



The National Monitoring Framework



The National Monitoring Framework



Foreword

Prisons are currently the subject of significant scrutiny, as the Government works towards our new prison reform programme, and there are undoubtedly challenges, coupled with financial pressures in the department and beyond. Although relatively much smaller in size, the immigration detention estate is also subject to significant scrutiny, particularly in terms of the treatment of the people detained in it.

As the Ministers responsible, we have to gauge and act upon challenges being faced in our prisons and the immigration detention estate. As a vital part of this, Independent Monitoring Boards (IMBs) throughout the two estates provide us with an invaluable insight into the treatment and care of prisoners and immigration detainees and we are very grateful for the hard work IMB members put in. IMBs offer an unparalleled level of protection for those detained, those working in prisons or the immigration detention estate and those accountable in Government.

We take time to meet IMB members when we visit prisons and immigration removal centres, without a governor or centre manager being present if possible. Their insights are part of the picture that we have been able to build about our prisons and the immigration detention estate and how they are run. We read and reply to at least two IMB annual reports each week. It is a process that helps inform our understanding about how current prison and immigration removal centre rules and regulations are being observed and how they are working in practice.

We welcome this new National Monitoring Framework which defines the role of IMBs in performing their duties and sets out a range of approaches to monitoring. It is important for all IMBs to act consistently within the National Framework but it allows for each individual Board to plan and implement its monitoring role.

We would like to take this opportunity to thank IMB members for their dedication and continued unremunerated hard work. They are doing a magnificent job and deserve widespread recognition.

A handwritten signature in black ink that reads 'Andrew Selous'.

Andrew Selous MP, Parliamentary
Under-Secretary of State for Prisons,
Probation, Rehabilitation

A handwritten signature in black ink that reads 'James Brokenshire'.

James Brokenshire MP,
Minister of State (Minister for Immigration)

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Independent Monitoring Boards (IMBs) have been established by statute¹. They exist for a range of custodial environments (prisons of all sorts and the Immigration Detention Estate (IDE) which comprises immigration removal centres (IRCs), short-term holding facilities (STHFs) and repatriation flights for those being removed from the United Kingdom²). Ministers appoint the members.

Whilst the most appropriate techniques vary from one establishment to another, the purposes and principles of monitoring are the same for all IMBs, whatever the establishment. This National Monitoring Framework expresses and explains these common foundations.

The Framework refers to two guidance documents. The IMB Toolkits give examples of the monitoring techniques that IMBs may use. Not all are relevant to all IMBs because of their different circumstances. The Toolkits (one for prisons and one for the IDE) are living documents and, as new approaches to monitoring are developed in response to changing needs, they will be added. The Report Template comprises guidance for the preparation of annual reports for Ministers.

1. Overview

Those detained in custody are among the most vulnerable people in society.

The IMB for a prison, IRC or STHF is charged with monitoring whether prisoners and detainees are treated with fairness and humanity whilst in custody, and (in prisons and Young Offender Institutions (YOIs)) prepared properly for release. In fulfilling this monitoring role, IMB members are expected to be impartial and apolitical.

The purpose of this Framework and the guidance documents is to:

- define the role of IMBs in performing these duties;
- promote a consistency of approach;
- disseminate good practice;
- support Boards in monitoring effectively.

2. Points from mandatory requirements that are relevant to Monitoring

Statutes and Statutory Instruments

Members of an IMB are from the local community, appointed by the Secretary of State for Justice under the Prison Act 1952 or the Home Secretary under Section 152 of the Immigration and Asylum Act 1999.

The following paragraphs summarise the relevant secondary legislation³.

It is the duty of each IMB:

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

¹ The Prison Act 1952 and the Immigration and Asylum Act 1999

² Flight monitoring and monitoring STHFs are not yet on a statutory footing

³ Prison Rules Part V 2010; YOI Rules Part V 2010, and Detention Centre Rules Part VI 2001

To enable the Board to carry out these duties effectively its members have right of access to every prisoner or detainee, every part of the establishment and all its records (except for personal medical records)⁴.

Explanatory Statement issued following the Lloyd Review of Prison Boards of Visitors (2000-1)

(1) In fulfilling these duties any matter which directly or indirectly affects an individual held in custody or detention, or affects the prospects for her/his successful resettlement on release, is of relevance to the Board. That includes the state of the establishment's buildings and the efficiency of the administration where they have an impact on prisoners or detainees.

(2) Although Boards have no comparable responsibilities for staff, staff problems which affect those held in custody or detention are the Board's proper concern. It is also important for Boards to build a professional relationship with staff and where they can assist in resolving any difficulties a member of staff may have, the Board, where it judges appropriate, should do so.

(3) Board members should regularly engage with prisoners or detainees and staff and do so with a courtesy and interest which earns their trust and draws out their hopes and concerns. Members should note the quality of the interaction between staff and those held in custody or detention. They should be conscious at all times that their own demeanour and approach can have an important impact on the atmosphere of the establishment and the readiness of prisoners or detainees and staff to confide in them.

(4) To be able to carry out their monitoring and reporting duties effectively, Boards must have a wide knowledge of what is expected of their

prison or removal centre in all its activities. This includes familiarity with the rights of prisoners and detainees and established standards for their welfare and treatment. It also includes a sound appreciation of what those responsible for the quality of the various aspects of the regime and associated services regard as good practice. It is this knowledge which enables Boards to report confidently and accurately when establishments are falling short of what is required of them or, just as importantly, where they are reaching high standards.

(5) Knowing how, when and with whom Boards should raise their concerns is crucial to their ultimate effectiveness. Where Boards are critical, the matter should be raised as soon as it arises with those to whom authority for that aspect of the regime has been delegated. In reporting to the Secretary of State, Boards should ensure that the issues they highlight are sufficiently explained so that not only Ministers but also other interested parties can fully appreciate their significance.

(6) Most importantly, the Board's duty is not only to report on how well an establishment is measuring up to accepted standards but to look with clear and fresh eyes at the prisoner's or detainee's total experience of custody or detention and preparation for release or removal. Boards should also express, where they judge necessary or desirable, their common-sense opinion on the humanity and utility of the policies and practices that the establishment is obliged to follow.

The National Preventive Mechanism (NPM)

IMBs are part of the United Kingdom's NPM, created to meet the obligations of the Optional Protocol of the United Nations Convention Against Torture (OPCAT). As such, in England and Wales IMBs work in partnership with other

⁴ IMBs do not have access, in any custody setting, to records covered by the Regulation of Investigatory Powers Act 2000; medical records may only be consulted with the explicit written permission of the prisoner or detainee concerned

members such as the Prison Inspectorate (HMIP), and with bodies such as the Youth Justice Board (YJB) and the Prisons and Probation Ombudsman (PPO).

The limits to mandatory requirements

The requirements listed above, and the explanatory comments made following the Lloyd review, provide a complete statement of what is mandatory for each IMB. Examples of good practices are given below. No Board is obliged to follow every guideline in all circumstances. Rather, each Board should strive to fulfil the mandatory requirements listed above in the most efficient, effective and economic ways possible, in the situation of its establishment, by deploying the particular skills and resources of its members.

Although each IMB has to decide how best to monitor its particular establishment, it must also recognise its place within the national network of IMBs, whose reputation and effectiveness it can, in principle, either enhance or damage. No IMB is autonomous. Members are public appointees and must behave responsibly.

IMBs should ensure that their practices comply with general legislation (such as for data protection, handling personal data, information assurance) as well as specific requirements for safety and security. IMB members must always take proper precautions to safeguard their personal safety and do nothing to put at risk the safety of others within the establishment. In this matter, they should obey instructions from prison or IDE staff. If it is felt that such instructions are inappropriate, the time for discussion is after, not during, the event.

The IMB National Council was established to provide leadership and guidance to IMBs. There are some instances when it asks all IMBs to conform to a specified standard practice (for instance, reporting prisoner Applications according to a common classification so that

Ministers can identify similarities between prisons and monitor trends over time). Council uses this authority with caution because the differences between establishments mean that there can be few universal 'rules'.

3. The nature of monitoring

Monitoring is different from inspection.

Monitoring involves frequent, systematic and purposeful observation to determine how well objectives are met. It involves keeping track of outcomes continually. Monitors do not have executive roles but they can question and prompt those who do. *Inspection*, by contrast, is episodic and involves critical examination, looking especially for strengths and weaknesses. Typically it includes scrutiny of processes, where the inspectors themselves are experts equipped to make technically sound recommendations for improvement.

Monitoring uses standards for comparison.

Monitors check whether stated performance standards are met. For instance, IMB members observe whether prisons conform to Prison Rules, Prison Service Orders and Instructions, Detention Centre Rules and Detention Services Orders, Service Level Agreements, specifications, contracts and the law. They monitor anything that affects those held in custody, whether it is the impact of government policy or operational matters decided at the level of the establishment.

Monitoring involves close observation.

Efficient use of time is achieved by identifying key questions and doing what it takes, going where is needed, talking to who can help, to obtain answers. Monitoring simply by walking about is not, in general, good practice because it is inefficient. Nevertheless, IMB members who keep their eyes open cannot fail to pick up

useful information in addition to what they learn when focusing on a specific question.

Monitoring requires planning and selection.

It is not possible to observe everything that happens, even some of the time, and Board members have to agree the most important areas on which to concentrate effort in the context of each establishment.

Monitoring has a cost.

Although IMB members are not remunerated, monitoring costs the taxpayer a significant cash sum (for payment of travel expenses, for member training, for secretariat support). There are also opportunity costs for the establishments (provision of office space, the support of a part-time clerk, the staff time it takes to answer IMB questions etc.). Boards must provide value for money and this is an important criterion informing the selection of what is monitored and how.

Monitoring is a skill.

Effective monitoring requires more than going round an establishment and responding to Applications from prisoners or Requests from detainees. Monitoring involves scrutiny with a purpose. It needs eyes that know what to look for and ears that can interpret what they hear. Direct observation trumps hearsay ('prison staff say that...') but hearsay, so long as it is recorded as such, is admissible, particularly when it can be independently checked.

IMBs do good by monitoring skilfully and perceptively. They do not monitor by 'doing good'. Perhaps their most important function in this context is '...to look with clear fresh eyes at the prisoner's or detainee's total experience...'

4. What may be monitored

Safety of the establishment, especially prisoners and detainees (e.g. assaults, bullying – both physical and emotional, equality and diversity, listeners and mentors, humane and decent treatment of vulnerable individuals, use of intelligence, use of force, security, the Assessment Care in Custody Teamwork (ACCT) and Assessment Care in Detention Teamwork (ACDT) systems, prevention of contraband from entering the establishment (drugs, phones etc.), results and impact of mandatory drug testing (MDT), quality of risk assessments, Multi-Agency Public Protection Arrangements (MAPPA)).

Fairness of prisoner treatment (e.g. the incentives and earned privileges (IEP) regime, use of care and separation/segregation unit, removal from association, temporary confinement and special accommodation, adjudications and reviews, access to exercise, availability of work, food for the range of diets and its quality, access to canteen, opportunities for religious observance, operation of a trustworthy complaints system, complaints statistics, organisation of visits, equality in terms of the protected characteristics).

Accommodation, the daily regime and the way it is managed (e.g. use of association, range of age-appropriate activities (behaviour management programmes, work, educational and vocational courses, exercise, recreation), prisoners being unlocked promptly and consistently able to get to their activities, ease of booking activities and family visits, furnishing, equipment and maintenance of living accommodation and public areas, general cleanliness and tidiness, personal officers and prisoner or detainee/staff relationships).

Communication and consultation (e.g. the accuracy, clarity and timeliness of communication with prisoners and detainees (individually and collectively) over matters

that concern them, induction and induction materials, use of notice boards and IT for communication, issues relating to sentences, eligibility for Release on Temporary Licence (ROTL) or Home Detention Curfew (HDC), communication between different parts of the establishment and with external agencies (e.g. probation) concerning individual prisoners, consultation arrangements and hearing the 'prisoner or detainee voice', personal officers, arrangements for non-English speakers, the illiterate and those with mental health issues).

Healthcare (e.g. whether the healthcare provided is as good as in the community, taking into account the vulnerability and particular needs of the population. This is shown in waiting times for appointments, mental health services, dentistry, effectiveness of collaboration with external health service providers, support for those with long-term health conditions or addictions, prescribing and medication, range of clinics offered).

Entitlements (e.g. whether prisoners and detainees receive their full entitlements across all areas, access to timely confidential legal advice, the correct number of visits, correct sentence planning and access to obligatory courses/programmes, accurate release dates, rapid repatriation for foreign national prisoners, especially those detained under immigration powers post-sentence, voting in elections when this is an entitlement).

Education, training and preparation for release (e.g. maintenance of good family links (subject to security considerations), rehabilitation and offender behaviour programmes, provision of relevant education or training to prepare for employment and life after release, adequacy of careers information, advice and guidance, accommodation in appropriate resettlement prison as release date approaches, assistance with housing, job search etc., links with community rehabilitation company (CRC)/ probation and other external agencies or organisations working 'through the gate').

There are overlaps between the seven areas listed here but, even so, they include much more than an IMB is able to cover in the course of a year's monitoring. Hence the requirement for deliberate selection, by every Board, of a focus that is relevant to the circumstances of the establishment it monitors.

IMBs have a duty to report whether prisoners and detainees receive their rightful entitlements (as indicated above) and also the extent to which such entitlements constitute fair and humane treatment. This is why members are given the right to be shown all the establishment's records, including of contractual arrangements.

5. Monitoring activities

IMBs have developed a range of approaches to monitoring all of which have a place in some circumstances and some of which have a place in most circumstances. Few are mandatory and required either by law or by a Secretary of State. The approaches listed below should be deployed insofar as they enable an IMB to fulfil its remit as set out on Sections 1 and 2 above, not because they have particular virtues in or of themselves. The IMB Toolkits (for prisons and for the IDE) contain expanded lists, with examples.

Establishing a profile.

IMBs cannot operate in secrecy. Prisoners and detainees need to know that they exist and how to make contact. Staff need to understand and respect the independence and integrity of IMB members. Prisoners, detainees and staff alike need to appreciate that IMBs have no executive power but that they can exert influence. IMBs must build a reputation for honesty and fairness. The IMB role is unique and easily misunderstood. Explaining it is an unending task

because of the turnover of prisoners, detainees and staff. The demeanour of members whenever they are in an establishment is a key factor in promoting trust in the IMB.

Responding to Applications and Requests.

Prisoners and detainees must be able to apply directly or ask to speak to a member of the IMB, without involving or informing staff and without incurring sanctions. IMB members have an obligation to respond (orally or in writing). Such Applications and Requests are relevant to fulfilment of the IMB's role because they are a way to monitor which issues concern prisoners or detainees. They provide an invitation and an agenda for dialogue with individuals. There are two things that they are not.

- An establishment should run an effective complaints system. Applications and Requests are not an alternative and IMBs need to discourage those being held from perceiving them this way. It is unhelpful for the IMB to appear to offer a substitute (which militates against the establishment ensuring that its own system is fit for purpose). Ideally, Applications and Requests should identify issues (one of which might be that the complaints system is unsatisfactory).
- The issues raised in Applications and Requests should not set an IMB's monitoring agenda. They must not be ignored and they should certainly influence the agenda but an IMB must make its own decisions about monitoring priorities and not simply 'follow the Applications'.

Visiting the establishment.

IMB members visit an establishment in order to monitor how well it operates in one or several aspects of its work. The term rota visit has become IMB jargon for a visit by the member whose week it is (according to a rota of the members) to monitor the general state of the

establishment and be the point of contact in the event of (e.g.) a serious incident. But there are many other possible reasons to visit, some of which are illustrated below.

- All visits should be purposeful, with specific monitoring objectives in mind. Evidence relevant to other matters may be picked up at the same time, and must not be ignored, but members should have a focus for what they do and good reasons for where they go.

- Usually, an important element of monitoring the 'general state of the establishment' involves assessing the atmosphere where prisoners or detainees are accommodated and collecting evidence about the quality of life that they experience. The care taken of prisoners or detainees with open ACCT or ACDT documents or under a constant watch will also be things most IMBs want to monitor routinely.

- All significant evidence acquired during any visit needs to be recorded in a concise and retrievable way. Boards have to establish processes for forwarding promptly any such evidence that ought to be brought to the attention of the establishment's governor, director or manager, so that they can respond. IMB written records may be required during an investigation, by a court or under the Freedom of Information Act.

Attending adjudications, reviews and cellular confinement.

There are disciplinary and management procedures that are applied when prisoners or detainees infringe in some way. Potentially, they

are a point of vulnerability for those concerned because they do not have easy recourse to the advice and support that might be available in society. A focus of IMB monitoring should normally be how the establishment uses sanctions. Are they fair and proportionate? Do prisoners and detainees understand them? When some form of cellular or temporary confinement is imposed, are the conditions humane?

- **Segregation under Rule 45 (Good Order or Discipline), Rule 49 (YOI) or Rule 40 (IDE).**

Removal from association is an administrative measure, not a punishment. This explains why there is no quasi-legal process (as for adjudications) and no appeal possible. There is no outside scrutiny of the use of R45/49/40 apart from that by the IMB or HMIP during an inspection. It is therefore important for Board members to speak to those held under these rules and attend the Reviews held in prisons when possible to check that the segregation decision is fair, that due process is followed, and that the total time spent segregated is not excessive.

- **Special accommodation.** Keeping someone in special accommodation is another administrative measure, not a punishment. It is a last resort, justified only when its use is essential to keep the individual or others safe, because such accommodation is by definition less than decent. They should be monitored at least once a day.

Visiting residential healthcare units.

Not all establishments have in-patient healthcare units but where they exist they are similar to care and separation/segregation units in that prisoners or detainees, often with mental health concerns, may be held without access to normal facilities and where abuse might occur without being detected. Such units are priority areas for monitoring effort.

Attending serious incidents.

Establishments are obliged to inform the IMB promptly in the event that a significant (reportable) incident occurs. This might be a death in custody, an epidemic, an escape, a hostage incident, industrial action by staff, a significant security lapse or prisoner or detainee unrest. IMBs need to have a contingency plan in place covering action in event that an incident is deemed serious, generally one that involves opening a Command Suite. This plan should be agreed with the establishment and up-to-date.

All significant incidents need to be looked into but not all incidents require urgent IMB attendance. Whether this is appropriate, necessary or simply helpful will depend to some extent on the advice of the establishment's staff. However, ultimately it is for the IMB to decide whether and when to attend. Serious incidents, such as hostage-taking, may affect people's safety and security, both inside and outside the walls. They give rise to heightened emotions that may affect judgements. Things can sometimes go badly wrong.

When an establishment opens its Command Suite, it is often sensible for the IMB to arrange for two members to attend. One can monitor events in the Command Suite whilst the other attends the incident itself. Safety advice given by staff must always be followed.

When IMB members monitor a serious incident directly (either as it unfolds or its aftermath) the purpose is to make a contemporaneous record of events that is independent of that produced by staff or the National Offender Management Service (NOMS) or the Home Office. In the absence of CCTV and video-monitoring, the presence of an IMB member may be the only source of independent evidence about how an incident unfolds.

Observing meetings.

Establishments hold many meetings every week (staff meetings and meetings with prisoners or detainees). IMB members are entitled to attend any of them as observers, not participants. They do not endorse a meeting's conclusions, though they may confirm (e.g.) that the meeting has considered its agenda conscientiously or that a particular procedure has been followed correctly.

The purpose of attending a meeting is not because it is interesting, but because it may provide information or evidence relevant to one of a Board's monitoring priorities. These priorities govern the selection of the meetings to be observed. Generally, members do not routinely attend any given meeting but sample a range periodically, and read the minutes of others.

Analysing an establishment's records, data and CCTV.

IMBs are entitled to see all records, including individual prisoner or detainee records (apart from medical records and some covert intelligence information), in whatever format (paper or digital). IMBs may also see the establishment's agreements with outside providers. Such data can provide a wealth of relevant information. For instance, complaints statistics, use of force statistics, minutes of meetings, IEP levels, attendance at education courses, work placements and their analysis by prisoner age, ethnicity, location etc. yield powerful evidence about fairness, humanity and preparation for release.

CCTV records provide evidence about how staff deal with specific incidents which IMB members cannot observe because they are not present at the time. They also permit observation (e.g.) of how association times are managed, how promptly those held are routinely unlocked, and many other activities.

Analysing data takes time and Boards need to decide, case-by-case, what is appropriate. The importance of data to an IMB should be measured in terms of the secure evidence it provides of relevance to the Board's priorities, not in terms of whether or not it is 'interesting'.

6. Monitoring skills and good practice

The important product of an IMB's monitoring is a set of judgements about the treatment of prisoners or detainees. They are first and foremost judgements about outcomes (not practices or processes). Such judgements, to be credible, must be evidence-based and so the first job of IMB members is to collect and record secure and relevant evidence. It is not enough to base judgements on what a Board 'thinks' is the case if this cannot be persuasively substantiated.

Evidence may be hard and quantitative (e.g. ... three prisoners refused food for 24 hours or longer during the period 1 January to 31 March) or softer and qualitative (e.g. ...the atmosphere in the prison was tense – there was no laughter during movement between activities and prisoners were avoiding any eye contact with staff and also IMB members). Both are valid, potentially relevant and valuable.

The core skills needed for good monitoring are those of focused observation, careful listening, perceptive interpretation (avoiding over-interpretation) and concise, accurate recording.

Observation, to be useful, begins with knowing what to look out for and is achieved by actively looking for it. The starting point is an explicit question to be answered. Are the food portions adequate? Is the floor clean? Are the washing machines all working? Are all staff on the wing wearing clear personal ID? Taking six prisoners

or detainees at random, how many know the name of their personal or welfare officer?

Listening involves both hearing and watching because body language conveys important messages. It is most illuminating when accompanied by use of open questions. It may involve interpretation if the person concerned is nervous or inarticulate or not a native speaker of English. It often requires patience and the avoidance of rushing. The goal is to understand what the individual means, whether or not they use words accurately to express it.

Interpretation is the process of extracting meaning from evidence. Are three food refusals in a three-month period significant? If so, in what way? Are they part of a pattern of growing frustration (e.g. more dirty protests, increasing prisoner-on-prisoner assault figures or damaging TV sets) or do they stand alone? Were three different prisoners or detainees involved? Were they related in any way? Many individual pieces of evidence have little significance by themselves but may be part of a wider pattern.

Recording evidence contemporaneously is essential to ensure accuracy and because 'if it is not recorded it didn't happen'. Given the unavailability of personal IT within a prison (either for audio or text recording), observations will usually be first noted in manuscript. However, manuscript records made by a range of individuals in their own styles are not easily catalogued, sorted or retrieved. Boards have to establish practical systems for recording raw data collected by observation in ways that they can be retrieved and analysed (e.g. when preparing the annual report or responding to an enquiry from the PPO or a coroner).

7. Reporting

IMBs achieve impact, exert influence, by reporting what they discover through monitoring and their evaluations of such evidence. Some reporting is informal, perhaps phrased as a question, and often oral (e.g. asking a manager why a wing is dirty). Some is more formal and in a public document (like the annual report – see the Report Template agreed by Ministers). Whatever the level of formality, there are some general principles.

All reporting should be concise and must be **accurate**. IMBs need a reputation for reliability so that the instinctive response to any report is 'if the IMB says so, it is so'. This applies equally at local and national levels.

A Board's major judgements must be **corporate**. They should be agreed by members, each of whom has arrived at their own interpretation of the evidence. There will be different perspectives and the Board, collectively, is responsible for weighing them. IMBs should not report either a series of individual opinions, unmoderated by Board discussion, or a 'lowest common denominator' comprising only the issues where there is unanimity. A Board's diversity of membership is one of its strengths and it needs to take full account of the range of views in finding its insights.

Reporting must be **objective**. IMBs are independent of all external groups and pressures, be they political or commercial, trades unions or employers, prisoner or detainee charities or families. IMB evaluations may align with the views of a group but, when this occurs, it is because the IMB has independently made its own, evidence-based judgement, that happens to agree with the group's, not because it has been influenced by them.

Reporting should be **evaluative**. There is no need for any report to provide much description, except insofar as this is necessary evidence to explain and support an evaluation.

Reports must not compromise **prisoner or detainee confidence**. Adhering to this vital principle often requires care and some subtlety. Many of those in custody assume that IMB members are ‘part of management’ and demonstration of an IMB’s independence, manifestly and convincingly, is essential. It is why members must not have or be seen to have a conflict of interest, e.g. by being closely associated with HMPS, NOMS, the Home Office, a contractor or provider of services to the establishment.

Reports must be **measured**. IMB members are not experts. It is unwise to make recommendations based on opinion rather than relevant expertise. If an IMB observes that food portion sizes are small and variable it is right to report it and state that it is wrong. The reasons for the situation (e.g. poor purchasing, inadequate budget, incompetent kitchen staff, theft from the food stores, poor server supervision) are unlikely to be things an IMB can be sure about. It would overstep the Board’s remit to ‘recommend’ (e.g.) that the budget for food be increased.

8. Re-statement of purpose

The role of every IMB is to be satisfied as to the humane and just treatment of those being held. No two custodial settings are the same, however. The purpose of this Framework is to guide each Board towards the best way to monitor in its own unique circumstances.

