreign nationals, to ensure equitable access to family contact.

21. **START** - Establish scheduled time slots for overseas calls to accommodate time zone differences and improve access for foreign nationals.

22. **KEEP** - Continue providing free lawyer calls without requiring phone credit, ensuring prisoners can access legal representation without financial barriers.

23. **KEEP** - Preserve the quality of the visit room, which is spacious, well-equipped, and conducive to safe and respectful interactions.

### 1h. Healthcare

24. **STOP** - Inequalities in access to healthcare between remand and convicted prisoners. With particular focus on access to routine dental care and substance misuse programmes.

25. **START** - Offering access to female doctors for female prisoners. While female nurses conduct screenings, the absence of a female doctor limits gender-sensitive care. Options for female medical officers should be explored.

26. **KEEP** - All prisoners are seen by a nurse within 24 hours of arrival, which is a strong practice that supports early identification of health needs.

27. **KEEP** - The cleanliness, organisation, and availability of private consultation spaces at Westgate and other sites reflect good practice and should be sustained.

28. **KEEP** - The Right Living House TC model provides structured support for substance misuse and should be maintained and expanded where possible.

### 1i. Contact with Visiting Board/Committee

29. **STOP** - Treatment of Offenders Board should be fully removed from the adjudication process to eliminate conflicts of interest and strengthen its role as an independent oversight and advocacy body for prisoners. Its primary focus should shift toward monitoring welfare, investigating complaints, and ensuring that prisoners' rights are upheld.

30. **START** - Establish clear and confidential channels for communication between prisoners and the Board, such as private meeting spaces during visits and secure drop boxes or sealed envelopes for correspondence. The Board should also ensure its visits are consistently logged and publicly scheduled.

### 1j. Respect for Religion and Beliefs

31. **START** - Hire chaplains as full-time staff to increase their availability within the prison, as opposed to the current limit of 30 hours per month. This change would enable them to become more deeply involved in rehabilitation programmes for prisoners, fostering a more supportive environment.

32. **KEEP** - The facility should continue to enable prisoners to observe the needs of their religion by maintaining access to religious services, texts, and spiritual support. Regular visits from religious leaders across denominations, the availability of religious books in the library, and the recording of religious affiliation upon reception reflect good practice.

### 2a. Accommodation

33. **START** - Implement a structured maintenance program with a dedicated budget, supported by a low-cost initiative involving prisoner contributions, to improve living conditions and uphold dignity.

34. **START** - Upgrade ventilation systems to meet health and safety standards, ensuring cells are fit for purpose and support wellbeing.

35. **START** - Conduct quarterly audits on accommodation standards and supply chain performance to maintain compliance and accountability.

36. **START** - Train staff to ensure regular Accommodation Fabric Checks (AFCs) effectively identify and fix issues with prisoner accommodation and hygiene facilities.

37. **KEEP** - Single-cell accommodation, which removes the need for cell-sharing risk assessments.

## 2b. Personal Hygiene

38. **START** - Implement a proactive maintenance schedule for shower facilities to address current issues and prevent future deterioration.
39. **KEEP** - Frequent access to shower facilities that supports personal hygiene and meets climate-appropriate standards.

## 2c. Clothing and Bedding

40. **START** - Establish a centralised policy and inventory management system for mattresses, pillows, and essential clothing. Set minimum stock thresholds and trigger alerts for replenishment.
41. **START** - It is advised that prisoners be permitted to wear their own clothing or other appropriate attire when attending court or formal hearings. This approach supports fairness, dignity, and the principle of avoiding undue prejudice.
42. **KEEP** - Issuing three sets of clean, climate-appropriate prison clothing upon admission, which meets basic standards of decency and health.

## 2d. Food and Water

43. **STOP** - Remand prisoners' access to drinking water is limited during lockdown hours. As they are locked in their cells from 16:30 onwards, consideration should be given to providing bottled water or personal water containers to ensure they have access to drinking water throughout the evening and overnight.
44. **START** - Appoint a dedicated kitchen manager at Westgate to oversee daily operations, ensure hygiene compliance, and provide consistent oversight of kitchen staff and procedures.
45. **START** - Provide catering and hygiene training, or facilitate access to relevant qualifications, for officers and prisoners working in kitchen areas to enhance food safety and quality assurance.
46. **START** - Align the timing of the hot evening meal at Westgate with other facilities by serving it at 16:30, thereby reducing the extended gap between dinner and breakfast.

47. **KEEP** - Continue to accommodate special dietary needs, including vegan, vegetarian, and medical diets, and maintaining the practice of adapting meals and mealtimes to support religious observance, such as during Ramadan.

### 3a. Education, Training and Work

48. **START** - Integrate prison education programs with the territory's formal education system to ensure continuity, recognition, and access to accredited learning pathways.

49. **START** - Create individualised education plans for all sentenced prisoners, based on case assessments. Plans should outline learning goals, vocational interests, and any disability accommodations to support rehabilitation and reintegration.

50. **KEEP** - Structured work programmes like the farm that support rehabilitation.

### 3b. Exercise and Recreation

51. **START** - Invest in new gym equipment to replace damaged or dangerous items, prioritising safety and functionality. Ensure all gym equipment across all sites is subject to regular safety checks and maintenance.

### 4a. Leadership and Governance

52. **START** - Undertake a staff profiling exercise to ensure roles and responsibilities are aligned with operational needs and staff capacity.

53. **START** - Implement an annual staff engagement survey to gather valuable data on employee satisfaction, needs, and suggestions. This initiative will provide insights into staff morale, highlight areas for improvement, and foster open communication between management and employees.

54. **KEEP** - Continue displaying positive messages and staff recognition throughout the facility using images and posters to boost morale (Annex B, Image #2, #3, #4, and #5)

### 4b. Training

55. **START** - Develop and implement a comprehensive staff training and development plan that includes mandatory and specialist modules, refresher timelines, and professional development opportunities.

56. **START** - Appoint a permanent, qualified, Training Manager to oversee the development, coordination, and monitoring of all staff training activities. This position should have administrative support for scheduling, record-keeping, and evaluation of training outcomes.

57. **KEEP** - Providing gender-specific training for staff working with female detainees, such as *“Understanding the Female Offender”*.

#### 4c. File Management System

58. **START** - Develop a standardised file management policy – to meet compliance and operational standards.

59. **KEEP** - Maintaining separate, confidential medical files.

#### 4d. Separation and Assessment of Detained Individuals

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#### 4e. Removal and Transfer Procedures

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#### 4f. Encouraging Good Behaviour – Incentivisation and Earned Privileges (IEP)

66. **START** - Introduce a formal IEP scheme (basic, standard, enhanced). Experience from other OTs and the UK can inform this process.

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