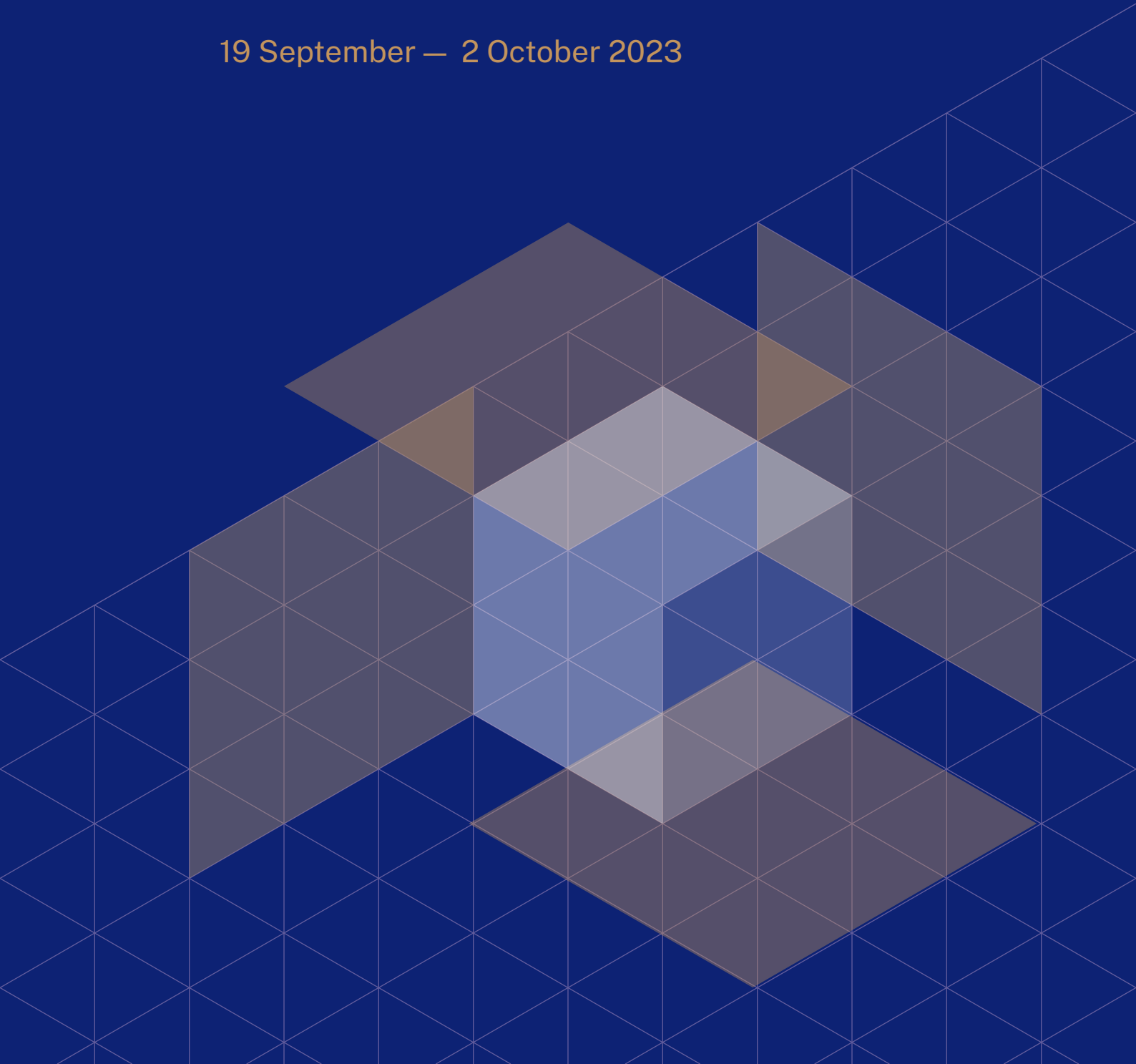




Oifig An Chigire Príosún  
Office of the Inspector of Prisons

# **Inspection Report** Unannounced General Inspection of the **Dóchas Centre**

19 September — 2 October 2023



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# FOREWORD

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This report forms part of the first set of comprehensive reports on unannounced general inspections of prisons in Ireland produced by the Office of the Inspector of Prisons.

This new programme of unannounced general inspections began in late 2022. So far, my colleagues and I have fully inspected nine of the fourteen prisons in the State, housing two-thirds of all people living in prison in Ireland.

The reports on our first five inspections – of Mountjoy Prison, the Training Unit, Cork Prison, Cloverhill Prison and the Dóchas Centre – have been submitted to the Minister for Justice as a batch.



This approach has meant that some time has elapsed since the very first of those inspections were completed. Nonetheless, this process has created the necessary space for the Inspectorate to reflect deeply on a number of the systemic issues affecting the prison system as a whole, and I am convinced that it will stand the test of time. Recommendations designed to address those issues have been standardised across this first set of reports, which should facilitate the task of the Minister for Justice, the Director General of the Irish Prison Service and Prison Governors in responding to the Inspectorate's concerns.

The treatment of women held at the Dóchas Centre has been a long-standing concern for the Inspectorate. The Minister for Justice has published two short inspection reports drawn up by my predecessor (report of 5 August 2020, published with redactions on 25 January 2024; report of 23 December 2021, published on 28 April 2022). In addition, on 15 February 2022, my predecessor provided the Minister with a report on her statutory investigation under section 31(2) of the Prisons Act 2007; this remains unpublished. Some common themes in these reports include allegations of inter-prisoner bullying, inappropriate relationships, disrespectful treatment of women by a minority of prison staff, and women's fears of reprisals if they make complaints against staff.

Regrettably, this latest inspection report records that our team observed examples of prison staff treating women inappropriately, including infantilising them, shouting at them, and ignoring them. The cumulative effect of these poor staff-prisoner dynamics, combined with the imposition of harsh punitive sanctions had a substantial adverse impact on the daily lives of many of the women living in the Dóchas Centre. A summary of our key findings follows this Foreword.

Looking to the future, and provided that the necessary human and financial resources are made available to the Inspectorate, we aspire to carry out unannounced general inspections of every prison in Ireland at least once every three years, and to complete our draft reports on those inspections within a maximum of six months from the end of the inspections concerned.

**Mark Kelly, Chief Inspector of Prisons**

# SUMMARY OF KEY FINDINGS

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## *Respect & Dignity*

- The situation of overcrowding in the Dóchas Centre was of serious concern to the Inspectorate. Overcrowded conditions hindered the ability of the prison to offer good and healthy living conditions, access to activities and services in the prison and effectively undermined the original ethos of the prison to encourage personal growth and development in a caring and safe environment.
- Nearly one-third (30%) of women held in the Dóchas Centre were on remand on 19 September 2023. Sentenced, remand and immigration detainees were accommodated in the same areas of the prison, and shared cellular accommodation.
- A new “lock-back” regime in place in certain houses imposed an unnecessary limitation on the amount of out-of-cell time women were entitled to on a daily basis. While daily unlock times were recorded in Class Office journals; there were no records kept of individual unlock periods. This meant it was not possible to decipher the amount of time women in the general population spent locked-back in their rooms, nor was it possible to determine the length of lock-back periods for individual women.
- Women engaged in essential work in the prison, or who were in open houses, were out of their rooms for a large part of the day, many in excess of eight hours. Positive practice was noted in Elm House where women were unlocked from seven in the morning until ten at night.
- The Inspectorate observed many examples of staff treating women inappropriately, including infantilising them, shouting at them, and ignoring them. Overall, there was a lack of substantive engagement between prison staff and the women.
- Relationships between prisoners and staff were very poor, and required significant improvement. The cumulative effect of poor staff-prisoner dynamics, combined with the imposition of harsh punitive sanctions in the Dóchas Centre had a substantial adverse impact on the daily lives of many of the women living there.
- While most staff reported that they worked well together, there was evidence of a staffing culture that negatively affected women in the prison. There was a high turnover in prison management which impacted on staff-management relationships. Staff and management relationships required improvement, including strengthening communications and facilitating staff input and ‘buy in’ into decision-making processes.
- There was evidence of discrimination against women on numerous grounds. Women in prison reported that they believed they were discriminated against on grounds including: age, gender, nationality, disability, race/ethnicity and religion.
- Prison authorities had no policy in place for transgender persons and thus treatment and conditions for transgender prisoners were subject to the discretion of prison management. There was evidence that a transgender prisoner was subjected to discriminatory treatment, including the imposition of a more punitive segregation regime.

## ***Safety & Security***

- There were a number of concerns with respect to record-keeping and restricted regimes: (i) there was no mechanism by which to track and review imposition of temporary-lock backs; (ii) healthcare special monitoring logs were not comprehensive and did not sufficiently capture prisoner treatment and engagement with services; (iii) special observation recording was inconsistent and in some cases it was not possible to determine from the special observation record books the rationale for placement.
- The Healthcare/Committal Unit was not an appropriate place in which to accommodate women with serious mental illnesses. A small number of women were held in committal cells designed for 24 hour occupancy, they spent less than two hours out of their rooms each day and had very limited meaningful contact; this practice should cease with immediate effect.
- Positively, the majority of prisoners on Rule 63 protection restricted regimes experienced an open regime as compared to prisoners on this regime in other prisons.
- Despite a 2017 commitment to eliminate solitary confinement in Ireland, this practice persisted in the Dóchas Centre.
- The prison relied on the use of temporary lock-backs to punish prisoners involved in incidents in the prison; this was underpinned by a 2023 Chief's Order. No specific lawful basis grounded in the Prison Rules was applied in these instances, despite prisoners being segregated from the general prisoner population. There was no structured recording or review process in place to ensure temporary lock-backs were carried out in accordance with the Chief's Order.
- Approximately 50% of prisoners who participated in the Inspectorate's survey indicated they did not feel safe in the prison.
- The prison emphasised drug detection and punitive measures over treatment and support of drug users, in contrast to the health-led response set out in the National Drugs Strategy: Reducing Harm, Supporting Recovery 2017-2025.
- Staffing availability during the weekdays was not of a level sufficient to ensure prisoner access to services. The staffing roster required review to ensure staffing levels were commensurate with need rather than to allow for over-staffing on weekend periods when services and courts were closed.
- Women in the Dóchas Centre had very low confidence in the complaints system.
- The P19 (disciplinary) system was operating as a sort of surrogate system to record incidents in the prison, which obfuscated the actual prevalence of incidents in the prison. There was evidence of inconsistent application of disciplinary sanctions, and this lack of consistency in approach led to concerns about procedural fairness, and how application and efficacy of the use of the P19 process was measured and evaluated.

## ***Health & Wellbeing***

- In general, healthcare resourcing at the Dóchas Centre was adequate; however, additional staffing supports including administrative staff and increased staffing for night nursing cover are required to support healthcare delivery.
- It was positive to note that the composition of the healthcare staff was predominantly women, which is an asset in delivering healthcare to a prison for women.

- E-recording healthcare and psychology systems were not appropriately linked to support healthcare delivery.
- While healthcare provided was generally of good standard and the healthcare team was committed to the women's welfare, many women reported that they felt they were not listened to or dismissed by the healthcare team. This perception had an impact on women's impression of the quality of healthcare and also on their willingness to engage with healthcare services.
- There was good evidence of gender-responsiveness in relation to the provision of primary healthcare, mental healthcare, and preventive healthcare. However, in line with Rule 18 of the Bangkok Rules (2011), invitations to preventive screenings should be extended to all eligible women as is done in the community, regardless of their conviction status or sentence length.
- Both women in prison and prison staff highlighted the issue of mental health within the prison. Augmented supports and facilities for both women and staff would be welcome; for example, space to allow for group interventions, and additional mental health training for prison staff. Communication of wait times for services could also be improved.
- As previously described in the Inspectorate's thematic report on psychiatric care, there is a need to strengthen clinical pathways to ensure swift transfer of people to community-based and hospital-based psychiatric care facilities, where appropriate. Significant challenges remain in this respect which results in deleterious consequences for people in custody who are being treated in a wholly inappropriate environment.
- During medical committal assessments, greater efforts should be made to avail of interpretation services to allow for effective communication and to ensure that medical histories are being accurately relayed.
- There were delays in women being able to access support services, particularly mental health and addiction services.

### ***Rehabilitation & Development & Resettlement***

- There was a good range of self-development programmes run within the prison, with a gender-based focus. It was positive to note the engagement and involvement of prison staff with these services. However, these programmes could benefit from greater support in terms of suitable spaces, facilitation of access, awareness raising, and ensuring they are inclusive for all women in the prison.
- There was a need to introduce meaningful milestones that recognised and reflected progression.
- Access to work training was not equally distributed across all houses within the Dóchas Centre. Additionally, access to work roles was frequently hampered by closures due to redeployment. Poor record-keeping in relation to work training attendance made it difficult to determine the frequency and number of women engaged in work training each day.
- The training offered in the prison was not of a calibre to support employment and re-integration prospects for women released from the Dóchas Centre. The lack of externally accredited training should be urgently addressed. This is particularly important given that women often face poorer economic and labour outcomes post-release.

- In relation to education, there was a very effective process in place to identify initial and ongoing learning needs, strengths, and interests for students. The curriculum was highly effective to help students maintain contact and connection with their children and families. Commendably, the education centre had introduced a digital strategy and digital technologies were used meaningfully to support student engagement and learning.
- Teacher collaboration was a strength of the education centre and it was highly commendable that all teachers worked together to support students. The quality of facilities in the education centre was very good; the kitchen and art room were very well resourced with very good provision of specialised equipment to support learning.
- Prison systems were effective in supporting the education centre. However, there was limited access to education for people on restricted regimes.
- The majority of recreation areas in the houses were poorly furnished, and did not afford women the opportunity for purposeful activity or meaningful human contact.
- At least one hour of access to the fresh air in the yards was offered to women on a daily basis; this aligned with the standard set by the Prison Rules 2007-2020, Rule 32(1). The big and small yards were well-maintained, however, there was no shelter in the yards. The gym was frequently closed, with 72 full closure days between March and August 2023.
- Positively, efforts were underway to install in-cell phones in all houses; however the length and frequency of phone calls was not sufficient to maintain family contact links or to engage with legal representation.
- Contact was not permitted between women and their visitors during physical visits; this should be addressed as a matter of urgency.
- Owing to eligibility criteria, there were notable gaps in the delivery of support services, particularly in securing housing for women on remand and those serving short sentences.
- Early release programmes, such as Community Support and Community Return Schemes operated in the prison; however there was scope to improve practice by requiring engagement with all relevant stakeholders so that every woman leaving prison under these programmes has access to resettlement supports.
- There was a low number of spaces available, with highly stringent criteria, for acceptance to the limited number of step-down facilities and re-integration opportunities available to women.



# ABOUT THE INSPECTORATE OF PRISONS

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The Office of the Inspector of Prisons was established pursuant to Section 30 of the Prisons Act 2007 (“the Act”) in January 2007. The Chief Inspector of Prisons is appointed by the Minister for Justice to perform the functions conferred on him by Part 5 of the Act. The current Chief Inspector was appointed on 1 June 2022 for a five year term in office with effect from 15 August 2022, under Section 30 of the Act. The Chief Inspector of Prisons is independent in the performance of his functions.

Section 31(1) of the Act places an obligation on the Chief Inspector of Prisons to carry out regular inspections of prisons.

In addition to inspections, the Chief Inspector of Prisons may be requested by the Minister for Justice to carry out an investigation into any matter arising out of the management or operation of a prison, and if so requested, is obliged to carry out the investigation. The Chief Inspector may also carry out an investigation of his own volition.

The role of the Chief Inspector of Prisons is as follows:

- Regular inspection of all 13 prisons in Ireland;
- Carry out investigations of deaths in custody and also of any death of a person on temporary release that occurs within one month of his/her release;
- Investigate any matter arising out of the management and operation of a prison at his own volition or at the request of the Minister for Justice;
- Receive and reply to letters from prisoners in accordance with Rule 44 of the Prison Rules 2007-2020;
- Oversight of the Irish Prison Service prisoner complaints system and carry out the functions assigned pursuant to Prison Rule 57B of the Prison Rules 2007-2020;
- It is not a function of the Chief Inspector to investigate or adjudicate on a complaint from an individual prisoner, but he may examine the circumstances relating to a prisoner complaint where necessary for performing his functions (Section 31(6) Prisons Act 2007).

The Chief Inspector of Prisons does not currently have statutory authority to publish inspection reports, investigation reports or annual reports. In accordance with the Act, as soon as practicable after receiving a report from the Inspector of Prisons, the Minister must, subject to the following caveats, lay it before both Houses of the Oireachtas and publish the report. However, the General Scheme of the Inspection of Places of Detention Bill envisages that, in future, the Inspectorate will be able to publish its own reports.

At present, the Minister may omit any matter from any report laid before the Houses of the Oireachtas if she is of the opinion that:

1. Its disclosure may be prejudicial to the security of the prison or of the State, or
2. After consultation with the Secretary General to the Government, that its disclosure
  - a. would be contrary to the public interest, or
  - b. may infringe the constitutional rights of any person.

Where any matters are so omitted, a statement to that effect must be attached to the report concerned on its being laid before both Houses of the Oireachtas, and on its publication.

In 2020, the Office of the Inspector of Prisons published *A Framework for the Inspection of Prisons in Ireland*. This document sets out how the Inspectorate conducts inspections of prisons in Ireland, as well as outlines assessment ratings criteria used by the Inspectorate to evaluate compliance with legislation and human rights standards.

The Framework was updated in 2024, after a consultation process including the Irish Prison Service, people in prison, civil society organisations, and other stakeholders.

# 1 INTRODUCTION

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## A. Inspection Process

- 1.1** The Office of the Inspector of Prisons (“Inspectorate” / “OIP”) conducted an unannounced General Inspection of the Dóchas Centre between 19 September and 2 October 2023.

The OIP inspection team consisted of: Mr Mark Kelly, Chief Inspector; Dr Ciara O’Connell, Senior Inspector; Ms Michelle Martyn, Inspector; Dr Sarah Curristan, Inspector; Mr Thomas Harte, Inspector; Dr Douglas Nanka-Bruce, Data Analyst; and was supported in administration by Ms Louise Joyce.

The Inspection Team was assisted by two medical experts, Ms Maxine Radcliffe and Dr Brendan O’Connell, who assessed healthcare provision (Chapter 4 - Health & Wellbeing), and one subject matter expert Dr Sophie van der Valk who assisted with the survey administration and the assessment of Respect and Dignity focus area. The Inspectorate is especially grateful for the assistance provided by the experts, who form part of its expert pool as well by our colleagues from the Inspectorate of the Department of Education.

The Department of Education Inspectorate assisted the OIP to evaluate provision of education in the prison (Chapter 5, Section 5B - Education).<sup>1</sup> Senior Inspector Ms Liz O’Neill and Inspector Ms Catherine Treacy from the Department of Education Inspectorate carried out the inspection of the school.

The Dóchas Centre was previously inspected by the OIP in 2013 and again in September 2021 as part of its COVID-19 thematic inspections.<sup>2</sup> A section 31(2) inquiry in relation to the Dóchas Centre also commenced in April/ May 2020, with the report submitted to the Minister for Justice in February 2022.

- 1.2** The General Inspection was carried out in accordance with *A Framework for the Inspection of Prisons in Ireland*. The prison was assessed against five Focus Areas:

Respect & Dignity	Safety & Security	Health & Wellbeing	Rehabilitation & Development	Resettlement
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- 1.3** The Inspectorate employs a range of approaches to gather evidence and examine prison compliance with legislation and human rights standards. These include:

- Review of documentation and records
- Meetings with Irish Prison Service Headquarters personnel
- Discussions with people living in prison
- Observation of facilities and activities
- Meetings with Prison Senior Management
- Discussions with prison staff (operational and service staff)
- Review of CCTV footage
- Electronic surveys completed by people in prison and people working in the prison

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<sup>1</sup> Office of the Inspector of Prisons and Department of Education Inspectorate (March 2022) Memorandum of Understanding

<sup>2</sup> OIP (2013) Interim Report on the Dóchas Centre, and OIP (2022) COVID-19 Thematic Inspection of Mountjoy Women's Prison - Dóchas Centre

- 1.4** On the first day of the inspection visit, the inspection team provided the prison with an information request. This request lists the key documentation required by the Chief Inspector. The Inspectorate engaged with prison staff during and after the inspection visit to ensure fulfilment of the information request.
- 1.5** The Inspectorate has developed electronic surveys to afford people living and working in prison the opportunity to engage with the OIP anonymously during general inspections. The OIP prisoner survey was administered by the OIP inspection team using digital tablets. This approach allowed for real-time data analysis which informed the inspection. The password-protected OIP staff survey was hosted on the OIP website, and information on accessing the survey was distributed to prison staff by email. A total of 104 women in prison and 67 prison staff (operational and service staff)<sup>3</sup> completed the surveys.
- 1.6** The Inspectorate assessed the implementation of recommendations made to the Irish Prison Service in relation to previous inspections; relevant updates are included in Appendix A.
- 1.7** The General Inspection concluded with a Close Out meeting on 2 October 2023. The Inspectorate shared and discussed initial findings and recommendations with the prison's senior management team.
- 1.8** All inspection findings are evidence-based. Recommendations made by the OIP are rooted in relevant legislation and international human rights standards, including the International Covenant on Civil and Political Rights (1966), the United Nations Convention against Torture (1985), the European Prison Rules (2020), the United Nations Standard Minimum Rules for the Treatment of Prisoners (Mandela Rules 2015), the United Nations Convention on Elimination of all forms of Discrimination Against Women (CEDAW 1979) United Nations and Council of Europe recommendations, and the United Nations' Rules for the Treatment of Women Prisoners and Non-custodial Measures for Women Offenders (Bangkok Rules 2011).
- 1.9** The Irish Prison Service is requested to respond to all OIP recommendations (Appendix B) by developing an Action Plan. Action Plans should apply the SMART approach to recommendation implementation; that is, they should be specific, measurable, achievable, realistic, and time-bound. In line with the Recommendations Monitoring Policy, the Inspectorate monitors progress made in addressing recommendations. This is done through (i) IPS self-assessment status updates on outstanding recommendations, and (ii) monitoring of progress made in implementing Action Plans as part of the Inspectorate's inspection process.

## **B. The Dóchas Centre**

- 1.10** The Dóchas Centre is a closed medium security prison for adult women. It serves as the committal prison for all women, whether sentenced or remand, from all courts with the exception of those in the Munster counties. In 2019, the then Director of Operations increased the capacity of the Dóchas Centre from 105 to 146 through the installation of bunk beds. At the time of the inspection, the operational bed capacity of the Dóchas Centre remained at 146. The Dóchas Centre also accommodated immigration detainees, who were required to share living space with convicted and unconvicted prisoners.

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<sup>3</sup> Operational staff include prison management, IPS healthcare personnel and prison officers. Service staff include Chaplaincy, teachers, other healthcare providers and people employed with in-reach services.

- 1.11** The Dóchas Centre is comprised of eight separate houses. The capacity for each house is provided in **Table 1**.

**Table 1: Summary of Dóchas Centre House and Room Capacity**

House	Rooms	Accommodation Layout	Capacity
Rowan	10	Two beds	20
Maple	10	Two beds	20
Laurel*	10	Two beds	20
Hazel	12	Two beds	24
Elm	10	Single beds	10
Cedar	18	Bunk beds	36
Phoenix	7	3 bedsits with two beds; 4 rooms with two beds	14
Willows	11	One, two, three, and four beds	24
Healthcare / Committal Unit (HCU)**	6 (excluding 2 SOC's)	One, two and three beds	8***
<b>Total Beds</b>			<b>168</b> (***not inclusive of HCU capacity)

\* The top floor of Laurel House, containing five rooms, was closed for refurbishment during the first week of the inspection visit. The ground floor was closed during the second week.

\*\* At time of inspection, one room was used as a committal cell and had three beds, 1 room was a High Support Unit (HSU) and the remaining cells were occupied by one prisoner on a restricted regime and several prisoners with physical and mental health needs.

- 1.12** Two houses, Rowan and Maple, were located on the “small yard”. Women newly committed to the prison were generally assigned to rooms in these houses. Originally, these houses were designed for single-cell occupancy, with a total capacity for 20 women. However, as a result of overcrowding, 40 women were living in Rowan and Maple Houses at the time of inspection.
- 1.13** Six houses were located off the “big yard” - Laurel, Hazel, Elm, Cedar, Phoenix, and Willows. Laurel House was undergoing refurbishment with one landing vacant each week of the inspection. There were two negative pressure rooms located on the ground floor of Laurel House, and were intended for use if a prisoner contracted an air-borne illness.
- 1.14** Elm House accommodated women serving long-term or life sentences. It was also designated as a non-smoking house. Phoenix House was comprised of three bedsit-style rooms, each containing two beds. A separate section of Phoenix House accommodated women on protection regimes (Rule 63); rooms in this house were double-occupancy. In Willows House, the majority of women were on an Enhanced regime and were unlocked 24 hours each day.

A small number of women were accommodated in the Healthcare / Committal Unit (HCU). There were eight rooms in the HCU. Although there were five designated committal cells, these were not all used to accommodate newly committed prisoners (see 2.24 and 2.25). The landing also contained a High Support Unit (HSU), Close Supervision Cell and Safety Observation Cell.

- 1.15** Under Rule 17 of the Prison Rules 2007-2020, young infants under 12 months of age could remain with their mothers in prison. Phoenix House was used to accommodate pregnant women or mothers with young babies. There were no babies or infants in the prison at the time of inspection.
- 1.16** On the first day of the inspection, 19 September 2023, there were 154 women in custody at the Dóchas Centre, and an additional one woman in hospital. Two women were accommodated in a shared committal cell in the HCU. Nine women were on protection regimes, under Rule 63 and eight were housed in the protection section of Phoenix House. One woman was held on Rule 63 in cell on the HCU.
- With 154 women in custody, the prison was overcrowded and operating at 105% of its IPS official percentage bed capacity. Two women were sleeping on mattresses on the floor. Occupancy in the prison increased over the course of the inspection. On 27 September, 166 women were in custody and the prison was operating at 114% of its official percentage bed capacity. On this day, nine women were sleeping on mattresses on the floor.
- 1.17** As of 19 September 2023, 69% of women in custody were sentenced, 30% were unconvicted, and 1% were held under immigration detention. Of the women who were sentenced, nearly one-third (31%) were serving sentences of less than 12 months.
- 1.18** 17% of women in the prison were foreign nationals, and 21% of women were of an ethnicity other than White (i.e. Irish Traveller; Black / Black Irish; Asian / Asian Irish; or Other).
- 1.19** The age breakdown of women in the Dóchas Centre is provided in **Table 2**. The majority of women (73%) were between 31 and 50 years of age.

**Table 2: Breakdown of Women in the Dóchas Centre by Age, 19 September 2023**

Age	18 - 20	21 - 30	31 - 40	41 - 50	51 - 70	Total
%	1.3%	19.4%	42.6%	30.3%	6.5%	100%
Number	2	30	66	47	10	155

- 1.20** Prisons can often be a male-dominated work environment. The Council of Europe's European Committee for the Prevention of Torture (CPT) advocate that a mixture of male and female staff is particularly important in places of detention for women. This provides for additional safeguards against ill-treatment; fosters a degree of normality, and allows gender-sensitive tasks to be carried out in a dignified way. The CPT also considers that the majority of staff in contact with women in prison should be women.<sup>4</sup>

Positively, the gender breakdown of staff working in the Dóchas Centre reflected these considerations; at the time of inspection, 66% of staff were women, and 35% were men. It was also positive that staff working in the Dóchas Centre were highly experienced; 59% of staff had over 10 years' service working with the Irish Prison Service.

<sup>4</sup> CPT (2018) Factsheet on Women in Prison.

## C. Gender Considerations

- 1.21** Women comprise a small proportion of the national prison population. On 19 September 2023, they comprised 4% of the total Irish prison population. The needs of women in prison are significantly different from that of men. Coupled with this is the fact that prison environments are traditionally designed by men for the detention of men. As women are a minority category of prisoner there is a risk that their needs may go unmet in the design and management of prisons.
- 1.22** Another important consideration is that the profile of women entering prison differs from that of men. Women entering prison typically have a complex history, which may include physical or sexual abuse, mental health issues, drug or alcohol dependency and misuse and experiences of being unhoused. The prevalence of these issues is often much greater than what is observed among men in prison.<sup>5</sup> Frequently, women in prison have caring responsibilities and may be the primary or sole caregiver in their families; imprisonment carries a substantial impact for their children and families. Given the complex and traumatic backgrounds of many women in prisons, prisons must offer tailored gender-informed supports.
- 1.23** Importantly, mechanisms of power and control as they are conventionally understood in prisons for men can manifest differently in women's prisons. For women, the experience of powerlessness and dependence that prison enacts may not be a new imposition but simply a new manifestation of power relations they have previously encountered.<sup>6</sup> Because of this, women may find it difficult to identify and articulate mistreatment in prison.
- 1.24** Power relations in prison can be specifically gender-coded in such a way that taps into the vulnerabilities of women who have a history of trauma and abuse. Such power relations can be characterised by infantilisation, intensive scrutiny and surveillance, and relational inconsistency. The combination of which creates feelings of powerlessness and anxiety in an unpredictable environment.<sup>7</sup>
- 1.25** Opened in 1999, the Dóchas Centre set out to establish a prison regime that was different to that of prisons for men, and that would meet the specific needs of women. Accommodation was built in the form of houses, which was intended to reflect a living environment that more closely aligned with that in the general community. Women had their own rooms and keys, as well as individual toilet and shower facilities. The prison regime encouraged women to earn additional privileges and progress to more open conditions within the prison, eventually working towards the pre-release centre in Phoenix House.<sup>8</sup>
- 1.26** When first opened, the Dóchas Centre was regarded as a highly progressive model of best practice for accommodation of women in prison. The stated *Vision* of the prison was:

*We are a community which embraces peoples respect and dignity*

*We encourage personal growth and development in a caring and safe environment*

*We are committed to addressing the needs of each person in a healing and holistic way*

*We actively promote close interaction with the wider community*

<sup>5</sup> UNODC (2014) *Handbook on Women and Imprisonment* (2<sup>nd</sup> Edition).

<sup>6</sup> BH Zaitzow and J Thomas (Eds) (2003) *Women in Prison: Gender and Social Control*.

<sup>7</sup> B Crewe et al (2023) 'It Causes a lot of Problems': Relational Ambiguities and Dynamics Between Prisoners and Staff in a Women's Prison. *European Journal of Criminology*, 20(3), 925-946.

<sup>8</sup> C Quinlan (2015) Women, Imprisonment and Social Control, in D. Healy et al (Eds) *Routledge Handbook of Irish Criminology*.

Unfortunately, the progressive model originally underpinning the design and intention of the Dóchas Centre has eroded over time to the point that it is evident to the Inspectorate that it is no longer the driving ethos of this prison.

- 1.27** In 2013, the OIP carried out an interim inspection of the Dóchas Centre where several significant issues were identified, including overcrowding, imposition and impact of short sentences, reduced staffing levels, and a disconnect between frontline staff and management.<sup>9</sup>

In 2022, the OIP published a report on the Dóchas Centre as part of its 2021 Thematic Inspections on the impact of COVID-19 in Irish prisons. The report highlighted shortcomings in the management of prison, a lack of structured meaningful activity, as well as reported concerns of bullying and intimidation.<sup>10</sup> An oversight visit report in 2020 and a 2022 investigation report made similar findings.

- 1.28** The United Nations' Bangkok Rules (2011) recognise the distinctive needs of women and set out specific standards for their treatment in custody.<sup>11</sup> The Inspectorate applied the standards of the Bangkok Rules in its 2023 inspection of the Dóchas Centre. In particular, the Inspectorate explored how the original ethos of the prison has degraded and considered the extent to which gender considerations were recognised by prison management and informed the daily operation and governance of the Dóchas Centre.

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<sup>9</sup> OIP (2013) Interim report on the Dóchas Centre.

<sup>10</sup> OIP (2022) COVID-19 Thematic Inspection of Mountjoy Women's Prison - Dóchas Centre

<sup>11</sup> United Nations (2011) Rules for the Treatment of Women Prisoners and Non-Custodial Measures for Women Offenders.



## 2 RESPECT & DIGNITY

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**2.1** In line with *A Framework for the Inspection of Prisons in Ireland (2020)*, the Inspectorate assesses how prisoners and staff experience *Respect and Dignity* in prisons. Drawing on national legislation and international standards, the Inspectorate evaluates performance across four themes:

- A. Living Conditions:** accommodation, hygiene and sanitation, clothing and bedding, out-of-cell time and meals and nutrition
- B. Relationships & Interactions:** prisoner relationships, staff relationships and prisoner-staff relationships
- C. Non-Discrimination:** experiences of fair and equal treatment
- D. Information:** access to information in the prison

### A. Living Conditions

#### Accommodation

**2.2** International standards require that all cellular accommodation align with minimum cell-size requirements.<sup>12</sup> Accommodation should provide decent sleeping and living conditions and the means to keep clean, which includes proper sanitation, including toilet and shower facilities, washing water, cleaning products, laundry, and personal hygiene products.<sup>13</sup>

Single-cell accommodation is considered to be international best practice, except for where it is preferable for prisoners to share accommodation.<sup>14</sup> In 2021, the Council of Europe's Committee for the Prevention of Torture (CPT) expressed the view that all prisons should have a maximum occupancy number in order to guarantee the minimum standard of personal living space (4m<sup>2</sup> in multi-occupancy cells).<sup>15</sup> Under the Prison Rules 2007-2020, the Minister for Justice can specify the maximum number of persons to be accommodated in a cell.<sup>16</sup>

The UN Bangkok Rules (2011), Rule 41, sets out that "those with mental health-care needs (should be) housed in accommodation which is not restrictive, and at the lowest possible security level, and receive appropriate treatment, rather than being placed in higher security level facilities solely due to their mental health problems".

National legislation and international standards establish that sentenced and remand prisoners should be accommodated separately; with the European Prison Rules 2020 setting out that exceptions to separate detention can be made to facilitate participation in organised activities, and where prisoners consent to sharing cells.<sup>17</sup>

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<sup>12</sup> CPT (2015) *Living Space per Prisoner in Prison Establishment*.

<sup>13</sup> CPT (2021) *A Decency Threshold for Prisons - Criteria for Assessing Conditions of Detention*.

<sup>14</sup> *European Prison Rules* (2020), Rule 18(5).

<sup>15</sup> CPT (2021) *31<sup>st</sup> General Report*.

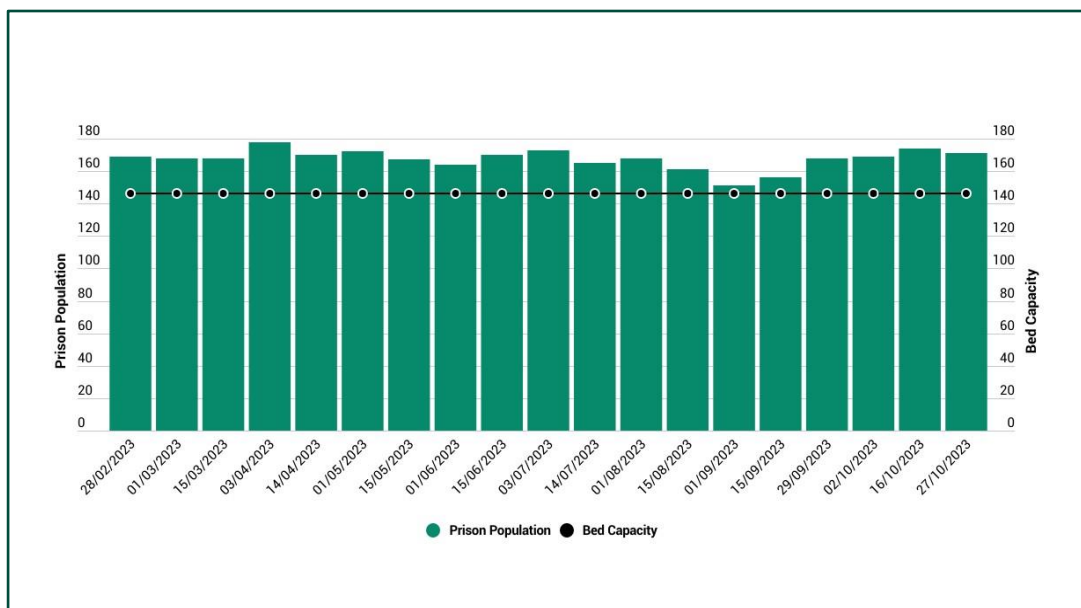
<sup>16</sup> *Prison Rules 2007-2020*, Rule 18(2)(a).

<sup>17</sup> *European Prison Rules* (2020) Rule 18(8) and 18(9), and *Prison Rules 2007-2020*, Rule 71.

## Overcrowding

- 2.3** Much like other prisons recently inspected by the Inspectorate, the Dóchas Centre was experiencing high levels of overcrowding at the time of inspection.<sup>18</sup> Overcrowding has been a longstanding issue in the Dóchas Centre, as previously observed by the Inspectorate in 2013.<sup>19</sup> In response to this long-standing issue, the IPS increased the bed capacity of the Dóchas Centre in 2019 from 105 to 146 by installing bunk beds in some of the houses. Despite this measure, overcrowding persisted.
- 2.4** In the six months leading up to the General Inspection, the Dóchas Centre continually operated above capacity, ranging from 103% to 122% of official bed capacity. **Figure 1** illustrates the number of people accommodated in the prison over time, with a fixed bed capacity of 146.

**Figure 1: Population and Bed Capacity, Dóchas Centre (February 2023 - October 2023)**



- 2.5** During the course of the general inspection, an average of five women slept on mattresses on floors in the Dóchas Centre. On the first week of inspection, between one and three women slept on mattresses on the floors. During the second week of inspection, there were between eight and nine women sleeping on mattresses on the floors.

Contrary to international best practice, only 12% (18 of 154) of women in the prison were in single cell accommodation (19 September 2023). OIP survey findings indicated that the majority of women in the Dóchas Centre (71%, 62 of 87) had a preference for single-cell accommodation.

- 2.6** Although the reported IPS bed capacity for Dóchas Centre is 146 (with an original design capacity for 85), this did not reflect the *true* operational bed capacity in the prison, which was impacted by the following factors:

<sup>18</sup> In Mountjoy Men's Prison, Cork Prison and Cloverhill Prison, people slept on mattresses on cell floors, which resulted in very little living space for all cell occupants. In Cloverhill Prison, the Inspectorate determined that in situations where four people were accommodated in one cell or where three or more people on restricted regimes were accommodated in one cell, the conditions amounted to degrading treatment. Similarly, with respect to Mountjoy Men's Prison and Cork Prison, the Inspectorate determined people on restricted regimes, who were limited in their out-of-cell time and therefore spent many hours in overcrowded cells, lived in degrading conditions.

<sup>19</sup> OIP (2013) Interim Report on the Dóchas Centre.

- decommissioning of rooms for repair, (e.g., a number of rooms were closed for renovation in Laurel House during the inspection)
- movement of prisoners to areas of the prison based on their behaviour and medical or protection needs, (e.g., women on protection needed to be segregated from the general population, and some women that could not share rooms as determined by prison management)
- designation of certain areas of the prison for prisoners who are engaged in work and/or on an Enhanced regime (e.g., all women in Elm house were required to be on an Enhanced regime level).

**2.7** On 19 September 2023, the IPS official percentage bed capacity for the Dóchas Centre was 105%, based on a prisoner-to-bed calculation of 154 women for 146 beds. On this day, two women were sleeping on mattresses on the floor and sharing a room with two other people (**Table 3**).

Taking account of the number of people and *available* beds in the prison on that day (132), the *actual* percentage bed capacity was 117%. This calculation considers unoccupied beds in the prison on this day, and more accurately reflects the overcrowding situation in the Dóchas Centre.

**Table 3: Dóchas Centre Bed Capacity By House, 19 September 2023**

Location	Location Details	Number of Rooms	Unoccupied Rooms	Number of Prisoners	Sleeping on Floor	Unoccupied Beds
Elm	Serving life and long sentences,	10	0	10	0	0*
Willows	Sentenced and remand,	11	1	22	0	2
Maple	Sentenced and remand	10	0	20	0	0
Rowan	Sentenced and remand	10	0	20	1	1
Laurel	Sentenced and remand	10	5 (temporarily closed due to renovation)	10	1	5
Cedar	Sentenced and remand	18	1	30	0	5
Hazel	Sentenced and remand	12	0	23	0	1
Phoenix	Sentenced prisoners (8 on Rule 63)	7 (4 rooms and 3 bedsits)	0	14	0	0
Healthcare / Committal Unit (HCU)	Restricted Regimes, Long-Term Care Needs. New Committals	6	1	6**	0	1
<b>Total</b>	<b>-</b>	<b>94</b>	<b>8</b>	<b>154***</b>	<b>2</b>	<b>15</b>

\* Prisoners accommodated in Elm House were long-term sentenced prisoners in single-occupancy cells; this was good practice.

\*\* The HCU was used both to process newly committed prisoners, and to accommodate prisoners on a long-term basis. The count of 6 prisoners on this day is broken down to 2 committal prisoners in one cell, 1 Rule 62 prisoner in a committal cell, 2 prisoners with serious mental health issues in committal cells and 1 prisoner with serious mental health issues in a "High Support Unit" cell.

\*\*\* One additional prisoner was in A & E and is not included in the 154 count.

**2.8** By the second week of the inspection (27 September 2023), overcrowding had worsened with 27 women accommodated in triple-occupancy rooms designated for double occupancy. Of these, nine women were sleeping on mattresses on the floor. Women accommodated in these rooms (16% of the population) were not afforded a minimum living space standard of 4m<sup>2</sup> per person (exclusive of sanitary facility). **These conditions amounted to degrading treatment.**

**2.9** Overcrowding negatively impacted on women in the Dóchas Centre in a multitude of ways: affecting general living conditions in some areas of the prison (see 2.13 - 2.25), access to rehabilitation services (see 5.21 and 5.94) and the overall safety of women (see 3.43 - 3.51).

Overcrowding had a knock-on effect as it impacted on privacy, as well as increased tensions and bullying amongst prisoners. This was highlighted by respondents to the staff survey:

*“Overcrowding is an issue for the women, especially multiple occupancy cells when accessing toilet facilities. Lack of privacy and personal space.”*

*“There is serious overcrowding which leads to bullying among the prisoners.”*

*“This is a serious safety concern [...] Overcrowding is becoming a real issue, prisoner numbers have almost doubled in four years but the staff numbers haven’t increased.”*

Overcrowding was reported as the biggest issue of concern for both prisoners and staff who responded to the OIP surveys. More than three-quarters of prisoners (70 of 91), and 91% of staff (49 of 54) reported that overcrowding was one of the biggest problems in the prison.

**2.10** The placement of women into overcrowded rooms caused observable stress, tension and anguish amongst the women. This was particularly the case when newly committed prisoners, who often had addiction issues, were accommodated with longer-term sentenced prisoners. Comments made by women in prison included:

*“There’s been 12 [different] people on the floor within three months [...] One (prisoner) talks about drugs the whole time.”*

*“The overcrowding is bad. I keep getting three in my cell because there’s three beds in it. If I was in a different cell they would be put on the floor. We do be falling over each other.”*

**2.11** **The situation of overcrowding in the Dóchas Centre is part of a much larger prison estate-wide crisis which, to remedy, requires a renewed commitment to prioritising alternatives to imprisonment, including those set out in the 2022-2024 Review of Policy Options for Prison and Penal Reform.<sup>20</sup>**

**2.12** Associated women-specific actions in the 2022 - 2024 Review include: scoping and piloting the development of a Women’s Supported Bail Service, as well as exploring the feasibility of providing an intensive community-based supervision and support programme for women who offend. **These actions should be urgently expedited.**

### **Accommodation Conditions**

**2.13** Room conditions varied across the prison. While conditions in Elm, Phoenix, and Willows Houses were very good, many rooms in other houses, and particularly in the HCU, required a deep clean and refurbishment.

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<sup>20</sup> Department of Justice (2022) Review of Policy Options for Prison and Penal Reform 2022-2024, pages 18-19.

Senior management acknowledged the dilapidated conditions in many of the houses, and indicated a prison-wide renovation project was in place, commencing with refurbishment of the floors in Laurel House which was underway at the time of the inspection.

- 2.14** General areas of the Dóchas Centre were grubby and required refurbishment. Communal areas such as kitchenettes and living areas were not in use in many of the houses and contained limited amenities. For example, in Rowan and Maple Houses, the kitchenettes contained no tables and chairs (**Figure 2**).

**Figure 2: Kitchenette in Maple House**

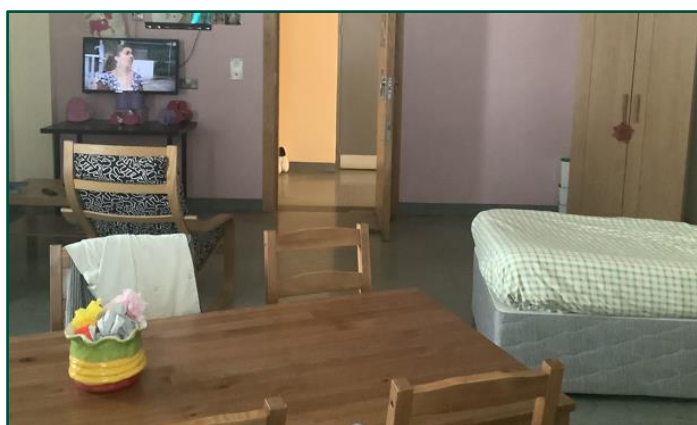


The kitchenette in Rowan House was locked during the inspection and was only accessible in Maple House for use of the laundry facility. Similarly, other kitchens were in poor condition and not in use in Laurel and Hazel Houses.

**The kitchen areas should be properly furnished in all houses and brought back into use to promote independent living skills and to facilitate communal dining (see 2.80).**

- 2.15** There were examples of appropriate and well-equipped facilities in some houses. For example, the kitchen and living areas in Elm House (**Figure 3**) were actively used by the women and were of a good standard. Women in Phoenix House had access to a kitchen, and multi-occupancy rooms in Willows House were equipped with tables and chairs to allow roommates to eat communally.

**Figure 3: Kitchenette in Elm House and Willows House Dining Area**



- 2.16** While some houses had inviting and well-attended communal recreation areas, the majority of communal recreation areas were not in use and many of these areas merely contained an old sofa and a television on the wall (**Figure 4**). Women were observed sitting in these living areas mainly for the purpose of waiting to see a Class Officer, as these living areas were typically located outside of Class Offices in the houses.

**Figure 4: Communal Recreation Areas**



- 2.17** With rare exceptions, the kitchen and living area environments in the majority of the houses were not hospitable, and did not offer opportunities for women to socialise or to practice independent living skills, aside from laundry. This represents a significant departure from the original concept underlying the design of all houses in the Dóchas Centre.
- 2.18** Room sizes differed in each of the houses. The standard size of a double-occupancy room measured by the Inspectorate was 12.24m<sup>2</sup> (inclusive of a 1m<sup>2</sup> sanitary facility); this resulted in 11.24m<sup>2</sup> of living space. When occupied by three people, the living space fell short of the 4m<sup>2</sup> per prisoner living space standard set out by the Committee for the Prevention of Torture (CPT).<sup>21</sup>
- 2.19** Despite efforts by prisoners across the prison to keep their rooms clean; the majority were in need of painting and a deep clean; particularly in Rowan, Maple and Hazel Houses, and the HCU where the vents in the rooms were covered in dust and the paint was grubby. Holding cells in the reception area were bleak and required improvement.
- 2.20** Within overcrowded rooms (typically in Hazel, Rowan and Maple Houses) conditions were very poor (**Figure 5**). In rooms that contained three women, two women slept on beds, while the third woman was required to sleep on a thin blue mattress on the floor. Mattresses were typically rolled up and stored under beds during the day to allow for more floor space in the room. This meant that women who slept on a mattress on the floor did not have a designated place to sit or eat throughout the day. Living in these conditions caused tension between the women residing in them.

<sup>21</sup> CPT (2015) Living Space per Prisoner in Prison Establishments.



**Figure 5: Overcrowded Rooms**



**2.21** In contrast, rooms in Willows House were spacious and in good condition. The house contained both single occupancy and multi-occupancy rooms.

Elm House served as a good practice model for suitable accommodation (**Figure 6**). Women accommodated in this house were long-term prisoners, and were therefore permitted a single-occupancy room. **The Inspectorate commends prison management's efforts to maintain single-cell occupancy for long-term prisoners.**

**Figure 6: Single-Occupancy Room, Elm House**



**2.22** Cedar House comprised of 18 double rooms across three floors. Conditions in this house were fair. While recreation rooms had ample space, they were very sparsely furnished with just couches and board games provided. The basic kitchenette was generally not used by the women.

**2.23** There were seven rooms in Phoenix House comprising three bedsit rooms and four standard rooms. Six women in Phoenix House were accommodated in separate bed-sit style accommodation which were bright and airy rooms, with good facilities.

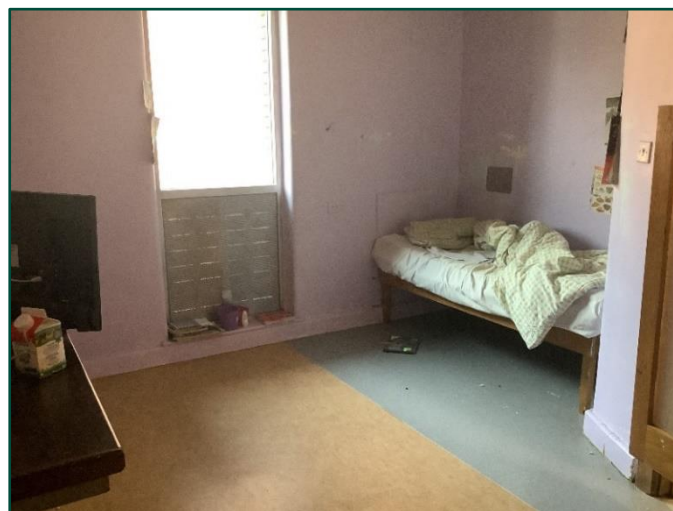
Eight women in Phoenix House were on Rule 63 protection regimes and lived in standard rooms in a secure area of the house. The facilities for women living in the protection area of Phoenix House were lacking. The women had access to a small courtyard area for outside recreation and the facilities inside were limited to a couch and a small table seating four people in the kitchen. Women also had limited access to the gym based in the school, at designated hours. There was a communal area in Phoenix House for women on protection; however, it was devoid of furniture at the time of inspection and accessible by stairs only. The women reported that it had been in this state of disuse for months. In case of emergency, there was one call bell located in the kitchen of Phoenix House's protection area. As such, the call bell was not immediately accessible to alert staff in the case of an emergency, despite one of the house's occupants having serious healthcare needs.

**2.24** Owing to use of committal cells for long-term accommodation of other prisoners, newly committed prisoners were required to share an overcrowded cell upon admission to the prison. The Inspectorate observed four new committal prisoners accommodated in a committal cell, with one of these women sleeping on a mattress on the floor. Prisoners in this cramped cell ate meals, made phone calls and used the toilet within the presence of each other. **Given the heightened vulnerability of prisoners when they first enter prison, it is important that each person be provided with their own bed, as well as sufficient space and privacy to adapt to the prison environment.**

**2.25** A small number of women, the majority of whom had serious mental health illnesses, were accommodated on a long-term basis in the HCU. Alongside prisoners with long-term care needs, the HCU accommodated prisoners on restricted regimes, and newly committed prisoners, as well as prisoners on Rule 64 in Special Observation Cells. Previously, the Inspectorate raised concerns about the purpose and utility of this area,<sup>22</sup> and these concerns remained in September 2023.

Conditions in the HCU were concerning, particularly because women – some of whom had serious mental illnesses - spent between 22 and 24 hours in segregated conditions (**Figure 7**).

**Figure 7: Room 2, HCU**



<sup>22</sup> OIP (2022) COVID-19 Thematic Inspection of Mountjoy Women's Prison - Dóchas Centre, September 2021.



**In line with the Bangkok Rules, Rule 41, women with serious mental illnesses should not be accommodated in committal cells, on very restrictive regimes on a long-term basis.**

## **Remand & Bail**

- 2.26** A key factor affecting overcrowding and poor conditions in the Dóchas Centre was the number of people committed to the prison on remand. Given the principle of the presumption of innocence, international standards indicate that remand detention should be used as a measure of last resort.<sup>23</sup>
- 2.27** On the first day of the general inspection, 19 September 2023, 30% (47 of 155) of women held in the Dóchas Centre were on remand. While many of these women were remanded in prison for short periods of time, six women were due to spend more than 100 days in remand detention.
- 2.28** A review of remand warrants for women in the Dóchas Centre identified that four women were being held on bail for amounts equal to or less than €200. Nine women had bonds of less than €500. One woman had a bail amount of €100; she had been remanded in custody for theft of a phone.
- 2.29** Women being remanded in prison for minor offences and for short periods does not align with the principle that remand detention should be used as a last resort, with non-custodial measures applied.
- 2.30** The development of bail supervision schemes<sup>24</sup> could be of benefit to reduce high numbers of women on pre-trial detention, particularly given that many people committed to Irish prisons are unhoused and have a higher prevalence of psychoses and alcohol and substance misuse than that of the general community.<sup>25</sup> For example, in 2016 a Bail Supervision Scheme was introduced for young people coming before the courts in Ireland. An evaluation<sup>26</sup> of the Bail Supervision Scheme demonstrated that there was a 72% reduction in reoffending. By comparison, the control group experienced a 37% reduction in reoffending over the same timeframe. This type of programme could be adapted to meet the needs of the remand women population as set out in the 2022 - 2024 Review of Policy Options for Prison and Penal Reform.<sup>27</sup>
- 2.31** There was also a high percentage of women serving short sentences. On 19 September 2023, 21% of women held in the Dóchas Centre were serving short sentences of less than 12 months.
- Of note was one woman who served a sentence of only five days and another woman who served a sentence of two weeks. Short sentences such as these contribute to overcrowding, are costly to implement, and perform no appreciable rehabilitative purpose.
- 2.32** Coupled with a continued reliance by the courts on short sentences (12 months or less), and an ongoing situation of overcrowding in the Dóchas Centre, the number of women with low bail amounts being held in the prison was of significant concern.

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<sup>23</sup> CPT (2017) Remand Detention.

<sup>24</sup> Bail supervision is a social work or third sector service that supports people to comply with conditions of their bail. It aims to provide an alternative to remand in prison, where people accused or convicted of an offence(s) are assessed as requiring a level of supervision, monitoring and support to adhere to bail conditions. For more on this, see Scottish Government (2022), Bail Supervision National Guidance.

<sup>25</sup> Gulati G. et al (2018) The Prevalence of Major Mental Illness, Substance Misuse and Homelessness in Irish Prisoners: Systematic Review and Meta-Analyses, *Irish Journal of Psychological Medicine*.

<sup>26</sup> C Naughton, et al (2019) Evaluation of Bail Supervision Scheme for Children, Department of Children and Youth Affairs.

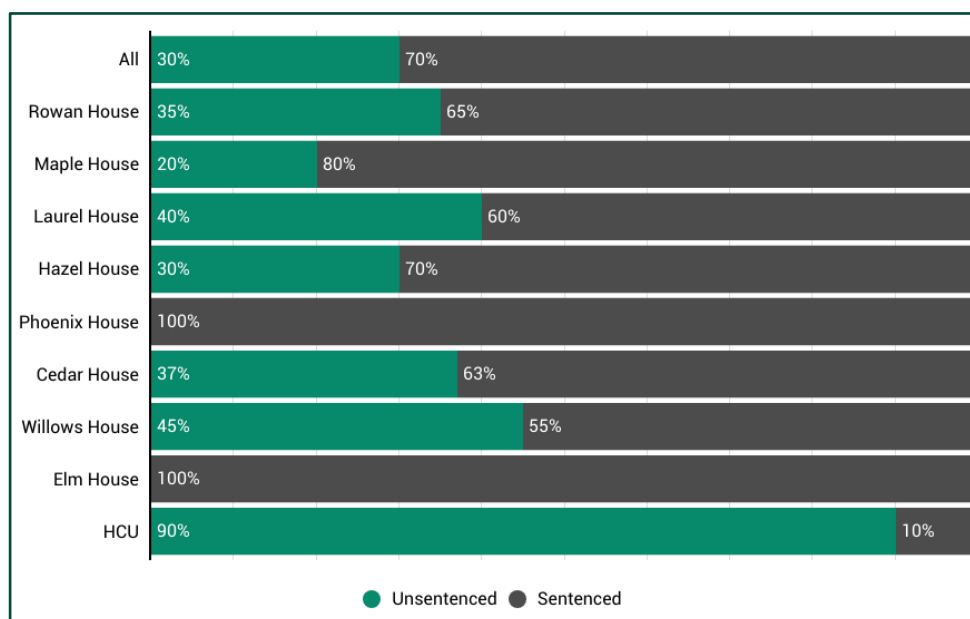
<sup>27</sup> Department of Justice (2022) Review of Policy Options for Prison and Penal Reform 2022-2024, pages 18-19.

The prevalence of low bail amounts indicates a lack of adherence to the principle of imprisonment as a last resort. **There is a continued need to enshrine the principle of imprisonment as a last resort in legislation and criminal justice strategies, as set out in the Government’s Review of Policy Options for Prison and Penal Reform 2022 - 2024.**<sup>28</sup>

### Accommodation of Convicted and Unconvicted Prisoners

- 2.33** On 19 September 2023, 53% of unconvicted prisoners shared rooms with sentenced prisoners. With the exception of Elm and Phoenix Houses, unconvicted and convicted prisoners were accommodated together in rooms across all of the houses in the prison (**Figure 8**).

**Figure 8: Areas of Prison by Conviction Status, 19 September 2023 (%)**



There was no policy in place to separately accommodate remand and sentenced prisoners, despite international standards which require that “(a)ccused persons shall, save in exceptional circumstances be segregated from convicted persons and shall be subject to separate treatment appropriate to their status as convicted prisoners”.<sup>29</sup>

### Accommodation of Immigration Detainees

- 2.34** The Dóchas Centre also accommodated immigration detainees. One immigration detainee was accommodated in the prison for a period of 19 days during the inspection (7 September 2023 to 26 September 2023) and shared a cell with a convicted prisoner. The practice of accommodating immigration detainees in prisons, with the general prisoner population, did not align with international standards.

<sup>28</sup> Gov.ie. [Review of Policy Options for Prison and Penal Reform 2022-2024](#).

<sup>29</sup> [International Covenant on Civil and Political Rights](#) (1966) Article 10(2). Ireland’s reservation to the full implementation of Article 10.2 remains in place (see Law Reform Commission (2020) [Discussion Paper: Domestic Implementation of International Obligations](#), p.145).

## 2.35 Accommodation Assessment

*The situation of overcrowding in the Dóchas Centre was of serious concern to the Inspectorate. Overcrowded conditions hindered the ability of the prison to offer good and healthy living conditions, access to activities and services in the prison and effectively undermined the original ethos of the prison to encourage personal growth and development in a caring and safe environment.*

*The manner in which percentage bed capacity is calculated by the Irish Prison Service did not sufficiently capture the “real” percentage bed capacity in the prison, given factors such as the operational and security needs of the prison as well as room closures due to ongoing renovations.*

*On the first week of inspection, between one and three women were sleeping on mattresses on the floor; however, by week two of the inspection, between eight and nine women were sleeping on mattresses on the floor on a nightly basis. On average, over the duration of the inspection, five people slept on mattresses on cell floors nightly.*

*Women with serious mental health illnesses were accommodated on a long-term basis in committal cells; this practice should cease.*

*There were examples of good housing models within the Dóchas Centre that should be replicated. For example, Elm House facilitates single-cell occupancy in a positive living environment, and Phoenix bedsits provide well-facilitated living conditions albeit shared. It was positive to note that accommodation was being renovated across the prison, particularly because of the immediate need in Rowan, Maple and Hazel Houses.*

*Nearly one-third (30%) of women held in the Dóchas Centre were on remand on 19 September 2023. Sentenced, remand and immigration detainees were accommodated in the same areas of the prison, and shared cellular accommodation. This did not align with international standards, as set out in the International Covenant on Civil and Political Rights, Article 10.2.*

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## 2.36 RECOMMENDATIONS

### To the Minister for Justice:

**Repeat Recommendation MDOJ22-1** (*recommendation also made in relation to Mountjoy Men’s Prison, Cork Prison and Cloverhill Prison*): The Minister for Justice should take urgent action to place an enforceable upper limit on the number of persons that can be committed to the Dóchas Centre, as well as in all other prisons in Ireland.<sup>30</sup> This should be accompanied by determined action to implement the alternatives to imprisonment foreseen in the 2022-2024 Review of Policy Options for Prison and Penal Reform.<sup>31</sup>

<sup>30</sup> Prison Rules 2007-2020, Rule 18(2)(a): “The Minister may specify the maximum numbers of persons who may, in normal circumstances, be accommodated in cells or rooms belonging to such class as may be so specified.” In 2021 the CPT considered that for every prison, there should be an absolute upper limit for the number of prisoners, in order to guarantee the minimum standard in terms of living space, namely 6m<sup>2</sup> per person in single cells and 4m<sup>2</sup> per person in multi-occupancy cells (excluding the sanitary annexe). See ¶102. On “Establishing Thresholds” in CPT (2022) 31<sup>st</sup> General Report of the CPT.

<sup>31</sup> Department of Justice, Criminal Justice Policy Review of Policy Options for Prisons and Penal Reform 2022-2024.

**Repeat Recommendation MDOJ23-1** (*recommendation also made in relation to Cloverhill Prison*): The Minister for Justice should take urgent action to reduce the high number of prisoners, and prolonged lengths of time prisoners are held in pre-trial detention in the Dóchas Centre, as well as in all other prisons in Ireland. This should be accompanied by determined action to ensure that viable alternatives are available including the commissioning of research on the use of remand detention for people before the district court as well as the development of a women's Bail Supported Service.

**Repeat Recommendation MDOJ23-2** (*recommendation also made in relation to Cloverhill Prison*): The Minister for Justice should bring an end to the practice of immigration detainees being held in prisons.

**Repeat Request for Information MDOJREQ22-1**: The Inspectorate would appreciate receiving detailed information about the work of the Department of Justice to implement the recommendations of the 2022-2024 Review of Policy Options for Prison and Penal Reform, including the work of the proposed "multi-stakeholder taskforce to address the current accommodation crisis".

**To the Minister for Justice & Director General of the Irish Prison Service:**

**Repeat Recommendation MDOJ22-2 / DG22-1** (*recommendation also made in relation to Mountjoy Men's Prison, Cork Prison and Cloverhill Prison*): In line with Rule 21 of the European Prison Rules (2020), the Minister for Justice and the Director General of the Irish Prison Service must ensure that every person in custody has their own bed and that cell occupancy is in line with CPT living space standards (4m<sup>2</sup> for each person, exclusive of sanitary facilities).

**To the Governor of the Dóchas Centre:**

**Recommendation DO23-1**: The recreation and kitchenette areas in all houses at the Dóchas Centre should be furnished, equipped and utilised to allow women to engage in recreation, purposeful activity, and meaningful human contact.

**Recommendation DO23-2**: Specifically designed committal cells in the Healthcare / Committal Unit should not be used to accommodate women with serious mental health issues on a long-term basis. [See also, Recommendation MHT25]

**Request for Information DOREQ23-1**: The Inspectorate requests information on the status of the prison-wide renovation plans to renovate and refurbish all houses in the Dóchas Centre.

## Hygiene & Sanitation

- 2.37** The Prison Rules 2007-2020 and European Prison Rules 2020 provide that prisons should be equipped with the necessary cleaning supplies to allow prisoners to keep their cells clean and to ensure all areas of a prison are hygienic and sanitary.<sup>32</sup> In addition, as provided for in international human rights standards, prisoners should have privacy when using sanitary facilities and all parts of the prison should be properly maintained and clean at all times.<sup>33</sup>

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<sup>32</sup> Prison Rules 2007-2020, Rule 20 and European Prison Rules (2020), Rule 19.

<sup>33</sup> European Prison Rules (2020), Rule 19.1 and Rule 19.3.

Rule 5 of the UN Bangkok Rules also states that “the accommodation of women prisoners shall have facilities and materials required to meet women’s specific hygiene needs, including sanitary towels provided free of charge.”<sup>34</sup>

The CPT recognises access to personal hygiene products as part of its “Minimum Decency Threshold” in prison settings. As outlined by the CPT, “prisoners should be systematically provided with sufficient supplies of basic personal hygiene products free of charge upon admission and on a regular basis thereafter.” The CPT also “takes into account whether the prices of products purchasable by prisoners exceed retail prices with the result that basic items remain unaffordable to those without private means or outside support.”<sup>35</sup>

- 2.38** The ongoing situation of overcrowding presented challenges to women with little space to store and organise their personal belongings.

Positively, most accommodation in the Dóchas Centre was fitted with showers, sinks and toilet facilities. This enabled women in prison to shower at a time suitable to them, and also ensured there was a sufficient number of showers available for the number of women in the prison. Unlike other houses in the Dóchas Centre, Willows House provided communal shower facilities. Given the open regime in this house, women could use the showers whenever they wished; these showers were functioning with running hot water at the time of inspection.

- 2.39** In contrast to other prisons, many in-cell sanitary facilities in the Dóchas Centre were partitioned from the remainder of the room, although they were not completely private (**Figure 9**).

**Figure 9: Partially-partitioned Sanitary Facility**



Overcrowding exacerbated concerns around privacy and dignity when accessing toilet facilities. A member of staff reported, “Resources are under pressure with an increased population. Overcrowding is an issue for the women, especially multiple occupancy cells when accessing toilet facilities. (There is) lack of privacy and personal space.”

<sup>34</sup> UN Bangkok Rules (2015).

<sup>35</sup> CPT (2021) 30th General Report of the CPT, “Minimum Decency Threshold” (see from p.35 onwards) para 78.

- 2.40 Of significant concern to the Inspectorate was inaccessibility of toilet facilities when women in Rowan and Maple Houses used the small yard.** When women in these houses elected to spend time outside in the small yard they were, as a result, denied re-entry to their rooms. There were no toilet facilities available in the yards. Given the newly imposed regime in the prison, whereby women who used the small yard were required to remain in the yard for periods of up to three hours during periods of unlock (see 2.63 - 2.72), the prohibition on access to toilets in the houses was inhumane.
- 2.41** Over half of prisoners who responded to the survey (50 out of 96 respondents) reported not having sufficient access to cleaning supplies to clean their cells. While supplies were available, overcrowding impacted on their availability and there were some reports of favouritism in the allocation of cleaning supplies.
- 2.42** Upon committal, women were provided with a toiletry kit, which included hygiene products such as deodorant, toothbrush, hairbrush, shampoo and conditioner.
- 2.43** Women were provided with period products free of charge in line with Rule 5 of the UN Bangkok Rules. Positively, 86% (80 of 93) of women stated that they were provided with products such as tampons and pads on a monthly basis; and 68% (46 of 68) of women surveyed said the products provided meet their needs.

However, because period products were locked in house offices and not readily distributed, many women reported challenges with accessibility. Women had to request from officers to be provided with period products, and reported:

*“It’s embarrassing to ask a male officer”.*

*“Sometimes they have them [period supplies], sometimes they don’t.*

*Women try to look after each other.”*

*“They don’t have enough, they gave me two pads in a week.”*

*“It’s is extremely difficult to get any female products.”*

*“Don’t have enough always none in stock.”*

Previously, the Red Cross had organised the dissemination of period products, however this practice had ceased.

The Inspectorate stresses the importance of ready access to period products for women in prison. This should be done in a manner which ensures they are easily attainable and does not create discomfort for the women seeking them. Inaccessibility to essential items of this kind can undermine dignity for women in prison.

- 2.44** Similar to previous inspection findings,<sup>36</sup> women spoke about limited access to certain essential hygiene products. For example, it was reported that other toiletry products such as toilet roll, shampoo, conditioner, toothbrush, moisturisers and shower gel were difficult to access. Certain gender-specific items were also unavailable to buy in the tuck shop such as moisturiser and specific sanitary products. Some concerns were raised about the suitability of products for different hair types, for particularly for women of colour. Other toiletries that women relied on to express their identity and femininity, such as hair dye, were inaccessible in the tuck shop.

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<sup>36</sup> OIP (2022) COVID-19 Thematic Inspection of Mountjoy Women’s Prison-Dochas Centre, 14-15 September 2021, pgs. 26-27.

**2.45** The school operated a hairdressing service which was very valuable to women in the prison. However, only women on the Enhanced IR level (see 5.4) were permitted to attend the hairdresser to receive a haircut.

#### **2.46 Hygiene & Sanitation Assessment**

*In-cell sanitation, including access to in-cell showers, was positive for women in the Dóchas Centre. However, repairs were needed in order to ensure that all sanitary facilities were fully partitioned to protect the privacy of women when using the toilet or shower in shared and overcrowded rooms.*

*The vast majority of prisoners had access to cleaning and personal hygiene supplies, but there were concerns raised about the accessibility and availability of period products and other toiletries, including the suitability for women of colour.*

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#### **2.47 RECOMMENDATION**

**To the Director General of the Irish Prison Service & Governor of the Dóchas Centre:**

**Repeat Recommendation DOCT7 (2021):** In line with international human rights standards, the Dóchas Centre and the Irish Prison Service should take positive measures to respect the dignity of women by ensuring that all women have ready access to gender-specific and period products.

### **Clothing & Bedding**

**2.48** As provided for in the Prison Rules, 2007-2020, all people in prison should have access to clean and warm clothing.<sup>37</sup> The European Prison Rules (2020) set out that people in prison should be supplied with a bed as well as climate-appropriate bedding.<sup>38</sup> Bedding and clothing should be laundered on a regular basis.<sup>39</sup> The UN Mandela Rules (Rule 5.1) establish that the prison regime should seek to minimize any differences between prison life and life at liberty that tend to lessen the responsibility of the prisoners or the respect due to their dignity as human beings.

#### **Clothing**

**2.49** Upon committal to the Dóchas Centre, prisoners were provided with two sets of prison clothing three sets of socks, three pairs of underwear, and a towel. Positively, women were permitted to wear their own clothing and to keep up to five sets of personal clothing in their rooms.

However, some women reported not being provided with essential garments, and that in some instances women borrowed undergarments from other prisoners. Some women did not have familial support, or their families could not afford to post packages (see 2.128), as a result they had to rely on clothing provided by prison authorities. One woman expressed feeling grateful for the clothing received, but commented that these items were not always suitable; *“knickers have rips in them, [they] fall apart or don’t fit you.”*

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<sup>37</sup> Prison Rules 2007-2020, Rule 21.

<sup>38</sup> European Prison Rules (2020), Rule 21.

<sup>39</sup> Prison Rules 2007-2020, Rule 22: “Each prisoner shall be issued with separate bedding adequate for warmth and health, which shall be cleaned regularly”, and that “A prisoner shall not be required to sleep without a mattress.” However, the European Prison Rules (2020), Rule 21 states that: “Every prisoner shall be provided with a separate bed and separate and appropriate bedding”.

- 2.50** The prison ordered prison-issued clothes in a variety of colours (and allowed women to select their clothing), as required. This practice was positive in that it allowed women to express their preferences and individuality. However, there was still a stigma attached to wearing prison-issued clothing and very few of the women were observed wearing prison-issued clothing at the time of inspection.

Clothes were a form of currency in the prison. For example, clothes swapping and borrowing occurred between women in the prison. There were reports in some houses of clothes going missing. In order to prevent this, increased staff supervision in the houses and a laundry rota was required.

- 2.51** In rooms across a number of houses, there were no storage facilities for women to store their clothes. Many women stored their clothes in a bucket or plastic bags under their beds. While overcrowding contributed to this issue, there were some houses that were not overcrowded in which women serving lengthy sentences had no storage facilities.

In relation to long-term storage, women were each assigned a locker, where additional personal items could be stored and requests could be made to rotate clothing items from their assigned lockers. The locker room that stored women's belongings was overflowing; some of the women's belongings were left in bags and suitcases because many of the lockers were too small to hold personal belongings. Some difficulties were reported in accessing these items from lockers in a timely fashion, particularly because access was contingent on prison officers fulfilling prisoner requests. This particularly affected women who were seeking clothes in advance of a visit or a court date.

- 2.52** Women washed and dried their clothing in laundry facilities contained in each house. The houses had facilities for women to do their own laundry and rosters were in place to facilitate this. However, due to the lack of staff supervision to facilitate the rota in a fair way, access to laundry facilities often caused quarrels between women and led to bullying between women sharing houses: *"One dryer, one washing machine for 20 prisoners causes fights."*

Two washers and two dryers were available next to the reception area. This was the laundry facility available for women in the HCU. All of the laundry facilities were in the process of being moved to one area in the prison. While plans to move laundry facilities to one area of the prison may alleviate bullying among prisoners in the absence of staff supervision in houses, and overcrowded housing conditions, removing laundry facilities away from the houses potentially diminishes the original concept and ethos of the Dóchas Centre to promote life skills and a regime that reflects living in the community.

### **Bedding**

- 2.53** Women were issued complete bedding sets on committal which included a duvet, pillow, bed sheet and a towel. Officers working on landings were responsible for requesting replacement bedding and mattresses; however, information was not readily available on the numbers of requests made in this regard.

While the quality of bedding was of a similar standard to that in men's prisons, there were multiple reports of women feeling cold in their rooms as the heating was not on in the month of September.



- 2.54** Cedar House was the only house in the prison in which bunkbeds were in use. The quality of the bunk beds were poor. The beds were metal and offered an uneven sleeping surface with deep grooves in the base that caused discomfort to the women.
- 2.55** Mattresses used to sleep on the floor were stored under beds, or in sanitary facilities during the day to allow prisoners move around in the cell and avoid being stepped on (**Figure 10**).

**Figure 10: Mattress Storage in Overcrowded Rooms During the Day**



## **2.56 Clothing & Bedding Assessment**

*It was positive that women were permitted to wear their own clothing. However, there were insufficient storage facilities for clothing for women in both the locker room and in their own rooms. Many women stored their clothing in buckets or plastic bags. Contrastingly, women in Elm House had good storage facilities.*

*The introduction of a choice of colours in the prison clothing was a positive development in that it allowed women to express their individuality and exercise choice. However, there was a stigma associated with wearing prison-issued clothing and very few women were observed wearing clothing items provided by the prison.*

*Metal bunk beds with deep grooves below mattresses provided a poor quality of sleep to women. Generally, bedding was in good condition, however there were multiple reports of women feeling cold in their rooms.*

*Mattresses were stored poorly on a daily basis in overcrowded rooms, and impacted on already compact and limited living space.*

## **Out-of-Cell Time**

- 2.57** The Prison Rules 2007-2020 provide that all prisoners should spend as much time out of their cells as is practicable to associate with other prisoners.<sup>40</sup> The Rules also state that each convicted prisoner should be engaged in authorised structured activity for a period of not less than five hours on each day of five days a week.<sup>41</sup> The CPT recommends that prisoners should be able to spend eight hours daily out of their cells engaged in purposeful activities.<sup>42</sup>

<sup>40</sup> Prison Rules 2007-2020, Rule 27(1).

<sup>41</sup> Prison Rules 2007-2020, Rule 27(3).

<sup>42</sup> As referenced by the CPT, in the 2015 Living Space per Prisoner in Prison Establishments, and the CPT's (2021) A Decency Threshold for Prisons-Criteria for Assessing Conditions of Detention.

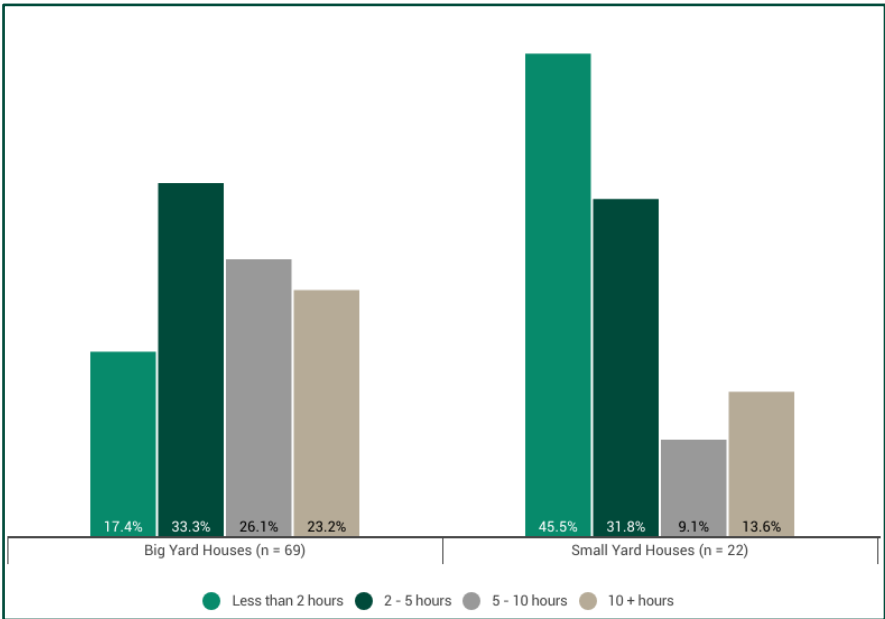
2.58 Out-of-cell time for women comprised of time spent in houses and the yards, participation in activities such as school, work and gym and access to services and visits.

The general scheduled daily unlock times for the majority of houses were: 9:30 - 12:00, 14:00 - 16:00 and 17.30 - 19:15. The majority of prisoners were “locked-back”<sup>43</sup> in their rooms at scheduled times: 19:00 - 09:30, 12:00 - 14:00 and 16:00 - 17:00.

The amount of out-of-cell time varied, and was dependent on where the women lived in the prison and the extent to which they were engaged in purposeful activity (**Figure 11**). Lower levels of reported out-of-cell time (i.e., less than two hours) were more pronounced for the women located in Rowan and Maple Houses in the small yard.

Of concern to the Inspectorate was the one-quarter of women surveyed (23 of 94) who reported that on a typical weekday they spent less than two hours out of their cell.

Figure 11: Prisoner Reports of Out-of-Cell Time, Weekday (by Part of Prison) (%)



2.59 In addition, there was a further deterioration of reported out-of-cell time for women during the weekends. While 49% (34 of 52) of women in big yard houses reported spending five or more hours out of their rooms on a weekday, this reduced to 33% (17 of 52) on weekends. Similarly, 46% (10 of 22) of women in small yard houses reported spending less than two hours out of their rooms on weekdays, and this rose to 80% (12 of 15) of women on weekends.

Across the prison, out-of-cell time for each prisoner is not recorded. **There was no clear way for staff and management to ascertain weekly, or indeed monthly, actual out of cell time for each prisoner.**

2.60 Women who engaged in essential work in the prison or who were in open regime houses were out of their rooms for a large portion of the day, often in excess of eight hours. This aligned with the CPT’s recommendation on access to purposeful activity. Positive practice was noted in Elm House where women were unlocked from seven in the morning until ten at night; although, this unlock was confined to unrestricted access within the house and not the general prison campus.

<sup>43</sup> “Lock-back” is a term used in prisons to refer to periods of time when prisoners are locked in their cells, these can be scheduled or applied to individuals or particular groups of people in the prison based on the discretion of prison staff.

**2.61** Although the scheduled unlock times exceeded the minimum standard set out in Rule 27(3) of the Prison Rules 2007-2020, many women were observed walking the perimeters of the yards and were not engaged in any form of authorised structured activity. In addition, the amount of scheduled out-of-cell time was below that of the CPT minimum standard of up to eight hours or more a day of engagement with activities.

Scheduled unlocked times were also negatively impacted by the introduction of a newly imposed lock-back regime in one area of the prison (see 2.63 - 2.72).

**2.62** It was also positive to note that there were no lock-backs imposed for women held on Rule 63 protection regimes in Phoenix House. This was in stark contrast to practices observed in men's prisons.

Women held on Rule 63 were unable to mix with the general prisoner population. Within their house, they were essentially unlocked and had free movement for the majority of the day. However, the women were also confined to a small space, only had access to a small yard for exercise and had limited access to the school.

### **“Lock-Back Regime”**

**2.63** Owing to a newly imposed regime, women in Rowan, Maple, Hazel, Laurel and Cedar Houses were not allowed back into their houses during periods of scheduled unlock. This lock-back regime, introduced shortly before the inspection visit, resulted in women being locked out of their houses for extensive periods of time. If women chose to be unlocked to attend the yard they were required to remain in the yard until scheduled lock-back. If they chose not to be unlocked, they had to remain in their room for the full period of scheduled unlock.

**2.64** One rationale given for this newly imposed regime was that it was intended to motivate more women to leave their room and engage in purposeful activities. Another rationale was that the regime was introduced as a result of reduced staffing availability coupled with an increasing prison population; the new regime limited the number of women permitted to interact freely in the houses during scheduled unlock periods. Given the minimal staffing allocation in the small yard houses, this regime had a particularly acute impact on the women in Maple and Rowan houses (although it also affected some of the houses in the big yard).

**2.65** On the late morning of Tuesday 26 September 2023, the Inspectorate conducted a snapshot census to identify the number of women who were locked-back under this newly imposed regime. These women were not permitted to spend time in the hallways, living areas or kitchens, and when locked-back in their rooms they had little or no engagement with prison staff (see 2.91). On that particular morning, two houses were affected: Maple and Hazel Houses. Eight of 22 (36%) women stayed locked-back in their rooms in Maple House; while 9 of 26 (34%) women in Hazel remained locked-back during this period.

**2.66** On numerous occasions, women were observed shouting at room doors and ringing call bells to seek the attention of prison staff to request be let out from their room. One woman explained she remained *“locked back to go to toilet”* and that she then raised a call bell *“for an hour and half, no one answered.”* Women reported that there was not enough time to organise themselves in the morning prior to choosing between staying in, or going out of their rooms.

- 2.67** Women who elected to leave their rooms during scheduled unlock times either attended a structured activity or spent time in unsheltered yards which were equipped with a couple of picnic benches but did not have toilets. Once they elected to attend the yard women were not permitted to return to their houses or use the toilet.
- 2.68** During the inspection, groups of women were observed huddled in the doorways of some of the houses, trying to shelter from a severe storm<sup>44</sup> (see also, 2.90). The Inspectorate observed multiple women locked out of the houses in the small yard in the heavy rain, all of whom were banging on the house door and yelling to staff to allow them to return to their rooms and get out of the rain. Their request to staff to be allowed to return to their rooms had been denied and they said they had been told they would be sanctioned if they tried to go into the kitchen or recreation rooms.
- 2.69** The imposition of this new lock-back regime was a striking example of how the Dóchas Centre had taken on more characteristics of a closed medium-security prison for men. Indeed, this approach to prisoner management and out-of-cell time was also observed in Cork Prison in March - April 2023;<sup>45</sup> the Inspectorate similarly identified concerns with the regime in its inspection of that prison.
- 2.70** While the rationale provided to the Inspectorate to support the need to impose the new lock-back regime was to encourage women to engage in purposeful activity, this was not the result in practice. On the contrary, the Inspectorate observed that this regime had an adverse impact on the wellbeing of women, and resulted in increased tensions in the Dóchas Centre.
- 2.71** A further concern regarding this regime related to record keeping. Class Officer journals did not record which women were locked-back during periods of scheduled unlock. This meant that there was no formal way to discern whether an individual was being continuously locked back or disengaging with the regime for a protracted period of time (see also, 3.10).
- 2.72** Concerns regarding this regime were raised at the close out meeting with prison management. Immediately following the inspection, prison management considered the Inspectorate's findings and a petition raised by women in the prison to re-consider imposition of the lock-back regime. Prison management revised the procedure to allow women to use the toilets and visit their rooms to collect their belongings during periods of unlock. However, this was contingent on the availability of staff to grant access to the houses.

## **2.73 Out-of-Cell Time Assessment**

*The new "lock-back" regime in certain houses imposed an unnecessary limitation on the amount of out-of-cell time women were entitled to on a daily basis. This regime should cease immediately.*

*Immediately following the inspection, prison management revised the procedure to allow women to use the toilets and visit their rooms to collect their belongings during periods of unlock. This action was welcome; however implementation of this was contingent on the availability of staff to grant access to the houses.*

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<sup>44</sup> Storm Agnes was described as a significant weather event; Met Eireann issued a weather warning of strong winds and rain.

<sup>45</sup> OIP (2024) General Unannounced Inspection of Cork Prison: March - April 2023, ¶ 2.41. & 5.37.

*While daily unlock times were recorded in Class Office journals; there were no records kept of individual women's unlock periods and out-of-cell time recording of this information was more pertinent given the newly imposed "lock-back" regime. As a result, it was not possible to decipher the amount of time women in the general population spent "locked-back" in their rooms, nor was it possible to determine the names of prisoners locked back and lengths of time they were locked back for.*

*Contrastingly, women engaged in essential work in the prison or who were in open houses were out of their rooms for a greater portion of the day, many in excess of eight hours, which aligned with the CPT's recommendation on access to purposeful activity. Positive practice was noted in Elm House where women were unlocked from seven in the morning until ten at night (restricted to the house itself).*

## 2.74 RECOMMENDATIONS

### **To the Director General of the Irish Prison Service:**

**Repeat Recommendation DG22-3** (also made in relation to Mountjoy Men's Prison, Cork Prison and Cloverhill Prison): In the ongoing review of the Prison Rules 2007-2020, consideration should be given to amendment of Rule 27(1)(a) to increase the minimum amount of out-of-cell time, in line with the CPT's *Decency Threshold for Prisons* (2021), which sets out a goal of at least eight hours out-of-cell time engaged in purposeful activities for people in prison. Particular consideration should be given to safeguarding the minimum out-of-cell time for prisoners on restricted regimes.

### **To the Governor of the Dóchas Centre:**

**Recommendation DO23-3:** Prison management should develop a recording mechanism to ensure that *actual* out-of-cell time is properly recorded for all prisoners in custody, with a particular emphasis on restricted regimes and out-of-cell time record-keeping. [see also, Recommendation DO23-8]

## Meals & Nutrition

**2.75** Under the Prison Rules 2007-2020, Rule 23, the Governor of the prison is responsible for ensuring that prisoners receive good quality and varied meals.<sup>46</sup> In addition to this, international standards require that meals be served at reasonable intervals and at times reflective of mealtimes in the community.<sup>47</sup>

**2.76** Prisoner opinions on the quality of food in the Dóchas Centre were mixed, with 25% of women surveyed (21 of 85) indicating that the quality of the food was one of the top five main positive things in the prison, and 24% of survey respondents (22 of 91) indicated that the food was one of the top five main problems in the prison. Food observed by the Inspectorate was sufficient in quantity, but did not include an adequate amount of green vegetables (see **Figure 12**).

<sup>46</sup> Prison Rules 2007-2020, Rule 23.

<sup>47</sup> UN Mandela Rules (2015), Rule 22 and European Prison Rules (2020), Rule 22.4.

**Figure 12: Meals Provided During Inspection**



**2.77** A new menu had recently been introduced in the prison, and this was largely welcomed by women in the prison. This menu was based on a required calorie count for men, and it was reportedly intended that, following a trial period, the menu would be reassessed to meet the needs of women.

**2.78** Mealtimes did not align to those in the community. For example, dinner was served at 12:30 and lunch at 16:00. In 2021, the Inspectorate recommended that “scheduling around meal times be amended to ensure meals are served at reasonable intervals and at normal times: lunch (midday) and dinner (evening).” In March 2023, the Irish Prison Service indicated no changes would be made to the serving times or intervals between meals. Instead, the menu was changed to enhance the final meal of the day (16:00), and to align meal times across the prison estate.

While the Inspectorate welcomes efforts made to improve the quality of the menu, the ongoing practice across much of the prison estate continues to not be aligned with international best practice, which sets out that “there shall be three meals a day with reasonable intervals between them” and “every prisoner shall be provided by the prison administration at the usual hours with food of nutritional value”.<sup>48</sup>

**2.79** In the past, all women in the Dóchas Centre ate their meals in a large communal dining hall. However, this practice had not returned since before the COVID-19 pandemic, apparently because communal dining had led to bullying issues amongst prisoners. As a result, with the exception of women living in Elm House and some women in Phoenix House, the majority of women ate in their rooms. Very positively, women in Elm House could prepare their own food in the kitchen within the house.

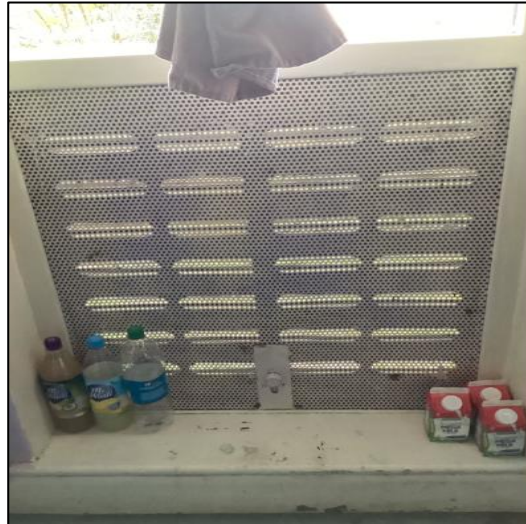
**2.80** Many women ate their meals in cramped conditions in their rooms, with some sitting on the floors of their rooms as there was not sufficient counter space or seating for all occupants. This was particularly the case in overcrowded rooms but was also observed in double occupancy rooms where the configuration and furnishing of the room did not provide enough space. For example in a double room in Cedar House, one woman ate on her bed, while the other ate on the chair; with one woman explaining, “*Whoever has top bunk gets the chair.*” While there were kitchenettes in all of the houses, the majority were not used for their intended purpose and did not have dining areas or even chairs (see 2.14 and Recommendation DO23-1).

<sup>48</sup> European Prison Rules (2020), Rule 22.4 and UN Mandela Rules (2015), Rule 22.



- 2.81** Basic food supplies, such as bread and milk were handed out by staff each day. As a result of kitchens being locked, women could not store these items in the kitchen area and instead placed milk and bread close to window in their room in an attempt to prevent them from spoiling (**Figure 13**). In some of the houses women did not have easy access to non-perishable foodstuffs from the kitchenette, for example cereal, sugar and teabags.

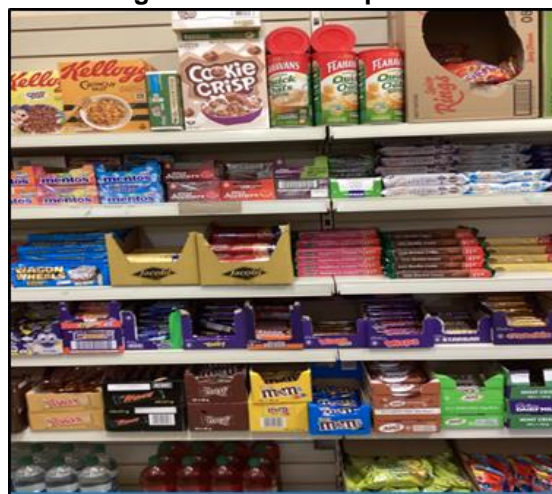
**Figure 13: Storage of Food Supplies**



- 2.82** In addition to the food supplied by the kitchen, women could supplement their diet with food from the tuck shop. However, the majority of products available in the tuck shop were unhealthy options (**Figure 14**).

In its current location, women could not visit the tuck shop. Instead, women placed their orders via a tuck shop form and items were delivered to their room on different days depending on where they were located in the prison. The tuck shop was being relocated at the time of the inspection. In the new location, it was envisaged that women would be able to visit the shop in-person; this is a positive step to create a sense of normalcy.

**Figure 14: Tuck Shop Items**



- 2.83** Prices for toiletries in the tuck shop were high and no price list was available; women relied on receipts to estimate the prices of items. The prices were set by the supplier and changed frequently. This could present challenges for women in managing the money in their account and in placing orders.

Regulations set out in the European Communities (Requirements to Indicate Product Prices) Regulations 2002<sup>49</sup> require that where products are for sale, traders “shall indicate the selling price of that product”. The regulations indicate the “selling price must be unambiguous, clearly visible and legible, and in proximity to the product itself”.

## **2.84 Meals & Nutrition Assessment**

*Food provided to prisoners was of fair quality. Women had a sufficient quantity of food to eat each day.*

*Despite the kitchen spaces available in most houses, these were generally not in use or suitably furnished. Meals were mostly eaten in rooms which did not afford sufficient space. Given the availability of spaces to eat food outside of their rooms, efforts should be made to restore communal dining.*

*Women did not have sufficient access to basic daily foodstuffs such as cereal, sugar and teabags, or to appropriate food storage facilities in kitchenettes designed for these purposes.*

*The introduction of the new meal plan was generally perceived as positive. However, the calorie count was calculated based on dietary requirements for men. This should be reassessed to take into account the needs of women.*

*It is a positive development that women will be physically able to attend the tuck shop once it is relocated, but it remains a concern that pricing is not transparent.*

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## **2.85 To the Director General of the Irish Prison Service:**

**Repeat Recommendation DOCT3 (2021):** In line with the Nelson Mandela Rules, Rule 22 and European Prison Rules, Rule 22.4, the Inspectorate recommends that the scheduling around meal times be amended to ensure meals are served at reasonable intervals and at normal times: lunch (midday) and dinner (evening).

**Repeat Recommendation DOCT5 (2021):** The Irish Prison Service should ensure that procured tuck shop items are marked at a price that is affordable to prisoners, and should consider assessing the daily gratuity rates received by prisoners to ensure they are able to purchase items in the tuck shop at a reasonable price.

## **To the Governor of the Dóchas Centre:**

**Recommendation DO23-4:** The Governor should ensure women in the Dóchas Centre are able to store perishable foods in a safe way, for example in house kitchens, and that women have appropriate space and seating to eat their meals in a humane way.

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<sup>49</sup> S.I. No. 639/2002 - European Communities (Requirements To Indicate Product Prices) Regulation 2002



## B. Relationships & Interactions

**2.86** Both the Prison Rules 2007-2020<sup>50</sup> and the European Prison Rules (2020) outline the importance of positive, respectful relationships between management, frontline prison staff and prisoners. Relationships are fundamental to the fostering of a prison context that treats “all prisoners with humanity and with respect for the inherent dignity of the human person”.<sup>51</sup> The United Nations Standard Minimum Rules for the Treatment of Prisoners (the “Mandela Rules”) states that “all prisoners shall be treated with respect due to their inherent dignity and value as human beings” (Rule 1). In addition, Rule 5 of the Mandela Rules states that “the prison regime should seek to minimize any differences between prison life and life at liberty that tend to lessen the responsibility of the prisoners or the respect due to their dignity as human beings.”

Prisoner experiences of humanity, staff professionalism and help and assistance are fundamental to assessing the quality of prison life for people in prison. When prisoner perceptions of trust and fairness are elevated this leads to better outcomes in other areas, such as prison order.

Research has shown that in addition to the loss of autonomy, women in prison can encounter gendered forms of social control manifested through enforced dependence and infantilism, intensive surveillance and regulation, and inconsistent use of authority that creates unpredictability and stress. The loss of autonomy and control is experienced by women as one of the most painful aspects of their confinement.<sup>52</sup> There can be a pervasiveness of soft power that is omnipresent in a prison environment for women. Power and control can be exerted in a way that is particularly detrimental to women given many women have experienced assaultive and abusive relationships.<sup>53</sup> Blurred boundaries, infantilisation, pettiness, inconsistency and favouritism are some of the challenges women in prison experience.<sup>54</sup> In research conducted on men and women prisoners, women were more likely to identify the multitude of ways in which their intimate, daily practices were controlled in a prison.

### 2.87 Staff-Prisoner Relationships

Nearly one-third of the women surveyed (32%, 29 of 91) indicated that prison staff treatment of prisoners was one of the top five problems in the prison. Explicitly, there appeared to be a lack of trust among women in Dóchas Centre prison staff.

For example, while more than half of prisoners indicated they were treated fairly by staff (57%, 55 of 97), just 25% (22 of 89) respondents indicated they trusted staff. Low levels of trust were further evidenced by prisoner reports that less than one-in-five prisoners (17%, 17 of 101) would go to a member of prison staff if they had a problem in the prison. Instead, the majority of survey respondents (53%, 53 of 101) indicated their preference to turn to another prisoner for assistance.

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<sup>50</sup> Prison Rules 2007-2020, Rules 75(2) and 85(3), and European Prison Rules (2020), Rules 72.1 and 72.2.

<sup>51</sup> European Prison Rules (2020), Rule 72.1, 74 and 75.

<sup>52</sup> Crewe et al. 2017.

<sup>53</sup> BH Zaitzow & J Thomas (eds.) (2003). *Women in Prison: Gender and Social Control*. Lynne Rienner Publishers. (pp. 201-202); B Crewe et al (2023). 'It Causes a lot of Problems': Relational ambiguities and dynamics between prisoners and staff in a women's prison. *European Journal of Criminology*, 20(3), 925-946 and B Crewe (2011) Soft Power in Prison: Implications for staff-prisoner relationships, liberty and legitimacy. *European Journal of Criminology*, 8(6), 455-468.

<sup>54</sup> B Crewe et al (2023). 'It Causes a lot of Problems': Relational ambiguities and dynamics between prisoners and staff in a women's prison. *European Journal of Criminology*, 20(3), 925-946.

Of note, is that trust in prison staff appeared to vary depending on area of the prison. Among women housed on the big yard who took the survey, 31% (21 of 68) reported they trusted prison staff. By comparison, just 5% (1 of 21) of women housed on the small yard or the HCU reported that they trusted prison staff.

- 2.88** A number of comments made by women illustrated how they viewed the manner in which prison staff engaged with them. Of particular concern was the judgemental and personal nature of the comments and insults that women experienced:

*"They don't speak to you like a person in this yard. (It's like) 'what's that yoke saying?'"*

*"I started [self-harming] over the weekend because people were being awful to me. Look at him snickering (referring to a member of staff)."*

*"They don't have to keep reminding us and treating us like dirt."*

*"There are officers who encourage us but others treat us like numbers, like scumbags."*

*"I've been insulted, dismissed and disregarded by staff on multiple occasions. Not by all officers but by a majority of staff."*

*"Some officers ignore you."*

*"Office is rude and obnoxious."*

*"I've been called ugly and a waster. [Prison officer name redacted] has told me I was 'some mother' and has said aloud horrible stuff to me".*

*"Anything that makes you feel good about yourself, they take it away from you."*

*"Insulting daily and passing very personal comments about private life among other officers etc."*

*"It's psychological... they back each other up. It's always going to be their word against ours."*

- 2.89** **Interactions between many members of prison staff and prisoners were observably disrespectful.** For example, officers were observed yelling orders at women in the houses' corridors and during meal times and collection for school. The Inspectorate also observed members of staff opening room doors and shouting at women to decide if they wanted to stay locked-back or attend the yard (see 2.63 - 2.72); the environment in the corridors at this time was chaotic and hostile.

Officers often walked hurriedly past women as they attempted to engage with them and ignored women locked in their rooms as they banged on doors and windows in an attempt to get an officer's attention.

Officers also used infantilising<sup>55</sup> and dismissive language when engaging with women in the prison; referring to the women as "girls" and frequently using phrases like "in a minute" or "I'll come back to you" to respond to prisoner attempts to engage with them.

- 2.90** The incident outlined above (see 2.68) is also a particularly concerning example of how some staff thought it appropriate to engage with women in the prison. While women sought shelter from a severe storm, prison officers ignored their pleas and instead remained upstairs in the houses.

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<sup>55</sup> A Rowe (2011) Narratives of self and identity in women's prisons: Stigma and the struggle for self-definition in penal regimes. *Punishment & Society* 13(5): 571–591 highlights that the 'loss of adult status' is exemplified in women being addressed as "girls".

The Inspectorate observed staff members cosseted in their Class Offices chatting to each other while women stood outside huddled in doorways to avoid the wind and rain. None of the officers engaged with the bedraggled women who remained locked out of their houses. One woman described their treatment as being “*left like rats outside.*” This was entirely inappropriate, and yet completely avoidable mistreatment, which only served to further exacerbate poor staff-prisoner relations in the prison.

- 2.91** There was a lack of visible meaningful engagement or even familiarity between prison staff and prisoners. Officers did not appear to know or speak to many of the women using their names. However, 63% of staff survey respondents (40 of 63) reported that relationships between prisoners and staff were respectful and professional.

**While there were some staff who clearly had positive prisoner outcomes at the core of the work they aimed to do in the prison, this was undermined by numerous examples of poor prisoner treatment.**

- 2.92** Limited staff availability (see 3.68 - 3.72), and the low number of staff posted to the houses, particularly for houses in the small yard, meant there was limited contact and engagement between staff and prisoners. A number of class offices were locked and empty with no class officers present in various houses throughout the course of the inspection; this posed challenges for prisoners seeking to engage with a member of staff.

A clear example of this was the absence of a Class Officer assigned to Phoenix House; any essential requests women had in Phoenix House were entered into a notebook for daily collection by a member of staff. One of the women said, “*We could be here all day and see no one*” (...) “*they don’t answer the call bell.*” The use of a general access notebook as the means to communicate with staff had implications for prisoner privacy and confidentiality.

- 2.93** While prisoners in Elm House, Willows House and Phoenix House experienced a good degree of autonomy, many women in the Dóchas Centre were subjected to intensive surveillance and regulation by prison staff. The introduction of the newly imposed “lock-back” regime in the small yard houses (see 2.63 - 2.72) was a prime example of intensive regulation. On one occasion a prisoner was in the shower when the officer briefly opened her door to let her out to the yard, but she couldn’t get out of the shower quickly enough and was required to stay in her room for the duration of the unlock period.

The daily activities of women in the Dóchas Centre were closely controlled. Prison staff policed with vigour the small minutiae of many of the prisoners’ daily lives, including threats of punishment for small things such as standing in doorways, wearing flip-flops outside, or visiting friends.

- 2.94** Women in prison reported, and the Inspectorate determined through examination of six-months of P19 disciplinary reports (see 3.107 – 3.113), an over-reliance on and inconsistent application of punitive sanctions in the prison.

Inconsistent application of power and authority by prison staff resulted in disciplinary sanctions or drops in Incentivised Regimes<sup>56</sup> for women. Prisoners were sometimes given a P19 following an incident, regardless of if they were the perpetrator of the incident or not. It was also reported that different treatment applied to different prisoners based on their individual relationships with prison staff. One prisoner said, *“The rules are clear, but always different”* and another said *“some officers bully and there’s a lot of favouritism”*.

- 2.95** There were some opportunities in which women could collectively advocate for themselves or actively engage as citizens. Positively, women serving life sentences met with prison management three times a year. In addition, the Inspectorate was informed that a prisoner council was soon to be established in the prison.

On an individual level, women had access to the Governor or the Assistant Governor during Governor’s Parade where they could bring issues of concern to attention. On observation, these interactions took place in the class office in the presence of prison officers who worked in the houses, which made it challenging for prisoners to bring issues of concern about staff treatment to the attention of prison management.

- 2.96** When combined with fears of reprisal around raising issues of concern or making complaints, and a sense of distrust when it came to interacting with prison staff (see 3.89 - 3.93) there were no genuine avenues through which prisoners could voice concerns about difference of treatment and punishment in the prison.

This undermined the efforts of staff who had a genuine desire to build positive professional relationships with women in the Dóchas Centre.

**Despite the best efforts of some members of staff, and prison management, the cumulative effect of poor staff-prisoner dynamics, combined with the imposition of punitive sanctions (see 3.107 – 3.113) and a restrictive lock-back regime (see 2.63 - 2.72) had a substantial adverse impact on the daily lives of many of the women in the Dóchas Centre.**

### **Staff Relationships**

- 2.97** Relationships amongst frontline staff were reportedly very good. 82% of staff survey respondents (52 of 63) indicated that staff in the prison worked well together, and 65% (35 of 54) reported that staff relationships were one of the five main positive elements of working in the prison.
- 2.98** Despite this, less than half of surveyed staff 43% (26 of 60) stated they looked forward to coming to work in the prison. In addition, staff morale was low in the prison, and 41% of staff surveyed (25 of 61) did not feel valued as a member of staff.

In addition, 62% (34 of 55) of surveyed staff did not feel comfortable expressing a workplace grievance. Just 18% of staff surveyed (11 of 60) felt they were supported by IPS Headquarters.

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<sup>56</sup> The IPS Incentivised Regimes (IR) Policy objective of motivating and rewarding prisoners for positive behaviour and engagement in the prison. The IR Policy designates prisoners as being on a Basic, Standard or Enhanced regime. The different regime levels determine prisoners’ weekly phone call allocation, their room assignment in the prison, and their weekly gratuity rate. See also, 5.4 - 5.6.

**2.99** While staff working relationships appeared positive some staff reported difficulties with the working culture in the prison. One member of staff said, *“Some staff work very well together, some staff negatively impact on each other which can result in prisoners not being treated with respect.”* Another member of staff echoed this sentiment, *“The majority of people living and working in the Dóchas Centre do their best to ensure that it is a safe environment for all that live and work there. But as in all areas of life there are some negative people having a detrimental effect on life in the prison”*.

**2.100** Many members of prison staff reported challenges in the relationship with prison management. While 44% surveyed (27 of 61) believed the prison was well-managed, over one-third (38%, 23 of 61) did not.

Some members of staff expanded on this issue to the Inspectorate:

*“There is a constant changeover of management which doesn’t help, as with each new Governor comes a new set of rules and as staff are getting used to new rules, a new Governor takes over and we start from scratch again which has been very frustrating for staff and prisoners.”*

*“The lack of direction and guidance from management is chronic. Zero thought about implementation of changes to regime or security measures with little to no guidance about these changes. Some members of management display unprofessional behaviour towards staff members.”*

*“There is a serious lack of communication between the management and staff on the floor, there are no handover of incidents that have happened the day before, staff are left on their own in posts as the assists are often stripped to do another post, the prisoners have been highly abusive, physically and verbally to staff with little to no repercussions.”*

**2.101** Prison staff reported that they were not included in decision-making processes by management, and that overall communication with frontline staff was poor. 58% (35 of 60) of staff surveyed did not feel sufficiently involved in decision-making processes in the prison. For example, staff did not feel consulted on the new lock-back regime, with one staff member stating that *“imposing regimes without consultation of staff causes undue stress in your working day”*.

**2.102** The lack of communication as well as changes to the regime not only negatively impacted on staff-management relationships, but also trickled down to negative outcomes for prisoners. For instance, one prisoner reported there was *“no communication from staff to prisoners when something changes in the prison and then [you] get threatened with a P19”*. This is likely the result of poor top-down communications between management and staff that in effect then impacts negatively on staff-prisoner relationships.

**2.103** Previously, the Inspectorate raised concerns about instances of poor inter-staff dynamics in the Dóchas Centre and how this has had negative outcomes for women in the prison.<sup>57</sup> Those concerns remain valid.

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<sup>57</sup> OIP (2022) Investigation into the Dóchas Centre (unpublished).

- 2.104** In its *2023-2027 Strategic Plan*, the Irish Prison Service outlines its intention to examine the working culture in the Service through the carrying out of a culture audit.<sup>58</sup> In 2015, the Inspectorate published *Culture and Organisation in the Irish Prison Service, A Road Map for the Future*, which outlined concerns about the culture in the Prison Service, and the impact it had on the ways in which staff and people living in prison were treated.

**The Inspectorate welcomes the effort by the IPS to complete a culture audit in 2024, and to subsequently develop and implement a culture roadmap.**

### **Prisoner Relationships**

- 2.105** Many women reported not feeling safe in the Dóchas Centre (see 3.43 - 3.53). Overcrowding, particularly when women were sleeping on mattresses on the floors of overcrowded cells, created tension and hostility amongst women in the prison. Not only were women not sufficiently risk assessed to determine their accommodation needs (see 3.54 - 3.57), but once accommodated in a shared cell there were little safeguards in place to protect women from inter-prisoner bullying.
- 2.106** Of women surveyed, 22% (20 of 91) indicated that prisoner violence was one of the main problems in the prison. There were multiple reports of bullying and fights among the women in the prison. Daily living activities, such as the use of laundry facilities, led to fights between women.
- 2.107** It also appeared that, for women newly assigned to particular work roles, their continuity in that role depended, in part, on whether the women they worked alongside would accept them. Some prisoners reported they were bullied out of a job by fellow prisoners.
- 2.108** There were also conflicts arising in the prison due to some women exhibiting mental health issues. For example, one woman who was later transferred to the National Forensic Mental Health Service (NFMHS) was engaged in frequent altercations with prisoners because she was experiencing paranoia and felt under constant supervision and threat.
- 2.109** At the same time, many in the Dóchas Centre relied heavily on their positive relationships with other women in the prison. For example, when asked who they would speak to if they had a problem in the prison, 52% of prisoners (53 of 101) indicated they would speak to another prisoner. Further, 42% of prisoners (36 of 85) rated support from other prisoners as the second most positive element of being in the prison, only behind education.

### **2.110 Relationships & Interactions Assessment**

*Relationships between prisoners and staff were very poor, and required significant improvement. The cumulative effect of poor staff-prisoner dynamics, combined with the imposition of harsh punitive sanctions in the Dóchas Centre had a substantial adverse impact on the daily lives of many of the women living there.*

*The Inspectorate observed many examples of staff treating women inappropriately, including infantilising them, shouting at them, and ignoring them.*

*While staff relationships were reported as very good and staff believed that they worked well together, there was evidence of a staffing culture that negatively affected women in the prison.*

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<sup>58</sup> IPS (2023) *Irish Prison Service Strategy 2023 - 2027*.

*There was a high turnover in prison management which impacted on staff-management relationships. Staff and management relationships required improvement including strengthening communications and facilitating staff input and 'buy in' into decision-making processes.*

*Among women, there was an undertone of tension, bullying and fights, which was exacerbated by factors such as overcrowding. Nonetheless, there was evidence that some relationships between women were helpful and many women relied on each other as an important source of support while in the prison.*

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## 2.111 RECOMMENDATIONS

### **To the Director General of the Irish Prison Service:**

**Request for Information DGREQ23-2:** The Inspectorate requests information on the progress to-date in the development and carrying out of the culture audit and the subsequent development of a culture roadmap, as committed to in the Irish Prison Service 2023-2027 Strategic Plan.

### **To the Director General of the Irish Prison Service & Governor of the Dóchas Centre:**

**Repeat Recommendation DOCT13 (2021):** In line with Rule 49 of the European Prison Rules, the Dóchas Centre and the Irish Prison Service should develop a plan to address bullying in the prison. Robust governance (the consistent filling of senior staffing vacancies) and leadership, in tandem with the establishment of a prisoner council and increased access to structured and purposeful activities may prove effective strategies by which to address these issues.

### **To the Governor of the Dóchas Centre:**

**Recommendation DO23-5:** In line with Rule 75(3) and Rule 86(1)(b) of the Prison Rules 2007-2020, the Governor of the prison and all staff should maximise opportunities to interact with prisoners in a manner that is meaningful and supports their general welfare.

**Recommendation DO23-6:** Strong and stable leadership is required in order to address elements of a negative staffing culture in the prison. Forums should be established by the Governor to facilitate direct communications, engagement and feedback between prison management and staff, as well as relevant training to provide staff with a fundamental insight into supporting women who have a unique set of needs in custody.

## C. Non-Discrimination

- 2.112 Under Section 42 of the Irish Human Rights and Equality Commission Act 2014, the Irish Prison Service has a duty to eliminate discrimination and promote equality of opportunity for both prison staff and people in prison.<sup>59</sup> The Prison Rules 2007-2020 also set out a duty on the Governor of a prison to ensure the Rules “are applied fairly, impartially and without discrimination and that all persons to whom these Rules apply are made aware of these Rules and of the consequences of any breach of prison discipline under these Rules”.

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<sup>59</sup> Irish Human Rights and Equality Commission Act 2014, Section 42, Prison Rules, 2007 - 2020, Rule 75(5). See also, UN Mandela Rules (2015), Rule 2 and European Prison Rules 2020, Rule 13.



Rule 1 of the United Nations Rules for the Treatment of Women Prisoners and Non-Custodial Measures for Women Offenders (the “Bangkok Rules”) states that in order to ensure the principle of non-discrimination, “account shall be taken of the distinctive needs of women prisoners” and “providing for such needs in order to accomplish substantial gender equality shall not be regarded as discriminatory.” The European Prison Rules (2020) outline that: “specific gender-sensitive policies shall be developed and positive measures shall be taken to meet the distinctive needs of women prisoners.”

- 2.113** Over one-third (25 out of 74) of prisoner survey respondents indicated they did not feel discriminated against.<sup>60</sup> However, experiences of discrimination were reported by survey respondents on the following grounds: Age (12%, 9 of 74), Nationality (12%, 9 of 74), Disability (11%, 8 of 74), Race/Ethnicity (10%, 7 of 74), Membership of the Traveller Community (10%, 7 of 74), Sexual/Gender Identity (10%, 7 of 74) and Religion (10%, 7 of 74).

Among prison staff, 74% of survey respondents (40 of 54) reported they did not feel discriminated against or treated unfairly; this was positive. However, 13% of staff survey respondents (7 of 54) indicated they experienced gender-based discrimination in the Dóchas Centre.

### **Gender-Based Discrimination**

- 2.114** There was system-wide gender discrimination with respect to the availability of progression pathways for women as to those available for men. For example, women had no possibility of transfer to an open centre and there was a paucity of step-down facilities.
- 2.115** The IPS had no policy in place for the safe and secure custody of transgender prisoners; this meant that treatment and conditions for transgender prisoners were subject to the discretion of prison management.
- 2.116** At the time of the inspection, one transgender prisoner (Prisoner A) was accommodated in the Dóchas Centre. Prisoner A experienced discrimination in a myriad of ways in the Dóchas Centre.
- 2.117** In reviewing Prisoner A’s records, the Inspectorate determined that Prisoner A’s behaviour deteriorated over a period of months during which she had been segregated from the general population. She became increasingly agitated and frustrated; this then manifested in outbursts of poor behaviour.
- 2.118** Prisoner A reported that she was being discriminated against based on her gender identity. Not only was she placed on Rule 63 protection involuntarily, but she also alleged incidents of being verbally mistreated. For instance, in the course of several disciplinary sanction hearings Prisoner A expressed feeling frustrated with her regime and treatment, and stated: “*what do you expect when I am being bullied*”, “*she is intimidating me and passing comments*” and “*(I) was bullied and called names on escort*”. There was no evidence in documentation that any of these allegations were addressed by prison management.

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<sup>60</sup> 48% of prisoner survey respondents in Mountjoy Men’s Prison (78 of 163) and 49% of prisoner survey respondents in Cork Prison (49 of 100) reported *not* feeling discriminated against in the prison.

- 2.119** Some members of staff neglected to refer to Prisoner A using her correct pronouns. In some disciplinary records she was referred to as “they / them”; for example: “*when I was putting them in the holding cell*” and “*they used derogatory remarks*”. This was confirmed in the Inspectorate’s staff survey, where a member of staff commented that “*transgender people (were) being (called) ‘he, it, that’*”.
- 2.120** Prisoner A stated to the Inspectorate that at times there were extended delays in delivery of her medication, and that some staff used “*belittling*” language when interacting with her, including misgendering her and using her former name when addressing her.
- 2.121** Despite there being other prisoners in the Dóchas Centre who had recently assaulted staff, Prisoner A was the only prisoner to be placed on a Rule 62 regime, and who required the presence of two members of staff, one man and one woman, to be unlocked from her cell.
- 2.122** Prisoner A was body searched by two men and two women prison officers, and was not given a choice as to the gender of the officer who searched her. This practice was in contravention to international best practice, which sets out that: “the search should be carried out by a custodial officer of the same gender as that with which the person being searched has self-identified and, as a rule, a second officer of the same gender should also be present during any strip search as a protection for detained persons and staff alike.”<sup>61</sup>
- 2.123** Prisoner A was the *only* prisoner to be continuously formally risk assessed in the prison, despite a number of women exhibiting violent behaviours against other women in prison and prison staff. These risk assessments characterised her as “high risk”, due to assaults, threatening abusive behaviour and damage to rooms.
- 2.124** **Rather than consider how segregation, and discriminatory remarks and treatment might impact on Prisoner A, prison management’s approach to managing her was to impose a more punitive regime. This approach clearly was not effective, nor was it humane.**

### **Race / Ethnicity**

- 2.125** Some prisoners alleged that prison officers used racist and discriminatory language when referring to women in prison, particularly women of colour or women who were Members of the Traveller Community.

One woman stated in relation to her experience of both racial and religious discrimination:

*I've received the most discrimination in being here. I've been called all different type of racial and religious slurs. I've been insulted, dismissed and disregarded by staff on multiple occasions. Not by all officers but by a majority of staff. Halal food options are scarce, little to none and we're unable to pray in the religious right that we have as human beings.*

- 2.126** Women of colour were not provided with products suited to their skin or hair care needs. For example, some of the women were not permitted to wear wigs, despite this practice being central to their identity.

Positively, prison staff had recently collaborated with women in prison to identify products more suitable to their needs.

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<sup>61</sup> CPT (2024) Transgender Persons in Prison

## 2.127 Disability

While there were some reasonable accommodations made in the prison (such as wheelchair accessible shower facilities), the physical prison environment was not always accessible or navigable for people with health issues or disabilities.

For example, one prisoner with a physical disability was unable to attend school as it was located upstairs. While education packs were brought to the prisoner in her room, this was not an adequate response to ensure respect for the rights of persons with disabilities. Another woman could not access the recreation room in her house as it was located upstairs.

One woman in the prison explained that the prison's failure to acknowledge and respond to the needs of people with disabilities, hidden or otherwise, *"makes you invisible"*.

## 2.128 Socio-Economic

The Inspectorate observed practices that amounted to indirect discrimination on socio-economic grounds. As a result of a policy change introduced during the COVID-19 pandemic, the families of prisoners could no longer drop in belongings to the prison and these belongings had to instead be posted by family members at their own expense. For many families this cost was prohibitively expensive.

Although all prisons were directed to reverse this policy in late 2022,<sup>62</sup> the practice of not accepting packages was still in place in the Dóchas Centre in September 2023. As highlighted in previous inspection reports,<sup>63</sup> this practice results in a form of socioeconomic discrimination as people with lesser financial means were less able to afford the costs of posting packages to the prison.

## 2.129 Non-Discrimination Assessment

*There was evidence of discrimination against women on numerous grounds. Women in prison reported that they felt discriminated against on grounds including: age, gender, nationality, disability, race/ethnicity and religion.*

*Prison authorities had no policy in place for transgender persons and thus treatment and conditions for transgender prisoners were subject to the discretion of prison management. There was evidence that a transgender prisoner was subjected to discriminatory treatment, including the imposition of a more punitive segregation regime [see also, 3.41 - 3.47 and 3.56 - 3.57].*

*The practice of requiring packages to be posted, rather than left at the gate, had a discriminatory impact on families and prisoners on socio-economic grounds.*

*Similarly to other prisons inspected, it was positive to note that the vast majority of staff did not feel discriminated against, with the exception on the grounds of gender.*

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<sup>62</sup> Houses of the Oireachtas, [Prison Service](#), Tuesday 29 November 2022.

<sup>63</sup> OIP (2024) Report on the Unannounced General Inspection of Cork Prison, March - April 2023.

## 2.130 RECOMMENDATIONS

### To the Director General of the Irish Prison Service:

**Recommendation DG23-13:** The Irish Prison Service must ensure that a clear policy on the treatment and management of transgender persons is put in place, and that it aligns with the standards set out in the 2024 CPT Standards on Transgender Persons in Prison.<sup>64</sup> [related to DOCT9 (2021) and LMCT18 (2021)]

**Recommendation DG23-14:** The Inspectorate urges the Irish Prison Service to fully implement its 2022 decision to cease the practice of no longer accepting drop-off of packages by family and friends at the prison gate; this practice puts an additional financial cost on families and friends to send items by post.

### To the Governor of the Dóchas Centre:

**Recommendation DO23-7:** In line with Section 42 of the Public Sector Duty, the prison should work towards eliminating all forms of discrimination within the Dóchas Centre, with due consideration to, *inter alia*, (i) clear communication of staff obligations under the Duty, (ii) provision of reasonable accommodations to ensure accessibility, (iii) and means to allow for the expression of one's identity and beliefs.

## D. Information

- 2.131** The Prison Rules 2007-2020, Rule 13, requires that all people in prison be provided with an information booklet which outlines their entitlements, obligations and privileges while in the prison. The European Prison Rules (2020) also require that prisoners be provided as often as necessary with information in a language they understand, about the regulations governing prison discipline and their rights and duties in the prison.<sup>65</sup>

The CPT previously recommended that Irish authorities should take steps to ensure that foreign nationals and prisoners with reading and writing difficulties be provided with information on the regime in the establishment and on their rights and duties in a language they understand and that this information should be provided both in writing and orally.<sup>66</sup>

- 2.132** At the time of inspection, newly committed women were provided with an information booklet and information about the TV channel. The Dóchas Centre Information Booklet had not been updated in many years, and was not available in languages other than English.

**Positively, following the inspection prison management undertook to develop an updated information booklet in consultation with women in the prison.**

- 2.133** Findings from inspection survey highlighted deficiencies in the level of information provided to women in the prison:
- 53% (54 of 102) disagreed that the prison rules were explained to them in a language and manner that they understood

<sup>64</sup> CPT (2024) Transgender Persons in Prison.

<sup>65</sup> Prison Rules 2007-2020, Rule 13 and European Prison Rules (2020), Rule 30.

<sup>66</sup> CPT (2020) 37 Report to the Government of Ireland on the visit to Ireland carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT) from 23 September to 4 October 2019.

- 48% (47 of 98) of respondents reported that the rules and the regulations in the prison were not clear to them

**2.134** Language could pose a barrier to effective communication of essential information to women in the prison. If a new prisoner was committed and spoke little or no English, the prison relied upon online translation tools to communicate, rather than on an interpretation / translation service. This practice has been observed in other prisons during general inspections.<sup>67</sup>

However, the Inspectorate has also observed an example of good practice in Cloverhill Prison, where information on the rights of prisoners was available in several languages on the television channel; this practice should be replicated in all prisons, including the Dóchas Centre.

## **2.135 Information Assessment**

*Overall, women were not provided with sufficient levels of information about the regime, rules and their rights in the Dóchas Centre. The Inspectorate welcomes efforts by prison management to update the prison information booklet.*

*Prison staff relied on online translation tools rather than a professional interpretation service to communicate with non-English speakers in prison.*

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## **2.136 RECOMMENDATION**

**To the Director General of the Irish Prison Service:**

**Repeat Recommendation DG23-2:** *(recommendation also made in relation to Cork Prison and Cloverhill Prison):* To ensure the protection of prisoners' personal data, and to facilitate effective communication, the Irish Prison Service should embed within its policies and procedures, ready access to interpretation and translation services. These should not only be provided "on request", but should be offered to prisoners at committal, and on an ongoing basis to ensure prisoners are able to communicate over the course of their imprisonment.

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<sup>67</sup> OIP (2024) Report on the Unannounced General Inspection of Cork Prison, March - April 2023 & OIP (2024) Report on the Unannounced General Inspection of Cloverhill Prison, May 2023.

## 3 SAFETY & SECURITY

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- 3.1** In line with A Framework for the Inspection of Prisons, the Inspectorate assesses how prisoners and staff experience *Safety & Security* in prisons. Drawing on national legislation and international standards, the Inspectorate evaluates performance across four themes:
- A. Record-Keeping:** the extent to which official records are accurately and effectively maintained
  - B. Regimes:** how the prison responds operationally to safety and security issues
  - C. Complaints:** the functioning of the prisoner complaints system, in line with Rule 57B of the Prison Rules 2007-2020
  - D. Disciplinary Processes:** the manner by which discipline is carried out in the prison, and to what effect

### A. Record-Keeping

- 3.2** As outlined under various provisions of the Prison Rules 2007-2020 transparent and up-to-date record keeping is essential to the safety and security of persons detained in a prison setting.<sup>68</sup> Reasons for the importance of record keeping are three-fold as it: (i) contributes to good management of the prison, (ii) guarantees the protection of the rights of persons in custody and (iii) enhances data management with a view to facilitating individualised care.<sup>69</sup>

All custodial records, including the electronic records maintained in the Prisoner Information Management System (PIMS), must be regularly updated including where relevant, with recent photographs. Records such as class officer journals and reports between ACOs, night guard books and other systems designed to reduce corporate risk are equally if not more important, where staff can find themselves involved in unsubstantiated allegations.

Accurate operational record-keeping of a contemporaneous nature is essential if safety and security are to be maintained by the prison.

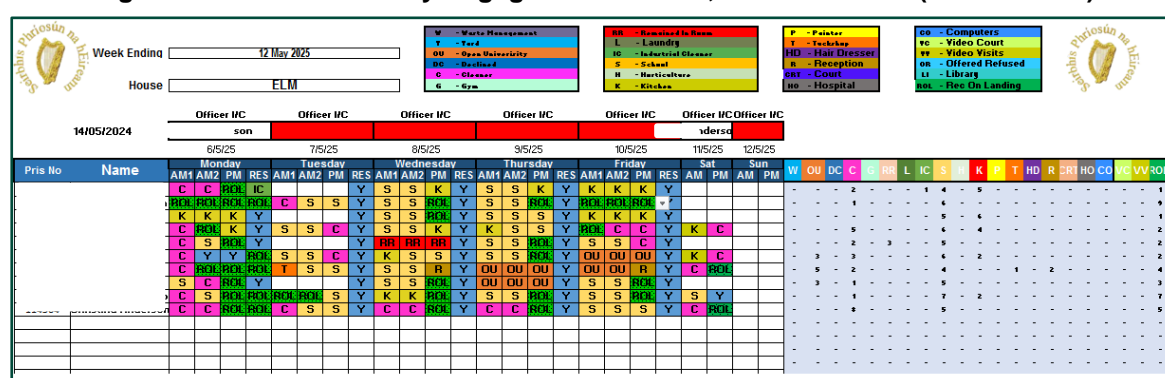
- 3.3** The Dóchas Centre maintained various records across a myriad of hard copy and electronic recording systems. The Prisoner Information Management System (PIMS), National Incident Management System (NIMS) and Prisoner Healthcare Management Systems (PHMS), alongside service-specific recording systems, operated in silos and were not sufficiently interconnected. There were also a large number of paper-based record logbooks, which included daily class officer journals in each of the eight houses in the prison, restricted regime out-of-cell time logbooks, relocation and use of force forms and special observation logbooks.
- 3.4** Paper-based and electronic record-keeping processes were fragmented and the available log books, staff-to-staff emails and PIMS records provided only a partial picture of daily activities in the Dóchas Centre.

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<sup>68</sup> Prison Rules, 2007-2020, Rules 4, 8, 10, 11, 14, 34, 55, 60, 62, 63, 64, 65, 78, 80, 83, 102, 105, 107. See also, UN Mandela Rules (2015) Rule 6, and European Prison Rules (2020) Rule 16A.1.

<sup>69</sup> See Association for Prevention of Torture, Files and Records, and UNODC (2008) Handbook on Prisoner File Management.

**3.6 Positively, in the months following the inspection, the prison instituted a work-around approach to tracking prisoner engagement with activities and services in the prison (Figure 15).** All operational and service staff maintained a joint-use daily tracker which provided a breakdown of each prisoner's activities in a given day. Although this tracking system sits outside of PIMS, it could serve as a potential model for how such an integrated approach to tracking prisoner engagement might be developed within the PIMS.



**3.8** The quality of record-keeping in Class Officer daily journals was inconsistent, with some logs containing minimal information and others being sufficiently detailed. For instance, an altercation between an officer and a prisoner on 21 September 2023, which resulted in the issuing of a P19 disciplinary sanction, was not documented in the Class Officer Journal; instead the journal simply noted the prisoner was moved to another house.

**3.9** There was no proper recording of the imposition and review of temporary lock-backs. **Electronic recording of temporary lock-backs should be instituted with immediate effect in the Dóchas Centre, and across the prison estate, as applicable.**



### **Serious Incident Record-Keeping**

- 3.10** Given the lack of a prison-specific serious incident record-keeping system, prison staff and management relied on surrogate systems to record serious incidents in the prison. These included the P19 disciplinary process, the IR system and the NIMS. Unfortunately, this approach resulted in gaps, where information gathered through one process was not necessarily identified in other systems and also in wider data collection efforts.
- 3.11** The NIMS system, which is designed to alert the State Claims Agency to matters that may involve future financial liabilities, was the only centralised means of recording significant incidents in which prisoners or staff had been injured. Details recorded in the NIMS system were minimal.
- 3.12** The Inspectorate identified data inconsistencies as a result of a compartmentalised approach to record-keeping, as well as a reliance on surrogate systems to record serious incidents.

By way of example, the Inspectorate identified use of the P19 disciplinary process to identify a serious incident of attempted suicide in March 2023. The P19 issued to the prisoner indicated the prisoner had “placed a ligature around her neck”. The prisoner, who was under the care of the psychiatry team since her committal in January 2023, received a “Caution” for this behaviour.

Despite being seen by nursing staff on all dates around the incident, there was no record of deliberate self-harm for this prisoner on the date concerned in the PHMS. In addition, the attempted suicide was not reported to the Self-Harm Assessment and Data Analysis (SADA) Project. This has implications for the veracity of data on suicide and self-harm in the Dóchas Centre.

### **Restricted Regime Record-Keeping**

- 3.13** The prison maintained out-of-cell time record books for people on restricted regimes, as well as more detailed records for people held under Rule 64 in Special Observation Cells (SOCs). In addition, placement and review of prisoners on Rule 62 and Rule 63 was documented in the Rule 62 Prisoners on Restricted Regimes and Rule 63 Record Books.
- 3.14** Out-of-cell time records for people accommodated in the HCU, including new committals, were completed consistently. Record books in the Dóchas Centre included a prompt for staff to enter both the time out of cell offered to and the time actually availed of by prisoners; this was good practice.

However, while paper-based out-of-cell time records provided a daily log of out-of-cell time, it was not possible to digitally track out-of-cell time, by individual, over time.

### **Special Observation Record-Keeping**

- 3.15** The quality of Special Observation record-keeping varied. While some comprehensive records were kept, others were not sufficient to determine the rationale for placement in a Special Observation Cell, nor the extent to which a prisoner placed under Special Observation was reviewed and monitored by operational and healthcare staff.
- 3.16** Safety Observation and Close Supervision Cell record books were sometimes used interchangeably. On a number of occasions the log book for the Safety Observation Cell indicated that this cell was instead being used as a Close Supervision Cell.

### **Rule 63 Record-Keeping**

- 3.17** Reviews of prisoners on Rule 63 protection regimes were carried out regularly, but were maintained in several co-existing record books. This meant records were out of order and resulted in there being no consistent way to track the review process over time.

Records for the eight prisoners in Phoenix House indicated these women elected to remain on Rule 63 due to “fear for own safety”. However, one prisoner, not accommodated in Phoenix House (Prisoner A), indicated she did not want to be placed on Rule 63, as recorded: “*Don’t need to sign, I’m not afraid of them*”. Despite this, the Rule 63 documentation specified she was on Rule 63 at her “own request”.

Prisoners on Rule 63 restricted regimes in Phoenix House were not locked back in their cells, which is commendable. As a result, out-of-cell time records indicated “unlocked 24 hours - recreation in own yard”.

### **Rule 62 Record-Keeping**

- 3.18** Imposition of Rule 62 requires a formal review at seven, 14 and 21 days of segregation from the general population; further extensions require approvals from the IPS Director General.
- 3.19** The Inspectorate found that the prison was meeting the strict legal requirements of the Rule. However, the detailed discussions of the situations of individual women were not always adequately recorded in the records of the Rule 62 review meetings.

### **3.20 Record-Keeping Assessment**

*Hard copy and electronic records were largely maintained in silos which impeded the capacity of the Dóchas Centre to gather accurate data, carry out thorough review processes and ensure an integrated and holistic approach to prisoner management and treatment.*

*There was no mechanism by which to track and review imposition of temporary-lock backs.*

*Positively, following the inspection visit, prison management had developed and instituted a tool to track prisoner engagement in structured activities in a more reliable way.*

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### **3.21 RECOMMENDATIONS**

#### **To the Director General of the Irish Prison Service:**

**Repeat Recommendation DG23-8:** *(recommendation also made in relation to Cloverhill Prison):* To promote effective handover processes, documentation of incidents in prisons, and notification and completion of restricted regime reviews, efforts should be made across the estate to digitalise all records and log books; this will require development and integration of digital technologies accessible to staff throughout the prison.

**Repeat Recommendation DG22-4** *(recommendation also made in relation to Mountjoy Men’s Prison, Cork Prison and Cloverhill Prison):* To ensure accurate and effective record-keeping, the Director General of the Irish Prison Service should review the organisation of compliance functions across the prison estate.

## To the Governor of the Dóchas Centre:

**Recommendation DO23-8:** Records should be kept in relation to *all* restricted regimes, including in instances where prisoners are separated from the general population on a temporary basis. Records should be (i) comprehensive and detailed; (ii) maintained in sequential order in distinct log books; and (iii) include thorough explanations for the (ongoing) placement of prisoners on restricted regimes, as well as the services and supports offered to and availed of by prisoners during their placement on a restricted regime.

## B. Regimes

### Restricted Regimes

**3.22** As provided for in the Prison Rules 2007-2020, prisoners placed on a restricted regime must be appropriately accommodated to ensure their safety, as well as the safety of others.

Rule 62 of the Prison Rules sets out grounds for removal of prisoners from structured activity or association on grounds of order:

*(A) Prisoner shall not, for such period as is specified (in the Rule), be permitted to – (a) engage in authorised structured activities generally or particularly authorised structured activities, (b) participate in communal recreation, (c) associate with other prisoners, as the Governor so directs.*

Rule 63 of the Prison Rules provides for the protection of vulnerable prisoners:

*A prisoner may, either at his or her own request or when the Governor considers it necessary, in so far as is practicable and subject to the maintenance of good order and safe and secure custody, be kept separate from other prisoners who are reasonably likely to cause significant harm to him or her.*

Rule 64 establishes parameters around use of special observation cells. These cells are used when it is necessary to:

*Prevent the prisoner from causing imminent injury to himself or herself, or others and all other less restrictive methods of control have been or would, in the opinion in the Governor, be inadequate in the circumstances.*

Rule 80 of the Prison Rules 2007-2020 sets out that a Governor may give a direction to monitor a prisoner by not less than one prison officer until the Governor is satisfied that a possible risk no longer justifies such monitoring. Risks outlined in this Rule include where a prisoner is: *“(a) liable to inflict injury upon himself or herself, or other person, (b) particularly vulnerable to injury or harm by another person or persons, or (c) poses a significant risk to the security, good order and government of the prison”.*

People accommodated on regimes that are particularly restrictive, that is 22 or more hours each day in their cell, with less than two hours of meaningful human contact, experience conditions of solitary confinement.<sup>70</sup> People held in these conditions for periods in excess of 15 days experience *prolonged solitary confinement*, which has significant negative impacts on a person's health and wellbeing. The imposition of solitary confinement should always be used as a last resort and should not be used for prisoners with physical or mental disabilities.<sup>71</sup>

For people on protection regimes who experience solitary confinement, the CPT concludes:

*The risk to some (prisoners) is such that the prison can only discharge its duty of care to the individuals by keeping them apart from all other prisoners. This may be done at the prisoner's own request or at the instigation of management when it is deemed necessary. States have an obligation to provide a safe environment for those confined to prison and should attempt to fulfil this obligation by allowing as much social interaction as possible among prisoners, consistent with the maintenance of good order. Resort should be had to solitary confinement for protection purposes only when there is absolutely no other way of ensuring the safety of the prisoner concerned<sup>72</sup>.*

In 2017, the Irish Prison Service committed to the elimination of solitary confinement across the prison estate.<sup>73</sup>

**3.23** **Table 4** provides a breakdown of the number of prisoners reported to be on a particular restricted regime on the first day of inspection, 19 September 2023, as well as the relevant Rule applied by the prison, under the Prison Rules 2007-2020.

**Table 4: Prisoners on Restricted Regimes (19 September 2023)**

Restricted Regime	Number of People
<b>Rule 62 - Removal on Grounds of Order</b>	1 (also on Rule 63)
<b>Rule 63 - Protection of Vulnerable Prisoners</b>	9
<b>Rule 64 - Special Observations</b>	0
<b>Rule 80 - Special Monitoring of Prisoner</b>	3 * (not included in prison record)
<b>Total Number on a Restricted Regime</b>	9 (*12)

**3.24** Although not recorded as being on a specific restricted regime Rule, there were three prisoners, all of whom had serious psychiatric mental illness and behavioural issues, accommodated in the HCU on a long-term basis. These women were reviewed by the Multi-Agency Meeting (MAMs) group, and received input from psychiatry in-reach care. Although not recorded as prisoners with "Special Features", it appeared that the Healthcare Monitoring SOP underpinned the management of their care and monitoring, in line with Rule 80(1)(a) and (b) of the Prison Rules 2007-2020.

<sup>70</sup> UN Mandela Rules (2015), Rule 44.

<sup>71</sup> UN Mandela Rules (2015), Rule 45.

<sup>72</sup> CPT (2011) *Solitary Confinement of Prisoners* CPT/Inf(2011)28-part2

<sup>73</sup> IPS (2017) *Elimination of Solitary Confinement*.

- 3.25** The regime for these women was very limited, and included between zero and two hours of out-of-cell time each day, as well as minimal meaningful interaction with others. For example, over nine days, one woman availed of only 70 minutes of offered out-of-cell time, and another woman availed of just over two hours offered out-of-cell time over a period of five days. The rooms in which these women were held in the HCU were in poor condition, and the overall HCU environment was loud, chaotic and stressful; this was not an appropriate environment in which to accommodate women with serious mental illnesses.
- 3.26** Given that people placed on healthcare monitoring (Rule 80) are often subject to very restricted regimes over prolonged periods of time, their **removal from the general prisoner population should be included in restricted regime records; including the daily list of prisoners with “Special Features”, as well as restricted regime data published by the Irish Prison Service**<sup>74</sup>.

### **Solitary Confinement**

- 3.27** Rules 44 and 45 of the UN Mandela Rules (2015) establish that “solitary confinement shall be used only in exceptional cases as a last resort, for as short a time as possible and subject to independent review”, and that the imposition of solitary confinement should be prohibited in the case of prisoners with mental or physical disabilities when their conditions would be exacerbated by such measures”.

In addition, the 2024 CPT Standards on Transgender Persons in Prison state:

*Transgender persons might be placed in a situation where they are separated from the mainstream prison population for protection purposes (...) Given that it is widely recognised that isolation or segregation can have long-term negative consequences on an individual, especially if it is prolonged or indefinite, such placement can only be justified in exceptional circumstances, in the short-term, and with the proper safeguards in place (note: European Prison Rules 2020, Rule 53A). (...) Conditions for all prisoners, including newly arrived and/or transgender prisoners, should not amount to a solitary confinement type regime.*

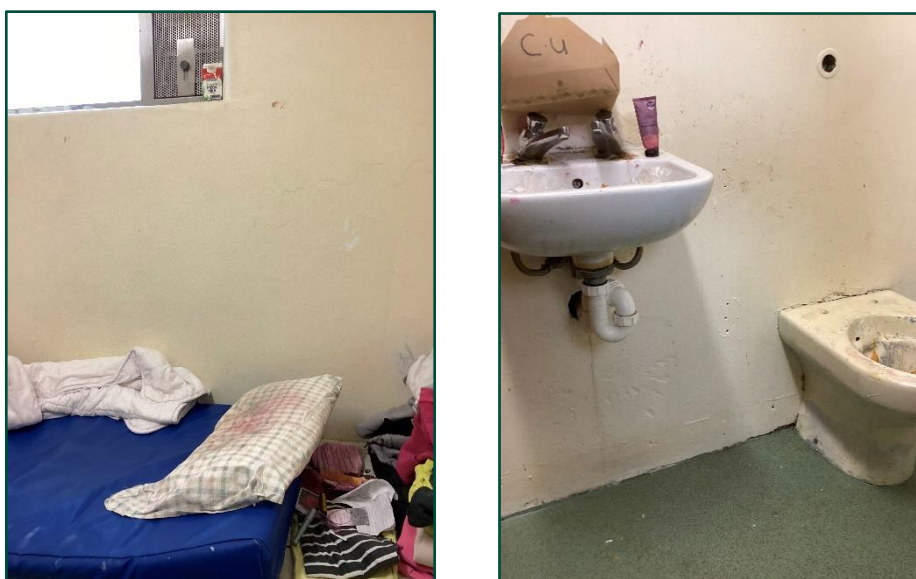
- 3.28** The CPT defines solitary confinement as: “whenever a prisoner is ordered to be held separately from other prisoners, for example, as a result of a court decision, as a disciplinary sanction imposed within the prison system, as a preventative administrative measure or for the protection of the prisoner concerned”.<sup>75</sup>
- 3.29** At the time of inspection Prisoner A was held in conditions of solitary confinement in the Dóchas Centre HCU; that is she was locked in her cell for 22 or more hours each day and had less than two hours of meaningful human contact each day. There were also three women (Prisoners B, C and D) who, due to serious mental illness and poor behaviour, were accommodated in the HCU in similar conditions to that of Prisoner A.
- 3.30** By the time of inspection, Prisoner A had been segregated from the general prison population and experienced conditions of solitary confinement for 167 days (in a general population house and also in the HCU). Prisoner B had been segregated at the time of inspection for 76 days, Prisoner C had been segregated for 56 days and Prisoner D had been segregated for 52 days.

<sup>74</sup> See [IPS Census Data - Restricted Regimes, January 2024](#) - provides numbers of people on Rules 62, 63, 64 and 103.

<sup>75</sup> CPT (2011) Solitary Confinement of Prisoners, CPT/Inf (2011)28-part2.

- 3.31** In addition to very limited out-of-cell time Prisoners A and B were also on the Basic regime, as well as subjected to punitive measures resulting from deteriorating behaviour over the duration of their segregation. Prisoner A was on Rule 62 and serving a disciplinary sanction resulting in no access to the tuck shop and Prisoner B, who was mentally ill and under the care of the in-reach psychiatry team, was serving a 40-day sanction, which limited her access to exercise and family contact.
- 3.32** Cellular accommodation provided to women in long-term HCU accommodation was in very poor condition. Prisoner B, for example, was held in a small, dilapidated and dirty room in the HCU (**Figure 16**).

**Figure 16: Room 5, Healthcare Committal Unit**



- 3.33** The prolonged solitary confinement of Prisoner A did not align with international standards on isolation and segregation, and amounted to degrading treatment. Further, the conditions in which Prisoners B, C and D were held were degrading, particularly because these women had serious mental illnesses, spent between 23 and 24 hours in their cells each day and had almost no engagement with other people in the prison.
- 3.34** Data provided to the Inspectorate on the number of people subjected to solitary confinement in the months preceding the inspection only included data on people accommodated in Special Observation and High Support Unit cells in the HCU.

Data on conditions of solitary confinement should include *all* people in prison experiencing conditions of solitary confinement.

### **Restricted Regimes Applied without a Rule**

- 3.35** Between 4 March and 27 September 2023, the Inspectorate identified 73 instances of prisoner segregation from the general population, either by placement on a restricted regime Rule, or by temporary lock-back in a prisoner's room. Both forms of segregation restricted prisoners' access to the daily regime over and above regularly scheduled periods of lock-back. Of the 73 instances of segregation identified by the Inspectorate, less than half were underpinned by a Rule.

**The Inspectorate identified 43 occasions between 4 March and 27 September 2023 in which a prisoner was segregated from the general population (temporary lock-back), and thus experienced a restriction to their regime, without application of a Rule.**

- 3.36** In July 2023, Chief's Order 02/2023 was issued to permit the "Locking (of) Prisoners Behind the Door", in the event that it became "necessary to lock back a woman due to disruptive behaviour"; referred to as "temporary lock-back". This Order indicated that in addition to placement on a restricted regime when a person is on Rule 62 or 63, it was permissible to lock-back prisoners on a temporary basis for a period of no more than two hours following disruptive behaviour. This was to "allow time to resolve the issue or to remove one or more of the prisoners to another location".
- 3.37** Often times, people were segregated from the general population during times of heightened vulnerability, such as following a physical altercation or retrieval of contraband. This was a particularly important time for prison and healthcare staff to institute a robust and structured monitoring and review process.
- 3.38** The Inspectorate examined one case in which a woman was temporarily locked-back in her room following a physical altercation with another prisoner. According to a completed relocation form the prisoner was relocated from the yard to her room at 17:45, at which point she was locked back. A P19 discipline record related to this incident noted she was to be locked-back for the remainder of the evening and that she declined to see a member of the healthcare team. Other than the P19 record, there was no evidence to indicate when and to what extent a review process was carried out with respect to the period of time the prisoner would remain locked-back, and there was no record of when she was permitted to re-join the general prison regime.
- 3.39** **The absence of a structured recording and review process around the temporary lock-back procedure in the Dóchas Centre meant that there was no record available to ensure people subjected to periods of lock-back were held in accordance with the two-hour limit permitted in the Chief's Order 02/2023.**

**Further, decisions to continue or discontinue periods of lock-back were not systematically documented, and were therefore not subject to review or oversight by prison management.** This is particularly problematic given that temporary lock back is a form of punishment that was often imposed in addition to other disciplinary sanctions.

#### **3.40 Restricted Regimes Assessment**

*A small number of women with serious mental illnesses were segregated from the general prisoner population in the HCU on a long-term basis and were subject to healthcare monitoring, without clear application of a Rule. Prisoners held in long-term segregation, regardless of the rationale, should be placed on a Rule, and also be included in IPS statistics and reporting on restricted regimes.*

*The HCU was not an appropriate place in which to accommodate women with serious mental illnesses. They were held in committal cells, spent less than two hours out of their rooms each day and had very limited meaningful contact.*

*Despite a 2017 commitment to eliminate solitary confinement in Ireland, this practice remained in place at the Dóchas Centre.*



*The prison relied on the use of temporary lock-backs to punish prisoners involved in incidents in the prison; this was underpinned by a 2023 Chief's Order. No Rule was applied in these instances, despite prisoners being segregated from the general prisoner population. This meant there was no structured recording or review process in place to ensure temporary lock-backs were carried out in accordance with the Chief's Order.*

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### 3.41 RECOMMENDATIONS

#### **To the Director General of the Irish Prison Service:**

**Repeat Recommendation DG22-5** (*recommendation also made in relation to Mountjoy Men's Prison and Cloverhill Prison*): The Director General of the Irish Prison Service should take immediate action to implement the 2017 Policy for Elimination of Solitary Confinement, and in line with Rules 43 and 44 of the UN Mandela Rules (2015), should with immediate effect, cease the practice of prolonged solitary confinement.

#### **To the Governor of the Dóchas Centre:**

**Repeat Recommendation DOCT14 (2021)**: The Inspectorate recommends that the Dóchas Centre ensure that removal of any person from the general population is done in accordance with the Irish Prison Rules, 2007-2020, and that any such removal is subject to continuous and substantial review. All persons who are to be removed from the general prison population should be clearly identified on the "Special Feature" list, irrespective of where in the prison they are being accommodated.

**Recommendation DO23-9**: Senior management should conduct regular audits of temporary lock-backs carried out under Chief's Order 02/2023 with a view to guaranteeing fair application and consistent review.

## Prisoner and Staff Safety

### **Violence**

- 3.42 The prison reported eight prisoner-on-prisoner assaults occurring between September 2022 and September 2023. However, the Inspectorate's review of 234 P19s revealed 75 references to prisoner-on-prisoner fights and assaults between March and September 2023.

It is possible that only prisoner-on-prisoner assaults referred to An Garda Síochána (AGS) are included in the assault data provided by the prison. Prison management indicated that prisoner-on-prisoner assaults are reported to AGS in instances where the victim elects for the AGS to be informed, but that many prisoners choose not to raise incidents of assault with the AGS.

- 3.43 Approximately half of prisoner survey respondents (51%, 51 of 100) indicated they did not feel safe from being injured, bullied or threatened by other prisoners in prison. Women reported not feeling safe for a myriad of reasons, including overcrowding in cells, drug use amongst people in the prison and insufficient prison staff support.

- 3.44 Women in the Dóchas Centre told the Inspectorate:

*"Staff say they can only intervene when things get physical".*

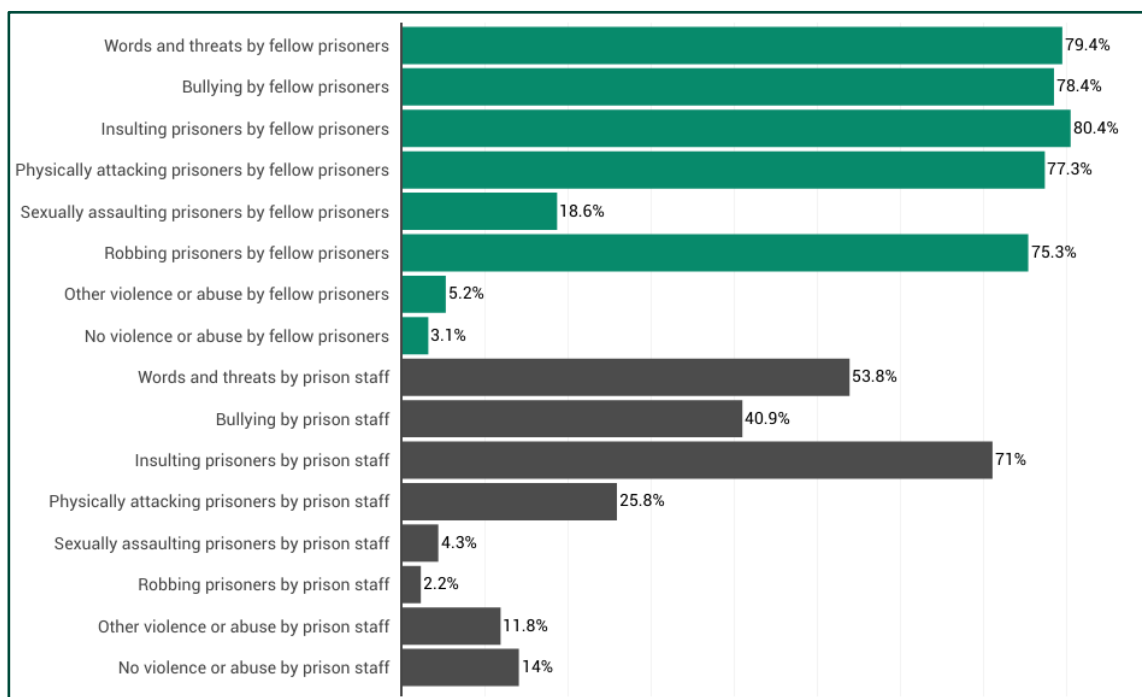
*"It's not a nice place to be and I don't feel safe at all".*

*"I'm not safe in a shared accommodation."*

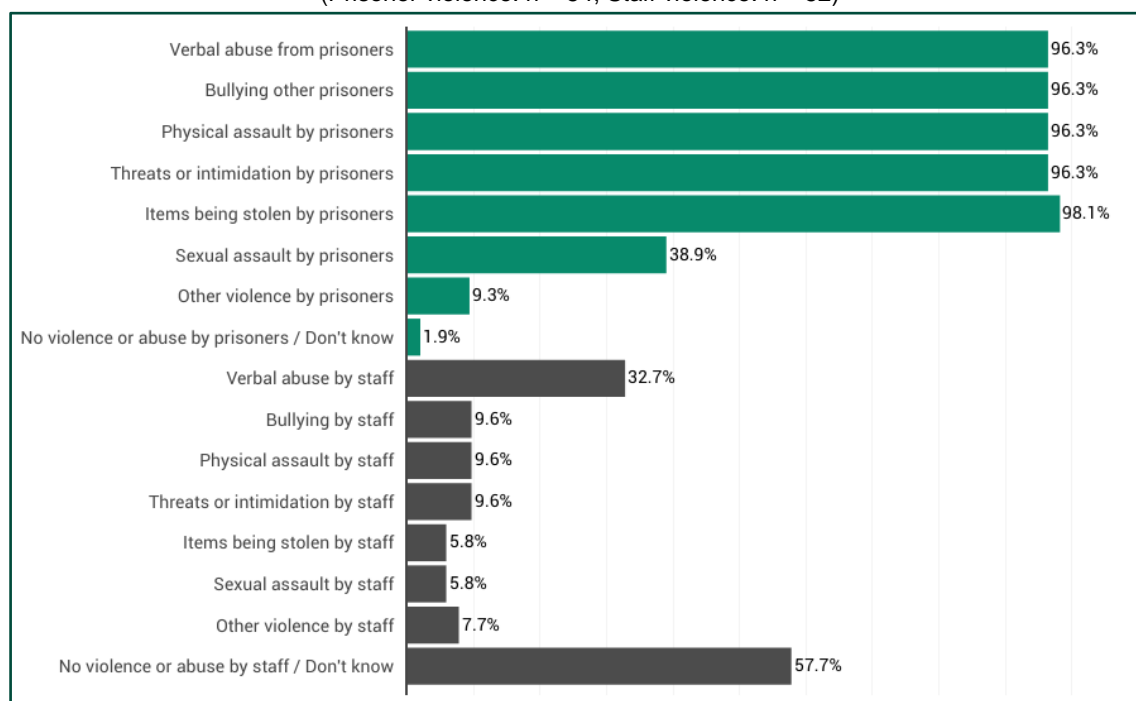
The Inspectorate observed interactions between prisoners and staff, and amongst prisoners, which further substantiated reports of feeling fearful in the prison. For example, during Governor's parade a prisoner indicated to the Governor that she was being intimidated by other women in the prison. In response the Governor stated, *"it's up to you to keep your tobacco and say no, stick up for yourself"*. No further support was offered to this woman.

- 3.45** The very clear message sent to women in the Dóchas Centre was that they were responsible for ensuring their own safety, and for defending themselves from intimidation and violence from other prisoners. However, in the event that women did do this, it was very likely they would be issued an "unacceptable" Incentivised Regime assessment, or a P19 (disciplinary sanction); this could then lead to a reduction in access to phone calls, money or recreation time (see 5.4).
- 3.46** A number of staff raised concerns about lone-working in the prison, with an emphasis on ensuring the safety of both prisoners and staff alike. Not only did staff have concerns about managing overcrowded houses of more than 30 women on their own, but some also warned of previous incidents in the Dóchas Centre where low staffing levels created an environment of victimisation and impunity. One member of staff said, *"Management and IPS do not seem to have learned from previous alleged incidents here of sexual relationships/institutional rape between staff and prisoners and lone working is a regular occurrence still"*.
- 3.47** In addition to staffing shortages, prison staff also reported there were insufficient handover processes in place, leading to staff being unaware of incidents and lingering tensions in the prison. Some staff also felt they did not receive support from management to address serious issues of concern. One member of prison staff stated, *"Staff (are) going to upper management with very serious issues regarding prisoner drug use, prisoner conflicts, staff safety, overcrowding issues, and (we are) being LAUGHED AT to our faces and told to deal with it"*.
- 3.48 Both prisoners and prison staff had concerns for their safety in the Dóchas Centre that were not sufficiently addressed by prison management.**
- 3.49** Prisoner and staff survey respondents reported hearing about incidents of violence and assault in the Dóchas Centre (**Figures 17 and 18**).

**Figure 17: Prisoner Reports of Violence (%)**  
(Prisoner violence: n = 97; Staff violence: n = 93)

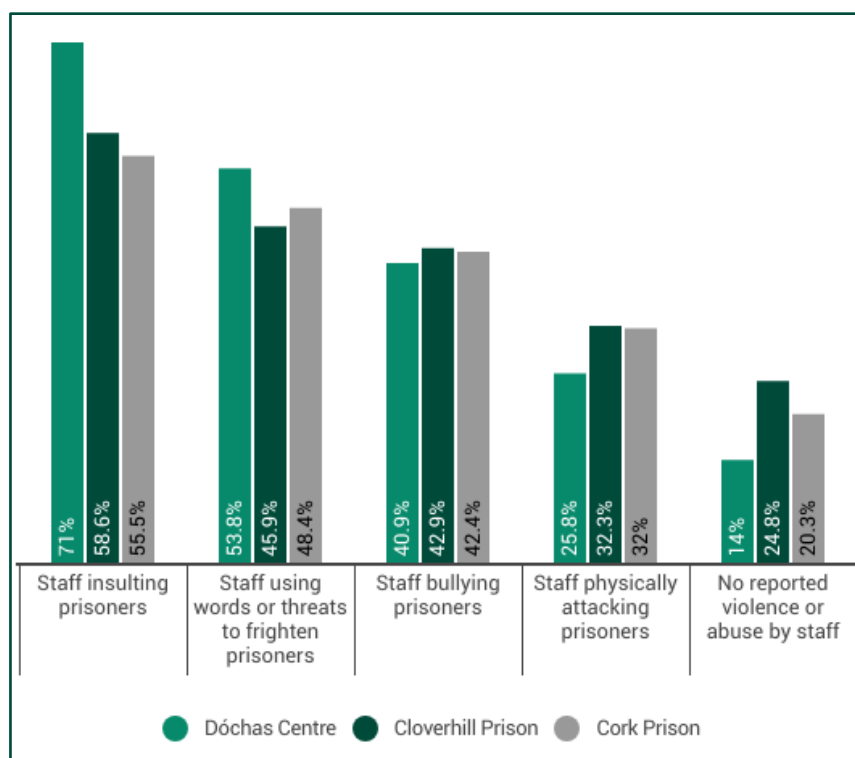


**Figure 18: Staff Reports of Violence (%)**  
(Prisoner violence: n = 54, Staff violence: n = 52)



**3.50** When compared with two closed men's prisons visited by the Inspectorate in 2023, prisoner survey responses in the Dóchas Centre indicated a higher prevalence of reports of staff using insults or words / threats to frighten prisoners. In contrast, respondents in men's prisons reported more instances of having heard of staff physically attacking or bullying prisoners (**Figure 19**).

**Figure 19: Prisoner Reports of Violence, Comparison across Prisons**



- 3.51** These findings further support concerns the Inspectorate has about the treatment of prisoners in the Dóchas Centre, particularly considering the combined impact of a restrictive regime in much of the prison; observably poor relations between many prison staff and women in the prison; women’s mental health; and overly punitive implementation of sanctions.

### **Risk Assessments**

- 3.52** Aside from formal risk assessments regularly carried out with respect to one prisoner (Prisoner A) there were no formal risk assessment processes in place in the prison.
- 3.53** At committal, there was no thorough review of wellbeing or security concerns. There was also no meaningful attempt made to determine if particular houses or individuals in the prison caused increased security risks to newly committed prisoners. The Inspectorate observed a number of committal interviews, where the effort made to determine inter-personal safety risks was limited to the questions: “*You’re not fighting with anyone here are you?*” and “*Do you have a history of violence or using weapons?*”
- 3.54** Women who were active drug users were accommodated with women who did not use drugs, and this frequently led to disruptive behaviour in the rooms; sometimes this erupted into physical altercations.
- 3.55** **The Inspectorate was not reassured that the committal process could adequately detect, assess and mitigate risk.**

- 3.56** Unlike other prisoners in the Dóchas Centre who perpetrated violence or engaged in intimidating behaviour, Prisoner A, who was a transgender woman, was the only prisoner to be risk assessed by prison management. Cisgender women who presented with similar backgrounds and experiences of violence and threatening behaviour were not assessed in the same way.

As has been stated by the CPT<sup>76</sup>, there is no valid security reason why, in principle, a balanced individual risk assessment carried out when a transgender person is admitted to prison should differ from that which is carried out on the committal of a cisgender person” (and) (...) while inter-prisoner violence between cisgender persons living in prisons remains a very significant issue (...), it is never suggested that this security issue is best viewed through a gender lens”.

### **Contraband**

- 3.57** The Irish Prison Service Strategy 2023 - 2026<sup>77</sup> sets out a three-pronged approach to managing the presence of illicit drugs across the prison estate: (i) inform and education; (ii) detect and reduce; and (iii) support and treat. The strategy promises an approach that will improve medical and therapeutic interviews and services for people in prison living with addiction.

The National Drug Strategy: Reducing Harm, Supporting Recovery 2017-2025, sets out a vision for a “healthier and safer Ireland, where public health and safety is protected and the harms caused to individuals, families and communities by substance misuses are reduced and every person affected by substance use is empowered to improve their health and wellbeing and quality of life”.<sup>78</sup>

- 3.58** Over a period of six months (March to September 2023), there were seven incidents of contraband detection in the prison, with four of these being retrieval of tablets and other illicit drugs.

Many women in the Dóchas Centre were drug users, and had addiction challenges. In response, the prison emphasised a zero-tolerance drug policy, which included urine testing to identify and punish prisoners who used drugs in the prison.

- 3.59** As part of the IR mechanism, the prison’s approach to urine testing permitted prison staff to immediately “drop” a prisoner’s regime to Basic in the event that they either declined or tested positive for drugs. Women who lived in the more privileged houses, such as Elm or Willows, were also to be relocated to a house with less privileges.

Women who disputed their test result had the option of sending their urine sample for external testing. However, they were advised that in doing this they would be responsible for the cost, and that if the test result remained positive they would be issued a P19 disciplinary sanction.

The policy on IRs and urine testing did not require the issuing of P19 disciplinary sanctions outside of the situation described above; however, the practice in the prison was to issue a P19 caution to women who refused a drug test or tested positive.

- 3.60** Despite the knowledge that many women in the Dóchas Centre were engaged in substance use, the prison emphasised a punitive approach to responding to drug use, rather than a harm-reduction / health-led approach designed to support women in the prison. This was further compounded by low availability of and access to addiction counsellors.

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<sup>76</sup> CPT (2024) Standards on Transgender Persons in Prison, para. 95

<sup>77</sup> IPS (2023) Drugs Strategy 2023 - 2026.

<sup>78</sup> National Drug Strategy: Reducing Harm, Supporting Recovery 2017-2025.

**3.61** The approach implemented in the Dóchas Centre to manage drug use emphasised detection and punishment over treatment and support, and did not entirely align with the National Drug Strategy: vision to empower people to improve their health and wellbeing and quality of life.<sup>79</sup>

**3.62** A number of recommendations made by the Citizens Assembly on Drug Use<sup>80</sup> may prove particularly useful in conceptualising of how to move forward in responding to drug use in prisons:

- That alternative, health-focused options for people with a drug addiction should be formalised, adopted and resourced within the criminal justice system.
- The Department of Justice and the Irish Prison Service should develop and fund enhanced prison-based addiction treatment services.
- A comprehensive health-led response to possession of drugs for personal use should be adopted by the State.
- Drugs policy should prioritise the needs of vulnerable and marginalised groups and disadvantaged communities.
- Additional resources should be allocated to fund a significant increase in community-based and residential treatment and recovery services as an alternative to custodial sentences for people with problematic drugs use, where appropriate.

### **3.63 Prisoner and Staff Safety Assessment**

*Approximately 50% of prisoners who participated in the Inspectorate's survey indicated they did not feel safe in the prison.*

*Data on prisoner on staff assaults in the prison may be an underestimate.*

*There was evidence of an indifferent attitude by prison management towards concerns raised by staff and women about their safety in the prison.*

*Some staff had concerns about lone working in the prison, in particular with respect to the possible development of unhealthy relationships emerging between prisoners and staff.*

*There was no formal and comprehensive risk assessment and committal screening process in the prison, as such the Inspectorate could not be reassured that the committal process could adequately detect, assess, and mitigate risk.*

*Although a number of women engaged in threatening behaviour and assault of prison staff, only one woman, who was transgender, was the subject of individualised formal risk assessment.*

*The prison emphasised drug detection and punitive measures over treatment and support of drug users, in contrast to the health-led response set out in the National Drugs Strategy: Reducing Harm, Supporting Recovery 2017-2025.*

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### **3.64 RECOMMENDATIONS**

**To the Director General of the Irish Prison Service:**

**Recommendation DG23-15:** The committal interview and induction process across the prison estate requires review and amendment to ensure all prisoner placements are based on a formal rigorous and reviewable risk assessment process.

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<sup>79</sup> Reducing Harm, Supporting Recovery 2017-2025

<sup>80</sup> Report on Citizen's Assembly on Drugs Use (January 2024)

**Repeat Recommendation DG23-9** (*recommendation also made in relation to Cloverhill Prison*): In line with the National Strategy on Drugs 2025-2027, and the Irish Prison Service's commitment to support and treat people with substance use issues, the Inspector urges the Prison Service to increasingly adopt a harm reduction and health-led approach to respond to drug prevalence in prisons.

**To the Governor of the Dóchas Centre:**

**Recommendation DO23-10:** There is a duty of care on prison managers to ensure that all persons held in prison are kept safe. Increased efforts should be made to promote safe interactions in the Dóchas Centre, including application of conflict mediation and restorative justice practices to ease tensions amongst prisoners and staff.

## Staffing

- 3.65** The European Prison Rules (2020) establish that prison management must ensure prisons operate at consistently high standards and are adequately staffed in order to maintain a safe environment.<sup>81</sup> Prison staff should be deployed in a fashion that enables a minimum guaranteed level of safety and security, while ensuring access to rehabilitation activities for people in prison.

International standards set out that all frontline staff working in prisons should have, maintain and improve their knowledge and professional capacity, and that prison administration should ensure continuous provision of in-service training courses. In particular, staff who work with specific groups of prisoners, for example foreign national prisoners, women or mentally ill prisoners, must be given specific training for their specialised work.<sup>82</sup>

Moreover, alongside the role played by prison staff in direct contact with people in prison, there is a requirement for administrative staff to ensure the smooth running of policies and procedures.

- 3.66** At the time of inspection, there were 5.5 prison officer vacancies in the Dóchas Centre, one Integrated Sentence Management (ISM) officer, two Work Training officers and 2.5 vacant officer positions.

- 3.67** Similar to other prisons, staff absences impacted on service delivery in the prison. Between 25 March and 22 June 2023, a total of 90 days, there were only 26 days where all rostered staff reported to work in the prison. Staff availability was not consistent across days of the month. For example, despite services and courts being closed on weekends, more staff were rostered and reported to work on these days than on weekdays when the prison school, workshops and courts were open. There was one week in April 2023 when staffing on a Saturday was nearly double that of the preceding Monday.

- 3.68** A number of Dóchas Centre staff reported that staff shortages impacted on their capacity to deliver services in the prison, as well as resulted in high staff turnover rates. In addition, some staff raised concerns about officers working alone with prisoners and the implications this might have for development of unhealthy relationships between staff and prisoners.

- 3.69** The prisoner population in the Dóchas Centre has nearly doubled in size since first opening, but there does not seem to have been sufficient consideration given to the staffing required to ensure women in the prison are supported in their efforts to prepare for re-integration into society.

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<sup>81</sup> European Prison Rules (2020), Rule 83

<sup>82</sup> European Prison Rules (2020), Rule 81.2 and 81.3, UN Mandela Rules (2015), Rules 75.1 and 75.3.



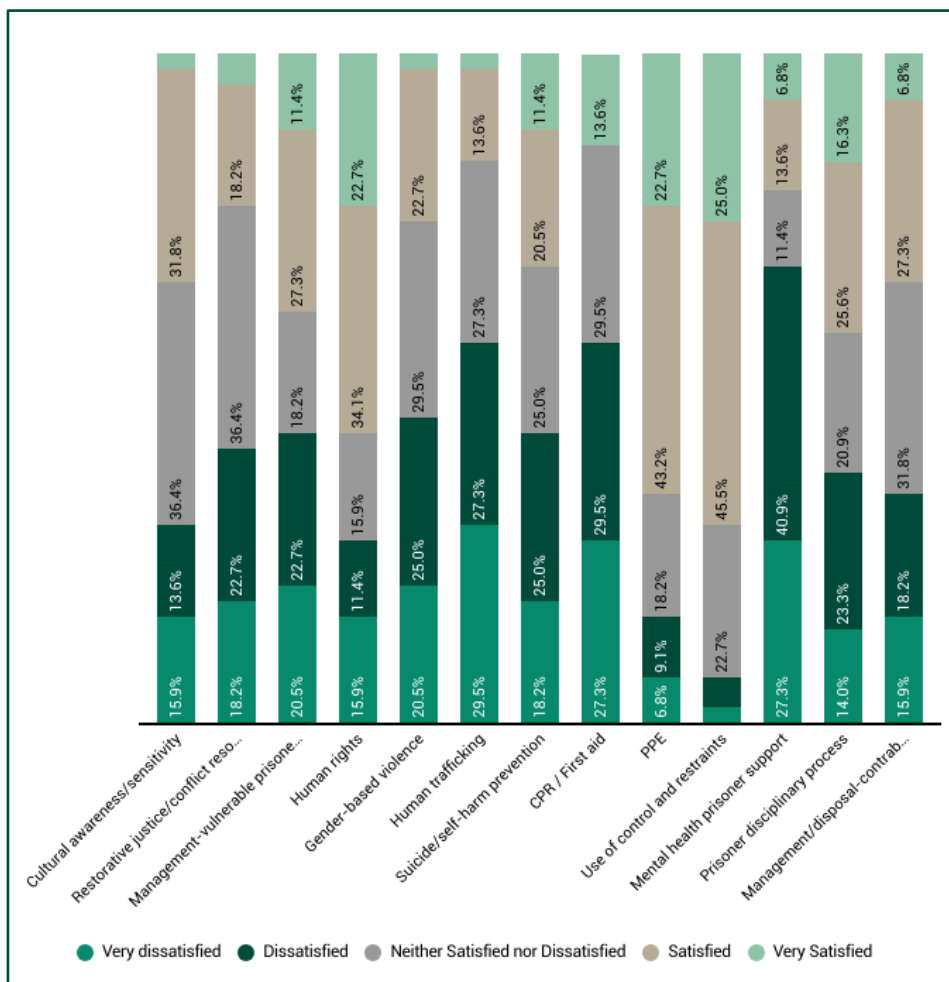
### 3.70 Inconsistency in staffing levels in the Dóchas Centre requires immediate attention to ensure staff and prisoner safety, as well as adequate staffing of escorts and services in the prison during the week.

#### Prison Officer Training

**3.71** All prison officers working in the Dóchas Centre were provided with training in gender specific needs, suicide prevention and human rights and equality as part of their initial recruit training. For most staff in the Dóchas Centre, many of whom had served more than ten years of service, this initial introductory training took place many years ago and was not necessarily followed up through continuous professional development.

Staff survey respondents in the Dóchas Centre indicated in particular high levels of dissatisfaction with the training they received in mental health prisoner support, CPR / First Aid, human trafficking, gender based violence and restorative justice / conflict mediation (**Figure 20**).

**Figure 20: Operational Staff Reports of Training Satisfaction Levels**  
(n = range between 41 and 44 respondents)



**3.72** Despite working in a prison for women, only 25% of prison staff (11 of 44) reported being satisfied with the level of training they received in gender-based violence. Staff indicated to the Inspectorate they felt ill-prepared to support women in their custody at the Dóchas Centre. This was because of the often traumatic backgrounds many of the women had experienced, and the lack of supports they had been provided with prior to their imprisonment.

**3.73** Rule 33 of the UN Bangkok Rules sets out the following:

*33.1 All staff assigned to work with women prisoners shall receive training relating to the gender-specific needs and human rights of women prisoners.*

*33.2 Basic training shall be provided for prison staff working in women's prisons on the main issues relating to women's health, in addition to first aid and basic medicine.*

**3.74** In 2021, the Inspectorate recommended this be remedied, "all prison staff should be required to undertake comprehensive and continuous gender-specific training; this training should be developed in consultation with stakeholders working in the areas of gender, sexual and gender-based violence and deprivation of liberty".

In March 2023, the IPS responded that: "Senior Psychologists in Dóchas Centre and Limerick Female Prison have contributed to bespoke prison officer training to support their work with women in prison. A plan is also underway in relation to the development of e-learning for existing staff".

Positively, in July 2023 one-third of staff working in the Dóchas Centre were offered a 2.5 hour course on gender-based domestic violence abuse training; however, staff survey results in September 2023 indicate low satisfaction levels with training received in this area.

**3.75** In line with the UN Bangkok Rules (2011), there remains a need for staff and management working in the Dóchas Centre to be provided with effective training in the areas of gender-based needs and trauma, as well as in mental health supports for women specifically.

**3.76 Staffing Assessment**

*Staffing availability during the weekdays was not of a level sufficient to ensure prisoner access to services. The staffing roster required review to ensure staffing levels were commensurate with need rather than to allow for over-staffing on weekend periods when services and courts were closed.*

*Positively, in July 2023 one-third of staff working in the Dóchas Centre were offered a 2.5 hour course on gender-based domestic violence abuse training. Despite this, 45% of staff survey respondents indicated they were not satisfied with the training they received in gender-based violence.*

*Staff survey respondents also reported dissatisfaction with their training in mental health support for prisoners, CPT / First Aid and human trafficking.*

**3.77 RECOMMENDATIONS**

**To the Director General of the Irish Prison Service & Governor of IPS Training College:**

**Repeat Recommendation DOCT8 (2021):** In line with Rule 81.3 of the European Prison Rules (2020), all prison staff should be required to undertake comprehensive and continuous gender-specific training; this training should be developed in consultation with stakeholders working in the areas of gender, sexual and gender-based violence and deprivation of liberty.

**To the Governor of the Dóchas Centre**

**Recommendation DO23-11:** A review of staffing allocation should be conducted to ensure adequate staffing availability during the week, rather than a surplus of staffing on weekend periods when prisoner activities and services are limited and courts are not in session.

## C. Complaints

- 3.78** The European Committee for the Prevention of Torture (CPT) sets out that the principles of a strong prisoner complaints system must include: availability, accessibility, confidentiality/safety, effectiveness and traceability. In order to be effective a complaints system must be perceived to be fair as well as independent from the agency responsible for persons deprived of their liberty.<sup>83</sup>

The UN Mandela Rules (2015), Rule 57.2 and the European Prison Rules (2020) Rule 70.9 require that complainants must not be subjected to negative consequences, including reprisal or intimidation as a result of raising a complaint. As part of a complaints system, it is important that prisoners are facilitated to effectively participate in the complaints process, which includes being provided with practical information about complaints procedures.<sup>84</sup>

While the Inspectorate does not investigate individual complaints, under Rule 57(B) of the Prison Rules 2007-2020, it does play a role in the oversight of the prisoner complaints system.

For many years, the Office of the Inspector of Prisons has deemed the Irish Prison Service Complaints System to be unfit for purpose.<sup>85</sup>

- 3.79** In addition to its role in the oversight of prisoner complaints, the Inspectorate also receives and responds to confidential correspondence from prisoners, under Rule 44 of the Prison Rules 2007-2020. All people in prison custody are entitled to send and receive letters from the Inspectorate in confidence. Correspondence by way of the Rule 44 process is not a complaint, and the Inspectorate does not investigate individual complaints.

### Complaints Procedures

- 3.80** In 2023, 42 complaints were notified to the Inspectorate by the Dóchas Centre. Of these 4 were category A complaints, as set out in the IPS Prison Complaints Policy. A further 10 were category B (complaints of a serious nature), 18 category C (service level complaints), 10 category D (complaints against professionals), 0 category E (visitor-submitted complaints) and 0 category F complaints (complaints related to IPS decision-making complaints).
- 3.81** Complaint boxes and forms were displayed in the prison houses (**Figure 21**). The type of box used was not consistent, and the opening in some of the complaint boxes was either too large to prevent forms being illicitly removed or not large enough to fit the multi-page complaint form. Also, sealable envelopes were not provided to ensure complaint forms were not read by staff or prisoners prior to being returned to the Governor's office.

<sup>83</sup> CPT (2018) Complaints Mechanisms.

<sup>84</sup> European Prison Rules (2020), Rule 70.1, 70.4 and 70.6.

<sup>85</sup> OIP (2020) Annual Report 2020, pg. 24; OIP (2021) Annual Report 2019, pg. 42; and OIP (2018) Annual Report 2018, pg. 14; and OIP (2016) Review, Evaluation and Analysis of the Operation of the present Irish Prison Service Prisoner Complaints Procedure.

**Figure 21: Complaint Boxes, Accommodation Landings**



- 3.82** Assistant Chief Officers checked the complaints boxes each day; the Inspectorate considers that it is best practice for Chief Officers rather than Assistant Chief Officers to collect complaints forms. This ensures that staff involved in the day-to-day management of prisoners and staff are not permitted to read confidential complaint forms.
- 3.83** Record-keeping on complaints was organised and well-kept, and was managed by a Governor in the prison. However, as only one member of staff was assigned to this role there were times, such as when this Governor went on leave, when complaints submitted by prisoners remained unprocessed.
- 3.84** Positively, good practice was observed in the categorisation of complaints. On most occasions where a complaint form referred to multiple complaint categories these were applied and investigated separately. There were some minor examples of complaint miscategorisations, such as disputes between prisoners being categorised as category C basic-service level complaints.
- 3.85** There were some instances of procedural inaccuracies in relation to complaints. For instance one ongoing Category A complaint did not include in the witnesses list several people who were observed on CCTV as being clear witnesses to an incident.
- 3.86** Further, in April 2023, a complaint involving an allegation of assault by a prison officer in Limerick Prison was sent to that prison for investigation. The complaint was categorised as being comprised of elements of category A, B and D-related allegations, including that a prison officer had assaulted the prisoner concerned, but the complaint was only investigated as a category D complaint.

At the time of inspection, this complaint had been “ongoing” in the Dóchas complaints records, yet the Inspectorate had been notified that this complaint was closed and “not upheld” in April 2023. From April to September 2023 the complainant had not been informed of the status of her complaint. Only because the prisoner raised this issue with the Inspectorate was the matter addressed by the prison through engagement with the Inspectorate and management in Limerick Prison.

**3.87** Prisoners reported that they feared reprisal should they attempt to submit a complaint. This finding is not unique to the Dóchas Centre, and is one of several reasons why the Inspectorate has for many years sought reform of the IPS prisoner complaints system.

**3.88** Many prisoners indicated to the Inspectorate that they considered that if they were to complain about treatment by a member of Dóchas Centre staff that they would then face consequences from other staff. A prisoner said: *“A couple of them stick together, it’s like a domino effect. You have to be strategic, if you answer her back you’ll have to deal with all of them.”*

**3.89** Prisoners also spoke about the ways in which they were deterred from submitting complaints. One woman in prison reported, *“I was told there would be no point going to a governor or to report it because I wouldn’t be believed over her”*. Another prisoner stated that when she requested a complaint form from an officer that the officer had written their name and staff number on the paper as a way to intimidate her from submitting the complaint. Some prisoners reported they felt they had to withdraw their complaints, and that *“[name and rank of staff redacted] comes around and makes you feel bad”* and *“officers intimidate me to make me back off. I didn’t want to keep poking the bear.”*

**3.90** Of 102 women who took the Inspectorate’s survey, 20% (20) felt safe making a complaint in the Dóchas Centre and 67% (68) did not feel safe making a complaint. This increased to 78% (21 of 27) for women who lived in the HCU and small yard houses.

While 62% of staff (34 of 55) felt that prisoner complaint and grievance mechanisms were good in the prison, only 13% of prisoners (13 of 97) thought the complaints system worked well.

Nearly half of prisoners (46%, 44 of 95) surveyed indicated that staff punish prisoners who make complaints.

**3.91** Women in the Dóchas Centre had understandably low confidence in the IPS prisoner complaints system. This sentiment was encapsulated succinctly by one woman who explained her reluctance to submit complaints: *“I’d complain about it, they’ll do nothing and it will make my time harder”*.

#### **Rule 44 Confidential Correspondence**

**3.92** Under Rule 44 of the Irish Prison Rules, all people in prison are entitled to write in confidence to a number of bodies. These include their legal advisor, the Visiting Committee, the Minister for Justice, the European Court of Human Rights, the CPT, the Parole Board, the Irish Human Rights and Equality Commission, and the Office of the Inspector of Prisons, among others. Under Rule 44(4), a letter sent to a person in prison from any of these bodies should be given to the individual without undue delay and should not be examined to any extent greater than to determine it is in fact a Rule 44 letter; if the letter must be examined, it shall only be open in the presence of the individual addressed.

**3.93** In 2023 the Inspectorate received two Rule 44 letters from people in the Dóchas Centre; this represented 9% of all letters received by the Inspectorate that year.

**3.94** The Inspectorate has received few Rule 44 letters from women in the Dóchas Centre.<sup>86</sup> During the inspection, the Inspectorate observed notices hung in several areas of the prison to advertise to prisoners their entitlement to correspond with the Inspectorate through Rule 44 letters. However, the Inspectorate did not locate any available Rule 44 post boxes in which to submit a letter. Rule 44 post boxes should be installed in common areas and landings to allow women to submit confidential correspondence to all bodies covered under Rule 44 of the Irish Prison Rules.

**3.95** Some women in the Dóchas Centre raised concerns about incoming Rule 44 correspondence being opened upon receipt, in particular letters from their legal representatives. The Inspectorate recalls obligations set out in the Prison Rules for the Governor to ensure Rule 44 correspondence “shall not be examined to any greater extent than is necessary to determine that it is such a letter. If any such letter is to be examined, it shall only be opened in the presence of the prisoner to whom it is addressed”.

### **3.96 Complaints Assessment**

*Positively, complaints boxes and forms were displayed in common and accessible areas throughout the prison. However, some of these boxes were either not securely locked or were not of a sufficient size to allow for submission of the complaint form. In addition, sealable envelopes were not made available alongside complaint forms, which had implications for assurances of confidentiality.*

*Complaint forms were collected by ACOs, who had frequent contact with frontline prison staff who could be the subject of prisoner complaints; complaint forms should be collected by Chief Officers.*

*While overall complaints record-keeping was good, there were a small number of procedural inaccuracies in the complaints process, as well as one incident where a prisoner was not informed of the status of her closed complaint for a period of five months.*

*Women in the Dóchas Centre had very low confidence in the complaints system. More than two-thirds of women in the prisoner survey respondents reported they did not feel safe making a complaint in the Dóchas Centre.*

*As noted by the Inspectorate on numerous occasions, the IPS Prisoner Complaints system is not fit for purpose.*

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### **3.97 RECOMMENDATIONS**

#### **To the Minister for Justice:**

**Repeat Recommendation MDOJ22-3:** The Minister for Justice should take all possible measures to ensure the prompt review and adoption of the draft Statutory Instrument to amend the Prison Rules 2007-2020 Rule 57B. The amended Rule should take into account the requirements of a well-functioning complaint system, which includes independence, expediency and the opportunity for independent appeal.

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<sup>86</sup> OIP (2024) Annual Report 2023, see breakdown of Rule 44 correspondence for 2021 - 2023.

## To the Governor of the Dóchas Centre:

**Recommendation DO23-12:** To address prisoner reports of low confidence in the complaints system, senior management should take visible steps to promote engagement with the complaints system, which may include (i) making available sealable envelopes in close proximity to complaint forms and boxes; (ii) installation of secure complaint boxes that are clearly labelled and of the same type across the prison; (iii) regular notification to complainants of the status of their complaints; and (iv) daily collection of submitted complaints by Chief Officers.

**Recommendation DO23-13:** Clearly marked Rule 44 post boxes should be immediately installed in common areas and landings to allow women to submit confidential correspondence to all bodies covered under Rule 44 of the Irish Prison Rules 2007-2020.

## D. Disciplinary Processes

- 3.98** International human rights standards provide that disciplinary procedures should be mechanisms of last resort. Alternative restorative mechanisms should be used to resolve disputes in the prison. Prisoners charged with disciplinary offences should be informed promptly in a language they understand, have adequate time and facilities to prepare their defence, be allowed to defend themselves or be provided with legal assistance, request the attendance of witnesses, and have the free attendance of an interpreter if so required. The severity of any punishment imposed shall be proportionate to the offence committed.<sup>87</sup>

The Prison Rules 2007-2020 and international human rights standards outline that the use of force should always be applied as a last resort. Where force is deemed necessary and proportionate, it should be imposed for the shortest duration of time. There should be clear procedures in place about the types and circumstances in which force is used, as well as its authorisation. Training should be provided to prison staff on control and restraint techniques and use of force incidents by staff should be reported immediately to the prison Governor.<sup>88</sup>

### Disciplinary Processes

- 3.99** The Irish Prison Service disciplinary process, referred to as the P19 system, is underpinned by Part 3 of the Prisons Act 2007. The Prisons Act, Section 13, sets out the sanctions which may be imposed by the Governor of a prison. Sanctions that are permitted under the Act range from loss of privileges such as reduced phone calls and visits to a reduction of remission, which effectively lengthens the period of time a person is required to remain in prison.

Part 3 of the Act is operationalised by the *Guideline Document on the Imposition of Disciplinary Sanctions*. This Guideline establishes parameters, in line with the Act, by which Governors can apply sanctions, and includes requirements, such as:

- i. The severity of an imposed sanction should be proportionate to the breach of discipline concerned, and previous behaviour and character of the prisoner may be taken into account by the Governor (sections 2.1 and 4.22)

<sup>87</sup> European Prison Rules 56.1, 56.2, 59, 60.2 and UN Mandela Rules (2015) Rules 36, 38 (1), 39(2) and 41.

<sup>88</sup> Prison Rules 2007-2020, Rule 93.1, European Prison Rules (2020), Rule 64.1, 64.2, 65 and 66 and UN Mandela Rules (2015) Rule 82.



- ii. The right to communicate with family cannot be removed in response to a breach of prison discipline; loss of family visits should not be employed (sections 2.3 - 2.5)
- iii. Removal of a prisoner to a segregation unit should be limited as a sanction for the highest level of prison discipline; close confinement of prisoners as a sanction should only be used in exceptional circumstances and should be strictly monitored (section 2.6)
- iv. The Governor may place a prisoner on a restricted regime for operational, administrative or security reasons; any such decision should be regularly reviewed and appropriate records must be maintained (section 3.2)
- v. A prisoner should not be segregated during the period of adjournment unless the Governor considers it necessary for the maintenance of good order and discipline or to ensure the safety of officers, prisoners or other persons or in the prisoner's own interest. Any such segregation must be subject to regular review and the ground of which must be clearly documented (section 4.10).
- vi. Only officers required for the purpose of the disciplinary hearing or for reasons of safe and secure custody should be present at a hearing. The number of officers present should never be such as to intimidate the prisoner or expose the prison authorities to allegations of intimidation (section 4.17)

The Guideline establishes Breach of Discipline "Levels", with sanctions for Level 3 breaches not exceeding 14 days, sanctions for Level 2 breaches not exceeding 28 days and Level 3 breaches resulting in imposition of sanctions for a period not exceeding 40 days. Level 3 breaches could also result in forfeiture of not more than 14 days' remission.

**3.100** In examining the disciplinary process, the Inspectorate reviewed a sample of 234 P19s issued to 97 people in the Dóchas Centre over a six-month period in 2023. This sample was compared against the procedures outlined in the *Guideline Document on the Imposition of Disciplinary Sanctions* ("Guideline").

**3.101** Of a total 234 P19s, 96 resulted in a "served" sanction, 35 resulted in a "suspended" sanction and 72 were "cautions". The remaining P19s were either not upheld, not processed as the seven-day review period had lapsed or were grouped with another P19 sanction.

**3.102** There was a relatively heavy reliance on the P19 disciplinary process in the Dóchas Centre. Across the five months preceding the inspection, a total of 201 P19s were issued to 79 people in prison. By comparison, over a period of five months (1 June - 31 October 2022) in Mountjoy Men's Prison, which is more than four times the population of the Dóchas Centre, 582 P19s were issued to 285 people. Taken together, the Dóchas Centre utilised the P19 system 50% more often than Mountjoy Men's Prison.

The majority of P19-related incidents in the Dóchas Centre were concerned with fighting between people in prison and the use and retrieval of drugs.

**3.103** The Dóchas Centre used both the P19 disciplinary process and the Incentivised Regime (IR) mechanism to both reward good behaviour and punish poor behaviour. While all prisons operate both the P19 and IR systems, reliance on the IR system was more pronounced in the Dóchas Centre, with many people in the prison noting apprehension around receiving a "bad IR" as this impacted on their overall regime (Basic, Standard or Enhanced) and subsequently on their gratuity and call amounts each week.

- 3.104** There was notably good practice in the administration of the P19 process at the Dóchas Centre. For example, on a number of occasions sanctions for different offences were grouped together to minimise the length of time that a sanction was applied. In some instances sanctions were suspended, rather than served, and instead the incident was handled through the IR process. Also, in the event that a P19 hearing could not be carried out within the seven-day period, the P19 was dismissed.
- 3.105** However, the Inspectorate's review of 234 P19 infractions raised concerns about the severity and consistency of imposed sanctions, as well as removal of prisoners to segregation units and to their own rooms for temporary lock-back periods. In many instances, P19 incidents resulting in served sanctions also attracted additional punitive measures. In some cases, this resulted in segregation from the general population and / or a reduced regime level, which led to a reduction in entitlements, including access to out-of-cell time and family contact.
- 3.106** Also of note, some prisoners who received their first P19 for similar infractions received different sanction responses. For example, of four prisoners who received their first P19 for having a prohibited article in their possession one received a caution, one received a seven-day suspended sanction on evening out-of-cell time, one person received a seven-day served sanction on evening out-of-cell time and one person received a four-day sanction on evening out-of-cell time.
- 3.107** **A lack of consistency in approach led to concerns about procedural fairness, and how application and efficacy of the use of the P19 process was measured and evaluated.**
- 3.108** Of the total 234 P19s issued, prisoners were segregated from the general population 60 times prior to the P19 hearing; of these 42 were locked back in their own rooms in general population houses. **Prisoners who were temporarily locked-back in their rooms were not placed on a Rule, and there was no evidence that "any such segregation (was) subject to regular review and the ground (...) clearly documented",** as required in section 4.10 of the Guideline.
- 3.109** On a systemic level, the Inspectorate has concerns about procedural fairness **and the utilisation of the P19 process as a sort of surrogate for the recording of incidents in the prison.**
- 3.110** There were instances in the Dóchas Centre whereby all prisoners involved in an incident were issued a P19 by prison staff, regardless of whether they were at fault. Only after P19s were issued to prisoners would an investigation into and gathering of detail surrounding an incident be conducted.

In practice, this meant the onus was placed on victims of incidents to prove a case for a P19 issued to them to be unfounded. Regardless of whether or not a P19 disciplinary sanction was upheld, the record that a P19 had issued remained.

- 3.111** The review of P19s in Dóchas Centre highlighted how this operates in practice: 17 prisoners were found not guilty following the issuing of P19s, yet the P19 remained on their record. In one of these instances a prisoner was placed in a Close Observation Cell following the incident, despite the allegation not being upheld in the course of the P19 hearing.

Such a practice has potential implications for prisoners as they progress in their sentences and seek to engage with internal and external services and agencies, such as the Parole Board. Although a "not upheld" P19 implies a positive outcome, frequent "not upheld" P19s may depict a prisoner in a negative light when being considered for opportunities in the prison and beyond.

Further, **reliance on the P19 system to record incidents serves to obfuscate the actual prevalence of incidents in the prison, including incidents of assault and self-harm.**

- 3.112** P19 hearings were carried out by prison Governors, and were held in offices in the prisoner houses. The environment in which these hearings were held was not appropriate. Governors sat at a desk across from the prisoner, and between two and four members of staff stood in close proximity to the seated prisoner; on observation this was very intimidating. This did not align with section 4.17 of the Guideline, which requires that “the number of officers present should never be such as to intimidate”.

Often times other prisoners lined up outside the door in an effort to be seen by the Governor for other requests. This made for a hectic and loud environment, with people engaged in conversation, and opening and banging on the door during the P19 hearing proceedings. Staff also walked in and out of the room during hearings, which distracted the prisoner and Governor, and resulted in increased anxiety on the part of the prisoner.

- 3.113** The majority of women who came before a P19 hearing observed by the Inspectorate were apologetic, but at times became frustrated when they felt they were not being understood or listened to. Prisoners were not given sufficient time to advocate for themselves and reported feeling rushed during the hearing. One woman became panicked during the hearing as she wanted to ensure her P19 record accurately recorded the incident; she was instructed to calm down and in response said, “*I’m all over the place, sorry*”. Another prisoner tried to explain that her poor behaviour was in response to being misgendered and being denied medication; the Governor responded: “*It’s a reason, it’s not an excuse*” and “*don’t overreact when instigated*”.

- 3.114** Although there is an appeal mechanism associated with the P19 process, people in prison reported they did not often elect to appeal, with one woman noting: “*If you appeal something, they’ll give you a dog’s life.*”

- 3.115** **The environment in which to carry out a P19 hearing should be calm and professional. No more staff than are required should be present in the hearing, and other prisoners should not be permitted to interrupt or disrupt hearing proceedings.** Prisoners should be given sufficient time to engage in the P19 hearing process, and should not be made to feel that efforts to explain themselves are inappropriate or not worthy of the Governor’s time.

**3.116** **Disciplinary Processes Assessment**

*While there was some good practice observed in how the P19 disciplinary system was implemented in the Dóchas Centre, the Inspectorate had concerns about the heavy reliance on P19s in the prison.*

*The P19 system was operating as a sort of surrogate system to record incidents in the prison, which obfuscated the actual prevalence of incidents in the prison.*

*There was evidence of inconsistent application of disciplinary sanctions, and this lack of consistency in approach led to concerns about procedural fairness, and how application and efficacy of the use of the P19 process was measured and evaluated.*

*P19 hearings were not held in complete accordance with the Guideline Document on the Imposition of Disciplinary Sanctions.*

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### 3.117 RECOMMENDATIONS

#### **To the Director General of the Irish Prison Service & Governor of Dóchas Centre:**

**Recommendation DG22-9 (repeat) / DO23-14** (*also made in relation to Mountjoy Men's Prison, Cork Prison and Cloverhill Prison*): The Director General of the Irish Prison Service and the Governor of the Dóchas Centre should ensure a clear demarcation between an incident recording system and the P19 (disciplinary sanction) recording system.

#### **To the Governor of Dóchas Centre:**

**Recommendation DO23-15:** Senior management should regularly conduct and record audits of P19 sanctions to ensure consistency of approach and application of sanctions. To facilitate this audit process, the PIMS system should be reviewed and amended to reduce compartmentalised effects of siloed record-keeping and ensure appropriate safeguards are put in place.

## 4 HEALTH & WELLBEING

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- 4.1** People living in prison should have access to a standard of healthcare equivalent to that in the outside community.<sup>89</sup> It follows that prisoners should not be constrained to live in conditions which are “detrimental to their health”, “make their health deteriorate” or have “no or poor access to health care services”.<sup>90</sup>

Primary healthcare for people living in prisons should take account of their distinctive needs, including a higher prevalence of mental illness, substance abuse disorders, infectious diseases, and intellectual disabilities, that require targeted service provisions and management strategies.<sup>91</sup> Prisons also accommodate an over-representation of marginalised people whose pre-existing health inequalities have often led to them being in generally poor health and/or having chronic untreated diseases.<sup>92</sup>

- 4.2** The general inspection of the Dóchas Centre included an assessment of the health of people in the prison, including the health services available to them and factors that could impact on their health outcomes. This assessment was carried out in line with the healthcare standards established by the European Committee for the Prevention of Torture (1993), the Council of Europe Recommendation on Ethical and Organisational Aspects of Healthcare in Prison (1999) and the Irish Prison Service Healthcare Standards (2011).

In addition, drawing on standards set out in the European Prison Rules 2020, the United Nations Bangkok Rules (2011) and the Committee for the Prevention of Torture and Inhuman or Degrading Treatment (CPT), the Inspectorate examined the provision of healthcare in the Dóchas Centre with respect to its responsiveness to gender-based needs in the provision of healthcare to women in the prison.

The assessment of Health and Wellbeing in the Dóchas Centre is rooted in the “Availability, Accessibility, Acceptability and Quality (AAAQ)” Healthcare Assessment Framework, as set out by the United Nations Committee on Economic, Social and Cultural Rights General Comment Number 14 on the Right to the Highest Attainable Standard of Health.<sup>93</sup>

- 4.3** Drawing on national legislation and international standards, the Inspectorate evaluates *Health & Wellbeing* performance across four themes:

- A. Healthcare Resources:** available healthcare services and staffing, prison environment, and healthcare technologies and infrastructure
- B. Healthcare Delivery:** healthcare services available to prisoners, waitlists to access services, equivalence and continuity of care, barriers to access, staff training, and measures taken to address the needs of the prisoner population
- C. Healthcare-Informed Decision-Making:** healthcare input into operational decision-making, healthcare assessments on committal and in relation to isolation
- D. Patient Experience:** patient-centred considerations in provision of healthcare services, patient voice on experience of healthcare engagement and confidentiality assurances

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<sup>89</sup> UN Mandela Rules (2015) Rule 24.1; CPT. (1993)

<sup>90</sup> Danish Institute Against Torture (Dignity) (2021) Monitoring Health in Places of Detention.

<sup>91</sup> Kennedy, HG et al (2004) Mental Illness in Irish Prisoners. National Forensic Mental Health Service.

<sup>92</sup> WHO Regional Office for Europe (2023) Status Report on Prison Health in the WHO European Region 2022.

<sup>93</sup> UN CESCR. General Comment No. 14 on the Right to the Highest Attainable Standard of Health.

## A. Healthcare Resources

- 4.4** International standards outline the importance of aligning medical services in prisons with the general health administration in the community, with an emphasis on the integration of prison healthcare with national health policy.<sup>94</sup> Prison authorities are responsible for safeguarding the health of prisoners in their care. This includes ensuring every prison has at least one qualified General Practitioner,<sup>95</sup> and that people in prison also have access to qualified psychiatrists, psychologists, dentists, opticians, and other specialists.<sup>96</sup> In addition, prison medical units should be equipped with appropriate medical equipment<sup>97</sup> suited to the needs of the prisoner population, including technologies to support the delivery and administration of healthcare services.

In Ireland, the provision of healthcare in prisons remains the responsibility of the Department of Justice, rather than the Department of Health. The Minister is responsible for making arrangements related to the provision of primary healthcare services in each prison, and appoints the Director of Prison Healthcare Services of the Irish Prison Service. In addition, the Minister may be involved in decision-making in respect of the number of approved posts for doctors and nurses, as well as the provision of other healthcare services in prisons.<sup>98</sup>

The composition of the healthcare team should reflect the needs of the prison population, both in its specialisms and in its demographic composition. Rule 10(2) of the European Prison Rules (2020) states that if a woman “requests that she be examined or treated by a woman physician or nurse, a woman physician or nurse shall be made available, to the extent possible, except for situations requiring urgent medical intervention”. The gender composition of the healthcare team should be such that requests of this kind can be easily facilitated.

To meet the healthcare needs of women in prison, staff require appropriate training and skillsets. On this point, the CPT has advised that in order to ensure equivalence of care with that of the community, healthcare staff in women’s prisons should be provided by “medical practitioners and nurses who have specific training in women’s health issues, including in gynaecology.”<sup>99</sup>

### Healthcare Services & Staffing

- 4.5** Healthcare services available in the Dóchas Centre included general practice and nursing, psychology, psychiatry, and substance misuse support. The staffing complement for in-prison healthcare services is set out in **Table 5**. The gender composition of the primary healthcare team was predominantly women (67%),<sup>100</sup> which was appropriate for working with women in prison.

As is the case for all prisons in Ireland, general practice and nursing healthcare services and staffing were provided for by the Irish Prison Service; the Health Service Executive (HSE) did not operate or oversee these healthcare services in the prison. Staffing shortages could not be addressed by drawing upon HSE staff, and the regulatory body designated to assess healthcare quality in the community, the Health Information and Quality Authority (HIQA), did not carry out oversight of healthcare services in the Dóchas Centre or in other Irish prisons.

<sup>94</sup> European Prison Rules (2020), Rules 40.1 and 40.2.

<sup>95</sup> European Prison Rules (2020), Rules 41.1.

<sup>96</sup> European Prison Rules (2020), Rules 41.5. See also, CPT (1993) Health Care Services in Prison.

<sup>97</sup> CPT (2017) Inspection of a Medical Service by a CPT Doctor-Checklist

<sup>98</sup> Prison Rules 2007-2020, Rule 99(1-5).

<sup>99</sup> CPT (2018) Factsheet on Women in Custody.

<sup>100</sup> Based on GP and nursing staff.

**Table 5: Healthcare Staffing, Dóchas Centre (September 2023)**

Healthcare Role	Staffing	FTE
General Practice	1 General Practitioner	1
Nurses	1 Chief Nurse Officer 7 Nurse Officers / Prison Nurses [1 Nurse Officer provides night cover]	1 7
Psychologist	1 Senior Grade Psychologist 1 Staff Grade Psychologist (recently appointed)	1 0.6
Addiction Counsellor	2 Addiction Counsellors (contracted from Merchants Quay Ireland). 1 Senior Addiction Counsellor	0.6 / 0.5 0.2
Psychiatry	1 Psychiatrist (in-reach) 1 Psychiatry SHO Doctor	0.2 0.2
Forensic Mental Health Nurse	1 Forensic Mental Health Nurse (in-reach)	1.0
Social Worker	1 Mental Health Social Worker	0.2

- 4.6** Access to healthcare services was facilitated in a variety of ways, including through screening upon committal, by approaching staff directly to arrange to be seen (such as prison officers, nurses, psychologists and addiction counsellors), or by requesting to be seen by healthcare staff at medication rounds each morning.
- 4.7** Specialist in-reach clinics were available in dentistry, chiropody, optometry, as well as clinics for Hepatitis C and HIV which were supported by St. James' Hospital. In-reach specialisms for occupational therapy, colposcopy, and physiotherapy were not in place.

## Environment

### Physical Setting & Infrastructure

- 4.8** Overall, the clinical areas on the healthcare corridor were clean and well-maintained. There were sufficient clinical rooms to meet with women on a one-to-one basis. Clinical rooms were appropriately resourced and stocked.
- 4.9** There was no large therapeutic space in the prison, which if put into place could be used to support women with psychosocial needs. Similarly, there was no suitable space to run therapeutic supports for groups, particularly for addiction counselling. The feasibility of creating such a space should be examined.
- 4.10** Of particular concern to the Medical Experts working with the Inspectorate were the cell conditions and regime available to women detained on the HCU. As noted, this landing accommodated women with psychiatric illnesses whose needs were ill-matched with the accommodation and regime of the main houses.



- 4.11** The regime afforded to women on the HCU provided limited out-of-cell time and opportunities for meaningful contact with others. While women were offered the option to visit the yard for fresh air, they could only do so alone.
- 4.12** The Inspectorate also noted, with concern, the frequency with which women called out in distress and banged repeatedly on their cell doors to attract the attention of staff. Women regularly pressed their call buttons, but received a delayed response and sometimes no response at all.
- 4.13** The women housed on this landing were often not well enough to maintain the cleanliness of their cells. **Appropriate support should be provided to assist women with poor health on the HCU to clean and maintain their rooms.**
- 4.14** The conditions observed were not conducive to supporting the well-being of the women accommodated on the HCU. The distress and noise created by women with a mental illness was also, in turn, unsettling and upsetting for the new committals and other women held on the HCU. Women living in houses on the big yard also commented on the impact of seeing other women in profound emotional distress, with one woman expressing the sadness she felt seeing “*people looking out of their rooms, crying at you*”.

### **Technologies**

- 4.15** Medical notes were recorded through the PHMS. In general, patient notes were maintained to a good standard.

However, some improvements to the PHMS system could be made with respect to the user experience. The current manner in which information is presented means that information could be overlooked within sub-speciality notes, as the notes were organised by speciality rather than event, and therefore not foregrounded for all the healthcare professionals working with a given patient.

- 4.16** Client notes for psychology services were maintained in a separate e-system, which was not linked to the PHMS. A consequence of having two independent systems was that it could create inefficiencies in referral processes and also impede multidisciplinary efforts across healthcare services. This issue has been previously highlighted in past reports by the Inspectorate,<sup>101</sup> where it has been recommended that the two systems should be sufficiently linked.

### **4.17 Healthcare Resources Assessment**

*In general, healthcare resourcing at the Dóchas Centre was adequate; however, additional staffing supports including administrative staff and increased staffing for night nursing cover are required to support healthcare delivery.*

*It was positive to note that the composition of the healthcare staff was predominantly women, which is an asset in delivering healthcare to a prison for women.*

*The healthcare environment was clean and well-maintained. However, the regime and accommodation in the HCU did not provide a suitable environment in which to support women with serious psychiatric illnesses.*

*As noted, accommodating newly committed prisoners in the same area as women with serious mental health illnesses was not appropriate.*

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<sup>101</sup> See: OIP (2023). Thematic Inspection: An Evaluation of the Provision of Psychiatric Care in the Irish Prison System; OIP (forthcoming) Report on the Unannounced General Inspection of Cork Prison March - April 2023.

*E-recording healthcare and psychology systems were not appropriately linked to support healthcare delivery.*

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#### 4.18 RECOMMENDATION

##### **To the Director General of the Irish Prison Service:**

**Repeat Recommendation MHT22:** It is recommended that the lack of mutual access to clinical records and documentation between psychology and other clinical disciplines is overcome. Even if certain information is deemed highly confidential and remains restricted, broader mutual access to certain core information should be facilitated, particularly when it relates to key risks to self and others.

## B. Healthcare Delivery

- 4.19** Primary health care must be available to people in prison whenever needed. Access to secondary health care and hospital care, upon advice of a prison doctor, should be guaranteed by employed or contracted specialists, particularly psychiatrists, and by fully-equipped hospitals whenever needed. Appropriate arrangements must be in place for immediate medical care at any time in emergency situations. Unimpaired access to healthcare in prisons implies that prison managers and administrators should ensure appropriate health care professionals are available in prison, and good communication and co-operation takes place with health care professionals and hospital facilities outside prisons.<sup>102</sup>

The Inspectorate examined the delivery of healthcare with respect to its responsiveness to gender-based needs. Rule 10 (1) of the European Prison Rules (2020) states that healthcare services for women in prison should be at least equivalent to the gender-specific healthcare services that are provided in the community. Furthermore, Rule 18 of the Bangkok Rules (2011) sets out that “preventive health-care measures of particular relevance to women, such as Papanicolaou tests and screening for breast and gynaecological cancer, shall be offered to women prisoners on an equal basis with women of the same age in the community.”

As previously stated, the profile of women in prison can often differ from that of men, and this extends to their histories of abuse and/or mental illness. For this reason, places of detention for women should take account of gender-based needs in relation to mental health supports. Rule 12 of the Bangkok Rules (2011) states that “individualized, gender-sensitive, trauma-informed and comprehensive mental health care and rehabilitation programmes shall be made available for women prisoners with mental health-care needs in prison or in noncustodial settings.”

## Primary Healthcare

### **General Practice**

- 4.20** The Dóchas Centre was served by one full-time General Practitioner (GP). On weekends, support cover is provided by a locum doctor. Women could access the GP by making an appointment request to prison or service staff. Between March 2023 and September 2023, 41 women were referred to the GP in this manner. Alternatively, each house was individually called to medication rounds in the morning and prisoners could be brought to the healthcare corridor to seek an appointment.

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<sup>102</sup> Council of Europe (2019) Organisation and Management of Health Care in Prison Guidelines, pg. 22.

Overall, access to the GP was efficient. The healthcare team reported that, typically, most women were seen by the GP on the same day as requested or within 24 hours. In some instances, non-urgent or follow-up cases were scheduled for a later time, but within an appropriate timeframe. Through the survey, women reported similar perceptions of their access to the GP; 35% of survey respondents (24 of 68) reported that they would be seen by the GP within 48 hours. Commendably, at the time of the inspection there were no women on the waiting list to meet with the GP.

- 4.21** In total, 452 GP appointments took place over the Q1 2023 period. This ranged from 0 to 12 patient appointments per day, with an average of 5 patients seen each day.
- 4.22** Healthcare staff capitalised on the opportunities to bolster health-based interventions for women during their time in prison. The primary healthcare team focused on achieving stability in health and reconnecting women with essential services and screenings that, for many reasons, they may have become disconnected from in the community.

### **Nursing**

- 4.23** There were seven nurse officers on the healthcare team, overseen by one Chief Nurse Officer. Access to nursing care was very good, and accessible through the same pathways as described for GP care. From the survey, 77% of women (51 of 66) surveyed reported they could meet with a nurse within 48 hours of making a request.
- 4.24** The Inspectorate found the healthcare team to be committed to the welfare of women in the Dóchas Centre. They provided holistic long-term therapeutic care to women who were both vulnerable and clinically complex. The commitment of the clinical team was apparent to the Inspectorate, with both the nurses and GP providing strong advocacy around care and individualised support to the women in their care.
- 4.25** However, there was evidence of under-resourcing within the healthcare team. Healthcare staffing remained at the level that was commissioned for a prison capacity of 105 women; yet at the time of the inspection there were more than 150 women in prison.<sup>103</sup> The nursing team provided a 24 hour service 365 days a year, with only one nurse manager. At night, there was one nurse covering the prison and there were a number of women in the HCU at any one time with complex additional needs, as well as the requirement to undertake new committal assessments. As in other prisons, this staffing arrangement raises the concern that, in the event of an emergency, one individual would not be able to provide sufficient coverage to the prison.
- 4.26** A further concern is that the primary healthcare team at the Dóchas Centre was not supported by administrative staff. Consequently, healthcare staff were required to assume all administrative duties in addition to their clinical workload. Clinical time, particularly that of the nursing staff, was absorbed by administrative work such as communication with external health and allied services which is often very time-consuming. The administrative burden could pose a detrimental effect on health outcomes for women in prison, as both patients and the healthcare team struggled to stay informed where complex care and external services were required.

**The absence of administrative support presents a major gap in terms of healthcare provision; it creates a significant drain on clinical time and resources, and can affect healthcare delivery.**

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<sup>103</sup> There were 153 women in the Dóchas Centre on the first day of the general inspection, 19 September 2023.

The Irish Prison Service's *Health Care Standards*<sup>104</sup> recognises the importance of administrative responsibilities in healthcare delivery and states that "appropriate administrative support will be provided" in support of primary care delivery (Standard 2, 2.1.4). **Appropriate administrative staffing resources must be provided to address this gap across the prison estate.**

### Preventive Healthcare

- 4.27** Prisons provide primary healthcare services for people in prison. Embedded and routine preventive healthcare programmes should be an essential component of the healthcare services offered in prison. Examination of the healthcare services in the Dóchas Centre showed good evidence that access to contraceptive advice, menopause advice, smoking cessation, and cancer screenings were in place and offered in a timely and appropriate way.
- 4.28** In terms of contraception, women of child bearing age were offered a consultation and advice on short and long-acting contraception. Women could also avail of contraceptive implantation devices and the contraceptive coil.
- 4.29** In regard to support for menopause, the healthcare team informed the Inspectorate that all women who presented as symptomatic were offered GP review. The healthcare team noted that it was difficult to determine the number of women who met with the healthcare team to seek menopause advice as this information is not categorically collated within PHMS.
- 4.30** Access to the national screening programmes for cervical cancer and breast cancer was also in place. In relation to screenings for cervical cancer, women aged 25 to 65 were invited to attend screenings, as aligned with the national programme. Eligibility for screening was checked against the cervical screening register.

In the 12 months prior to inspection, 71 women availed of cervical check screenings. The healthcare team noted that women on short remand were not routinely offered cervical check screenings; however screenings could be arranged if they were explicitly requested. **The Inspectorate urges the healthcare team to extend invitations for screening to women on short remand, to ensure that they can avail of vital preventive screenings.**

The healthcare team reported that the proportion of abnormal smear results and positive HPV results were observed at a rate higher than the national average. This may be attributed to lifestyle or not attending screening services in the community. This pattern of results is concerning, and further underlines the importance of connecting women, regardless of sentence status, with screening services.

- 4.31** Women were also referred to symptomatic breast clinics by the GP following a clinic exam. Referrals of this kind were made for women under the age of 50 with a strong family history of breast cancer or who presented with a concerning symptom. Ten such referrals were made in the 12 months preceding the inspection.

In line with the national programme, Breast Check, women between the ages of 50-69 years were invited to receive a free mammogram every two years. Women were offered referral to the programme once sentenced, or if they were on a long period of remand. At the time of inspection, 13 women were in this age bracket. The healthcare team reported that many women chose not to avail of the referral from prison, and opted instead to attend screening on release.

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<sup>104</sup> Irish Prison Service (2011) *Health Care Standards*.

As in the case of cervical screenings, **the Inspectorate urges the healthcare team to ensure that access to Breast Check screenings be facilitated regardless of sentencing status or length.**

- 4.32** In relation to harm reduction, initiatives such as needle exchange programmes had reportedly not been instituted due to a belief that such practices could encourage behaviours of concern, rather than help prevent harm. Evidence internationally does not support this approach.

For example, the World Health Organisation (WHO) has noted that health protection in prison involves the reduction of hazards in the prison environment which include the availability of harm reduction services. Given the commonality of drug use in prisons, the WHO recommends that health intervention packages include harm reduction interventions such as needle and syringe programmes, opioid agonist maintenance therapy and naloxone for overdose management.<sup>105</sup> Furthermore, the European Monitoring Centre for Drugs and Drug Addiction notes “prisons can be a core setting for engaging with people who inject drugs and who may have been hard to reach in the community, allowing the provision of harm reduction, counselling, testing and treatment services before they return to the community”.<sup>106</sup>

The approach to harm reduction in the Dóchas Centre at the time of inspection did not sufficiently align with international standards in the area of harm prevention in prison settings.

## Specialist / External Healthcare Services

### In-Reach Specialists

- 4.33** A chiropodist attended the prison for a full day clinic approximately every eight weeks. The most recent clinic prior to the inspection occurred in late August 2023. At the time of the inspection, there were nine women on the waiting list for the next clinic.
- 4.34** A full day clinic was run by an optician every quarter. The most recent clinic prior to the inspection was conducted in early September 2023. At the time of the inspection, there were three women on the waiting list.
- 4.35** As mentioned, in-reach specialisms for occupational therapy, physiotherapy, and colposcopy were not in place. The healthcare team noted that the addition of physiotherapy and colposcopy, in particular, would be desirable to support the profile of clinical needs in the Dóchas Centre. The absence of access to specialities represented a lack of equivalence of healthcare to that found in the community.
- 4.36** In relation to transgender people in prison, the Irish Prison Service did not have in place a policy to explicitly recognise the health supports required to support this group of patients. Reference has already been made (see Section 2.116 – 2.124) to one transgender prisoner, Prisoner A, being held in the Dóchas Centre at the time of the inspection.

Guidance set out by the European Committee for the Prevention of Torture has highlighted the importance of healthcare for transgender people in prison.<sup>107</sup> In addition, the CPT has stated that education on transgender prisoners is essential for healthcare staff.

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<sup>105</sup> WHO (2021) The WHO Prison Health Framework –A Framework for assessment of prison health performance, and WHO (2021) Recommended Package of Interventions for HIV, Viral Hepatitis and STI prevention, Diagnosis, Treatment and Care for People in Prisons and Other Closed Settings.

<sup>106</sup> European Monitoring Centre for Drugs and Drug Addiction (2023) Prisons and Drugs: Health and Social Responses.

<sup>107</sup> CPT (2024) Transgender Persons in Prison.

As a particularly vulnerable cohort, often with greater risk of suicide and self-harm, the CPT has strongly emphasised the need for access to mental health and psychosocial supports. Of note, Prisoner A was not engaged with psychology services at the time of the inspection.

Positively, healthcare and psychology staff working in the Dóchas Centre exhibited a strong understanding of the practical challenges involved in supporting women with a transgender history. In developing a policy on the treatment and management of transgender people in custody, the Inspectorate urges the Irish Prison Service to ensure that the healthcare team in the Dóchas Centre are meaningfully represented with any group created to develop this policy.

- 4.37** The Inspectorate noted effective access to specialist care could, at times, be impeded. In instances in which secondary care speciality involvement was sought or ongoing, there were examples of communication and integration challenges with acute services.<sup>108</sup> These challenges were largely a consequence of the lack of administrative supports, resulting in the burden of administrative liaison with acute services falling on an under-resourced nursing team with competing priorities. This issue again underscores the importance of having effective administrative supports in place for healthcare delivery, in particular so as not to negatively impact access to treatment or patient outcomes.

### **Dentistry**

- 4.38** In-reach dentistry was provided by Dublin University Dental Hospital. A dentist and dental nurse attended the prison one day per week for clinic, with a further half-day undertaken for administrative work in support of the clinic. Positively, clinical hours had been expanded from one half day per week to a full clinical day, in the previous 12 months.
- 4.39** Referrals to dentistry could be made by the GP or the nurse. It was reported that women also self-referred, in that written requests for appointments were regularly slipped under the dental office door by women in the prison. These requests were accepted by the dentistry team for appointment. However, although open and accessible, it was a method by which requests could be mislaid and go unprocessed.

Typically, six to eight women were seen by the dentist each week. As of 22 September 2023, there were 15 women on the wait list for dentistry. Women's perceptions of the amount of time they spent waiting for a dentist appointment was much greater than for other services. Among women who were surveyed, 78% (46 of 59) reported that it took at least a month to be seen by the dentist. Access to dentistry was also commonly raised as an issue among many of the women spoken to by the Inspectorate, and also by prison staff who raised concern on the women's behalf regarding wait times.

- 4.40** Preventative dental care was offered to women already attending the service. For example, advice on oral health, brushing, smoking cessation, and dentures was provided. The Inspectorate noted there was a missed opportunity to develop a more proactive and assertive approach to the provision of preventative dental care and patient education.
- 4.41** Dentistry staff reported that women's entitlements to dental care varied depending on both their committal status and sentence length. It was reported that women on remand or serving less than sixteen months were entitled to extractions, temporary fillings and primary root canal work only.

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<sup>108</sup> Acute services are healthcare services such as inpatient scheduled care, unscheduled emergency care, outpatient and diagnostic services, cancer care and maternity care.

Those serving more than sixteen-month sentences were reportedly additionally entitled to two permanent fillings per year and could apply for sanction to have other procedures, such as cleaning, denture fitting, and full root canal treatment. Dentistry staff indicated that women serving life were entitled to an annual dental cleaning, in addition to the entitlements for sentenced women.

This difference in entitlements greatly disadvantaged women serving short, or in particular, repeated, short sentences, or those on longer remand. Although women on remand had the possibility to access private dentistry, dentistry staff were not aware of any instances in which this had been availed of. **Access to essential healthcare treatment such as dentistry should not be contingent on one's sentence status or length. The Inspectorate urges the IPS to review its policy concerning dental healthcare provision.**

## Mental Healthcare

- 4.42** Mental healthcare was provided to women in prison through psychology services based in the prison and a psychiatry in-reach team. These services, as described in **Table 5**, were responsible for the mental health care of approximately 150 women.

Mental health was identified by women in prison, prison staff, and service staff as a pressing matter within the Dóchas Centre. Among women who took the survey, insufficient help for mental health problems was rated by survey respondents as the third most significant issue in the prison (42%, 38 of 91). Relatedly, 84% of women (81 of 96) surveyed reported that the prison was not equipped to support people with mental health needs.

- 4.43** Prison and service staff also recognised the urgency of mental health issues within the prison. Among members of staff who took the survey, mental health supports for prisoners was ranked as the third biggest issue within the prison (61%, 33 of 54). Staff shared important insights into the pressures on daily life at the Dóchas Centre created by the prevalence of mental health issues:

*“The types of issues that women are coming into custody with such as mental health, drug addiction, the effects of which are becoming more extreme. Staff get very little formal training in these areas and continue to deal with the women in very professional ways, helping them through their time in prison in the best way possible. Dealing with these issues is causing staff to have mental burnout and stress.”*

*“Staff are entirely under-qualified to deal with the level of mental health issues we are faced with in this jail. The situation is becoming worse year on year.”*

These concerns were further compounded by frequently low staffing numbers and feeling unequipped to appropriately support women who have a mental illness.

### 4.44 Psychology

Referral pathways to psychology services included requests made through healthcare staff, prison officers or self-referrals.

As of 21 September 2023, 28 women had regular access to psychology services in the Dóchas Centre. The waitlist on this date indicated that a further 44 women were seeking engagement with psychology services. Of those on the waitlist, a proportion were on temporary release or unlawfully at large, engaged with other services or referred to the service more than once. With those individuals removed, the number on the waitlist was 27 women.

Of these, the longest wait time faced by a woman who was present in the prison at the time of an inspection was six months (referral made in early March 2023).

The Inspectorate spoke with many women who reported difficulty in receiving an appointment with psychology services, and it was a palpable source of concern. Psychology wait times and interventions were comparable, or compared favourably, to wait times for intervention in the community. However, it is the responsibility of the Irish Prison Service to provide both therapeutic and rehabilitative support to those in prison.

- 4.45** The Assistant Psychologist position remained vacant over the duration of the inspection. However, it was reported that the Staff Grade post was filled following the inspection, and it was hoped that this addition would impact favourably on wait times and available interventions.
- 4.46** As with the primary healthcare team, administrative supports for psychology services were not in place; this caused a further burden on practitioners who had to assume these duties.
- 4.47** The Inspectorate welcomed efforts made by the psychology service to adopt a gender-informed approach in its supports and interventions. Psychology staff recognised the differing criminogenic pathways for women, women's differing needs in relation to psychosocial supports, as well as the importance of trauma-informed practice.
- 4.48** In 2015, a review of IPS Psychology was undertaken called New Connections or the Porporino Review.<sup>109</sup> The review identified a lack of a *dedicated* psychology resource at the Dóchas Centre; psychology staff at that time were shared across the Mountjoy campus. This was critiqued as "inconsistent" with international efforts to provide women with an array of gender-responsive interventions to support desistance and resettlement, as per the Bangkok Rules (2011).

It was positive to note that since the Porporino Review, the Dóchas Centre has established a dedicated psychology services team. However, at the time of the inspection, the team was, at times, obligated under current IPS Psychology Service policies to provide risk assessments and reports for the male prison population. Significant improvements have undoubtedly been made in the provision of a dedicated psychology service for women in prison. However, this service is somewhat eroded by having additional commitments to men in prison.

- 4.49** In response to the Porporino Review, the Irish Prison Service asserted "in view of the fact that well-coordinated throughcare for women is perhaps an even more critical requirement for their success in resettlement, the Dóchas Centre psychologist should also devote a portion of their time to working with women following release". This may for example, include collaboration with HSE Community Mental Health Teams or NGOs when women leave prison and are transitioning to supported accommodation or tenancies.

Changes to one's professional healthcare support team can prove to be a sensitive transition point for people leaving prison. Continuity of care through shared formulation and intervention can be effective supports in managing risk of harmful substance use and recidivism. There was no evidence of this approach to throughcare treatment having been operationalised at the time of the inspection.

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<sup>109</sup> JF Porporino (2015) New Connections: Embedding Psychology Services and Practice in the Irish Prison Service. Dublin: Irish Prison Service.



- 4.50** The long absence of a Rape Crisis Centre (RCC) counsellor was reported by both staff and women in prison as a major deficit in service provision. Women who were unhoused or had insecure living environments were more likely than men to seek out unstable accommodation or stay within unsafe relationships that provide some form of accommodation, and therefore may be more vulnerable to sexual exploitation as a result. It was also noted by clinical staff that sometimes women came into the Dóchas Centre within 24 hours of having been sexually assaulted.

Staff informed the Inspectorate that when it was in place the RCC service was greatly valued by women in the Dóchas Centre as it was a support that was fully independent of the IPS. In its thematic inspection on the provision of psychiatric care, the Inspectorate recommended that the vacant post be filled as a matter of urgency.<sup>110</sup>

**Positively, the Inspectorate was informed at the close of the inspection visit that a RCC counsellor had been identified to take up post at the Dóchas Centre.**

### **Psychiatry**

- 4.51** Detail about the provision of mental health care in the Dóchas Centre, and across the prison estate, can be found in the Inspectorate's 2023 Thematic Inspection report of the provision of psychiatric care to people living in prisons in Ireland.<sup>111</sup> The report notes the high number of committals at the Dóchas Centre resulting from service failures in the community, as well as the difficulties of transferring women from prison to psychiatric hospitals.

At the time of the inspection, the primary healthcare team reported there were three women in the Dóchas Centre who were unfit for detention and under the care of the in-reach psychiatry team. One woman was under consideration for admission to the NFMHS, and another was accepted and awaiting admission to an approved centre in the community.

- 4.52** Concerns were raised by women that access to psychiatric services was impeded at times by refusal on the part of the healthcare team to refer onwards. This included instances where women reported they were under the care of adult community mental health teams (CMHT) (as opposed to a GP) prior to entering prison. A change in catchment area due to change in residence in the community would typically result in transfer between CMHTs at secondary care level, rather than require re-referral from primary care via GP in the new location. This risked delays and disruptions in continuing access to secondary care. In terms of equivalence of care, it would seem reasonable that, **in instances where a woman is incarcerated who was under the care of a CMHT, the healthcare team should transfer care to the NFMHS in-reach team, without the need for referral from the prison GP.**

In the community, individuals who were not under the care of a CMHT but who wished to have a psychiatric consultation, could initially request same via their GP. If a GP formed the opinion that this was unwarranted, an individual had the option of paying for a second opinion. Consideration should be given to how such access to a second opinion / appeal as a component of equivalence of care, can be supported within IPS.

- 4.53** As prisons are not approved centres under the Mental Health Act, equivalence of care for prisoners when in-patient admission is deemed appropriate can only be offered by the NFMHS at its Portrane complex.

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<sup>110</sup> OIP (2023). Thematic Inspection: An Evaluation of the Provision of Psychiatric Care in the Irish Prison System.

<sup>111</sup> OIP (2023) Thematic Inspection: An Evaluation of the Provision of Psychiatric Care in the Irish Prison System.

Given that bed availability has, for a number of years, not matched the demand from the Prison Service, the Dundrum Toolkit has been utilised to quantify level of need and prioritise people for admission.

There have been some concerns that in its original form, the Dundrum Toolkit may not give adequate weight to time left to serve. Without due consideration of time left on an individual's sentence when considering admission, this would likely disadvantage those with acute needs serving longer or indeterminate sentences, as they risk repeatedly being "leap-frogged" on the wait list by people who may in the short term be able to access acute in-patient services through the community route post release.

- 4.54** As highlighted in the Inspectorate's recent thematic report on psychiatric care in Irish prisons, pathways to mental health services in the community and to the NFMHS hospital remain a significant challenge. For women in prison with a severe and enduring mental health diagnosis or an intellectual disability, the services are extremely limited as there is a failure to bridge care between the prison and the acute sector.

A stark example of this was a woman with high clinical need held in the HCU who was referred by the treating psychiatrist as urgently requiring a Mental Health Act assessment and admission. However, this was not supported by the HSE in a timely fashion. A difference of view around acuity and trajectory of this woman, meant that the Dóchas Centre's psychiatry team had no choice but to manage an acutely psychotic patient for weeks in a deprived and non-therapeutic environment that likely worsened her health and other outcomes.

- 4.55** The Inspectorate has previously recommended that "urgent consideration be given to the systemic changes that are required to facilitate the swift transfer of minor offenders who have mental disorders to local psychiatric hospitals".<sup>112</sup> In response, the Irish Prison Service agreed with the principle of this recommendation but identified the need for support from the Department of Health to ensure its implementation.

### **Suicide and Self-Harm**

- 4.56** The 2011 Irish Prison Service Health Care Standards, Standard 3 on Mental Health Services<sup>113</sup> sets out a recommended approach to provision of mental health care in the prisons. This states that there should be: "appropriate implementation of, a) promoting and protecting mental health and b) policy on preventing self-injury among prisoners" within the prison.
- 4.57** In the 12 months prior to the inspection (September 2022 - September 2023) there were 157 recorded instances of self-harm and suicide attempts at the Dóchas Centre. A high proportion of the total number of instances (78%, or 123 instances) took place between September to November 2022. During this period, there were two women in the prison with diagnosed intellectual disabilities who had repeated self-harm behaviours and accounted for the majority of these instances. Excluding these three months, the average number of instances per month was three. However, it should be noted that the Inspectorate has concerns about the veracity of the data in this area given a siloed approach to record-keeping (see 3.3 - 3.4).
- 4.58** 59% of women who took the survey (57 of 96) disagreed that the prevention of suicide and self-harm was a priority in the Dóchas Centre. Relatedly, women were discernibly concerned about mental health issues and timely access to necessary supports (see Section 4.81-4.82).

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<sup>112</sup> OIP (2023) Thematic Inspection on Provision of Psychiatric Care, Recommendation MHT23.

<sup>113</sup> Irish Prison Service (2011) Healthcare Standards.

- 4.59** As previously mentioned, prison staff felt under-equipped to support women to deal with mental health issues, self-harm, and suicidal ideation and behaviour. For example, one member of staff stated, “[...] (with) *the overcrowding and increase in people with serious mental health conditions entering the general population it leaves staff dealing with tough situations on their own.*”

The majority of staff survey respondents (73%, 40 of 55) indicated they did not feel well-equipped to manage the mental health needs of people in the Dóchas Centre. In addition, 67% of staff respondents (36 of 54) reported they were dissatisfied with the level of training offered to them on supporting people in prison with mental health issues.

- 4.60** Staff also highlighted gaps in provision in relation to safeguarding their own mental health in response to witnessing difficult or traumatic situations. One staff member stated, “*Management at present do not consider the mental health of staff when having to deal with traumatic incidents*”

Among staff who took the survey, mental health supports for staff were regarded as one of the biggest challenges in the prison (reported by 56% of respondents, 30 of 54). As emphasised in the Inspectorate’s thematic report on psychiatric care, **greater efforts should be made to provide prison staff with appropriate support and training to equip them to meet the challenges of working people in prison with mental health needs.**<sup>114</sup>

## Addiction

- 4.61** Merchants Quay Ireland are contracted to provide substance use services in the Dóchas Centre. Staffing at the Dóchas Centre was comprised of one 0.2 WTE Senior Addiction Counsellor and two Addiction Counsellors (1.0 WTE combined). Referrals could be made to the MQI team directly, through the primary healthcare team, the ISM Officer or women could make a request on committal.

On 20 September 2023, 65 women in the Dóchas Centre were on methadone. The GP described the Addiction Service as being “*swamped*”, whilst MQI Addiction Counsellors referred to the waitlist as “*a challenge*”. On 21 September 2023, there were 36 women on the waitlist to see addiction counsellors.

- 4.62** The approach to addiction services differed to that in the community, with all interventions reported to be in a one-to-one format. MQI noted there had been no physical space to run group sessions for the past 2.5 years and that ideally they should be able to run preparatory groups for women prior to attending community based group treatment programmes. This should be a priority for implementation by local management. Healthcare staff proposed that the addition of a large therapeutic space would be of great benefit for supporting psychosocial needs. The feasibility of creating such a space or utilising existing spaces for this purpose should be examined by prison management.

- 4.63** Women on remand represented almost one-third of the population at the time of the inspection (32%).<sup>115</sup> Several professionals and women in prison themselves, referred to re-entering the prison over time as “*doing a life sentence in intervals*”. In terms of accessing addiction services, this cohort of women can be disadvantaged by the MQI wait list which operates by referral date only. Healthcare staff also highlighted this practice as causing “*difficulties for women accessing these services*”.

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<sup>114</sup> OIP (2024) Thematic Inspection on Provision of Psychiatric Care, Recommendation MHT8.

<sup>115</sup> Dóchas Centre population as of 20 September 2023.

In effect, women lose their place on the wait list upon leaving prison; this particularly disadvantaged women who repeatedly entered prison on short sentences. This group was extremely vulnerable to not being seen at all when a wait list system operates solely by date referred. The recommendations of the Porporino Review addressed similar concerns in relation to wait listing for psychology services, and policies developed and implemented since that time would be helpful to consider in this instance.

#### **4.64 Healthcare Delivery Assessment**

*Overall, there was evidence that the healthcare team at the Dóchas Centre was committed to the women's welfare. Women in prison presented extremely complex and challenging personal health histories; focus was placed on meeting and stabilising women's immediate healthcare needs.*

*There was good evidence of gender-responsiveness in relation to the provision of primary healthcare, mental healthcare, and preventive healthcare. However, in line with Rule 18 of the Bangkok Rules (2011), invitations to preventive screenings should be extended to all eligible women as is done in the community, regardless of their conviction status or sentence length.*

*The Inspectorate noted the healthcare team was under-resourced, with staffing modelled on outdated capacity numbers for the prison. The introduction of administrative support for the healthcare team and a second night nurse would be of benefit in supporting healthcare delivery.*

*It was positive to note that clinical hours for dentistry had been increased in the 12 months prior to inspection. There remain significant concerns in relation to the discrepancy of entitlements for dental care that are based on conviction status and sentence length, particularly given the high proportion of women on remand within the prison.*

*It was not possible to determine the number of women who met with the healthcare team to seek menopause advice as this information is not categorically collated within PHMS.*

*Both women in prison and prison staff highlighted the issue of mental health within the prison. Augmented supports and facilities for both women and staff would be welcome; for example, space to allow for group interventions, and additional mental health training for prison staff. Communication of wait times for services could also be improved.*

*As previously described in the thematic report on psychiatric care, there is a need to strengthen clinical pathways to ensure swift transfer of people to community-based and hospital-based psychiatric care facilities, where appropriate. Significant challenges remain in this respect which results in deleterious consequences for people in custody who are being treated in a wholly inappropriate environment.*

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#### **4.65 RECOMMENDATIONS**

##### **To the Director General of the Irish Prison Service:**

**Repeat Recommendation MHT8 (2023):** It is recommended that further formal training regarding the recognition, assessment, and treatment of prisoners with mental disorder, including regarding communication and risk issues, is offered to prison officers.

**Repeat Recommendation MHT9 (2023):** It is recommended that the provision of individual and/or group psychological support sessions (e.g., monthly) are offered to prison officers, with particular emphasis on those staff working in areas where the level of mental disorder is more acute, such as the special units where such prisoners are accommodated.

**Recommendation DG23-16:** It is recommended that the nurse staffing complement in the Dóchas Centre is augmented to provide adequate cover on night duty, and to ensure that night cover is not staffed by just one individual.

**Recommendation DG23-17:** It is recommended that, in line with the Irish Prison Service (2011) *Healthcare Standards*, administrative support staff are employed alongside clinical staff to support in the delivery of essential healthcare services.

**Recommendation DG23-18:** Policies for dental care should be reviewed to, at a minimum, align entitlements for remand prisoners to that of sentenced prisoners and to promote equivalence of healthcare services with those available in the community.

**Recommendation DG23-19:** In line with the 2015 New Connections report, and international best practice, improved linkages between IPS Psychology, community-based services and step-down initiatives should be explored.

**Recommendation DG23-20:** An immediate review of the wait list management procedures for addiction services should be undertaken. An agreed written policy should be developed between MQI and IPS that explicitly addresses efforts to engage women on shorter and recurring sentences.

**Repeat Request for Information DGREQ23-1** (*request also made in relation to Cloverhill Prison*): The Inspectorate requests status updates on recommendations made based on findings from the 2023 Thematic Inspection: An Evaluation of the Provision of Psychiatric Care in the Irish Prison System, particularly those that were identified by the Irish Prison Service as requiring commitment and action from other bodies, including the National Forensic Mental Health Service. These recommendations are: MHT5, MHT6, MHT7, MHT11, MHT14, MHT23, MHT24 and MHT25.

#### **To the Governor of the Dóchas Centre:**

**Recommendation DO23-16:** The Inspectorate urges the healthcare team to extend invitations to preventive health screenings, in particular for cervical and breast checks, to women on remand.

## **C. Healthcare-Informed Decision Making**

- 4.66** Healthcare professionals working in prisons play a key role in assessing and informing decision-making relevant to individual prisoners, including at points of heightened vulnerability, such as on committal to the prison and when separated from the general prisoner population.

Upon committal, it is the responsibility of the prison doctor to examine a prisoner on the day of his or her admission for the purpose of diagnosis of any physical or mental illness, isolation on medical grounds, determination of a prisoner's fitness to work, the noting of any physical or mental health conditions, any indication of a prisoner's injuries and the recording of any prescribed medication.<sup>116</sup> If a doctor is unavailable for a committal assessment, in exceptional circumstances, it is the responsibility of the nurse to conduct a preliminary committal screening.<sup>117</sup>

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<sup>116</sup> Prison Rules 2007-2020, Rule 11(1) (a-f).

<sup>117</sup> Prison Rules 2007-2020, Rule 11(2).

Prison doctors also have a duty to communicate with the Governor of a prison on any aspect of the prison environment or regime that may be harmful to the physical or mental health of any prisoner, any group of prisoners, any prison officer or anyone working or visiting a prison.<sup>118</sup>

In situations where medical professionals are involved in decision-making related to the isolation of a prisoner, the World Medical Association (2019)<sup>119</sup> recommends that physicians should not participate in the decision making processes which determine whether an individual is “fit” to undergo solitary confinement. Further, the CPT states that “A prison doctor acts as a patient's personal doctor. Consequently, in the interests of safeguarding the doctor/patient relationship, he should not be asked to certify that a prisoner is fit to undergo punishment”<sup>120</sup>. The role of medical personnel includes a particular focus on the health of prisoners in solitary confinement, including visiting them daily, as well as a duty to inform the director of the prison when continued solitary confinement would put a prisoner’s physical or mental health seriously at risk”<sup>121</sup>.

## Healthcare Input

- 4.67** There was evidence of a good working relationship between healthcare staff and prison management. Both healthcare staff and prison management reported that this relationship was generally positive and that communication was open and constructive. Some examples of good collaboration included the provision of training to prison staff by members of the healthcare team, and evidence of good participation and communication in the management of prisoners at multi-agency meetings (MAMS).

The Inspectorate reviewed MAMS minutes for the three month period preceding the inspection visit. Meetings took place at weekly intervals, and were attended by both operational prison staff and healthcare staff, as well as service staff (for example, Chaplaincy and the Probation Service).

- 4.68** It was positive to note that the healthcare team was consistently represented at MAMS. There were some issues concerning record-keeping; minutes for three meetings during the period reviewed were not available, and on some occasions, there was no administrative support available to record minutes; this duty was assumed by a member of the healthcare team. As many important decisions and actions regarding the welfare of women are taken at these meetings, it is important that record-keeping is maintained.
- 4.69** Typically, between six and ten women were discussed at each MAMS. Positively, meeting minutes reflected a strong focus on health concerns, particularly mental health, necessary assessments and diversion pathways. Plans for arranging suitable accommodation on release were also discussed.
- 4.70** Outside of MAMS, there were opportunities to improve the extent to which the healthcare team provided input into wider decision-making within the prison; for example, in the areas of exercise, nutrition and education. The Inspectorate would welcome further examples of input of this kind.

## Committal Process

- 4.71** The healthcare team was responsible for conducting medical interviews with all people newly committed to the prison. These interviews could be conducted by any of the seven nursing staff or the GP. All medical committal interviews took place in the surgery area.

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<sup>118</sup> Prison Rules 2007-2020, Rule 104.

<sup>119</sup> World Medical Association (2019) Statement on Solitary Confinement.

<sup>120</sup> CPT (1992) Third General Report – Health Care Services in Prisons, (CPT/Inf (93)12) ¶73.

<sup>121</sup> European Prison Rules (2020), Rules 43.2 and 43.3.

The interview covered the individual's medical history, possibility of withdrawal symptoms, psychological needs, links to healthcare in the community, as well as possibility of pregnancy. Any injuries observed were assessed and documented on the PHMS.

**4.72** In the case of women in prison whose first language was not English, the healthcare team reported there was a contracted interpretation service in place. Interpreters could be availed of over-the-phone and in-person, as required. However, this service was not commonly used.

**4.73** The healthcare team noted that a history of sexual assault was commonly disclosed by women during committal interviews. In formulating its approach to support and intervention, the healthcare team considered a number of factors - including when the assault occurred, present healthcare issues, and the duration of time the individual would spend in prison. Women were linked with the local Sexual Assault Treatment Unit (SATU). The healthcare team in the Dóchas Centre reported that it had a close working relationship with the local SATU in the community.

**4.74 Assessment of Healthcare-Informed Decision-Making**

*Overall, there was a positive relationship and good collaboration between healthcare staff and prison management; however, consultation of the healthcare team in wider decision making that shapes the prison regime would be a welcome inclusion.*

*During medical committal assessments, greater efforts should be made to avail of interpretation services to allow for effective communication and to ensure that medical histories are being accurately relayed.*

## **D. Patient Experience**

**4.75** All patients in prison should be treated with the same respect and dignity as any patient who is not in a prison.<sup>122</sup> Many prisoners, including women, prisoners with disabilities, ethnic minorities, foreign national prisoners, LGBTIQ+ prisoners and elderly prisoners, have needs that require special healthcare considerations.<sup>123</sup> These considerations may take account of cultural or ability needs, and as such all healthcare services provided to prisoners should be free from discrimination, promote equality of opportunity and treatment and should protect the human rights of people to whom healthcare services are provided<sup>124</sup>.

Patients should be encouraged to participate in decision-making about their own healthcare<sup>125</sup> and information should be provided to facilitate patients to make informed healthcare decisions.<sup>126</sup>

Medical consultations should respect the privacy of prisoners (i.e., these consultations should take place out of sight and hearing from others).<sup>127</sup> Requests made by prisoners to access healthcare consultation should be on a confidential basis and without selection barriers by non-medical staff. Information on how to access medical consultation and on the organisation of health care should be provided to every newly admitted person, preferably in written form<sup>128</sup>.

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<sup>122</sup> Prison Rules 2007-2020, Rule 100(1)(c).

<sup>123</sup> WHO (2014) Prisons and Health, pgs 151-171.

<sup>124</sup> European Prison Rules 2020) Rule 40.3, and see Irish Human Rights and Equality Commission Act 2014, Section 42(1).

<sup>125</sup> Prison Rules 2007-2020, Rule 100(1)(e).

<sup>126</sup> Prison Rules 2007-2020, Rule 100(1)(f)

<sup>127</sup> Prison Rules 2007-2020, Rule 11(7).

<sup>128</sup> Council of Europe (2019) Organisation and Management of Health Care in Prison Guidelines, pg. 22.



## Confidentiality

- 4.76** Generally, a good level of confidentiality was maintained for patients. Consultations and committal interviews took place in private, and prison officers were not present during these interactions.
- 4.77** Some minor improvements could be made to better ensure confidentiality and patient privacy. For example, soundproofing was an issue in some clinical areas such as the consultation rooms on the healthcare corridor. While not fully audible from adjacent rooms, privacy concerns could potentially inhibit patients from feeling free and comfortable in communicating with healthcare professionals.

As another example, the queueing system at medication rounds was observed to have separate queues for methadone and all other medications. This system inadvertently identified women choosing to engage in methadone maintenance / reduction. Consideration should be given as to how to rectify this practice and provide greater discretion to patients

## Patient Voice

- 4.78** Of much concern to the Inspectorate was a generally negative opinion on the part of women in the Dóchas Centre about the healthcare they received in the prison. Almost three quarters (72%, 70 of 97) of survey respondents reported they did not receive good healthcare. In addition to this, less than one in five women (17 of 97) reported that officers working in the houses took an interest in their health.
- 4.79** Many women expressed the view to the Inspectorate that they felt dismissed by the healthcare team. This manifested in women not feeling listened to, not feeling that their ailments were considered to be genuine, or that the concerns they raised were perceived by healthcare staff to be an attempt at drug seeking. One woman described an interaction which “*made (her) feel that small*”; another felt “*belittled*” and treated “*like dirt*” because she was perceived as an addict. Another woman shared, “*Just because you were on drugs they put you down. When you’re better, you’re always going to be a junkie to them.*”

Related to these experiences of feeling dismissed, some women expressed a reluctance to approach healthcare with their concerns, conceding “*I don’t go anymore*”.

These reported views are at odds with the Inspectorate’s own findings regarding the overall quality of healthcare available to women, suggesting that the interpersonal communication skills of some healthcare staff could be improved.

- 4.80** When combined with the Inspectorate’s findings about general prisoner-staff relations in the Dóchas Centre (see 2.87 - 2.91), the inhospitable relationship between some members of the healthcare team and women in the prison was all the more cause for concern.
- 4.81** Support for mental health also emerged as an issue in the prison. Among women who completed the survey, 42% of prisoners surveyed (41 of 95) reported they had been diagnosed with a mental illness; of those who reported having a diagnosis of mental illness, 81% (33 of 41) reported they were not getting the support they needed to manage their condition.
- 4.82** Delayed access to support services had a profound impact on women in prison. For example, one woman described attempts to seek supports elsewhere, such as through prison officers and participation in the school, but acknowledged that these were not appropriate alternatives.



*“When you’re talking to an officer, it’s not confidential. Everything comes back. They’re not trained to listen. So you are alone. [...] I am really struggling at the moment. School is great, but I go back to the room and I’m on my own.”*

Similarly, another woman reported there should be: *“more support for medical and mental healthcare. The prison officers are expected to be counsellors but aren’t trained to be.”*

#### **4.83 Patient Experience Assessment**

*While healthcare provided was generally of a good standard, many women expressed that they felt they were not listened to or dismissed by the healthcare team. This perception had an impact on women’s impression of quality of healthcare and also on their willingness to engage with healthcare services.*

*Many women also reported dissatisfaction at delays in accessing support services. This poses a concern as given the trajectory of growing numbers of people in prison; it is likely that demand for such services will continue to increase.*

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#### **4.84 RECOMMENDATION**

**To the Governor of the Dóchas Centre:**

**Recommendation DO23-17:** The healthcare team should examine opportunities for building positive patient relations and trust with women in prison. This may entail focusing on opportunities to enhance communication (i.e. health promotion, preventive healthcare offerings, engagement with external speakers) and to increase engagement with women in prison (i.e. women’s health forums, events and external speakers, informal mental health and addiction support).

## 5 REHABILITATION & DEVELOPMENT

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**5.1** The Inspectorate assesses how prisons support people living in prison to rehabilitate and re-integrate into the community. Drawing on national legislation and international standards, the Inspectorate evaluates the prison's *Rehabilitation and Development* performance across three themes:

- A. Purposeful Activity:** provision of and access to work training, library services, and exercise in the prison
- B. Education:** assessment of teaching and learning conducted by the Department of Education Inspectorate
- C. Contact:** prisoner experiences of meaningful human contact in prison, and with family and relatives

**5.2** The vision statement of the Dóchas Centre emphasises the centrality of rehabilitation to the ethos of the prison. The vision statement sets out,

*“We are a community which embraces people's respect and dignity.*

*We encourage personal growth and development in a caring and safe environment.*

*We are committed to addressing the needs of each person in a healing and holistic way.*

*We actively promote close interaction with the wider community.”*

Rehabilitative programmes and services were highly valued at the Dóchas Centre. In particular, the school was placed high on the Regime Management Plan (RMP); this ensured that when staffing shortages occurred, staff posted to the school are retained and access to the school could be preserved. Similarly, the high placement of the post of the Integrated Sentence Management (ISM) officer on the RMP meant that their post could be protected against frequent redeployment.

Both women in prison and staff members valued the role of rehabilitation within the prison. Of the women in prison surveyed, 41% (38 of 93) agreed that the education, work training, and other activities offered to them in the prison would benefit them upon release. Among prison staff, the vast majority (84%, 51 of 61) stated that prisoner rehabilitation was an important part of their work.

In order to be effective, rehabilitation and development must provide a clear pathway for progression<sup>129</sup>. The prison should offer a variety of rehabilitative opportunities to engage. Rule 25(1) of the European Prison Rules states that people in prison should be offered a regime that provides a “balanced programme of activities”. Moreover, people in prison should be aware of these opportunities and be in a position to not just participate, but contribute and meaningfully engage<sup>130</sup>. In addition, women's prisons must consider how the needs of women in relation to rehabilitation and development differs from that of men, and also consider rehabilitative opportunities from a gendered perspective.<sup>131</sup>

The inspection identified several key issues for rehabilitation and development at the Dóchas Centre. These included the lack of work training opportunities, the impact on women of the incentivised regime policy, hindrances to maintaining family contact, and the lack of opportunity for progression.

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<sup>129</sup> Council of Europe (2003) Recommendation Rec(2003)23 of the Committee of Ministers to member states on the management by prison administrations of life sentence and other long-term prisoners.

<sup>130</sup> See, European Prison Rules (2020) Rules 26(6), 26(8) and 27(6).

<sup>131</sup> UN Bangkok Rules (2015) Rule 42(1).

## A. Purposeful Activity

- 5.3** The Prison Rules 2007-2020, Rule 27(3) set out that, in so far as is practicable, prisoners must be provided with five hours of structured activity on each of five days in a week. In defining “structured activity”, the Prison Rules include work, vocational training, education or “programmes intended to increase the likelihood that a prisoner, when released from prison, will be less likely to re-offend or better able to re-integrate into the community.”

The concept of “structured activity” as referred to under Irish law<sup>132</sup> does not fully capture the potential impact that engagement with purposeful activity can have for people in prison. The notion of “purposeful activity” goes further and, alongside the aim of preparing people for re-integration into the community, promotes active community engagement by people in custody. Purposeful activity should benefit prisoners during their period of imprisonment, as well as support their rehabilitation and reintegration outcomes. The CPT has proposed that “a wider definition of purposeful activity should be developed on the basis that purpose is defined by the impact on an individual, rather than the nature of the activity and as such a wider range of formal and informal, individual and group activities can be considered purposeful.”<sup>133</sup>

## Progression & Opportunities for Self-Development

- 5.4** The IPS Incentivised Regimes (IR) Policy has the objective of motivating and rewarding prisoners for positive behaviour and engagement in the prison.

The IR Policy designates prisoners as being on a Basic, Standard or Enhanced regime.<sup>134</sup> The different regime levels determine prisoners’ weekly phone call allocation, their room assignment in the prison, and their weekly gratuity rate.

The Policy allows for flexibility in application across prisons, and defines engagement with services as:

“regular participation in education activities under the auspices of the prison education centre, work/training activities under the auspices of the Industrial Manager or equivalent and/or offender programmes and/or activities under the auspices of the Psychology and/or Probation Services or approved in-reach services. Certified attendance at activities outside the prison as part of an agreed programme will also confer eligibility.”

While the IR Policy is not designed to penalise people living in prison if prison operations result in them not being able to attend a scheduled activity, it does make clear that: “prisoners on waiting lists for structured activity will not be eligible for the enhanced regime.” Where access to activities is limited in a prison, there is a subsequent impact on access to the Enhanced regime, and therefore on access to family contact and gratuity payments.

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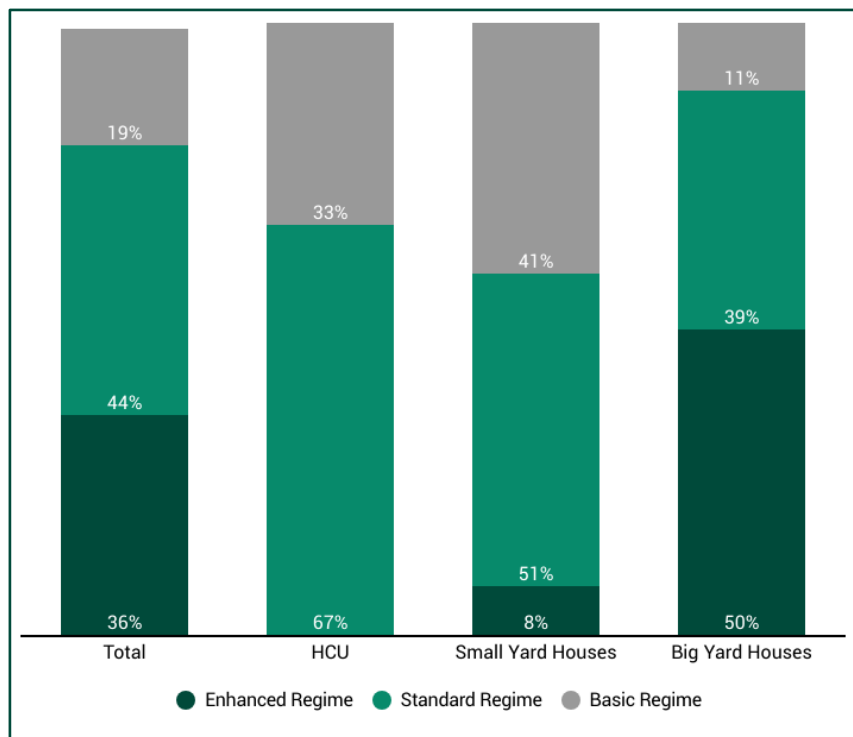
<sup>132</sup> Prison Rules, 2007-2020, Rule 27(1).

<sup>133</sup> CPT (2022) Report to the United Kingdom 2021, ¶51.

<sup>134</sup> The IPS Incentivised Regimes Policy (2012) provides for differentiation of privileges between prisoners according to their level of engagement with services and quality of behaviour.

- 5.5** In the Dóchas Centre, women who attended work training, education, or rehabilitative programmes received IR “stamps” which were used to track their engagement with services and activities. In line with the IPS Incentivised Regime policy, after four weeks of engagement and good behaviour, women could be considered for a move from the Basic regime to the Standard regime. After a further eight weeks on Standard, with continual engagement and good behaviour, they could then be considered for a move to the Enhanced regime.
- 5.6** **Figure 22** illustrates the proportion of women on each of the incentivised regime levels in the Dóchas Centre at the outset of the inspection. In total, across the prison, 36% of women were on the Enhanced regime, 44% were on Standard, and 19% were on Basic.

**Figure 22: Incentivised Regime by Area of the Prison, 19 September 2023**



- 5.7** As described in previous OIP inspection reports,<sup>135</sup> newly committed women were generally accommodated in the small yard houses. Then, through engagement and positive behaviour they could progress to houses off the big yard. With this in mind, it might be expected that there would be a higher proportion of women on Enhanced regimes housed off the big yard (50%) in comparison to the small yard (8%). However, the small yard houses were also used to accommodate women who had received disciplinary infractions and / or a drop in their Incentivised Regime; consequently, women in the Dóchas Centre described the small yard houses as “punishment” houses.

<sup>135</sup> OIP (2021), COVID-19 Thematic Inspection of Mountjoy Women’s Prison - Dochas Centre (14-15 September 2021), ¶1.4.

- 5.8** There was a perception among the women in prison that there were fewer opportunities for progression available to women housed on the small yard. This was reflected in the survey findings, with women in the small yard more likely to report they did not know how to progress within the prison (48%) when compared to women housed on the big yard (31%). More support should be given to women in the small yard houses to ensure they are aware of progression pathways within the prison, and the services and activities available to support this.

When speaking about the IR system, some women interpreted the system in disciplinary terms; they referred to “*getting an IR*” and receiving reduced privileges as punishment for an infraction.

- 5.9** A notable difference between women’s and men’s prisons in the Irish prison system is that women’s prisons are more constricted in their opportunities for progression. Both prison staff and women in prison drew attention to the lack of an open centre available for women. Additionally, there were extremely limited opportunities for work placements in the community that would allow for day release.

Women living in the Dóchas Centre tended to view Enhanced IR status as the ceiling for advancement within the prison. This was despite the fact that, as one woman commented, “*many women want to make a difference in their lives*”.

- 5.10** The Dóchas Centre offers several programmes and activities related to self-development. These include: the Alternative to Violence Project, a Befriender for women in prison, the Bridge Project, the Freedom Programme, the National Traveller Women’s Forum, the SAOL Project, and the STEPS Programme. The Inspectorate spoke with several representatives from these programmes. Through these conversations, some common themes emerged as to how programmes and activities could be better supported within the Dóchas Centre.
- 5.11** The Inspectorate was pleased to learn that most, if not all, programmes and activities took account of gender considerations in both their approach (tailoring the aims of the programme, a strong emphasis on trust-building, etc.) and content (topics, themes, and questions addressed, etc.). It was positive that some programmes had a strong focus on participant agency and encouraged women to contribute to the shape and focus of the programme. It was also commendable that, in many cases, women were encouraged to give feedback on the programme to the providers upon completion.
- 5.12** In speaking with providers, it was clear that staff support for programmes was critical. In some instances, members of prison staff had taken the programmes themselves; providers viewed this as very beneficial for developing an understanding of, and demonstrating support for, the objectives of their programmes.

Staff support was also required in a more fundamental way - to facilitate women’s access to attend the programmes. A commonly cited issue was that limited staffing availability could impact the running of programmes and activities. For example, unavailability of staff resources could result in a delay in the start times or early finishing times, or in some instances women were not collected to attend their programme. When this happened, it disrupted programme delivery.

**5.13** Another common issue related to available space on the prison grounds. The Dóchas Centre has limited space for rehabilitation and development activities, requiring programmes to be held in the school, in either small classrooms, the library space, or the gym. At times, scheduling conflicts meant that programmes could be relocated at short notice. There were also examples of small groups being held in a large space like the gym, in which the setting might be too cold in winter months; or examples of large groups of attendees squeezed into small classrooms. It is important that the providers are matched with an appropriate space to effectively run their programmes and that, whenever possible, the space is a fixed arrangement so as to provide consistency.

**5.14** The self-development programmes and activities described above were open to all women, regardless of their IR level or whether they were remand or sentenced. Some providers noted that participation may be slightly lower among women who are of foreign nationality, or from ethnic minority backgrounds. In particular, programme providers cited that it could be challenging for non-English speakers to participate.

Additionally, as women needed to be able to comfortably mix and interact in these settings, this could inhibit women on protection from participating and availing of self-development programmes.

**5.15** Awareness of the self-development programmes was generally raised through poster advertisements and by word of mouth from former participants. Prison staff also contributed to raising awareness, and referring women to programmes - in particular Class Officers, ISM Officers, or the Chief Officer for Work Training.

The Dóchas Centre regularly receives women newly committed to the prison. It also has a high proportion of women who are in prison with short sentences. In addition, there were a number of women on protection regimes who could have benefitted from these programmes, but were not proactively invited to participate. Information-sharing on the availability of supports and services in the prison must be given particular attention. The Inspectorate would welcome expanded efforts to raise awareness of available programmes, for example, through use of the in-cell TVs and information-sharing visits by providers, to ensure that knowledge of available programmes, services, and activities reaches all women in prison.

**5.16** There is no open prison for women in Ireland. This is a very notable gap in support for release preparation.

The lack of graduated transitional supports for women presents a clear inequality in the provision of custodial measures for men and women. Rule 45 of the Bangkok Rules states that:

“Prison authorities shall utilize options such as home leave, open prisons, halfway houses and community-based programmes and services to the maximum possible extent for women prisoners, to ease their transition from prison to liberty, to reduce stigma and to re-establish their contact with their families at the earliest possible stage.”<sup>136</sup>

**In light of this gap in provision, the Irish Prison Service and women’s prisons must make greater efforts to identify and implement alternatives for progression such as a dedicated reintegration unit within the prison with links to community-based programmes and day release placements.**

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<sup>136</sup> UN Bangkok Rules (2011), Rule 45.

## 5.17 Progression & Opportunities Assessment

*There was a perception among the women in prison that there were fewer opportunities for progression available to women housed on the small yard.*

*There was a need to introduce meaningful milestones that recognised and reflected progression, and that women could work towards and advance in their sentence.*

*There was a good range of self-development programmes run within the prison, with a gender-based focus. It was positive to note the engagement and involvement of prison staff with these services. However, these programmes could benefit from greater support in terms of suitable spaces, facilitation of access, awareness raising, and ensuring they are inclusive for all women in the prison.*

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## 5.18 RECOMMENDATION

### To the Minister for Justice:

**Recommendation MDOJ23-4:** Consideration should be given to the development of a re-integration unit to support women in the lead up to their release from prison. This should include access to community-based re-integration programmes for all women preparing to re-join the community. In the longer term, as the prison estate develops, consideration should be given to the construction of an open prison for women.

## Work Training

- 5.19** The Prison Rules 2007-2020 provide that work training activities should be available to prisoners in order to ensure that individuals can effectively reintegrate into the community.<sup>137</sup> Work should be viewed as a positive element of the prison regime and prisoners should have the opportunity to choose the type of employment with which they would like to engage.<sup>138</sup> The 2020 European Prison Rules 2020 and 2015 UN Mandela Rules establish that a systematic programme of work should be in place, and that prisoners have the opportunity to work.<sup>139</sup> Work should increase opportunities to earn a living after release.<sup>140</sup>

### Work Placements

- 5.20** Women in the Dóchas Centre engaged in essential work to facilitate the daily operation of the prison (**Figure 23**). This work included cleaning, maintaining the grounds, and working in the prison's kitchen. There were also designated cleaners for each of the houses, and for general areas of the prison.

<sup>137</sup> Prison Rules 2007-2020, Rule 27(2).

<sup>138</sup> European Prison Rules (2020), Rule 26.6

<sup>139</sup> European Prison Rules (2020), Rule 105.1 and UN Mandela Rules (2015), Rule 96.1

<sup>140</sup> European Prison Rules (2020), Rule 26.3

**Figure 23: Hairdressing Workshop and Industrial Cleaning Classroom**



**5.21** At the time of the inspection, 39 work training places were available within the prison. These are summarised in **Table 6**. On 19 September 2023, 22 of the 39 places were filled, with vacancies owing to staff redeployments. This meant that, on this day, just 14% of the Dóchas Centre prison population was engaged in work training activities.

**Table 6: Number of Prisoner Work Training Places Available and Filled**

Area of Work	Places Available	Filled on 19/09/2023
<b>Hairdressing</b>	7	4
<b>Industrial Cleaning</b>	8	Closed
<b>Horticulture</b>	10	4
<b>Kitchen</b>	10 (20 in total, two pods of 10)	10
<b>Library</b>	4	4
<b>Total</b>	<b>39</b>	<b>22</b>

**5.22** In addition to these 39 places, 41 women could be assigned to cleaning posts within their houses and in other areas of the prison by their Class Officer. Taken together, this comprises 80 work posts. Overall, 79 prisoners were engaged in the work training activities either through the placements listed in **Table 6** or through a house cleaning post.

**5.23** Access to work training activities, and the associated additional working payment (see 5.46), was not applied equitably across the houses (**Table 7**). Women accommodated in Maple, Laurel and Hazel Houses were less likely to be engaged in work training.

**Table 7: Number of Prisoners Engaged in Work Training, by House (%)**

House	Number of People (%)	House	Number of People (%)
<b>Cedar</b>	17 / 30 (57%)	<b>Phoenix</b>	9 / 14 (64%)
<b>Elm</b>	10 / 10 (100%)	<b>Willows</b>	13 / 22 (59%)
<b>Laurel</b>	4 / 10 (40%)	<b>Hazel</b>	7 / 23 (30%)
<b>Maple</b>	6 / 20 (30%)	<b>Rowan</b>	12 / 20 (60%)

*Note:* Figures are based on prison population as of 19 September 2023, and women in receipt of AWG the week beginning 25 September 2023.



Of further note, within Phoenix House (protection), three women were in receipt of AWG for their role as cleaners within the House. As a consequence of being on protection, they did not have the opportunity to attend workshops or engage in other work roles as this would require mixing with general population prisoners.

- 5.24** Women in Maple, Laurel and Hazel Houses were also less likely to be engaged with the school (Table 8).

**Table 8: Number of Prisoners Engaged in School, by House (%)**

House	Number of People (%)	House	Number of People (%)
Cedar	27 / 30 (90%)	Phoenix	12 / 14 (86%)
Elm	9 / 10 (90%)	Willows	20 / 22 (91%)
Laurel	6 / 10 (60%)	Hazel	15 / 23 (65%)
Maple	6 / 20 (30%)	Rowan	14 / 20 (70%)

**Note:** Figures are based on prison population as of 19 September 2023, and weekly school attendance recorded for the previous week (11-15 September).

- 5.25** The prison had plans in place to establish new work training posts, including the introduction of a centralised prison laundry (6 - 8 posts), a prison library (2 posts), as well as new posts for processing tuck shop orders (4 posts). A business plan had been submitted which proposed to set up a bakery within the kitchen. The Inspectorate welcomes this development as it will increase the opportunity for work training. However, staff involved in work training noted that the lack of available space within the Dóchas Centre campus was a major obstacle for creating new training opportunities.
- 5.26** In considering the development of new training opportunities, the Inspectorate advises that the prison take account of the nature of the posts offered. The commentary to the Bangkok Rules states that skills development programmes should consider offerings beyond what is considered stereotypically appropriate for women.<sup>141</sup>
- 5.27** Positively, the Chief Work Training Officer reported there were no waiting list for work posts. When speaking to women in the prison, many stated they could quickly obtain a work post if requested, and that they were able to state their preferred area of work.
- 5.28** Some survey respondents reported they did not have a job in the prison. Of this group, 21% (7 of 33) stated that they did not know how to sign up for work, and 39% (13 of 33) claimed that they signed up but did not receive work.
- 5.29** As a result of the manner in which work training information was provided, the Inspectorate was not able to clearly ascertain:<sup>142</sup>
- how many hours an individual worked per day;
  - how many days an individual worked per week; and
  - how many individuals were engaged in both work training and education.

<sup>141</sup> UN Bangkok Rules (2011), Commentary to Rule 42, p.39

<sup>142</sup> One exception to this was work training placements in kitchen; a weekly attendance sheet was maintained for kitchen workers.

- 5.30** In 2022, the Inspectorate issued a recommendation to the Irish Prison Service in relation to the manner in which data on access to structured activity is collected in the prisons.<sup>143</sup> Although this recommendation remains outstanding, in the months following the inspection of the Dóchas Centre, prison management developed a work-around tracking system to determine *actual* individual prisoner engagement with activities and services (see 3.6).

**The Inspectorate commends efforts by Dóchas Centre management to address this gap in record-keeping and data, and suggests that the work-around model adopted by the Dóchas Centre might inform an estate-wide approach to systematically gathering this data.**

- 5.31** The European Prison Rules, Rule 26.16 establishes that “prisoners shall have at least one rest day a week and sufficient time for education and other activities”. Despite this, there was evidence in the Dóchas Centre of women engaging in both work and school without a scheduled day for rest.

Comparing the kitchen attendance sheet for a three week period, with the school attendance sheet for the week of 11 September 2023 showed that there were two kitchen workers who attended school and work for seven consecutive days (10 - 16 September 2023). A further two women would have been scheduled to attend school or work for seven consecutive days if their classes had not been cancelled for operational reasons.

- 5.32** The Inspectorate encourages the Dóchas Centre to consider the standards set out in the European Prison Rules when scheduling school and work for essential prisoner workers.

#### **Staffing, Regime Management, and Closures**

- 5.33** The Regime Management Plan (RMP) sets out all posts required within the prison to fulfil its daily regime. The allocation number for each of the posts establishes an order of priority for each post, as determined by prison management, in collaboration with the staff representation body. In the case of staffing shortages, officers in posts given lower priority (i.e. those placed further down the RMP) are more likely to be redeployed from their originally designated role.

- 5.34** **Table 9** presents a section of the RMP for the Dóchas Centre, identifying posts related to prisoner activities and services. The RMP indicates that access to the school is given high priority, as is the prison kitchen, and support to in-reach services; this is because these posts are further down on the RMP and are less subject to being “cut”. The Integrated Sentenced Management Officer (ISM) post also appeared to be well protected from redeployment; indeed, in Quarter 2 of 2023 the ISM officer was only deployed from their post three times. However, ISM officers were often required to assume additional duties (see 6.5). Other rehabilitation-centred posts in the prison were more susceptible to redeployment. For example, industrial cleaning, horticulture, and the training kitchen posts were unstaffed on 20 September 2023.

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<sup>143</sup> OIP (2023) Education and Work Training Thematic Inspection April - June 2022, Recommendation HQEDWT1.

**Table 9: RMP Post Allocation - Prisoner Activities & Services, 20th September 2023**

<b>RMP Allocation Post Number</b> (higher number prioritised for removal)	<b>Post Status</b>
<b>7</b>	Staffed - Kitchen
<b>12</b>	Staffed - School
<b>13</b>	Staffed - Kitchen
<b>17</b>	Staffed - In-reach Services
<b>19</b>	Staffed - School
<b>22</b>	Staffed - ISM
<b>23</b>	Unstaffed - Industrial Cleaning
<b>24</b>	Unstaffed - Horticulture
<b>25</b>	Staffed - Gym
<b>27</b>	Unstaffed - WTO Training Kitchen

**5.35** **Table 10** summarises cuts to RMP posts between April and June 2023. The training kitchen was only closed 10% of the days during this 91 day period. However, the industrial cleaning and horticulture work training posts experienced a greater number of closures, at 26% and 38% respectively.

**Table 10: Work Training Closures - Quarter 2, April - June 2023**

<b>Work Training Post</b>	<b>Number of Dates Posts Appears on RMP</b>	<b>Number of Days Post Filled</b>	<b>Closures (%)</b>
<b>Training Kitchen</b>	91	82	10%
<b>Industrial Cleaning</b>	91	67	26%
<b>Horticulture</b>	61	38	38%

With few workshops available to the women at the Dóchas Centre, the rate of closures presented in the table above reflect substantial disruption to engagement with work training.

### **Accreditation & Certification**

- 5.36** Accredited training is an important aspect of rehabilitation in that it provides people in prison with practical skills, and increases their opportunities for employment upon release. The opportunities for accredited work training in the Dóchas Centre were very limited and were confined to two areas of work: hairdressing and industrial cleaning. The certification provided in these areas was not of the level necessary to secure employment in the community. Additionally, accreditation was offered in barista training, which was offered through the school (see Section B, Education).
- 5.37** Accredited training was offered through the hairdressing course which provided City and Guilds certification. In the 12 months prior to the inspection, 21 women had received certification in the hairdressing course. Accreditation was also offered in industrial cleaning through Clean Pass certification. Sixteen women had received Clean Pass certification in the 12 months prior to the inspection.

**5.38** In the kitchen, the City and Guilds accreditation that was previously in place for kitchen workers had been discontinued. Instead, informal training, concentrated on practical kitchen skills, was provided by kitchen Work Training Officers. While detailed records were maintained for each individual and their progress, this training was not sufficient to support women in attaining employment in a kitchen in the community on release.

**5.39** Certification and accreditation are essential to improve employment prospects for people released from prison. In its thematic inspection report on Education and Work Training, published in 2023, the Inspectorate recommended that “all prisoners have access to externally accredited qualifications in all work training areas”.<sup>144</sup> The Inspectorate urged the Irish Prison Service to ensure that certification offered to prisoners is labour-market tested and recognised by employers.

In response, the IPS committed to undertaking a review of its accredited trainings, with priority areas identified in industrial cleaning, laundry, catering, waste management, and gym. The IPS also stated that it would engage with SOLAS (the State agency overseeing the Further Education & Training (FET) sector in Ireland) to review options for training and pathways to future training and employment.<sup>145</sup>

**5.40** Further to this, the Irish Prison Service must consider gender in its examination of accreditation and preparatory measures for future employment. Analysis carried out by the Central Statistics Office has demonstrated that women who have been released from prison sentences earn substantially less than their male counterparts. Women also earn significantly less post-release in comparison to their earnings prior to their sentence.<sup>146</sup>

**5.41** **Opportunities for accredited training at the Dóchas Centre should be re-assessed so as to equip women with practical occupational skills and training, and to facilitate access to the labour market. In addition, as previously stated, opportunities for training and accreditation in women’s prisons should look beyond traditionally gendered work.**

**5.42** During the inspection a number of women attended a graduation ceremony for successfully completing the hairdressing course. At the event, the graduates shared their experiences of the course and highlighted the personal benefits, which included a boost to their self-confidence, the acquisition of a new skill, and seeing the course through to completion despite the challenges encountered. Overall, the event was very positive and highlighted the multifaceted benefits of vocational training for the women involved.

**5.43** Through the staff survey, 58% (32 of 55) of respondents felt that the quality of vocational training offered at the Dóchas Centre was good. While there are clear and important personal benefits to engaging in work training, there was a sentiment among staff that the impact of work training with respect to future employment prospects was one area that could be improved. For example, through the staff survey, one respondent commented that “*there needs to be more courses that the prisoners can get employment from*”. Likewise, staff involved in work and training expressed concern that the level of certification offered was not at the level required to secure employment on release.

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<sup>144</sup> OIP (2023) Thematic Inspection on Education & Work Training April-June 2022, Recommendation HQEDWT7.

<sup>145</sup> IPS (2023) Recommendation Action Plan in Response to Education and Work Training Thematic Inspection Report (April - June 2022), Rec ID HQEDWT7.

<sup>146</sup> Central Statistics Office (2023) Circumstances of People Linked to Justice Sanctions.

## Remuneration

- 5.44** The IPS policy on prisoner gratuities was established in 2012. It outlines three scales of daily gratuity, which are applied to prisoners based on their IR level. In addition to this, people in prison can also receive the “Approved Work Gratuity”, which is a small payment offered in return for work within the prison.<sup>147</sup> The current rate of AWG is €3.50 per week. **Table 11** summarises the amount of gratuity people engaged in essential work (see 5.22) receive each week, depending on IR level.

**Table 11: Gratuity Rates**

IR Level	Weekly Gratuity	Total, with AWG
<b>Basic</b>	€6.65 (daily: €0.95)	€10.15
<b>Standard</b>	€11.90 (daily: €1.70)	€15.40
<b>Enhanced</b>	€15.40 (daily: €2.20)	€18.90

- 5.45** At the time of the inspection, 79 women were in receipt of the AWG; of these 62 received €3.50 each week and 17 received €5.00.

In practical terms, these rates meant that a woman on the €3.50 AWG working a 5.5 hour day, three days a week would have an hourly earnings of €0.21 per hour.

- 5.46** The CPT has stated that people in prison should receive fair remuneration for their work to allow them to afford basic necessities for a humane and decent existence.<sup>148</sup>

The Inspectorate notes that many women in the Dóchas Centre reported that the prices of essential products in the tuck shop were prohibitively expensive. For example, the cost of toothpaste in the tuck shop was €2.38. This amounted to 13% of the weekly money received by a working prisoner on the Enhance regime, and 23% of the weekly money received by a working prisoner on the Basic regime. Similarly, the cost of hair conditioner was €3.69. This amounted to 20% of the weekly money received by a working prisoner on the Enhanced regime, and 36% of the weekly money received by a working prisoner on the Basic regime.

- 5.47** The Inspectorate recommended in 2022 that the 2012 Irish Prison Service Prisoner Gratuities and Private Cash Policy should be reviewed and updated.<sup>149</sup> As part of this review, consideration should be given to the hourly rate at which prisoners who work in the prison are paid, and the extent to which this enables them to afford basic necessities through the tuck shop.

## **5.48 Work Training Assessment**

*Access to work training was not equally distributed across all houses within the Dóchas Centre, with work training engagement higher among those accommodated on the big yard than on the small yard. Less opportunity to engage in work training may hinder the opportunity to progress within the prison.*

*Additionally, access to work roles was frequently hampered by closures due to redeployment. Poor record keeping in relation to work training attendance made it difficult to determine the proportion of women in the Dóchas Centre engaged with work training, and the frequency with which they attend workshops and work roles.*

<sup>147</sup> Irish Prison Service (2012) Prisoner Gratuity and Private Cash Policy.

<sup>148</sup> CPT (2021) 30<sup>th</sup> General Report – A Decency Threshold for Prisons, p.5

<sup>149</sup> OIP (2023) Thematic Inspection on Education and Work Training April - June 2023, Recommendation HQEDWT5.

*The Inspectorate welcomes the introduction of additional work posts planned for the laundry, library, and tuck shop, as well as the business plan for establishing a bakery in the kitchen. It is commendable that prison management has since taken steps to address this gap in record keeping.*

*The training offered in the prison was not of a calibre to support employment and re-integration prospects for women release from the Dóchas Centre.*

*The lack of externally accredited training should be urgently addressed. This is particularly exigent given that women often face poorer economic and labour outcomes post-release. Opportunities for work training should look beyond traditionally gendered forms of work.*

*As recommended in 2022, the IPS Prisoner Gratuities and Private Cash Policy should be re-examined so as to provide fair remuneration for work and to allow people in custody to afford basic necessities.*

## 5.49 RECOMMENDATIONS

### To the Director General of the Irish Prison Service:

**Repeat Recommendation HQEDWT1 (2022):** A centralised and integrated data recording system should be put in place to accurately identify, track and report on engagement with purposeful activity. This data should be shared with the Inspectorate of Prisons and made publically available on a regular basis.

**Repeat Recommendation HQEDWT4 (2022):** The Irish Prison Service should ensure that all prison officer posts are maximised to ensure access to and engagement with purposeful activity for all persons in custody. Prison officer posts and associated tasks should be sufficiently flexible to allow Governors to respond to changes in staffing structures. [See also, DG22-8]

**Repeat Recommendation HQEDWT5 (2022):** The Irish Prison Service should review and update its Prisoner Gratuities and Private Cash Policy to ensure it aligns with Rule 28.4 and Rule 105.4 of the revised European Prison Rules.

**Repeat Recommendation HQEDWT7 (2022):** The Irish Prison Service should ensure that all prisoners have access to externally accredited qualifications in all work training areas. Certification offered to prisoners should be labour-market tested and should be recognised by employers to improve employment prospects upon release.

**Repeat Recommendation HQEDWT10 (2022):** In order to provide a consistent approach to managing education provision across the prison estate, the IPS should develop a policy on education and training in collaboration with all of the relevant stakeholders.

## Library

- 5.50** Under Rule 110(6) of the Prison Rules 2007-2020, a library and information centre should be provided for in each prison. There should be regular access to a wide range of informational, educational and recreational resources catering for the needs and interests of prisoners. Furthermore, Rule 110(7) states that each prisoner shall be entitled to avail of the library service at least once a week and “be actively encouraged to make use of it”. Rule 28.5 of the European Prison Rules (2020) sets out that “Every institution shall have a library for the use of all prisoners, adequately stocked with a wide range of both recreational and educational resources, books and other media.”
- 5.51** In 2023, the Government of Ireland published its National Public Library Strategy 2023-2027.<sup>150</sup> The strategy states that the Local Government Management Agency and the Library Authorities will work with “the Department of Justice, the Irish Prison Service and prison governors to ensure that every relevant local authority will have a working Service Level Agreement with their local prisons”.
- 5.52** A review of prison library services across all Irish prisons was undertaken by Ulster University in 2021.<sup>151</sup> A summary of the review identified ten principles for the operation of prison libraries. Among these are that prison libraries should: be user-centred, offer universal access, offer a broad range and format of stock, be a source of support within the prison, and offer a stepping-stone to the community.
- 5.53** The old library in the Dóchas Centre was located on the HCU landing. Its location meant that it was not easily accessible. The RMP did not include a designated post tasked with the opening of the library, which meant that the library was infrequently opened to prisoners. According to staff, the library had been closed for approximately one year, and a book trolley service had been run in its place, although this was insufficient to meet the needs of the women. This is reflected in the survey findings, in which the majority of respondents (62%, 58 of 93) reported that it was difficult to access books.
- 5.54** At the time of the inspection, preparations were underway to move the library to a new, more accessible location in the school. The physical environment of the new library was clean and bright, if somewhat small. The library will be supported by a Dublin City Council librarian who will be present three times per week. The new library will create four work positions for women in the prison. The women will be trained in how to use the library system and how to process and order books. The space will also be used by some external services to host the sessions they organise.
- 5.55** In terms of stock, there were some books available in languages other than English, and library users could request additional books. There were no legal texts available to women in the prison. This was of concern, as at the time of inspection, 30% of women in the Dóchas Centre were unconvicted and engaging with legal proceedings.

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<sup>150</sup> Government of Ireland (2023). The Library is the Place: Information, Recreation, Inspiration.

<sup>151</sup> University of Ulster (no date). Review of Prison Libraries in Ireland.



## 5.56 Library Assessment

*Prior to, and during the inspection, access to the library was infrequent and insufficient. The RMP did not provide for staffing allocation to the library which prevent access.*

*The Inspectorate welcomes the development of a new, more accessible, library space. It is positive to note that the new library will also see the creation of four new work positions for women in the prison.*

*In its operation, the new library should take on board the principles identified by the University of Ulster review; in particular that the library should: be user-centred, offer universal access, offer a broad range and format of stock, be a source of support within the prison, and offer a stepping-stone to the community.*

## Exercise

- 5.57 The Prison Rules 2007-2020 require that prisoners should be provided with ample opportunities for outdoor exercise, at a minimum one hour per day, and alternative indoor exercise arrangements should also be available.<sup>152</sup> Access to exercise is a fundamental right, with the CPT highlighting access to one hour of outdoor exercise as a key component of a minimum decency threshold.<sup>153</sup> Access to outdoor exercise is also crucial for the mental and physical well-being of prisoners who have limited access to natural light and fresh air, with few chances to socialise.<sup>154</sup>

### Yards

- 5.58 A basic daily activity offered to women in the Dóchas Centre was access to the yards (**Figure 24**). There were three yards within the Dóchas Centre: the 'small yard' was used by its two adjacent houses, Rowan and Maple. These two houses accommodated approximately 40 women. The big yard was used by women in Laurel, Hazel, Elm, Cedar, Willows, and Phoenix houses; these houses accommodated approximately 95 women. The 'sponge yard', which was located beside the school, was used by women on protection regimes, although this was on a limited basis. Women on protection regimes in Phoenix house, who could not mix with other women in the prison, also had access to a small outdoor courtyard.

**Figure 24: Small Yard, Big Yard, Sponge Yard, and Phoenix Protection Courtyard**



<sup>152</sup> Prison Rules 2007-2020, Rules 32(1), 32(2), and European Prison Rules (2020) Rule 27.

<sup>153</sup> CPT (2021) A Decency Threshold for Prisons-Criteria for Assessing Conditions of Detention.

<sup>154</sup> Association for the Prevention of Torture, Outdoor Exercise.



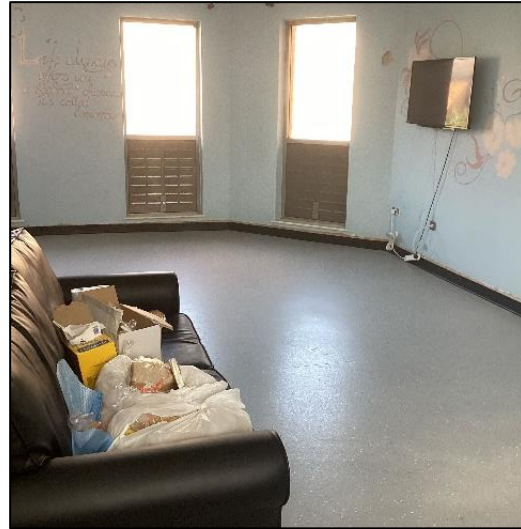


- 5.59** The yards were clean and well-maintained. The environment in the yards was pleasant and the grounds were well-kept. There were green areas, including grass, and benched seating areas. However, there was no shelter in the yards. There was also no sport, exercise equipment or recreational activities available for use by the women.
- 5.60** Two thirds of women who completed the Inspectorate's survey reported they spent time outdoors for at least one hour on a typical day. This finding suggests that for the majority of women, the prison met the statutory legal requirement of Rule 32 (1) of the Prison Rules 2007-2020: *"Each prisoner not employed in outdoor work or activities shall be entitled to not less than one hour of outdoor exercise in the open air each day, provided that having regard to the weather on the day concerned, that it's practicable."*

### Recreation Areas

- 5.61** Recreation areas are important spaces for facilitating purposeful activity and meaningful human contact. While the majority of houses in the Dóchas Centre had shared recreation areas, not all of these areas were equipped with furnishings conducive to communal interaction. Basic furnishings and provisions such as couches, tables and chairs, activities, and games were lacking - particularly in the houses located off the small yard.
- 5.62** The recreation area for women on protection in Phoenix house was used to store maternity supplies. The couches were in disrepair and there was no television. The room was also located upstairs, and so it presented accessibility challenges for women with physical disabilities.
- 5.63** Recreation areas in Elm house were well-equipped. The available spaces included couches, sewing machines, and games; there was also a kitchen area where women could cook. In contrast, recreation areas in Rowan, Maple, Laurel, Hazel, and Cedar houses were under-furnished and unappealing (see Recommendation DO23-1). Often, the sitting room areas contained a single couch and a television despite an average of 20 women living in each house (**Figure 25**).

**Figure 25: House Recreation Areas**



## Gym

- 5.64** The gym was located in the school building (**Figure 26**). The space was ample and the walls were decorated with murals. The gym was well-equipped with exercise equipment and machinery, including treadmills, exercise bikes, elliptical, weights, and boxing bags.

**Figure 26: Dóchas Centre Gym**



- 5.65** Exercise classes were offered by the school and Work Training Gym Officers. There was no gym timetable in place; as such, it was difficult to determine the extent to which all women had equal opportunity to access to its facilities.
- 5.66** In terms of closures, in the six months prior to the inspection (March to August 2023), the Gym Officer was redeployed from their post for a full day on 72 occasions; this meant that the gym was not accessible to women in the prison 39% of the time over a period of six months. In addition to full closures, the gym was also partially closed on some days over this period.

## **5.67 Exercise & Recreation Assessment**

*At least one hour of access to the fresh air in the yards was offered to women on a daily basis; this aligned with the standard set by the Prison Rules 2007-2020, Rule 32(1).*

*The big and small yards were well-maintained, however, there was no shelter in the yards.*

*The majority of recreation areas in the houses were poorly furnished, and did not afford women opportunity for purposeful activity or meaningful human contact.*

*The gym was closed on 72 full days between March to August 2023. With no timetable available for the gym, it was difficult to determine whether or not fair and equal access was being offered to women.*

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## 5.68 RECOMMENDATION

**To the Governor of Dóchas Centre:**

**Recommendation DO23-18:** The Inspectorate recommends that areas of shelter should be provided for women in the big and small yard, and that women should be permitted to return to their rooms from the yard at all times.

## B. Education



An Roinn Oideachais  
Department of Education

- 5.69** The Dóchas Education Centre is under the management of City of Dublin Education and Training Board (CDETB). The day-to-day running of the education centre is the responsibility of the Head Teacher who is supported by a recently appointed Deputy Head Teacher.
- 5.70** Inspectors from the Department of Education were part of the Office of the Inspector of Prisons (OIP) team which conducted the General Inspection of the Dóchas Centre.
- 5.71** During the evaluation, there was good student attendance at the education centre. Out of a total of 153 women in the prison, 113 students were timetabled for classes. The week prior to the evaluation saw a unique number of 96 students; this was the number of students who actually attended the education centre at least once over the course of the week. The difference between the timetabled number and the actual attendance was the number of students who, for a variety of reasons, were unable to attend the education centre.
- 5.72** At the time of the evaluation the full complement of teachers was not available to the education centre due to staggered summer breaks. It was reasonable to suggest that during the normal education centre year, the capacity of students is greater than 113 students per week.
- 5.73** The inspection activities conducted on 20 September 2023 are outlined in the table below:

### Inspection Activities

- |   |   |
|---|---|
| • Lesson observations   | • Classroom visits                                |
| • Review of resources and facilities  | • Review of students' work                        |
| • Discussions with teachers   | • Discussions with students                       |
| • Meetings with Head Teacher and Deputy Head Teacher  | • Feedback meeting with Head Teacher and teachers |
| • Meeting with the Organiser of Education City of Dublin Education and Training Board (CDETB) |   |

**5.74** During the evaluation, the DE inspectors focused on the following questions:

1. How effective was the education centre in identifying and meeting the needs of its students?
2. How effective was the education centre in supporting the students to have purpose and achieve good outcomes?
3. How effective was teaching and learning in the education centre?
4. How effective was education centre leadership and management?
5. How effective were the prison systems in facilitating access to education for people in the prison?

## **5.75 Main Findings**

- There was a very effective process in place to identify initial and ongoing learning needs, strengths, and interests for students.
- A very good range of curricular and vocational programmes were in place to meet the interests, aptitudes and abilities of students.
- The curriculum was highly effective to help students maintain contact and connection with their children and families.
- Commendably, the education centre had introduced a digital strategy and digital technologies were used meaningfully to support student engagement and learning.
- Teacher collaboration was a strength of the education centre and it was highly commendable that all teachers worked together to support students.
- There was an integrated approach to learning English and to literacy and numeracy.
- The quality of facilities in the education centre were very good; the kitchen and art room were very well resourced with very good provision of specialised equipment to support learning.
- The Work and Training hair salon and gym were located within the education centre. This has supported students to engage with education and work and training opportunities.
- The prison systems were effective in supporting the education centre. Prison management and the education centre demonstrated a commitment to supporting all learners particularly through the partnership projects such as the Horticultural project, Hairdressing and Barista project.
- There was limited access to education for people on protection regimes.

## **5.76 Recommendations**

- The education centre, with the input of students, should collaboratively identify the possibility of additional vocational and employer partnership programmes.
- Further development of the physical environment, for example more current displays of students' work, which celebrates the creativity, diversity and achievements of learners should be implemented.



- NALA's online courses provide very high quality literacy resources and the use of these in the education centre should be progressed.
- The Head Teacher in collaboration with the IPS should explore ways in which learning in Beauty and Self-care could be carried out in a more authentic salon environment.
- The leadership and management team in collaboration with the teachers and students should individualise the QA process to reflect both the priority needs of this education centre and CDETB and engage in the self-evaluation (SSE) process for improvement.
- It is recommended that the education centre and prison management work together in developing a system that ensures students are encouraged to go to the education centre and are facilitated in turning up on time every day.
- A brief training session could be delivered by the education centre management to support officers to gain an understanding of the expectations between themselves and the education centre.
- Ways in which people on protection regimes can be included further should be explored.
- Communication between the education centre and the assigned officers should be developed to further ensure fair and equitable operation of the subject waiting lists.
- The prison management and the education centre should work together to establish systems that allow all students access the education centre and avail of work opportunities.

## **1. How effective was the education centre in identifying and meeting the needs of its students?**

### **5.77 Ensuring high quality initial and ongoing assessment**

- There was a very effective process to identify initial and ongoing learning needs, strengths, and interests of the students. Initial interviews and individual timetable reviews were carried out twice a week by the Head Teacher where strengths, interests and possible areas for development were identified and recorded. The Head Teacher, in collaboration with the students, arranged further assessments in literacy and numeracy as appropriate. The education centre created a bank of suitable assessment resources which focus on literacy and numeracy.
- A variety of assessment strategies were in place for students who need to develop English language skills for speakers of other languages (ESOL). Commendably, assessment was in line with the Common European Framework of Reference for Languages (CEFR). Assessment information and high quality resources were used very skilfully to inform and develop both skills and language amongst students in the ESOL classes.

### **5.78 Designing a learning programme that accurately reflects students' strengths and meets their needs**

- A very good range of accredited and non-accredited curricular and vocational programmes were in place. These were chosen to match the interests and aptitudes of students. The courses available included; literacy classes, creative writing, and communications. Art and craft classes which included pottery, card-making, pyrography, leather crafts, stain glass and photography were also provided.

- First aid, childcare and parenting, and cookery were provided to support students when they leave the prison. Classes in personal care and beauty, Drama, the book club, yoga classes and choir provided a holistic programme which was non-accredited. Students also had access to the gym through the education centre.

## 2. How effective was the education centre in supporting the students to have purpose and achieve good outcomes?

### 5.79 *Providing opportunities for accreditation and achievement*

- The curriculum was focused around Quality and Qualifications Ireland (QQI) certification from levels 2 to 5. Junior Cycle and Leaving Certificate subjects were available on demand. Four students were engaged with Open University at degree level and short courses were available through the Open University also. Blended Learning courses created by CDETB were accessible through the Open Learning Centre for women who were on protection regimes and/or experienced difficulty accessing the centre.
- Students commented very positively about how employment partnerships have provided them with meaningful opportunities, such as working in local coffee shops. In group discussions with inspectors, students requested an increase in these types of partnerships in order to build skilled experiences which will further support employment for them when they leave prison. **The education centre, with the input of students, should collaboratively identify the possibility of additional vocational and employer partnership programmes.**

### 5.80 *Supporting students' connections to family and navigating next steps*

- The curriculum was highly effective to support wellbeing and help students maintain contact and connection with their children and families. The teachers put the emotional and care needs of the students first in all interactions. The students described the education centre as a safe, structured, and welcoming environment. They spoke very highly of the Head Teacher and her staff, reporting that everyone knew their name and they felt a sense of belonging to the centre. Some students described the education centre as a "life-line".
- The creation of art pieces, jewellery, and soft toys enabled students to create personalised gifts for their children. The *Story Mams* initiative was a particularly good example of how the curriculum was supporting family connections and wellbeing. This initiative involved students choosing a story book suitable for their child. The student was recorded reading the book aloud and the recording was then edited with images from the book. The books and recordings were delivered to the child and on occasion were accompanied by a gift such as an individualised bookmark, personalised T-shirt, piece of art, or an item of jewellery. Students really appreciated the opportunities these activities provided them to connect with their families.

- There were highly effective measures in place to support students on their release from prison. The students engaged in a pre-release programme with the career guidance teacher. There was a step-down facility to support reintegration. The *Pathways Centre* provided post-release education and guidance also. There was very good collaboration with outside agencies, for instance; Care After Prison (CAP), Sonas who support women experiencing domestic abuse, Money Advice and Budgeting Service (MABS), Finglas Addiction Support Team and Ana Liffey Drug Project, and the Peter McVerry Trust who offer support in relation to housing. Additionally, outside speakers, such as 'The Two Norries' came in to provide inspiration and hope for the women going forward.

### 3. How effective was teaching and learning in the education centre?

#### 5.81 *High quality engagement and very good learning in the classroom*

- The quality of teaching and learning was very good. Teachers provided clear and constructive explanations and instructions and communicated high expectation for students' learning. This was evident from the Cookery class where all students prepared and cooked a starter, main course and desert, followed by clean up. During the lesson, key learning outcomes were communicated and prior knowledge from the Health and Safety course were activated and consolidated. Students shared their sense of achievement during the class and spoke of how the class had opened their minds to experimenting with food and ingredients. Commendably, produce grown from the prison gardens was used in the cookery classes.
- Teachers encouraged students to think for themselves, learn skills, and develop confidence. This practice was most evident when students expressed nervousness at trying new things and the teacher provided guidance and support but did not do the task for the students. This valuable approach enabled all students to fully complete lesson tasks independently.
- In all lessons observed, students demonstrated an interest in learning, enjoyment of the learning activities, and achievement of the learning outcomes. Where teacher demonstrations were used, students observed the teacher completing the task and paid high levels of attention. The lessons included creative and absorbing tasks which were aligned to students' strengths and interests.
- Teachers were very effective in matching the learning activities to students' individual strengths and needs. In the Art lesson observed, there was a learning activity to suit the ability and needs of every student and the students achieved to their own potential. The quality of the student projects in their portfolios and on the classroom walls was very high.
- During the physical education lesson in the gym, students were not only developing skills and gaining fitness but were also engaging in positive social interactions. This lesson was lively and fun with music playing to motivate students to push themselves and achieve more. The teacher's instructions were clear and encouraging. The students thoroughly enjoyed the activities and reported very positively on their work in the gym.

#### 5.82 *Working together to support students*

- Teachers engaged in valuable opportunities for Continued Professional Learning (CPL) both individually and as a staff. Themes for whole staff CPL included workshops from the psychological services, the use of One Drive and security within the prison. Commendably, a central CPL log was maintained by the Head Teacher.

- There were very effective partnerships between the education centre and the work of the Irish Prison Service (IPS) Work and Training Officers (WTO). The Horticultural project provided a vibrant and purposeful learning experience for students; they learned theory in the education centre and the day-to-day running of the garden with the WTO. The hairdressing and the Bean Inside Barista training programmes were other examples of the positive working relationship between the education and the operational side of the prison. It was highly commendable that the Barista training was linked in with potential employers and that some students had received placements in coffee shops within the community on their release.

#### **5.83 *Providing high quality literacy, numeracy, and language supports for students who are speakers of languages other than English***

- Teacher collaboration was a particular strength of the education centre. There was an integrated approach to learning English, literacy and numeracy across the curricular subjects. Learning in ESOL was linked with cookery and Art, for example, with vocabulary taught in advance of lessons to ensure effective student participation.
- In keeping with highly effective practice, some of the learning activities were designed to enable students to develop the skills and strategies to function within the prison context. For example, numeracy was taught in the context of completing the prison shop order. The ESOL teacher supported students to acquire the language skills necessary to complete the health and safety course, which was a pre-requisite for cookery, and to develop the language skills to communicate with prison staff and other people in prison. It was highly commendable that the food safety booklet was available in a variety of languages.
- Relationships between teachers and students were highly respectful. Students were supported to work together and support one another. Peer-led teaching was a good example of this valuable approach; students who have a learning difficulty were paired up with a trusted person for peer-to-peer learning and mentoring. On the day of the evaluation a National Adult Literacy Agency (NALA) Literacy Ambassador workshop was taking place. The recent addition of a games based learning class was scheduled in response to the education centre priority to build respectful, collaborative and fun-based activities for students.

#### **5.84 *Celebrating achievement and ensuring the physical facilities and other resources are suitable***

- The education centre's physical environment celebrated student achievement through displays of art and craft work. However, the work of the current student population was not sufficiently reflected in these displays and there was scope to develop a more vibrant physical learning environment. Notice boards and televisions were used appropriately to inform students of timetables, various programmes, and items of interest. **Further development of the physical environment, for example more current displays of students' work, which celebrates the creativity, diversity and achievements of learners should be implemented.**



- The quality of facilities in the education centre were very good; the kitchen and art room were very well resourced with very good provision of specialised equipment to support learning. Commendably, the education centre has introduced a digital strategy and digital technology was used meaningfully to support student engagement and learning. Examples of this approach included televisions, Book Creator software, Near Pods, and the centre's shared drive. **NALA's online courses provide very high quality literacy resources and the use of these in the education centre should be progressed.**
- While the beauty and self-care room was well resourced with the necessary materials to facilitate the lessons, the students were working in an adapted classroom. **The Head Teacher in collaboration with the IPS should explore ways in which learning in Beauty and Self-care lessons could be carried out in a more authentic salon environment.** The room where the hair-dressing course was carried out could be used as an example for this development.
- The Work and Training hair salon and gym were located within the education centre. This has supported students to engage with education and work and training opportunities.

#### 4. How effective was education centre leadership and management?

##### 5.85 *Putting the systems and structures in place to ensure the effective running of the centre*

- The quality of leadership and management in the education centre was very good and the education centre was very well run. The Head Teacher demonstrated a clear vision for the centre and cultivated a positive cultural environment of reflective practice and improvement. All members of the education centre community shared a common purpose which was to do their very best for their students.
- In the past, students accessed the education centre and particular classes on a first come first served basis. This arrangement worked well when the student numbers were relatively low. In recent times, student numbers increased and this system was no longer effective. The Head Teacher introduced a revised system which involved the creation, management and fair operation of a waiting list for placement on class lists. This system change proved highly effective in making a significant difference to improved attendance in the centre. The numbers accessing the centre increased from between 65-75 unique numbers per week to closer to 100 each week following this change.
- The management systems have been recently strengthened by the introduction of a new post of responsibility at Assistant Principal One level. This additional resource has facilitated the appointment of a deputy Head Teacher to support the effective running of the centre. The deputy Head Teacher was just two weeks into their new role at the time of the evaluation and work was ongoing in relation to establishing clear roles and responsibilities within the management team. Work was in progress to introduce positions at AP2 level.

#### **5.86 Ensuring that The Dóchas Education Centre benefits from the quality assurance and self-evaluation processes in an individualised way**

- The education centre had informally engaged in an effective process to identify needs and strengths of the centre. As part of this process, it was highly commendable that the Head Teacher had sought the opinions and ideas of students. Additionally, there had been very good engagement with the overall CDETБ Quality Assurance (QA) process. **It is now timely, that the education centre individualise the QA process to reflect both the CDETБ and education centre priority needs and engage in the self-evaluation (SSE) process for improvement.** The SSE website may be useful in this regard.<sup>155</sup>

#### **5.87 Benefitting from the experience and expertise of other prison education leaders**

- The various ETBs across the country are effective in supporting collaboration between Head Teachers and deputy Head Teachers in the education centres in prisons. Regular meetings are held to problem solve and deal with common issues. A good example of this collaborative work includes the piloting of projects, for example the Fusion (CPL) Reach-Out Programme was initially piloted in the Progression Unit of Mountjoy Prison and has now been extended to the Dóchas Education Centre.
- Support for the education centre provided by CDETБ was very good. The organiser of prison education in CDETБ provided ongoing, highly valuable support to the management team and teachers. This included an initial meeting between newly appointed deputy Head Teachers and Head Teachers.

### **5. How effectively do the prison systems facilitate access to education for people in the prison?**

#### **5.88 Working well with prison management to optimise the education centre as a resource for students**

- The prison systems were effective in supporting the education centre. The Head Teacher reported a very good relationship between prison management and the education centre, describing it as cooperative and progressive. Prison management and the education centre together demonstrated a commitment to supporting all students and relevant resources and educational materials have been provided. The education centre was prioritised on the Regime Management System. This year there have been very few partial or full education centre closures. The prison's Standard Operation Procedures (SOP) were being reviewed at the time of the evaluation. Commendably, this review was collaborative and included management.

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<sup>155</sup> See <https://www.gov.ie/en/service/3f07cf-school-self-evaluation/>

- The Department of Education provides 19 teachers to the education centre; 3 full time and 16 part time. While, in general, there was a high level of facilitation shown to the education centre by the prison management, there was scope for improvement in a few areas. These areas relate to punctuality, encouraging students to attend the education centre and ensuring that work does not have a higher priority than the education centre. In order to ensure students experience optimum benefit of the teacher allocation and the significant resource it represents, **it is recommended that the education centre and prison management work together in developing a system that ensures students are encouraged to go to the education centre and are facilitated in turning up on time every day.**
- In recent times, a dedicated officer was assigned to the education centre. This role is critical to cultivating positive relationships with students and supporting them to engage and access the education centre as often as possible. However, at the time of the evaluation while there were officers assigned, there was inconsistency with different officers being assigned to the school on different days. Having at least one experienced and consistent school officer has been noted to contribute to higher levels of participation in education. In recognition that it may not be possible to have the same officer each day, **a brief training session could be delivered by the education centre management to support officers to gain an understanding of the expectations between themselves and the education centre.**
- There was limited access to education for people on protection regimes. They accessed the education centre two days per week and the gym two to three times per week. Blended learning and self-studying opportunities were provided also. **Ways in which people on protection can be included further should be explored;** for example a notice board of their work could be displayed in the school, the yard attached to their house could be used for an extension of the horticulture project, and outside exercise equipment could be provided. Additionally, the games based learning could be provided directly in their house. Periodic education events such as, cookery, or beauty and self-care, could also be used as a means of including something for these women to look forward to.

#### **5.89 Communicating with students in a manner that was fair and inclusive**

- The education centre had effective systems for communicating with students. Timetables were posted in the houses, students were given subject lists, and individual class timetables were provided. There was high demand for certain subjects and a keen desire for students to maintain their place on the class list for these subjects. However, at times communication broke down between the education centre and the assigned officers. For example, if a student needed to miss a lesson for a genuine reason that was not formally recorded, this was not always reported to the education centre. This type of occurrence contributed to a sense of unfairness amongst students. Attendance at the education centre also contributed to enhanced status levels within the prison. Therefore unexplained non-attendance could result in a reduced status for students and can in turn affect student privileges within the prison system. **Communication between the education centre and the assigned officers should be developed to further ensure fair and equitable operation of the subject waiting lists.**

- Students reported a barrier to accessing the education centre which occurred when attendance clashed with work within the prison. The work and education timetables were created separately and it was difficult for students to avoid missing classes as the work timetable changed from week to week. **The prison management and the education centre should work together to establish systems that allow all students access the education centre and avail of work opportunities.**

## C. Contact

**5.90** Maintaining relationships, inside and outside of prison, is essential for the wellbeing of people in prison and for successful re-integration upon release from prison.

International human rights standards and national legislation set out requirements for how contact is to be promoted and maintained for people in prison, with the objective being to ensure a minimum level of meaningful engagement for prisoners with other people in prison and with family and friends outside of prison.

### Meaningful Human Contact

**5.91** The Irish Prison Rules 2007-2020 provide that all persons in custody should have access to daily meaningful human contact, which is defined as “interaction between a prisoner and another person of sufficient proximity so as to allow both to communicate by way of conversation”.<sup>156</sup>

As provided for under Irish law, all prisoners should have at minimum two hours out-of-cell time with an opportunity during that period for meaningful human contact.<sup>157</sup>

The University of Essex and Penal Reform International<sup>158</sup> have expanded on this to provide a better sense of what may be considered meaningful human contact in the context of the prison.

Meaningful human contact:

- may be provided by prison or external staff, individual prisoners, family, friends, or a combination;
- is carried out directly, face-to-face, allowing for social interaction;
- must not be limited to interactions related to criminal investigations or medical necessity;
- does not include when prison staff deliver a food tray, mail or medication to the cell door; and
- does not include situations where prisoners are only able to communicate by shouting at each other through cell walls or vents.

It follows that meaningful human contact cannot simply be equated with out-of-cell time, but rather an assessment of meaningful human contact must consider engagement with staff, prisoners and family or friends that is face-to-face, substantive and is not purely transactional.

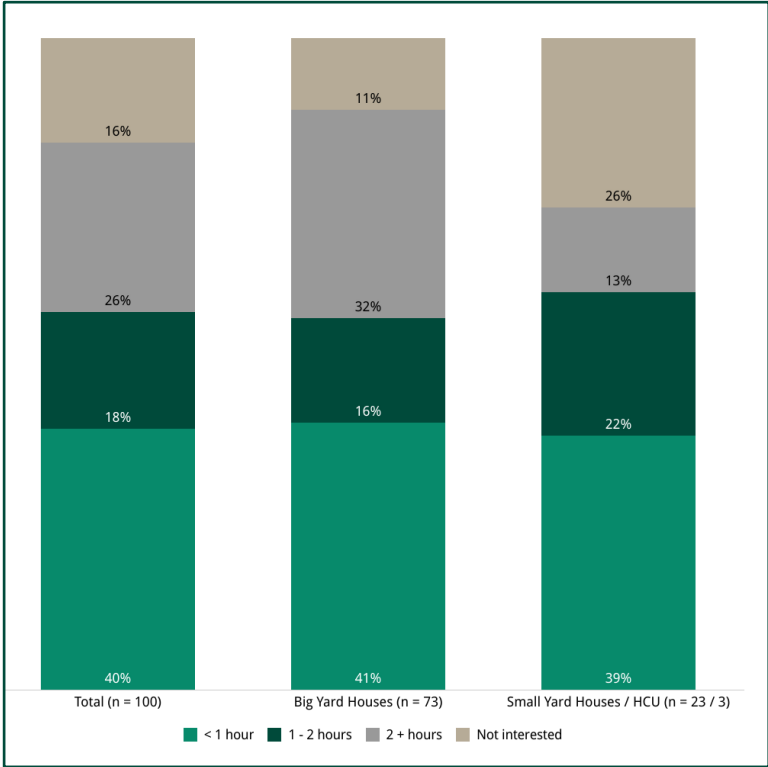
<sup>156</sup> Prison Rules 2007-2020, Rules 27(1) and 27(4).

<sup>157</sup> See S.I. 276/2017 - Prison (Amendment) Rules 2017. Meaningful human contact is defined as interaction between a prisoner and another person of sufficient proximity so as to allow both to communicate by way of conversation.

<sup>158</sup> Essex Paper 3 Initial Guidance on the Interpretation and Implementation of the UN Nelson Mandela Rules (2017).

**5.92** Opportunities to engage in meaningful human contact, and levels of interest in interacting with others, differed across areas of the prison. Women who completed the survey were asked how often they had opportunities to engage in meaningful contact, with approximately only a quarter of respondents (26%, 26 of 100) reporting they experienced over two hours of meaningful contact on a typical day (**Figure 27**).

**Figure 27: Amount of Daily Meaningful Human Contact (%)**



**5.93** **Figure 27** illustrates that women accommodated in big yard houses were more likely to engage in two hours of meaningful contact (32%) each day, in comparison to women who lived in the small yard (13%). Additionally, women in houses on the small yard were more likely to report they were not interested in interacting with others (26%) when compared to those accommodated in the big yard (11%).

**5.94** These findings may reflect differences in the amount of engagement women have with work and education opportunities. As previously noted (see **Tables 7 and 8**), a greater proportion of women in houses on the big yard attended work and the school when compared to women accommodated on the small yard. As such, it is likely that women in big yard houses had greater opportunities to have meaningful interactions with others during a typical day. This highlights the need to promote greater engagement with training and education opportunities among women in the small yard houses.

**5.95** The Inspectorate observed women interacting with each other while walking or sitting at the picnic benches in the yards. In communal areas, women sat chatting together or playing games. Inside their rooms, women were talking, knitting together, and playing card games. Some women, however, withdrew and opted to stay back alone in their cell during hours of unlock; they indicated this was due to their mental health, the need to avoid the presence of drugs or because of inter-personal dynamics and conflict in the prison.

- 5.96** On observation, there were very limited meaningful interactions between women in the prison and prison officers working in the houses. Engagement was primarily centred on prisoners making requests for assistance with issues such as approval of compassionate calls and loans, or to be permitted access to the houses or yards.

The newly imposed lock-back regime (see 2.63 - 2.72) in place in the small yard houses further impeded possibilities for meaningful interaction amongst prisoners, and prisoners and staff.

- 5.97** In the HCU, a small number of women experienced limited to no meaningful human contact each day. For one woman this amounted to solitary confinement, and for three others, all of whom had serious mental illnesses, this amounted to conditions of de facto solitary confinement. The Inspectorate had serious concerns about the overall wellbeing and treatment of the women in these conditions.

**5.98 Meaningful Contact in Prison Assessment**

*Women in big yard houses were more likely to report greater levels of meaningful human contact than women accommodated on the small yard. Women in the small yard were more likely to report that they were not interested in interaction with other people.*

*The policy of locking back prisoners who did not attend the yard, school, or work training hindered opportunities for women and prison staff to engage in a meaningful way.*

*The introduction of the lock-back regime combined with the lack of opportunities for women in the small yard to directly engage with staff likely contributed to higher self-reported levels of disengagement (e.g., 26% of women in the small yard reported a disinterest in opportunities for meaningful human contact, compared with 11% of women in the big yard.)*

## Family Contact

- 5.99** The European Convention on Human Rights, Article 8, highlights the importance of the right of all people to a private and family life; this right is retained upon committal to prison. For people in prison, a core element of their capacity to re-integrate into society upon release from prison is their ability to maintain relationships with their family members.

International human rights law and standards also set out rights for the children of people in prison, which include the right to have their best interests protected, the right to development, the right to have their views respected and the right to maintain personal relations and have direct contact with their parents on a regular basis.

Furthermore, the importance for family contact for women in prison is highlighted under the UN Bangkok Rules and also by the CPT. Under the Bangkok Rules, Rule 28 stipulates, "Visits involving children shall take place in an environment that is conducive to a positive visiting experience, including with regard to staff attitudes, and shall allow open contact between mother and child."

Article 9(3) of the UN Convention on the Rights of the Child (CRC) states that: 3. States Parties shall respect the right of the child who is separated from one or both parents to maintain personal relations and direct contact with both parents on a regular basis, except if it is contrary to the child's best interests.

A child's right to physical contact with their parent is cited as a principle under the Council of Europe's Recommendation CM/Rec(2018)/5 of the Committee of Ministers to member States concerning children of imprisoned parents,<sup>159</sup> which states:

*"A child's right to direct contact shall be respected, even in cases where disciplinary sanctions or measures are taken against the imprisoned parent. In cases where security requirements are so extreme as to necessitate non-contact visits, additional measures shall be taken to ensure that the child-parent bond is supported."*

**5.100** Family contact was a key area of assessment during an inspection visit; this is particularly relevant at the Dóchas Centre given that 57% (47 of 83) of women in prison who completed the survey reported they had children under 18 years of age.

**5.101** Women were facilitated to maintain family contact through in-person visits, video link calls, phone calls, and censored written correspondence. The frequency of permitted access to visits, video calls, and phone calls was determined, in part, by an individual's IR status. These permissions are summarised in **Table 12** below.

**Table 12: Family Contact Core Privileges by Incentivised Regime Status**

	Basic Regime	Standard Regime	Enhanced Regime
<b>Personal Phone Calls</b> [sentenced prisoners]	3 per week [1 per day]	7 per week [1 per day]	14 per week [2 per day]
<b>Personal Phone Calls*</b> [remand prisoners]	5 per week [1 per day]	7 per week [1 per day]	14 per week [2 per day]
<b>Legal Phone Calls</b>	7 per week [1 per day]	7 per week [1 per day]	7 per week [1 per day]
<b>Personal Video Calls</b>	1 video call <u>or</u> 1 physical visit per week	1 per week	1 video call and 1 physical visit per week (or 2 video calls per week)
<b>Physical Visits</b>		1 per week	

\* In practice, sentenced and remand prisoners received the same amount of phone calls, in line with the sentenced prisoner allocation.

## Calls

**5.102** The Prison Rules 2007-2020, Rule 46(2) sets out that convicted prisoners, subject to the availability of facilities, shall be entitled to make not less than one telephone call per week to a member of his or her family or to a friend. For unconvicted prisoners, this entitlement is increased to no less than five telephone calls each week (Rule 46(4)). However, unconvicted prisoners on the Basic regime did not receive the weekly basic entitlement set out in the Prison Rules.

**5.103** At the time of the inspection, in-cell phones were available in some, but not all, houses in the Dóchas Centre. This meant that some women were required to make calls to their family, friends, or legal representatives in communal areas. For example, the Inspectorate observed phones being used in the hallways in Rowan and Maple Houses, despite these being noisy spaces which afforded little privacy.

<sup>159</sup> Council of Europe (Committee of Ministers) (2018). Recommendation CM/Rec (2018)/5 of the Committee of Ministers to member States concerning children of imprisoned parents.

Positively, the Irish Prison Service has commenced an estate-wide effort to install phones in the vast majority of prisoner accommodation. **The Inspectorate strongly supports this initiative.** In-cell phones will have significant benefits for maintaining family contact in that many prisoners no longer need to share one or two phones on a landing and can instead make calls in their rooms.

- 5.104** Positively, many women (60% 60 of 100) who responded to the survey indicated that the prison was supportive in setting up phone cards; this was essential to ensure women could make contact with their families and children as soon as possible after entering prison.
- 5.105** Across the prisons inspected to-date, the Inspectorate has had concerns about the short length of all phone calls,<sup>160</sup> both personal and legal, which are currently capped at six minutes. Among women surveyed at the Dóchas Centre, the length of phone calls was the second most commonly cited problem in the prison, only second to overcrowding.
- 5.106** Women expressed frustration at the extremely limited duration of the calls, in particular that it constrained their ability to meaningfully check in with their family and life at home. One woman aptly summarised the issue stating, *“Six minutes? I have seven kids.”* Another woman stressed the importance of phone calls for connecting with family who are abroad: *“There is only one phone call per day for only 6 minutes. There are people who really need to talk with their family, people who are not even from this country.”*
- 5.107** Further to this, a member of the healthcare team highlighted that for women who are engaged with services and addressing personal issues, it can be difficult to advise them to seek additional family support in the knowledge that phone calls are of such short duration.
- 5.108** Maintaining contact with family and friends is crucial for re-integration and resettlement; and, as established in the Bangkok Rules, contact with family has a particular importance for women in prison<sup>161</sup>. Accordingly, the Inspectorate reiterates its recommendation that **the phone call length and frequency of phone calls at the Dóchas Centre, and all other prisons in Ireland, should be reviewed and increased.**

## Visits

- 5.109** The Prison Rules 2007-2020, Rule 35(1) establishes that convicted prisoners “shall be entitled to receive by prior appointment not less than one visit from relatives or friends each week of not less than 30 minutes duration.” Rule 35(3) sets out that unconvicted prisoners “shall be entitled to receive one visit per day from relatives or friends of not less than 15 minutes in duration on each of six days of the week, where practicable, but in any event, on not less than on each of three days of the week.”
- 5.110** As shown in **Table 12**, access to visits was not determined by conviction status but rather women’s status within the IR programme. Therefore, women who were on remand - even those on the Enhanced IR status - received less than their visit entitlements. This is of concern as it is contrary to the visit entitlements set out under the Irish Prison Rules for remand prisoners; additionally, it undermines the ability for women to maintain familial and caring relationships.
- 5.111** The visit facility was clean and colourfully painted (**Figure 28**). There were murals on the wall depicting cartoon characters to create a welcoming environment for children. Up to seven visits could be facilitated during each visit session, with each session lasting 30 minutes.

<sup>160</sup> See recent OIP reports on Mountjoy Men’s Prison and Training Unit, November - December 2022, Cork Prison March - April 2023 and Cloverhill Prison, May 2023.

<sup>161</sup> UN Bangkok Rules (2015), Rules 4, 23, 26 and 43, and their respective commentaries.



Figure 28: Dóchas Centre Visits Area



- 5.112** Despite efforts made to provide a welcoming visits environment, simple improvements should be made to improve this area. For example, the wood frames on the tables, which were previously used to hold plastic screens during COVID-19, should be removed to help create a more normal visit environment. Additionally, there was little by way of toys or items that women could use to interact with children. While there as a small box of colouring pencils and markers available in the visiting room, this was kept in close proximity to officers and was not easily accessible by children. The visitor toilets and baby changing facilities were also in disrepair.
- 5.113** Physical contact was not permitted during the course of physical visits, even though women described it as “*so crucial*”. Women raised this as a source of significant anguish and an issue in maintaining relationships. This practice is of serious concern, particularly where it applies to visiting children. Rule 28 of the Bangkok Rules states that visits “shall allow open contact between mother and child”. Similarly, the CPT have stated that physical contact should be permitted between women in prison and their children, as well as with partners, family, and friends. **Physical contact should be allowed for women in prison during physical visits, and any decision to disallow contact should be clearly documented and reasoned on the ground of individual risk which is regularly reviewed.**
- 5.114** At the end of the visit session, visitors received a printed sheet from the electronic Prisoner Information Management System. This sheet contained the prisoner’s committal photograph, which the visitor was required to show to an officer at the gate upon leaving the Dóchas Centre. This was to confirm the identity of the visitor to ensure the person leaving the prison was not a prisoner. Sharing a person’s prison committal photo with friends and family was a humiliating practice and not an appropriate way to confirm the identity of visitors and women in prison. This practice should be discontinued immediately and replaced with an alternative, more dignified, manner by which identity is confirmed.
- 5.115** There were significant challenges in the booking of visits in the Dóchas Centre. Visitors could book a visit through a dedicated email address, although this was not accessible to people with issues of literacy or digital literacy. An alternative mode of booking was by phone; dedicated phone lines were open on Tuesdays through Sundays from 10:00-12:00 and 14:00-16:00. **However, 14 test calls made by the Inspectorate to the visit booking phone lines on Tuesday, 26 September 2023 went unanswered. It is crucial that this post is staffed during these times to allow for the booking of visits.**

**5.116** Women in prison who were foreign nationals or who had close family members living abroad can face additional challenges in maintaining familial and other relationships while in prison. Staff reported that additional efforts are made to accommodate family travelling from overseas to visit women in prison. For example, the prison will allow for multiple visits to be scheduled during the family's time in Ireland, rather than enforce the one visit a week quota. **The Inspectorate commends the efforts made by staff at the Dóchas Centre to enable increased visit opportunities for women who are foreign nationals whose families are travelling from abroad.**

**5.117** All individuals who attended visits at the Dóchas Centre were required to undergo ION scanning as a check for contraband, as per the IPS Operational Support Group Security Screening Procedures.<sup>162</sup> IPS policy stated that where a visitor indicated a positive result on the ION scanner, they were to be offered a screen visit. Details on the number of times the screened visit area was used in recent months as a result of a positive detection on the ION scanner was requested; however, this could not be ascertained. As such, it is difficult to determine whether this alternative was routinely offered.

### **Correspondence**

**5.118** The Prison Rules 2007-2020, Rule 43, sets out that prisoners are entitled to send and receive letters from family and friends. Unconvicted prisoners, in addition, are entitled to send letters to other persons, as is necessary for the purpose of managing their affairs.

**5.119** All women were permitted to correspond with their family and friends. An examination of the received incoming correspondence and their postmarks indicated that correspondence was being processed in a timely manner.

**5.120** As noted (see 2.128), there was an ongoing issue with a prohibition on families being permitted to deliver packages to the prison, and instead they were required to post in personal belongings.

### **5.121 Family Contact Assessment**

*At the time of inspection, in-cell phones were not yet installed in many of the Dóchas Centre houses; the Inspectorate appreciates that efforts are currently underway to install in-cell phones in all houses.*

*The length and frequency of phone calls was not sufficient to maintain family contact links or to engage with legal representation.*

*Women on remand were not being provided with access to visits with the level of frequency set out in Rule 35(3) of the Prison Rules 2007-2020.*

*Minor adjustments to the visiting area, as described, could be implemented to normalise the visit environment and improve the physical space.*

*Contact was not permitted between women and their visitors during physical visits; this should be addressed as a matter of urgency.*

*The practice of issuing visitors with a PIMS photo print-out of a prisoner in order to avoid mistaken identity upon visitors leaving the prison should be discontinued immediately.*

*Good measures appear to be in place for accommodating family contact for women in prison who are foreign nationals and predominantly have family and friends overseas.*

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<sup>162</sup> Irish Prison Service (2017). OSG Security Screening Procedures, Security Screening X Ray Machine.

## 5.122 RECOMMENDATIONS

### To the Director General of the Irish Prison Service:

**Repeat Recommendation DG22-13** (*recommendation also made in relation to Mountjoy Men's Prison, Training Unit, Cork Prison and Cloverhill Prison*): In order to facilitate and strengthen the right to family contact, the Irish Prison Service should increase the length of phone calls.

**Repeat Recommendation DG22-14** (*recommendation also made in relation to Mountjoy Men's Prison, Cork Prison and Cloverhill Prison*): The Irish Prison Service should review the application in practice of the Prison Rules 2007-2020, Rules 35(3) and 46(4) across the prison estate, to ensure the rights of unconvicted prisoners are fulfilled, particularly with respect to telephone calls and visits.

### To the Governor of the Dóchas Centre:

**Recommendation DO23-19:** The Inspectorate recommends that contact between women in prison and their visitors be allowed during physical visits (as per Rule 28 of the Bangkok Rules), and that any decision to disallow contact should be clearly documented and reasoned on the grounds of individual risk.

## 6. RESETTLEMENT

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- 6.1** The Prison Rules 2007-2020, Rules 61 and 75, establish a role for the Governor to advise and assist prisoners to prepare for release from prison.<sup>163</sup> As part of this responsibility, the Rules set out that:

*“The Governor shall co-ordinate the delivery of all services to prisoners and ensure, in so far as is practicable, the preparation and implementation of sentence management plans incorporating plans for their reintegration into society. The Governor shall endeavour to ensure that the persons engaged in the delivery of such services and the preparation and implementation of such plans co-operate with one another in such delivery, preparation and implementation.”*

Similarly, Rule 85 sets out that prison officers have a duty to conduct themselves in such a manner as to contribute to the rehabilitation and reintegration into the community of people in prison.

Rule 46 of the United Nations Rules for the Treatment of Women Prisoners and Non-Custodial Measures for Women Offenders (the Bangkok Rules, 2011) stipulates that prison authorities in cooperation with probation and or social welfare services, local community groups and non-governmental organisations shall design and implement comprehensive pre-and post-release reintegration programmes which take into account the gender-specific needs of women.<sup>164</sup>

There are a number of in-reach agencies located in the prison which provide support to prisoners throughout their imprisonment and up until their release, these include the Probation Service (Rules 108 and 109), services such as IASIO, the SAOL Project and the Befriending Service. In addition to these services, there exist external services such as the Bridge Project, which link in with in-prison supports to assist prisoners on release from prison.

Drawing on national legislation and international standards, the Inspectorate evaluates the prison’s Resettlement performance across two themes:

- A. Preparation for Release:** provision of in-prison pre-release supports such as sentence planning and management, including engagement with services
- B. Release:** utilisation of early release schemes and the prison discharge process

### A. Preparation for Release

#### In-Prison Pre-Release Support

##### *Sentence Planning*

- 6.2** Prisoners sentenced to 12 months or more are eligible for sentence planning supports provided by Integrated Sentence Management (ISM) officers. There were two ISM officers assigned to the Dóchas Centre to provide ISM support to 74 women who met these criteria.<sup>165</sup>

As a result of their sentence status or sentence length, a substantial proportion of women (53%) were not eligible to formally access ISM. This created an intervention gap in that a large group of

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<sup>163</sup> Prison Rules 2007-2020, Rules 58 and 61.

<sup>164</sup> UN Bangkok Rules 2011, Rule 46.

<sup>165</sup> Women in prison on 21 September 2023 who were sentenced and serving a sentence  $\geq$  12 months.

women did not receive sentence planning support, a structured plan for their time in custody if on remand, or onward referral to resettlement support services.

- 6.3** The Inspectorate observed ISM officers engaging with prisoners throughout the course of the inspection. Good relationships between ISM officers and women in the prison were evident; the ISM officers were well regarded by the women and viewed as very approachable.
- 6.4** The designation of two prison officers to the role of ISM officer is to be commended. It is also positive to note that the ISM post was rarely fully redeployed; in Q2 of 2023, the post was only redeployed three times.
- 6.5** However, it was of concern that ISM officers were very frequently assigned to additional tasks during the course of the day. For example, officers in this post were often called upon to supervise medication rounds or to assist in houses by undertaking breakfast guard duty. On 52 days in Q2 2023 (a 91 day period), the ISM officer in post was assigned to additional duties of this kind, eroding the time available to carry out ISM work.

The assignment of these additional duties hampered the capacity of the ISM officers to provide a structured and effective sentence management service to prisoners.

- 6.6** ISM officers developed Personal Implementation Plans (PIPs), which established sentence plans for prisoners, and Community Integration Plans (CIPs), which were prepared 12 months before the release of a prisoner. The development of PIPs and CIPs plans in the Dóchas Centre were behind schedule.
- 6.7** ISM meetings often took place in the houses and yards, and meetings were not scheduled or structured. Ideally, prisoner engagement with ISM officers should be planned in co-ordination with prisoners, done more formally on a regular basis, and take place in a setting that offers privacy; this was not the practice in the Dóchas Centre.

Although a large portion of ISM meetings occurred outside of the ISM office, officers were not equipped with a digital tablet to record the outcomes of these meetings, in line with a previous recommendation made by the Inspectorate.<sup>166</sup> While the IPS secured funding to purchase tablet computers for use by ISM officers, these were not yet made available for use in the prisons.<sup>167</sup>

- 6.8** PIPs should be reviewed with prisoners on a yearly basis, but review meetings were not formally scheduled and many prisoners were not aware of the need for ongoing engagement with the CIPs and PIPs process. A number of women interviewed by the Inspectorate indicated a lack of engagement in the development of individual plans, that they were often not in possession of a copy of their plan, and expressed feeling unprepared in the lead up to their release dates.

#### *Pre-Release Planning*

- 6.9** Resettlement support services in the Dóchas Centre benefitted from collaborative engagement across a number of services with a Multi-Disciplinary Team Meeting held monthly. The IASIO service in the Dóchas Centre was staffed by one Resettlement Coordinator and one Training and Employment Officer (TEO), who attended the prison three mornings per week. These service staff

<sup>166</sup> The Inspectorate recommended in 2021 that ISM officers be provided with laptops in order to support them to carry out their work with prisoners. Office of the Inspector of Prisons (2021) COVID-19 Thematic Inspection of Mountjoy Women's Prison- Dóchas Centre, see Recommendation DOCT21.

<sup>167</sup> OIP. Recommendations Database, "Integrated Sentence Management", Recommendation IDs: MJCT21, CHCT22, WFCT23, LMCT23, SACT17, AHCT17, MDCT26, LHCT13 and DOCT21.

were also responsible for parts of the adjacent Mountjoy Prison Campus. Very often, women were referred to both the resettlement service and the training and employment service.

- 6.10** Regarding preparation for release, 46% of survey respondents (21 of 45) indicated they had received support through engagement with either ISM, Probation Service, Resettlement Officers, or Counsellors.
- 6.11** The Resettlement service was not available to prisoners serving a sentence of less than three months, or to women who were on remand. On 21 September 2023, this represented 35% of the prison population at the Dóchas Centre. That said, the Resettlement Service demonstrated flexibility and did not refuse support (for example, arranging a medical card) if approached by a remand prisoner; although this support was informal in nature and not captured through the PIMS system.
- 6.12** It is important to note that gaps in support provision can arise if referral pathways are not clear. For example, as most referrals to resettlement services in the Dóchas Centre originated from an ISM Officer, the cohort who were not served by ISM (but may be eligible for resettlement) relied on an informal process of referral and assessment. Frequently, those serving sentences of under 12 months had acute resettlement needs which were very often exacerbated by the imposition of short prison sentences.<sup>168</sup>
- 6.13** The IASIO resettlement service in the Dóchas Centre, which included a training and employment component, worked with both internal and external service providers to prepare people for release.

The Training and Employment Officer provided a through-the-gate service and referred people on to training and employment opportunities in the community. There were less opportunities for women in prison as compared to men, partly as a result of the different employment needs of women and taking into account that these women had gendered work histories and were often primary caregivers prior to their imprisonment.

- 6.14** IASIO also provided practical support to prisoners preparing for release; this included support to acquire medical cards and to access social housing. In the Dóchas Centre, IASIO provided information on social welfare payments to prisoners, but appointments with the social welfare office were coordinated by the general office in the prison. Upon release, prisoners made their own way to the social welfare office.
- 6.15** The IASIO Resettlement service in the Dóchas Centre addressed the needs both of women who were released from prison and had accommodation, and women who declared as no fixed abode or unhoused on release from prison. On 19 September 2023, 40 women who were serving sentences of over three months were listed as having no fixed abode. However, this was not a true reflection of the Resettlement Service caseload given that some women who indicated they had accommodation also required housing supports; for example, they may require assistance with securing a place on the local authority housing list.
- 6.16** Sourcing and securing accommodation was a significant challenge. Homeless resettlement support included sourcing Supported Temporary Accommodation (STA) and emergency hostel accommodation, and making referrals to housing programmes such as Outlook and Tús Nua. STA placements are typically provided in the form of hostel accommodation which is arranged for

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<sup>168</sup>A Martynowicz and M Quigley (2010) "It's like stepping on a landmine: Reintegration of prisoners in Ireland." IPRT.

a period of up to three months. Emergency hostel accommodation is provided on a night-by-night basis.

The Inspectorate was informed that local authorities would frequently only confirm homeless accommodation at the point of release, which does not lead to sustainable resettlement planning. This in turn affects Training and Employment placements which depend on a person having a regular address, and the lack of such stable accommodation can negatively impact on a person's training and employment opportunities post release.

- 6.17** The Lisbon Declaration<sup>169</sup> commits to ensuring that, by 2030, no one is discharged from any institution (e.g. prison, hospital, care facility) without an offer of appropriate housing. Additionally, the Housing for All <sup>170</sup> strategy recognises that “*prisoners and other persons convicted before the courts frequently present as homeless with high and complex support needs and that homelessness poses a significant risk for many post release*”. **The ongoing shortage of sustainable and stable housing available to people released from prison continues to undermine policy efforts to address recidivism.**

#### *Resettlement of Foreign National Prisoners*

- 6.18** Foreign National Prisoners are a particularly vulnerable cohort of prisoners, and have specific challenges in accessing services, including pre-release supports. At the time of the inspection, 17% of the prison population in the Dóchas Centre were foreign nationals. Foreign national prisoners who did not have a Personal Public Service (PPS) number were not entitled to housing support, welfare payments or medical card support.
- 6.19** **Despite a 2021 recommendation made by the Inspectorate to support non-English speakers to engage with Resettlement Coordinators by ensuring the provision of an interpretation service, this was not in place in the Dóchas Centre at the time of the inspection.**

#### *Other Pre-Release Services*

- 6.20** In addition to IASIO, the Bridge Project operated in the Dóchas Centre. The Bridge Project provided pre-release resettlement support and development programmes, including a training and employment and back to education component. Referrals to the Bridge Project could be generated by IASIO, ISM officers, or the Chief Work Training Officer.
- 6.21** **Preparation for Release Assessment**

*Owing to the eligibility criteria to avail of ISM and IASIO, there were notable gaps in the delivery of these support services for women on remand and those serving short sentences. This is not an issue unique to the Dóchas Centre; however, as it is a prison with a large proportion of women on remand (32% of population) and serving short sentences (20% of population serving sentences of less than 12 months), its impact on pre-release is all the more apparent. Particular challenges were evident in securing housing upon release.*

*ISM officers had good relationships with women in the prison and were viewed as very approachable. However, there was room for improvement in the mode of delivery for sentence planning; specifically, meetings of this kind should be undertaken with greater regularity, through a more structured format, and in a setting that affords privacy. Of note, is that ISM staff often provided cover for additional tasks which was in effect a partial attrition of the ISM post.*

<sup>169</sup> European Commission 2021 Lisbon Declaration on the European Platform on Combatting Homelessness.

<sup>170</sup> Government of Ireland, Housing for All, p.52.

## 6.22 RECOMMENDATIONS

### To the Minister for Justice:

**Repeat Recommendation MDOJ23-3** (*recommendation also made in relation to Cloverhill Prison*): In line with Ireland's commitment to the Lisbon Declaration, and the Government's Housing for All Strategy, steps must be taken in partnership with relevant agencies to ensure that every person leaving prison has access to housing and pledged "intensive supports".

### To the Director General of the Irish Prison Service:

**Repeat Recommendation DG23-12:** (*recommendation also made in relation to Cloverhill Prison*): Resettlement services should be formally extended to support (i) people held on remand, and (ii) people serving short sentences.

**Repeat Recommendation DOCT21 (2021):** In line with the Mandela Rules and the European Prison Rules, and the need to strengthen, operationalise and apply the Integrated Sentence Management process, ISM officers should be provided with laptops/tablets so that they may more readily engage in regular meetings with prisoners

## B. Release

### Early Release Schemes

- 6.23** The Criminal Justice (Temporary Release of Prisoners) Act 2003 allows the Minister for Justice to temporarily release persons from custody for a number of reasons, including assessing the person's ability to reintegrate into society upon release, as well as preparing persons for release upon the expiration of their sentence of imprisonment.<sup>171</sup> The Minister may also justify the release of a prisoner on health grounds or other humanitarian grounds.<sup>172</sup> In addition to Temporary Release (TR), there were other forms of structured early release programmes available to prisoners in the Dóchas Centre, including the Community Return Scheme (CRS) and the Community Support Scheme (CSS).

### *Community Support and Community Return Schemes*

- 6.24** The Community Support Scheme (CSS) is a supervised early release programme introduced by the Irish Prison Service in 2011, in an effort to address recidivism rates of prisoners serving short sentences. To be eligible for the Community Support Scheme, prisoners must be serving a sentence of between 3 and 18 months.
- 6.25** CSS review meetings were held monthly with referrals being generated by the Co-located Unit in the Probation Service. The ISM officer conducted the CSS interview with prisoners and the assessment was carried out by Care after Prisons (CAP).

From January to September 2023, 35 releases were made to the Community Support Scheme from the Dóchas Centre. At the time of the inspection, 14 women were on the scheme.

<sup>171</sup> Irish Statute Book [Criminal Justice Temporary release of Prisoners Act \(irishstatutebook.ie\)](https://www.irishstatutebook.ie)

<sup>172</sup> See [Section 2 \(1\)\(b\)\(i\)\(ii\) \(irishstatutebook.ie\)](https://www.irishstatutebook.ie)



- 6.26** IASIO did not participate in the CSS review meetings, which could result in individuals being released on CSS without some practical resettlement supports in place. For example, without effective communication made to the Resettlement Coordinator of an upcoming release on CSS, situations could arise where a person was released without securing a medical card or without completing a housing application form to ensure a place on the local authority housing list.

The practice in the Dóchas Centre differed from that in other prisons. The absence of involvement from IASIO Resettlement could lead to situations where prisoners were released on CSS without appropriate resettlement support in place, and therefore militates against good resettlement planning and coordination.

- 6.27** The Community Return Scheme (CRS) is an incentivised early release scheme co-managed by the Irish Prison Service and the Probation Service.<sup>173</sup> Through a selection process, prisoners eligible for this scheme could be granted temporary release in exchange for agreeing to partake in unpaid community work. Access to the scheme is for prisoners serving a sentence of up to and including 18 months. It also allows prisoners serving sentences of between three and five years to be considered eligible for the Community Return Scheme at the halfway stage of their remitted sentence<sup>174</sup>.

- 6.28** In the Dóchas Centre, CRS review meetings were held monthly to assess prisoner suitability for the scheme. Between March and September 2023, 17 referrals were made to the Community Return Scheme and 12 were released. The remainder were considered not suitable or were awaiting a decision on the referral at the time of the inspection.

### **Discharge from Prison**

- 6.29** The Irish Prison Rules 2007-2020, Rule 61, establishes basic release provisions to be adhered to by the Governor of the prison, which include:

- Sufficient means for travelling to a person's destination within the state
- Provision of suitable clothing for people who have inadequate, or no clothing of their own
- Subsistence of an amount determined by the Governor as appropriate for the circumstance

- 6.30** Release processing entailed input from administrative staff, IASIO and relevant prison staff. For those prisoners referred to IASIO a standard release pack was emailed to the general office which included relevant information concerning housing, medical cards and directions to the social welfare office. Soon-to-be-released prisoners also met with the healthcare team. Training and employment information was provided when relevant.

- 6.31** The Inspectorate interviewed one woman to determine what release information and supports were provided to support her return to the community. The woman indicated that the decision on her release was very abrupt, which meant that she did not have much time to prepare herself. She informed the Inspectorate that her personal property was all accounted for and returned to her at reception.

She had suitable clothing and used her own small bag to transport her personal belongings. The Inspectorate was informed that arrangements had been made for a bed in Local Authority hostel accommodation.

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<sup>173</sup> Resettlement & Reintegration - Irish Prison Service

<sup>174</sup> This was confirmed in a letter from the Minister for Justice to the Chief Inspector of prisons following an Immediate Action Notification (IAN) for Cloverhill Prison subsequent to inspection, received on 26 June 2023.

The woman was not given the opportunity to charge her phone at reception prior to leaving the prison, and the use of the reception phone to make calls was not offered. These practices make it very difficult for released prisoners to contact families or support services in the community, particularly when a release occurs without much notice.

An appointment for the social welfare office in Dublin was set up to collect social welfare payment. No arrangements for travel or public transport were put in place and she used the remainder of her money from her prison account to fund taxi travel into the city.

**6.32** There are limited step-down facilities available for women upon release, with the exception of accommodation programmes such as Tús Nua and the Outlook Programme. These programmes have set eligibility criteria and limited capacity and therefore these options were not available for every cohort of women; for example, placement could depend on substance use history or the nature of one's offence.

**6.33** Women who were unhoused upon entering prison were almost in a better position when leaving prison because support services were required to engage with this cohort of women. However, women who indicated having a home address, regardless of how secure this accommodation was, did not receive the level of support they required.

#### **6.34 Release Assessment**

*Early release programmes such as Community Support Scheme and Community Return operated in the prison; however, there was scope to improve practice by requiring all relevant stakeholders to attend review meetings so that every woman leaving prison under these programmes has access to resettlement supports.*

*As identified above, some improvements to the release process could be implemented. It is essential that people released from prison are supported with travel money / vouchers, particularly where the individual needs to travel to appointments or reach their accommodation. Arrangements should also be put in place to facilitate phone charging and to allow for use of the reception phone.*

*There was a low number of spaces available with highly stringent criteria for acceptance to the limited number of step-down facilities available to women.*

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#### **6.35 RECOMMENDATION**

##### **To the Governor of the Dóchas Centre:**

**Recommendation DO23-20:** Immediate practical steps should be taken to promote best release outcomes, including providing facilities to charge mobile phones and make calls from a landline, and the issuance of travel vouchers.

# APPENDIX

## A. OIP Previous Recommendations Status Update

Rec ID	Recommendation	IPS Action Plan (22 December 2021)	Action Required / Owner	Timeline	IPS Details of Action Taken (1 September 2022)	IPS Details of Action Taken (Q1 / Q2 2023)	OIP Assessment September 2023
<b>DOCT1</b>  (Isolation / Quarantine Information)  <i>Focus Area: Respect &amp; Dignity</i>	In line with Rule 54 of the Nelson Mandela Rules, the Dóchas Centre and the Irish Prison Service should ensure that written and oral information about the process of quarantine is provided to prisoners on an ongoing basis. This information should be designed to assist prisoners in adapting to quarantine, and should clearly outline what they can expect while in quarantine. The information should be provided in a language and form that can be understood by the prisoner; this may require the assistance of interpreters. Prisoners should be provided with ongoing opportunities to raise questions and to be informed of all matters necessary to adapt to quarantine and prison life in general.	<p>The Irish Prison Service provides a comprehensive Prisoner Information Book to all new committals to prison. The Book is printed in several languages and gives basic information about regimes and services within prisons.</p> <p>A bespoke booklet titled "Covid-19 – Living in Cell" was developed by the Red Cross Prisoner Volunteers to provide detailed information to prisoners on isolation/quarantine and gives specific information on the Covid-19 testing process. The information, which has been designed by prisoners for prisoners, is provided in a clear, easy to read plain English format. This information booklet has been translated into several languages.</p> <p>In addition prisoners are provided with verbal information by prison management on the quarantine process including the timelines and testing process.</p>	<p>The Irish Prison Service will continue to provide translations of information provided.</p> <p>Dóchas Centre management provides a verbal briefing to new committals and prisoners going on temporary release.</p> <p>Additional information is provided by medical and discipline teams when the committal is moved to the quarantine area.</p> <p>----</p> <p>Care &amp; Rehabilitation Prison Management</p>	In place and will be reviewed and augmented on an ongoing basis	<p><b>Complete</b></p> <p>A 'Living in Cell' booklet has been provided throughout the covid-19 pandemic and has been updated on a number of occasions to reflect latest procedures.</p> <p>The booklet is circulated via the Covid-19 prison liaisons group. The document is developed in collaboration with the Prison Red Cross Volunteers and is approved by NALA. A new recording studio has been introduced in Loughan House and it is proposed that future communications will be broadcast via the Prisoner TV Channel. The Service continues to provide a comprehensive Prisoner Information Booklet to all new committals which is available in up to 7 different languages.</p>	NA	<p><b>COMPLETE</b></p> <p>People committed to the Dóchas Centre were no longer accommodated in quarantine.</p>

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<b>DOCT-2</b>  (Prisoner Engagement with OIP - Access to Reports)  <i>Focus Area: Respect &amp; Dignity</i>	The Inspectorate recommends that the Irish Prison Service and the Dóchas Centre make all Office of the Inspector of Prisons' materials and reports readily available and accessible to all prisoners.	The Irish Prison Service Communications team will work to identify opportunities to make Office of the Inspector of Prisons' materials and reports readily available and accessible to all prisoners.	Communications team to engage with colleagues at Office of Inspector of Prisons  ----- Communications / Press Office	End Q4 2021	<b>Complete</b>  The Irish Prison Service has agreed a process for the distribution of material with the Office of the Inspector of Prison.	<b>NA</b>	<b>ONGOING</b>  All OIP inspection and investigation reports were not readily available and accessible to prisoners.  Positively, the IPS supports the OIP to distribute summary inspection materials to prisoners and staff following publication of inspection reports.
<b>DOCT3</b>  (Information - Access)  <i>Focus Area: Respect &amp; Dignity</i>	The Dóchas Centre should update its general information leaflets provided to women in custody and in line with Section 42 of the Public Sector Duty, these leaflets should be made available in other languages and in accessible formats.	Arrangements are being made to have all material updated as per the recommendation.	Information leaflets to be reviewed and updated  ----- Chief Officer	End Q1 2022	<b>Ongoing</b>  Prison management has reviewed the material provided. Work has been ongoing on creating information videos which are developed by the prisoners for broadcast on the prison TV channel.	<b>Ongoing (26 June 2023)</b>  The IPS committal information booklet is currently being updated and should be completed and published in Q3 2023. Currently the Dóchas Centre is issuing an information sheet to prisoners on arrival. A new Dóchas specific booklet is nearing completion and this is being designed by the women of the Dóchas for the women of the Dóchas in collaboration with the local Red Cross group, local services and the management team.	<b>COMPLETE</b>  Updated information leaflets were not developed and distributed at the time of inspection.  However, in Q2 2024 prison management shared with the OIP a newly developed information leaflet, specific to the Dóchas. This was developed in consultation with women in the prison
<b>DOCT4</b>  (Food - Meal Options)  <i>Focus Area: Respect &amp; Dignity</i>	In line with Rule 23 (1) of the Prison Rules, 2007 and Rule 22 of the UN Mandela Rules, the Dóchas Centre should consider feedback provided by women in custody and review in consultation with the women key aspects of food provision such as quality, portion size, and choice.	The Dóchas Prison kitchen had a recent external audit where it achieved an 80% satisfaction rating. The Irish Prison Service operates a 28 day menu which has been adapted to meet the dietary needs of those requiring different diets. The 28 Day Menu has been reviewed by an independent nutritionist to assure nutritional quality and suitability. These are driven by the general requirement for the average person to consume 2000-2500 calories per day. A review of the current 28 day menu is to commence in Q1 2022 to include introducing a specific menu for female prisoners in both the Dóchas Centre and Limerick Prison. It is expected that the review will be completed in Q3 2022.	Complete Review of 28 Day Menu to include female specific menu.  Re-establishment of prisoner council  ---- Care & Rehabilitation Dóchas Assistant Governor	Q3 2022  Q1 2022	<b>Ongoing</b>  A review of the 28 day menu is being considered in the context of the change to the meal time structure.  The review of the menu will commence in September 2022 and consideration is to be given to specific menus for female offenders as recommended.	<b>Complete (13 February 2023)</b>  A Steering Committee gave oversight to the review process. A sub-committee comprising 2 members from Care & Rehabilitation and 2 members from the Staff representative association carried out the review in 2022 by visiting 4 prisons; Castlereagh Prison, Cork Prison, Wheatfield and the Progression Unit. The review was limited to reviewing the practicality of changes to the scheduling of the main daily meal, no changes are being proposed to the serving times or intervals between meals in prisons. The following were the recommendations from the review accepted by the steering Committee: 1. Revision and modernising of menu 2. Standardisation	<b>COMPLETE</b>  The Inspectorate welcomes the newly developed and implemented 28-day menu. General feedback from the women to the OIP was that portions sizes were good but that there were limited healthy options available.

		Dóchas management intend to re-establish the Dóchas Centre Prisoner council to enhance two way communication with prisoners.				of the serving times across all prisons in line with standard prison day to maximise access to prisoner services. Prisoners will remain in their morning structured activity until at least 12:15pm and in the afternoon until at least 4:15pm. 3. Provide enhanced tea/evening meal offering 4. Increase range of menu options for special dietary requirements. 5. Provide only a small range of menu alternatives. 6. Strict adherence to menu and alternatives. 7. Provision of amended menu options for female prisoners The work of drawing up the menu and testing dishes is underway and expected to complete in early April 2023. The new menu is expected to be complete and ready for implementation in Q3 2023. A new 28 day menu is being introduced across the Prisons. The female-specific equivalent of this menu programme will be implemented by Q4 2023.	
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DOCT5  (Prisoner Accounts – Tuck Shop)  <i>Focus Area: Respect &amp; Dignity</i>	The Irish Prison Service should ensure that procured Tuck Shop items are marked at a price that is affordable to prisoners, and should consider assessing the daily gratuity rates received by prisoners to ensure they are able to purchase items in the Tuck Shop at a reasonable price.	The Irish Prison Service revised the pricing structure in prison tuck shops which has ensured that all items (excluding tobacco products) for sale in the Tuck Shop are sold at cost price (+5%).  This has realised significant reductions in the cost price for prisoners and increased significantly their purchasing ability. This has also negated the need to seek an increase in the prisoner gratuity rates. Finance Directorate has written to prison management in all prisons reminding them of the need to have price lists available for prisoners and this communication will be re-issued.	Re-issue of communication from Finance Directorate	Complete	NA	NA	<b>ONGOING</b>  Tuck Shop pricelists were not available in the prison.  The OIP has recommended on several occasions, in particular in 2022 with respect to the OIP Thematic Inspection on Education and Work Training (Recommendation HQEDWT5) that increases be made to the daily prisoner gratuity rate.

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<b>DOCT6</b>  (Court - Remote Courts)  <i>Focus Area: Respect &amp; Dignity</i>	Taking into consideration Article 6 of the ECHR and Article 14 (3) of the ICCPR, the Irish Prison Service should continuously monitor and engage with prisoners on the impact of remote court hearings on participation and the right to a fair trial.	The Civil Law and Criminal Law (Miscellaneous Provisions) Act 2020 allows for certain type of court hearings to be heard by video link. This includes arraignments, returns for trial, sentencing hearings and certain hearings in relation to surrender proceedings for extradition. While video link is not the default, the Act gives this authority to the Courts allowing them to make certain proceeding of their choosing by default. This authority is vested firstly in the Presidents of the Courts and subsequently in the Judges themselves. The Irish Prison Service and the Courts Service are working to increase the capacity of video link. Infection control measures introduced during Covid-19 have resulted in the widespread use of video link for Court appearances. Approximately 60% of Court appearances are now taking place via video link. The use of video link will allow the Service to redirect vital resources into the provision of prisoner services.	The Irish Prison Service will continue to engage with Court Services as necessary.  The Irish Prison Service will continue to explore the use of video link for the provision of other services such as Probation interviews, prisoner case conferences, education and remote learning.  ---- Operations	Reviewed on an ongoing basis	<b>Ongoing</b>  The Irish Prison Service continues to enhance the physical infrastructure to support enhanced use of video link for prisoner attendance at Court. The Irish Prison Service will continue to engage with Court Services as necessary. The Irish Prison Service will continue to explore the use of video link for the provision of other services such as Probation interviews, prisoner case conferences, education and remote learning. Reviewed on an ongoing basis	<b>Ongoing (13 March 2023)</b>  The Irish Prison Service continues to take steps to enhance physical and ICT facilities to support the use of video link for prisoner attendance at Court. The Irish Prison Service continues to engage with Court Services as necessary to continuously improve the operation of video-courts to ensure that the rights of prisoners are upheld. The Irish Prison Service will continue to explore the use of video link for prisoner engagement with therapeutic and other support services. All opportunities to use video-link to the benefit of prisoners are reviewed on an ongoing basis.	<b>ONGOING</b>  Prisoners utilised video court links to attend court sessions, as required. There was no evidence that the prison monitored or engaged with prisoners on the impact of remote court hearings.
<b>DOCT7</b>  (Personal Hygiene - Menstruation Products)  <i>Focus Area: Respect &amp; Dignity</i>	In line with international human rights standards, the Dóchas Centre and the Irish Prison Service should take positive measures to respect the dignity of women by ensuring that all women have access to gender-specific and period products.	Sanitary products are readily available for women in the Dóchas centre. A number of supply related issues did arise earlier this year and these have been rectified. A new process for the ordering of sanitary products has been put in place by Dóchas Centre management and any person requiring sanitary products can access same through the Red Cross Volunteer Group.		Complete	NA	NA	<b>ONGOING</b>  While there was an adequate stock of period products in the reception and houses in the prisons, prisoners were required to approach officers and request these products. Some women reported this was embarrassing, particularly when they had to ask officers who were men.

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<b>DOCT8</b>  (Staff Training - Gender)  <i>Focus Area: Respect &amp; Dignity</i>	<p>In line with Rule 81.3 of the Revised European Prison Rules, all prison staff should be required to undertake comprehensive and continuous gender-specific training; this training should be developed in consultation with stakeholders working in the areas of gender, sexual and gender-based violence and deprivation of liberty.</p>	<p>All Recruit Prison Officers receive training specific to working with women in prisons. The specific learning objectives are 1. To work effectively with Women in Custody in compliance with the United Nations Rules for the Treatment of Women Prisoners (the Bangkok Rules 2010), and 2: Effectively comply with the gender specific needs and rights of women prisoners. The delivery of this training to other staff was hampered by the Covid-19 restrictions. However, this delivery of this training will be extended to all staff responsible for the management of female offenders in both the Dóchas Centre and Limerick Prison, once the Covid-19 restrictions on face to face training have been lifted in 2022.</p>	<p>Provision of training programme to all staff working with female offenders</p>	<p>Provision of training programme to all staff working with female offenders</p>	<p><b>Ongoing</b></p> <p>The resources and structures to support the delivery of this training via the new IPS eLearning Portal have recently been put in place. It is anticipated that this training will be offered to all appropriate staff via the eLearning Portal in Q4 2022.</p>	<p><b>Ongoing (6 March 2023)</b></p> <p>Senior Psychologists in Dóchas Centre and Limerick Female Prison have contributed to bespoke prison officer training to support their work with women in custody. A plan is also underway in relation to the development of e-learning for existing staff.</p> <p><b>September 2023 Status Update</b></p> <p>Aoibhneas provided Domestic Violence Abuse DVA training, which offers staff the skill to be able to understand the impact of abuse in women's lives and look at various types of abuse and how to support women who may make a disclosure of abuse to them. 1 in 4 women experience DVA here in Ireland. Sexual, Financial, Physical, Emotional and Digital abuse was explored within the training. On completion of the training, staff have a clear idea of what DVA is and feel competent in their understanding of how to support someone who has experienced DVA. Throughout the training while looking at supports we looked at ACE's Adverse childhood experiences and the impact that this has across the lifetime of someone who has had traumatic experiences in their lives. The training is delivered in a way that is Trauma informed and allows for a holistic response that is supportive and validates women's experiences of DVA. The training is 2.5 hours long. This Training was conducted over two days in July with approximately one third of the staff receiving this training. It is hoped to run this training programme again in quarter 4.</p>	<p><b>ONGOING</b></p> <p>In September 2023, 45% of operational staff survey respondents reported dissatisfaction with the training they received in gender-based violence.</p> <p>It is commendable that one-third of staff received 2.5 hours of DVA training in July 2023.</p>

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<b>DOCT9</b>  (Transgender Prisoners - Policy)  <i>Focus Area: Respect &amp; Dignity</i>	In line with Yogyakarta Principle 9 on the Right to Treatment with Humanity while in Detention, the Inspectorate urges the Irish Prison Service to develop, in partnership with relevant civil society organisations, transgender people in prison and other relevant stakeholders, a national policy regarding the safe custody of transgender women and men.	The Irish Prison Service is working on the development of a national Transgender Prisoner Policy regarding the safe custody of transgender women and men. The Irish Prison Service Equality, Diversity and Inclusion Lead is engaging with the relevant stakeholders including civil society organisations and transgender people in prison in this regard. The Irish Prison Service has engaged with the Transgender Equality Network Ireland in this regard, however there are other civil society organisations and stakeholders to be consulted. Policies from other jurisdictions have been reviewed also. It is intended to run a formal consultative process to ensure that all stakeholder views are taken into account.	Development of Transgender Prisoner Policy  Formal consultation phase to be completed  --- Equality, Diversity and Inclusion Lead	End Q2 2022	<b>Ongoing</b>  The Irish Prison Service has commenced engagement with appropriate stakeholders with regard to the development of a Transgender prisoner policy. This includes engagement with both statutory and non-statutory bodies. The Irish Prison Service is also conducting international research into the issue to help inform proposed policy development. It is anticipated that a draft discussion paper will be completed by the end of Q3 2022. The Irish Prison Service is also conducting a review of the Prison Rule with regard to the searching of prisoners to provide clarity on the searching procedures for transgender prisoners. It is proposed to bring forward an amendment to this rule in advance of the full review of Prison Rules which are not expected until 2023/2024 at the earliest. - IPS Equality, Diversity and Inclusion Lead Q3/Q4 2022	<b>Ongoing (9 March 2023)</b>  The Irish Prison Service has engaged with relevant stakeholders and hopes to finalise a transgender policy in Q3 2023.	<b>ONGOING</b>  An Irish Prison Service policy on the management and treatment of Transgender people in prison was not in place as of September 2023.



<b>DOCT10</b>  (Staffing - Shortage)  <i>Focus Area: Safety &amp; Security</i>	<p>In line with the European Prison Rules, Rule 83(a), the Irish Prison Service must ensure that Mountjoy Women's Prison - Dóchas Centre Senior Management roles are adequately and consistently staffed. This means there should not be extensive periods of time in which Senior Management positions are not attended in the prison, and that Mountjoy Prison Campus Senior Management staff should be supported to ensure the Dóchas Centre staffing is at a level to ensure a safe and secure environment.</p>	<p>Mountjoy Female Prison has an identified number of resources required with no vacant posts existing at management grades. Incidental absences occur on occasion and the prison is supported by the Human Resource Directorate in filling these posts through agreed processes and within the parameters of the relevant Civil Service provisions. In addition, each prison has in place a Regime Management Plan to ensure safe systems of working. It should also be noted that there is no Mountjoy campus structure in law or on an administrative basis.</p>		Complete	NA	NA	<p><b>COMPLETE</b></p> <p>Senior management positions were filled in the Dóchas Centre at the time of inspection.</p>
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<b>DOCT11</b>  (Staffing - Gender Composition)  <i>Focus Area: Safety &amp; Security</i>	<p>In line with the CPT Standards on Women in Prison, the Inspectorate recommends that consideration be made to the gender of staff working in high contact/supervision posts in the Dóchas Centre. In the event that male staff are allocated to these positions, they should be provided with the tools they need to ensure safe and secure interactions with women in custody.</p>	<p>The Human Resources Directorate has at the request of Dóchas management reviewed the number of female Officers available to conduct specific tasks associated with the direct supervision of prisoners. The Human Resources Directorate, having consideration to the tasks which are primarily associated with Section 27(1)(1) a of the Employment Equality Act, 1998 have, since 2018, reconfigured the ratio of male to female Officers at Dóchas. To achieve this, the Human Resources Directorate has applied the Employment Equality Act 1998 to ensure that appropriate resources are available to Dóchas within grades which routinely conduct direct supervision of female prisoners. In 2017 there were 46 female Officers and 14 male Officers in the PO/RPO grade, this has changed to 56 female Officers and 11 male Officers at end 2021. The allocation of resources at the grade of Prison Officer remain under constant review by the HR Workforce Planning Team.</p>		Complete	NA	NA	<p><b>ONGOING</b></p> <p>At the time of inspection, there was a mixed gender ratio in high contact/supervision posts. For example, all kitchen supervisors in the Dóchas Centre were men. Similarly, there were two ISM officers: one ISM officer was male and full-time, and at the time of the inspection, a female officer was covering the role of a second ISM officer prior to a recruitment process to fill the second ISM post.</p> <p>It was positive to note that other high contact posts were covered by women such as key healthcare posts and the Chief Work and Training Officer (WTO).</p>
<b>DOCT12</b>  (Overcrowding - Reduce Population)  <i>Focus Area: Safety &amp; Security</i>	<p>The Inspectorate recommends that the Irish Prison Service engages with the Department of Justice to maximise all opportunities available for reducing the prison population. The reduction in prison numbers reduces the number of people cell-sharing, minimises the risk of COVID-19 transmission, and enables prisoners to practice social distancing.</p>	<p>Mountjoy Female Prison has a bed capacity of 146. The daily average number in custody in 2020 was 128 or an average occupancy level of 88%. The average number in custody in Mountjoy Female in 2021 (to 11/12/2021) is 117 or 80%.</p> <p>The IPS is continuing to engage with the Department of Justice on a Review of Penal Policy which will include actions to reduce reoffending and incorporate the principle of imprisonment as a last resort.</p>			<p><b>Ongoing</b></p> <p>The Minister for Justice has published the Review of Penal Policy which includes actions to reduce reoffending and incorporate the principle of imprisonment as a last resort. The Training Unit has reopened in July 2022 providing an additional 96 prisoner spaces. An additional 90 male spaces and 22 female spaces are due to come on stream in late Q4 2022/Q1 2023 with the opening of new prisoner accommodation in Limerick Prison for male and female prisoners. (Subject to the availability of staffing resources).</p>	<p><b>Ongoing (13 March 2023)</b></p> <p>The Minister for Justice has approved amendments proposed by IPS to the Community Return Scheme and Community Support Scheme to allow for prisoners to be considered for both schemes at an earlier stage of their sentence. It should be noted that prison Governors are required by law to accept all prisoners into their custody who have been committed to prison by the Courts. The Irish Prison Service therefore has no control over the numbers committed to custody at any given time.</p>	<p><b>ONGOING</b></p> <p>The Dóchas centre was overcrowded, at an average of 109% capacity over the duration of inspection. At one point during the inspection nine prisoners were sleeping on mattresses on the floors. The size of the cells in which three prisoners were sharing living space did not meet the CPT's minimum living space requirements.</p>

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<b>DOCT13</b>  (Inter-Prisoner Treatment - Bullying)  <i>Focus Area: Safety &amp; Security</i>	In line with Rule 49 of the European Prison Rules, the Dóchas Centre and the Irish Prison Service should develop a plan to address bullying in the prison. Robust governance (the consistent filling of senior staffing vacancies) and leadership, in tandem with the establishment of a prisoner council and increased access to structured and purposeful activities may prove effective strategies by which to address these issues.	<p>No level of bullying or intimidation is accepted by prison management and any instance of bullying is dealt with through the Prisoner Disciplinary System (P19).</p> <p>Dóchas Centre Management intends to run an anti-bullying campaign in 2022 in conjunction with the Red Cross Volunteers.</p>	<p>Peer led anti-bullying campaign to be run by Red Cross Volunteers</p> <p>----</p> <p>Prison management Red Cross Volunteers</p>	Q1 2022	<p><b>Ongoing</b></p> <p>Prison management are rolling out an anti-bullying campaign - including the development of content for the prison TV channel. The campaign will be management and peer led. (Q3 2022)</p> <p><b>Ongoing (28 June 2023)</b></p> <p>The Dóchas has introduced a number of programmes to assist in tackling complaints of bullying between prisoners. AVP Ongoing courses The Alternatives to Violence Project (AVP) Ireland is a community of volunteers inside and outside prisons who run peer led experiential workshops in conflict resolution and restorative practices. The training is run by a mixed team of community and prison-based facilitators. It focuses on skills to build healthy relationships and to deal with conflicts in a nonviolent way. It consists in four levels of workshops for men and up to recently only three for women. It has been active in Irish prisons since 1994. A 3rd level 'Male Awareness' has been run in men's prisons for several years. Feedback is often amazingly positive and participants talk about 'a life changing experience'. The workshop shines a light on very deep beliefs around masculinity and gives an opportunity to participants to choose who they truly want to be, beyond the social construct of gender. Women did not have the opportunity for a similar experience. All AVP workshops were not even specifically designed with women in mind. In June, in the Dóchas Centre, was piloted the first ever 3rd level 'Female Awareness' workshop in AVP history. It was developed by a team of AVP Ireland facilitators and it is a reflection of Irish AVPers' creativity, commitment and perseverance. The workshop explores the reality of the social construct of womanhood in Irish society, to create awareness of the stereotypes and expectations for women in a patriarchal system. It's also an empowering process where participants realise the power, rank and privilege women have access to, and can use for the common good. The feedback from the pilot workshop was extremely positive. 14 women took part, 9 participants and 4 facilitators. They reported it was a fantastic learning experience. The workshop will be reviewed and improved from the experience of the pilot and from now on, will be regularly run in women prisons.</p> <p>STEPS Programme Three courses to be run this year commencing July Supporting the Personal Development of Prisoners The STEPS® programme is The Pacific Institute's® (TPI) highly renowned personal development programme for individuals and communities. The programme delivered at prisons has been tailored to meet the demand for practical and applicable educational material to assist prisoners who are trying to change their situation by examining habits, attitudes &amp; behaviours that are working for them and, importantly, identifying and addressing ineffective habits, attitudes and behaviours.</p>		<p><b>ONGOING</b></p> <p>There was evidence of bullying amongst women in the prison.</p> <p>While recent efforts made by the Dóchas Centre to address bullying are commendable, the OIP urges senior management to ensure these programmes and workshops, and the lessons learned from them, are embedded into the culture and daily activities of the prisoner population.</p>

					<p>STEPS® stimulates increased participation in and ownership of one's own personal development. It provides tools for effective goal setting, tools to raise self-esteem levels and the know-how to create a 'can do' attitude, often in the face of deep-seated beliefs that nothing can change. STEPS® has seen great success when delivered in Dóchas Centre in the past in shifting this type of mind-set and the feedback from the women in Dóchas, and from those who work with them inside, has shown that that the women who engage with the programme &amp; the material begin to make changes to their lives. STEPS® confronts the beliefs that limit achievement, helping participants to build a stronger sense of self and an expanded sense of potential and possibility. The programme enables individuals to move beyond where they have become stuck, to live more fulfilling and successful lives.</p> <p>Freedom programme A rolling eleven week programme to commence with staff training in July The Freedom Program is a 11–12-week program that identifies behaviors and traits of domestic abuse in intimate partner or familial relationships. The program is designed to support women to understand the complexities of abuse and identify patterns and responses to reduce the impact of Domestic abuse. The Program encourages and supports women to work through their experiences of Domestic Abuse in a supportive peer led program. We explore safety and recovery using a dialogical and collaborative approach supporting women understand recovery pathways and ultimately freedom from Domestic Abuse. Each week the program looks at the various impacts of different types of abuse, such as Emotional abuse , Financial abuse, Sexual abuse, Parenting etc... participants are invited to look at both "The Dominator" and "Mr./Ms. Right". This provides women educationally informed decision-making process for future partners and safety planning while in abuse situations. In Aoibhneas we believe that education informs choice and choice informs change and both can ultimately lead to freedom from Domestic abuse.</p>	
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<b>DOCT14</b>  (Restricted Regime - Record Keeping)  <i>Focus Area: Safety &amp; Security</i>	The Inspectorate recommends that the Dóchas Centre ensure that removal of any person from the general population is done in accordance with the Irish Prison Rules, 2007-2020, and that any such removal is subject to continuous and substantial review. All persons who are to be removed from the general prison population should be clearly identified on the 'Special Feature' list, irrespective of where in the prison they are being accommodated.	The Healthcare Unit is used by prison management for the accommodation of committals on their first night. Once seen by the doctor and Governor they are moved to Laurel House. Special Observation Cells are also located in this area. Women are sometimes accommodated in the Healthcare Unit on the instruction of the Chief Nurse Officer for healthcare reasons, these would be persons requiring medical supervision or have mental health issues and who could not mix in general population. The rules relating to the removal of prisoners from general population including Rule 62 and Rule 63 are to be reviewed as part of the ongoing Irish Prison Service Review of Prison Rules. In the interim, the Irish Prison Service will conduct a review of the operation of the Healthcare/Committal area including the application of the Monitoring of Prisoners Policy and associated Standard Operating Procedures to ensure compliance with the relevant procedures.	Review to area to be completed  --- Operations Care & Rehabilitation	Q1 2022	<b>Complete</b> Operations Directorate carried out a review of the Healthcare/Committal area in Q2 2022 with a view to addressing the issues raised. A number of procedural actions have been identified and are being actioned with local management. This includes: Clear identification of the cells as Special Observation Cells, Awareness session by prison management for staff on the process and procedures of Special Observations Cells and the need for compliance with SOPs. The re-issuing by prison management of all SOPs to the appropriate staff to raise awareness and drive enhanced compliance with same. A review of Rule 62 extensions to ensure compliance with Ops circular 01/2020	NA	<b>ONGOING</b>  Restricted regime record-keeping was not consistent, and on many occasions was not of sufficient detail to determine the rationale for placement on a restricted regime.  Aside from on one occasion where good practice was observed, prisoners were frequently locked back on a temporary basis without a restricted regime Rule applied to their removal from the general population.
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<b>DOCT15</b>  (Restricted Regime - Review Process)  <i>Focus Area: Safety &amp; Security</i>	The Inspectorate recommends that all materials related to the Rule 62 review process be recorded, readily available, legible and of sufficient rigour to illustrate the decision-making process behind extensions of Rule 62 directions.	The operation of the Rule 62 process in the Dóchas Centre, including the recording of same, will be considered in the review mentioned in response to DOCT 14.	-- Operations	Q1 2022	<b>Complete</b> (Same as DOCT14) Operations Directorate carried out a review of the Healthcare/Committal area in Q2 2022 with a view to addressing the issues raised. A number of procedural actions have been identified and are being actioned with local management. This includes: Clear identification of the cells as Special Observation Cells.	NA	<b>ONGOING</b>  The Rule 62 review process was not of sufficient rigour to illustrate decision making processes behind placement and extension on this Rule. There was evidence of one prisoner being placed on this Rule for an extended period of time (21 days) without adequate review and intervention to determine

					Awareness session by prison management for staff on the process and procedures of Special Observations Cells and the need for compliance with SOPs. The re-issuing by prison management of all SOPs to the appropriate staff to raise awareness and drive enhanced compliance with same. A review of Rule 62 extensions to ensure compliance with Ops circular 01/2020.		causes for deterioration in her behaviour and overall wellbeing.
<b>DOCT16</b> (COVID19 - Vaccination)  <i>Focus Area: Health &amp; Wellbeing</i>	Given the increase in COVID-19 cases in prisons in Ireland and the risk that prison settings pose to the transmissibility of the virus, the Inspectorate recommends the Irish Prison Service take all measures possible to advocate for the prioritisation of administration of booster COVID-19 vaccinations for people in prisons.	Given the increase in COVID-19 cases in prisons in Ireland and the risk that prison settings pose to the transmissibility of the virus, the Inspectorate recommends the Irish Prison Service take all measures possible to advocate for the prioritisation of administration of booster COVID-19 vaccinations for people in prisons.	The provision of the Covid-19 booster vaccination is being administered in line with the Government programme for same.  The Irish Prison Service continues to engage with the HSE/Public Health with regard to access to the booster vaccine for all prisoners and staff. --- Care & Rehabilitation		<b>Ongoing</b> A bespoke Prison Vaccination Programme was introduced in April 2021 resulting in over 80% of prisoners being vaccinated; the highest prisoner vaccination rate in Europe.  The Irish Prison Service continues to engage with the Health Authorities regarding the provision of vaccines including the booster vaccine. On 9 June 2022 almost 2,000 booster vaccines had been administered and over 9,000 vaccinations have been administered in total.	<b>Ongoing (13 February 2023)</b> The Dóchas Centre medical team are proactive in arranging clinics, be they HSE provided or provided by IPS to administer booster vaccines in accordance with HSE national guidance.	<b>COMPLETE</b>  The Irish Prison Service vaccination programme has been successful. There was a reasonably high vaccination rate among prisoners in the Dóchas centre, with education campaigns ran to promote vaccination uptake.
Rec ID	Recommendation	IPS Action Plan (22 December 2021)	Action Required / Owner	Timeline	IPS Details of Action Taken (1 September 2022)	IPS Details of Action Taken (Q1 / Q2 2023)	OIP Assessment September 2023
<b>DOCT17</b> (Family Contact - Visits)  <i>Focus Area: Health &amp; Wellbeing</i>	In line with Rule 35 of the Prison Rules, 2007, the Irish Prison Service and Dóchas Centre should consult with the National Public Health Emergency Team (NPHE) on the safe return of in-person visits to include at a minimum, a duration of 30 minute visits, on a weekly basis and the removal of the one-child visitation restriction.	Physical prison visits have returned to almost pre-pandemic levels across the entire prison system. The Irish Prison Service has returned all physical visits to 30 minutes duration in all closed prisons with effect from 1 November 2021. All prisoners are entitled to receive 1 physical visit per fortnight. Up to 3 visitors are permitted, of which 1 may be a child (U18 years of age). Prisoners continue to be entitled to receive a video visit per fortnight. All restrictions are continuously reviewed and are removed when safe to do so.		Complete	NA	NA	<b>COMPLETE</b>  In-person visits were in place in the Dóchas Centre, and the amount of in-person / video call visits was based on a prisoner's regime in the prison.

<b>DOCT18</b>  (COVID19 - Mental Healthcare)  <i>Focus Area: Health &amp; Wellbeing</i>	Measures must be taken to mitigate the detrimental effects of isolation or quarantine, including psychological support during and after quarantine/isolation in order to assist prisoners in coping with the impact of COVID-19 and subsequently imposed restrictive measures.	A Covid outbreak-specific mental health protocol has been put in place by the IPS Psychology Service. The approach incorporates a three-tiered layered care model which includes preventative, enhanced and acute mental health care interventions. This includes the use of tablets to proactively engage people on significantly restrictive measures, where required.	---- Care & Rehabilitation Psychology Service		<b>Complete</b>  A Covid outbreak-specific mental health protocol has been put in place by the IPS Psychology Service.	<b>NA</b>	<b>COMPLETE</b>  The IPS developed a COVID-19 specific mental health protocol, in line with the Action Plan. However, at the time of inspection there was a waiting list to access psychology and psychiatry services, which hindered capacity to provide enduring mental health support to people in prison.
<b>DOCT19</b>  (Education - Digital Learning)  <i>Focus Area: Rehabilitation &amp; Development</i>	To meet the education needs of prisoners (European Prison Rule 28.1), which include facilitating more substantive engagement with education (and other services), the Irish Prison Service should make digital tablets available for prisoner use. These digital tablets could be pre-loaded with education materials.	The Irish Prison Service is developing an in-cell learning strategy to enhance learning from prison cells and continues to engage with the relevant stakeholders in this regard. Laptops are provided to prisoners engaging on Open University course. A new prisoner in cell TV Information Channel has been rolled out across the estate. This allows for the broadcasting of local and national information and for the provision of educational material. A review of the in cell TV Information channel will be carried out in 2022 and facilitating education provision is a key priority of this review.  CDETB have developed a substantial quantity of audio-visual course materials to be viewed on the TV channel and accompanying supporting hard copy documentation to facilitate blended learning	A large volume of in-cell audio-visual and printed material has now been produced by the ETBs. Director of Care and Rehabilitation continues to engage with the staff representative association on the introduction of blended learning and progress is anticipated into 2022  ---- Care & Rehabilitation	Q2 2022	<b>Ongoing</b>  The Irish Prison Service is reviewing the enhanced use of technology to facilitate in-cell learning. A new Prisoner TV Channel has been introduced and is supporting in-cell learning. The Service is engaging with other prison services who have enhanced use of in-cell technology with a view to enhancing in-cell learning and service provision. This action remains under review.	<b>Ongoing (2 March 2023)</b>  In-cell TV information channel was developed in 2022 with educational content in place in all prisons. Specific in-cell blended learning is in place in Dublin prisons. The Building Bridges Project in late 2022 prioritised €500,000 SOLAS allocated funding. ETBs included Cork ETB, Limerick Clare ETB, Laois Offaly ETB and City of Dublin Education and Training Board (CDETB). Funding was primarily expended on technological enhancements in the prison schools for the teaching of prisoners engaging in education. The Department of Further and Higher Education, Research, Innovation and Science has allocated further funding of €5m in 2023. The project will be expanded to include all seven ETBs.	<b>ONGOING</b>  Digital tablets were not in use to support the education for prisoners. Prisoners on protection had less access to school activities than did prisoners in the general population, and would benefit from access to digital tablets to engage with education materials.

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DOCT20  (Activities & Services - Access)  <i>Focus Area: Rehabilitation &amp; Development</i>	In line with Rule 25.1 of the Revised European Prison Rules, the Inspectorate urges the Dóchas Centre and the Irish Prison Service to consider all possible measures to ensure that women in custody have access to a full and varied regime. The Dóchas Centre should ensure equitable access to meaningful activities for all women; not by reduction in access to activities for any prisoner, but instead by determining ways to increase the time spent in meaningful activity for prisoners currently receiving less time.	All women in the Dóchas Centre have equal access to the same level of regime including access to education, training and employment. From time to time there may be restricted regime prisoners (including those on protection) who may not be able to freely associate with other prisoners and as such they are supplied learning packs from the school.		Complete	NA	NA	<p><b>ONGOING</b></p> <p>The level of regime for women in the Dóchas Centre was very mixed. There was less engagement for those in small yard houses, than for women in the big yard. There was very little purposeful activity for those in the Healthcare Committal Unit and little opportunity for social contact. However, there was a good regime for those held under Rule 63 (protection).</p> <p>Generally, recreation facilities in most houses were underdeveloped, which was a missed opportunity. There was a notable effect of closures on the gym and workshops for all of the women.</p>



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<b>DOCT21</b>  (Integrated Sentence Management - Resources)  <i>Focus Area: Resettlement</i>	In line with the Mandela Rules and the European Prison Rules, and the need to strengthen, operationalise and apply the Integrated Sentence Management process, ISM officers should be provided with laptops so that they may more readily engage in regular meetings with prisoners.	The Irish Prison Service included in its Strategic Plan 2019 – 2022 a commitment to enhance and support the role of the ISM Coordinator to achieve the goal of personal sentence management plans. In July 2021, the Irish Prison Service introduced a new IT development which allows for the central recording of Integrated Sentence Management Coordinator interviews with prisoners and a standardised space to record the prisoner's Personal Implementation Plan devised in consultation with the prison-based multi-disciplinary team. In 2021, the Irish Prison Service also increased the number of hours dedicated to the ISM Coordinator role by moving the role to a rostered position to enhance and support the implementation of Integrated Sentence Management. There is a plan underway to increase the efficiency and capacity of existing WTO-ISM Coordinators by enabling them to operate using mobile devices and additional funding was provided in Estimates 2022 for this purpose. There is a requirement for ICT Directorate to sufficiently cable all locations with Wi-Fi capability before the WTO-ISM work can be conducted on a mobile basis. A cabling survey is underway which will inform Care and Rehabilitation in 2022 when use of mobile devices with ISMs can commence.	Installation of enabling works to facilitate the operation of mobile devices.	End Q2 2022	<b>Complete</b>  The Irish Prison Service secured funding in the 2022 Estimates process to facilitate the purchase of Tablet computers for use by ISM co-ordinators. Enabling works are required out to facilitate the necessary technical access to support same and work is underway in this regard. It is hoped that the necessary enabling work will be completed when technical components have been delivered and are installed. Delivery has been delayed due to global supply chain issues however it is anticipated that the necessary components will be delivered in November at which point enabling works will be progressed.	<b>NA</b>	<b>ONGOING</b>  ISM officers had not yet been provided with digital tablets to carry out their work.

<b>HQEDWT5</b>  (Prisoner Accounts - Gratuity)  <i>Focus Area: Rehabilitation &amp; Development</i>	The Irish Prison Service should review and update its Prisoner Gratuities and Private Cash Policy to ensure it aligns with Rule 28.4 and Rule 105.4 of the revised European Prison Rules.	<b>Action Plan Date: 9 February 2023</b>  Revision of Prison Rules and additional resources to give effect to this recommendation will be sought as part of Budget 2024 submission.	IPS will review Prisoner Gratuities and Private Cash Policy and update as appropriate.  Care and Rehabilitation	Q3 2023	NA	NA	<b>ONGOING</b>  Although the IPS informed the OIP in Q4 2023 that a 10% increase would be applied to prisoner gratuities across the prison estate, the 2012 Prisoner Gratuities and Private Cash Policy had not been reviewed or updated as of September 2023.
Rec ID	Recommendation	IPS Action Plan (9 February 2023)	Action Required / Owner	Timeline	IPS Details of Action Taken (1 September 2022)	IPS Details of Action Taken (Q1 / Q2 2023)	OIP Assessment September 2023
<b>HQEDWT9</b>  (Work Training - Prisoner Certification)  <i>Focus Area: Rehabilitation &amp; Development</i>	The Irish Prison Service should remove the name of prisons on certification obtained by persons in custody. This will increase a prisoner's ability to earn a living after release in line with Rule 26.3 of the Revised European Prison Rules.	On 22 November 2022 all Teachers and Work Training Officers were instructed that "the name of the prison is no longer to include in education/work and training certification obtained by persons in custody."	Care and Rehabilitation  Teachers Work and Training Officers	Complete	NA	NA	<b>ONGOING</b>  While there was limited accreditation available in the prison, it was positive to note that certification in certain areas such as hairdressing did not contain the name of the prison.
<b>HQEDWT10</b>  (Work Training / Education – Policy Development)  <i>Focus Area: Rehabilitation &amp; Development</i>	In order to provide a consistent approach to managing education provision across the prison estate, the IPS should develop a policy on education and training in collaboration with all of the relevant stakeholders.	The Irish Prison Service will undertake to develop a policy on education and training in collaboration with the relevant stakeholders. The Building Bridges work plan for 2023 will further progress collaboration.	A policy on education and training in collaboration with the relevant stakeholders will be developed in 2023.  Care and Rehabilitation	Q3 2023	NA	NA	<b>ONGOING</b>  As of September 2023, the Irish Prison Service had not developed a policy on education and work training.
<b>MHT8</b>  (Mental Health - Training)  <i>Focus Area: Health &amp; Wellbeing</i>	It is recommended that further formal training regarding the recognition, assessment, and treatment of prisoners with mental disorder, including communication and risk issues, is offered to prison officers.	The oversight group for MHAT has reviewed the content of this programme over the past 12 months. Focus will be initiated on developing a half day refresher course and hosting these refresher courses at regular frequency.	In progress  IPS HR / Irish Prison Service College	Q4 2024	NA	NA	<b>ONGOING</b>  Staff working with women in the Dóchas Centre who had serious psychiatric mental illnesses were not provided with sufficient training. In general staff were not satisfied with the level of training they received in the area of mental health supports for people in prison.

<b>MHT9</b> <i>(Mental Health - Prison officer support)</i>  <i>Focus Area: Health &amp; Wellbeing</i>	<p>It is recommended that the provision of individual and/or group psychological support sessions (e.g., monthly) are offered to prison officers, with particular emphasis on those staff working in areas where the level of mental disorder is more acute, such as the special units where such prisoners are accommodated.</p>	<p>This recommendation will be further considered, subject to the availability of relevant resources. The IPS currently provides a comprehensive staff support framework through the Employee Assistance Programme (EAP). This programme is supported by three full time staff and a network of Service Support Officers across the prison estate, all of whom are trained to provide support and assistance to staff. In addition all staff have access to the INSPIRE programme through which they can access free counselling services and additional supports are available through the text PRISON service for 24/7 easily accessible support.</p>	<p>For review</p> <p>IPS HR and IPS Psychology Service</p>	Q4 2024	NA	NA	<p><b>ONGOING</b></p> <p>There was evidence of some staff supports were in place (i.e. SSOs and periodic topical training sessions). However, these were often ad hoc or in response to a critical incident. Owing to high concern among staff regarding the impact of their work, and working with women with mental illness, in particular, consideration should be given to bolstering existing supports as described.</p>

## B. List of Repeat and New Recommendations

Each recommendation carries a recommendation code. The code is comprised of the action owner for the recommendation (for example: 'MDOJ' = Minister for Justice, 'DG' = Director General of the Irish Prison Service, 'DO' = Governor of the Dóchas Centre), the year the recommendation was first made, and the chronological recommendation number from that inspection activity. For example, MDOJ22-1 is a recommendation made to the Minister for Justice in 2022, and the first such recommendation. Where a recommendation has been previously issued and is then repeated, this has been indicated in the table.

Rec. Code	Recommendation
<b>Minister for Justice</b>	
<b><u>Repeat Rec.:</u></b> <b>MDOJ22-1</b>	<b><u>Repeat Recommendation:</u></b> The Minister for Justice should take urgent action to place an enforceable upper limit on the number of persons that can be committed to the Dóchas Centre, as well as in all other prisons in Ireland. This should be accompanied by determined action to implement the alternatives to imprisonment foreseen in the 2022-2024 Review of Policy Options for Prison and Penal Reform.
<b><u>Repeat Rec.:</u></b> <b>MDOJ22-2</b> <i>(also made to IPS DG, see DG22-1)</i>	<b><u>Repeat Recommendation:</u></b> In line with Rule 21 of the European Prison Rules (2020), the Minister for Justice and the Director General of the Irish Prison Service must ensure that every person in custody has their own bed and that cell occupancy is in line with CPT living space standards (4m <sup>2</sup> for each person, exclusive of sanitary facilities).
<b><u>Repeat Rec.:</u></b> <b>MDOJ23-1</b>	<b><u>Repeat Recommendation:</u></b> <i>(recommendation also made in relation to Cloverhill Prison):</i> The Minister for Justice should take urgent action to reduce the high number of prisoners, and prolonged lengths of time prisoners are held in pre-trial detention in the Dóchas Centre, as well as in all other prisons in Ireland. This should be accompanied by determined action to ensure that viable alternatives are available including the commissioning of research on the use of remand detention for people before the district court as well as the development of a women's Bail Supported Service.
<b><u>Repeat Rec.:</u></b> <b>MDOJ23-2</b>	<b><u>Repeat Recommendation:</u></b> The Minister for Justice should bring an end to the practice of immigration detainees being held in prisons.
<b>MDOJ22-3</b>	The Minister for Justice should take all possible measures to ensure the prompt review and adoption of the draft Statutory Instrument to amend the Prison Rules 2007-2020 Rule 57B. The amended Rule should take into account the requirements of a well-functioning complaint system, which includes independence, expediency and the opportunity for independent appeal.

<b>MDOJ23-4</b>	Consideration should be given to the development of a re-integration unit to support women in the lead up to their release from prison. This should include access to community-based re-integration programmes for all women preparing to re-join the community. In the longer term, as the prison estate develops, consideration should be given to the construction of an open prison for women.
<b>MDOJ23-3</b>	In line with Ireland's commitment to the Lisbon Declaration, and the Government's Housing for All Strategy, steps must be taken in partnership with relevant agencies to ensure that every person leaving prison has access to housing and pledged "intensive supports"
<b>IPS Director General</b>	
<b><u>Repeat Rec.:</u></b>  <b>DG22-1</b> <i>(also made to Minister for Justice, see MDOJ22-2)</i>	<b><u>Repeat Recommendation:</u></b> In line with Rule 21 of the European Prison Rules (2020), the Minister for Justice and the Director General of the Irish Prison Service must ensure that every person in custody has their own bed and that cell occupancy is in line with CPT living space standards (4m2 for each person, exclusive of sanitary facilities).
<b><u>Repeat Rec.:</u></b>  <b>DOCT7</b> <b>(2021)</b>  <i>(also made to Dóchas Governor, see below)</i>	<b><u>Repeat Recommendation:</u></b> In line with international human rights standards, the Dóchas Centre and the Irish Prison Service should take positive measures to respect the dignity of women by ensuring that all women have ready access to gender-specific and period products.
<b><u>Repeat Rec.:</u></b>  <b>DG22-3</b>	<b><u>Repeat Recommendation:</u></b> In the ongoing review of the Prison Rules 2007-2020, consideration should be given to amendment of Rule 27(1)(a) to increase the minimum amount of out-of-cell time, in line with the CPT's Decency Threshold for Prisons (2021), which sets out a goal of at least eight hours out-of-cell time engaged in purposeful activities for people in prison. Particular consideration should be given to safeguarding the minimum out-of-cell time for prisoners on restricted regimes.
<b><u>Repeat Rec.:</u></b>  <b>DOCT3</b> <b>(2021)</b>	<b><u>Repeat Recommendation:</u></b> In line with the Nelson Mandela Rules, Rule 22 and European Prison Rules, Rule 22.4, the Inspectorate recommends that the scheduling around meal times be amended to ensure meals are served at reasonable intervals and at normal times: lunch (midday) and dinner (evening).
<b><u>Repeat Rec.:</u></b>  <b>DOCT5</b> <b>(2021)</b>	<b><u>Repeat Recommendation:</u></b> The Irish Prison Service should ensure that procured tuck shop items are marked at a price that is affordable to prisoners, and should consider assessing the daily gratuity rates received by prisoners to ensure they are able to purchase items in the tuck shop at a reasonable price. [see also HQEDWT5]

<p><b><u>Repeat Rec.:</u></b> <b>DOCT13 (2021)</b></p> <p><i>(also made to Dóchas Governor, see below)</i></p>	<p><b><u>Repeat Recommendation:</u></b> In line with Rule 49 of the European Prison Rules, the Dóchas Centre and the Irish Prison Service should develop a plan to address bullying in the prison. Robust governance (the consistent filling of senior staffing vacancies) and leadership, in tandem with the establishment of a prisoner council and increased access to structured and purposeful activities may prove effective strategies by which to address these issues.</p>
<p><b>DG23-13</b></p> <p><i>[see also DOCT9 (2021) and LMCT18 (2021)]</i></p>	<p>The Irish Prison Service must ensure that a clear policy on the treatment and management of transgender persons is put in place, and that it aligns with the standards set out in the 2024 CPT Standards on Transgender Persons in Prison.<sup>175</sup></p>
<p><b>DG23-14</b></p>	<p>The Inspectorate urges the Irish Prison Service to fully implement its 2022 decision to cease the practice of no longer accepting drop-off of packages by family and friends at the prison gate; this practice puts an additional financial cost on families and friends to send items by post.</p>
<p><b><u>Repeat Rec:</u></b> <b>DG23-2</b></p>	<p><b><u>Repeat Recommendation:</u></b> To ensure the protection of prisoners' personal data, and to facilitate effective communication, the Irish Prison Service should embed within its policies and procedures, ready access to interpretation and translation services. These should not only be provided "on request", but should be offered to prisoners at committal, and on an ongoing basis to ensure prisoners are able to communicate over the course of their imprisonment.</p>
<p><b><u>Repeat Rec:</u></b> <b>DG23-8</b></p>	<p><b><u>Repeat Recommendation:</u></b> To promote effective handover processes, documentation of incidents in prisons, and notification and completion of restricted regime reviews, efforts should be made across the estate to digitalise all records and log books; this will require development and integration of digital technologies accessible to staff throughout the prison.</p>
<p><b><u>Repeat Rec:</u></b> <b>DG22-4</b></p>	<p><b><u>Repeat Recommendation:</u></b> To ensure accurate and effective record-keeping, the Director General of the Irish Prison Service should review the organisation of compliance functions across the prison estate.</p>
<p><b><u>Repeat Rec:</u></b> <b>DG22-5</b></p>	<p><b><u>Repeat Recommendation:</u></b> The Director General of the Irish Prison Service should take immediate action to implement the 2017 Policy for Elimination of Solitary Confinement, and in line with Rules 43 and 44 of the UN Mandela Rules (2015), should with immediate effect, cease the practice of prolonged solitary confinement.</p>
<p><b>DG23-15</b></p>	<p>The committal interview and induction process across the prison estate requires review and amendment to ensure all prisoner placements are based on a formal rigorous and reviewable risk assessment process.</p>
<p><b><u>Repeat Rec:</u></b> <b>DG23-9</b></p>	<p><b><u>Repeat Recommendation:</u></b> In line with the National Strategy on Drugs 2025-2027, and the Irish Prison Service's commitment to support and treat people with substance use issues, the Inspector urges the Prison Service to increasingly adopt a harm reduction and health-led approach to respond to drug prevalence in prisons.</p>

<sup>175</sup> CPT (2024) Transgender Persons in Prison.

<b><u>Repeat Rec:</u></b> <b>DOCT8</b> <b>(2021)</b>	<b><u>Repeat Recommendation:</u></b> In line with Rule 81.3 of the European Prison Rules (2020), all prison staff should be required to undertake comprehensive and continuous gender-specific training; this training should be developed in consultation with stakeholders working in the areas of gender, sexual and gender-based violence and deprivation of liberty.
<b><u>Repeat Rec:</u></b> <b>DG22-9</b> <i>(also made to Prison Governor, see DO23-14)</i>	<b><u>Repeat Recommendation:</u></b> The Director General of the Irish Prison Service and the Governor of the Dóchas Centre should ensure a clear demarcation between an incident recording system and the P19 (disciplinary sanction) recording system.
<b><u>Repeat Rec.:</u></b> <b>MHT22</b> <b>(2023)</b>	<b><u>Repeat Recommendation:</u></b> It is recommended that the lack of mutual access to clinical records and documentation between psychology and other clinical disciplines is overcome. Even if certain information is deemed highly confidential and remains restricted, broader mutual access to certain core information should be facilitated, particularly when it relates to key risks to self and others.
<b><u>Repeat Rec.:</u></b> <b>MHT8</b> <b>(2023)</b>	<b><u>Repeat Recommendation:</u></b> It is recommended that further formal training regarding the recognition, assessment, and treatment of prisoners with mental disorder, including regarding communication and risk issues, is offered to prison officers.
<b><u>Repeat Rec.:</u></b> <b>MHT9</b> <b>(2023)</b>	<b><u>Repeat Recommendation:</u></b> It is recommended that the provision of individual and/or group psychological support sessions (e.g., monthly) are offered to prison officers, with particular emphasis on those staff working in areas where the level of mental disorder is more acute, such as the special units where such prisoners are accommodated.
<b>DG23-16</b>	It is recommended that the nurse staffing complement in the Dóchas Centre is augmented to provide adequate cover on night duty, and to ensure that night cover is not staffed by just one individual.
<b>DG23-17</b>	It is recommended that, in line with the Irish Prison Service (2011) Healthcare Standards, administrative support staff are employed alongside clinical staff to support in the delivery of essential healthcare services.
<b>DG23-18</b>	Policies for dental care should be reviewed to, at a minimum, align entitlements for remand prisoners to that of sentenced prisoners and to promote equivalence of healthcare services with those available in the community.
<b>DG23-19</b>	In line with the 2015 New Connections report, and international best practice, improved linkages between IPS Psychology, community-based services and step-down initiatives should be explored.
<b>DG23-20</b>	An immediate review of the wait list management procedures for addiction services should be undertaken. An agreed written policy should be developed between MQI and IPS that explicitly addresses efforts to engage women on shorter and recurring sentences.

<b><u>Repeat Rec.:</u></b> <b>EDWT1</b> <b>(2022)</b>	<b><u>Repeat Recommendation:</u></b> A centralised and integrated data recording system should be put in place to accurately identify, track and report on engagement with purposeful activity. This data should be shared with the Inspectorate of Prisons and made publically available on a regular basis.
<b><u>Repeat Rec.:</u></b> <b>EDWT4</b> <b>(2022)</b>	<b><u>Repeat Recommendation:</u></b> The Irish Prison Service should ensure that all prison officer posts are maximised to ensure access to and engagement with purposeful activity for all persons in custody. Prison officer posts and associated tasks should be sufficiently flexible and to allow Governors to respond to changes in staffing structures. [See also, DG22-8]
<b><u>Repeat Rec.:</u></b> <b>EDWT5</b> <b>(2022)</b>	<b><u>Repeat Recommendation:</u></b> The Irish Prison Service should review and update its Prisoner Gratuities and Private Cash Policy to ensure it aligns with Rule 28.4 and Rule 105.4 of the revised European Prison Rules. [See also, DOCT5 (2021)]
<b><u>Repeat Rec.:</u></b> <b>EDWT7</b> <b>(2022)</b>	<b><u>Repeat Recommendation:</u></b> The Irish Prison Service should ensure that all prisoners have access to externally accredited qualifications in all work training areas. Certification offered to prisoners should be labour-market tested and should be recognised by employers to improve employment prospects upon release.
<b><u>Repeat Rec.:</u></b> <b>EDWT10</b> <b>(2022)</b>	<b><u>Repeat Recommendation:</u></b> In order to provide a consistent approach to managing education provision across the prison estate, the IPS should develop a policy on education and training in collaboration with all of the relevant stakeholders.
<b><u>Repeat Rec.:</u></b> <b>DG22-13</b>	<b><u>Repeat Recommendation:</u></b> In order to facilitate and strengthen the right to family contact, the Irish Prison Service should increase the length of phone calls.
<b><u>Repeat Rec.:</u></b> <b>DG22-14</b>	<b><u>Repeat Recommendation:</u></b> The Irish Prison Service should review the application in practice of the Prison Rules 2007-2020, Rules 35(3) and 46(4) across the prison estate, to ensure the rights of unconvicted prisoners are fulfilled, particularly with respect to telephone calls and visits.
<b><u>Repeat Rec.:</u></b> <b>DG23-12</b>	<b><u>Repeat Recommendation:</u></b> Resettlement services should be formally extended to support (i) people held on remand, and (ii) people serving short sentences.
<b><u>Repeat Rec.:</u></b> <b>DOCT21</b> <b>(2021)</b>	<b><u>Repeat Recommendation:</u></b> In line with the Mandela Rules and the European Prison Rules, and the need to strengthen, operationalise and apply the Integrated Sentence Management process, ISM officers should be provided with laptops/tablets so that they may more readily engage in regular meetings with prisoners.
<b>Governor of the Dóchas Centre</b>	
<b>DO23-1</b>	The recreation and kitchenette areas in all houses at the Dóchas Centre should be furnished, equipped and utilised to allow women to engage in recreation, purposeful activity, and meaningful human contact



<b>DO23-2</b>	Specifically designed committal cells in the Healthcare / Committal Unit should not be used to accommodate women with serious mental health issues on a long-term basis. [See also, Recommendation MHT25 <sup>176</sup> ]
<b><u>Repeat Rec.:</u></b> <b>DOCT7</b> <b>(2021)</b> <i>(also made to IPS DG, see above)</i>	<b><u>Repeat Recommendation:</u></b> In line with international human rights standards, the Dóchas Centre and the Irish Prison Service should take positive measures to respect the dignity of women by ensuring that all women have ready access to gender-specific and period products.
<b>DO23-3</b>	Prison management should develop a recording mechanism to ensure that <i>actual</i> out-of-cell time is properly recorded for all prisoners in custody, with a particular emphasis on restricted regimes and out-of-cell time record-keeping. [see also, Recommendation DO23-8]
<b>DO23-4</b>	The Governor should ensure women in the Dóchas Centre are able to store perishable foods in a safe way, for example in house kitchens, and that women have appropriate space and seating to eat their meals in a humane way.
<b><u>Repeat Rec.:</u></b> <b>DOCT13</b> <b>(2021)</b> <i>(also made to IPS DG, see above)</i>	<b><u>Repeat Recommendation:</u></b> In line with Rule 49 of the European Prison Rules, the Dóchas Centre and the Irish Prison Service should develop a plan to address bullying in the prison. Robust governance (the consistent filling of senior staffing vacancies) and leadership, in tandem with the establishment of a prisoner council and increased access to structured and purposeful activities may prove effective strategies by which to address these issues.
<b>DO23-5</b>	In line with Rule 75(3) and Rule 86(1)(b) of the Prison Rules 2007-2020, the Governor of the prison and all staff should maximise opportunities to interact with prisoners in a manner that is meaningful and supports their general welfare.
<b>DO23-6</b>	Strong and stable leadership is required in order to address elements of a negative staffing culture in the prison. Forums should be established by the Governor to facilitate direct communications, engagement and feedback between prison management and staff, as well as relevant training to provide staff with a fundamental insight into supporting women who have a unique set of needs in custody.
<b>DO23-7</b>	In line with Section 42 of the Public Sector Duty, the prison should work towards eliminating all forms of discrimination within the Dóchas Centre, with due consideration to, inter alia, (i) clear communication of staff obligations under the Duty, (ii) provision of reasonable accommodations to ensure accessibility, (iii) and means to allow for the expression of one's identity and beliefs.
<b>DO23-8</b>	Records should be kept in relation to all restricted regimes, including in instances where prisoners are separated from the general population on a temporary basis. Records should be (i) comprehensive and detailed; (ii) maintained in sequential order in distinct log books; and (iii) include thorough explanations for the (ongoing) placement of prisoners on restricted regimes, as well as the services and supports offered to and availed of by prisoners during their placement on a restricted regime.

<sup>176</sup> IPS (2023) Recommendation Action Plan in response to OIP (2023) Thematic Inspection on the Provision of Psychiatric Care within the Irish Prison System, February - March 2023.

<b>Repeat Rec:</b> <b>DOCT14</b> <b>(2021)</b>	<b>Repeat Recommendation:</b> The Inspectorate recommends that the Dóchas Centre ensure that removal of any person from the general population is done in accordance with the Irish Prison Rules, 2007-2020, and that any such removal is subject to continuous and substantial review. All persons who are to be removed from the general prison population should be clearly identified on the “Special Feature” list, irrespective of where in the prison they are being accommodated.
<b>DO23-9</b>	Senior management should conduct regular audits of temporary lock-backs carried out under Chief’s Order 02/2023 with a view to guaranteeing fair application and consistent review.
<b>DO23-10</b>	There is a duty of care on prison managers to ensure that all persons held in prison are kept safe. Increased efforts should be made to promote safe interactions in the Dóchas Centre, including application of conflict mediation and restorative justice practices to ease tensions amongst prisoners and staff.
<b>DO23-11</b>	A review of staffing allocation should be conducted to ensure adequate staffing availability during the week, rather than a surplus of staffing on weekend periods when prisoner activities and services are limited and courts are not in session.
<b>DO23-12</b>	To address prisoner reports of low confidence in the complaints system, senior management should take visible steps to promote engagement with the complaints system, which may include (i) making available sealable envelopes in close proximity to complaint forms and boxes; (ii) installation of secure complaint boxes that are clearly labelled and of the same type across the prison; (iii) regular notification to complainants of the status of their complaints; and (iv) daily collection of submitted complaints by Chief Officers.
<b>DO23-13</b>	Clearly marked Rule 44 post boxes should be immediately installed in common areas and landings to allow women to submit confidential correspondence to all bodies covered under Rule 44 of the Irish Prison Rules 2007-2020.
<b>DO23-14</b> <i>(also made to IPS DG, see DG22-9 above)</i>	The Director General of the Irish Prison Service and the Governor of the Dóchas Centre should ensure a clear demarcation between an incident recording system and the P19 (disciplinary sanction) recording system.
<b>DO23-15</b>	Senior management should regularly conduct and record audits of P19 sanctions to ensure consistency of approach and application of sanctions. To facilitate this audit process, the PIMS system should be reviewed and amended to reduce compartmentalised effects of siloed record-keeping and ensure appropriate safeguards are put in place.
<b>DO23-16</b>	The Inspectorate urges the healthcare team to extend invitations to preventive health screenings, in particular for cervical and breast checks, to women on remand.
<b>DO23-17</b>	The healthcare team should examine opportunities for building positive patient relations and trust with women in prison. This may entail focussing on opportunities to enhance communication (ie. Health promotion, preventive healthcare offerings, engagement with external speakers) and to increase engagement with women in prison (ie. Women’s health forums, events and external speakers, informal mental health and addiction support).
<b>DO23-18</b>	The Inspectorate recommends that areas of shelter should be provided for women in the big and small yard, and that women should be permitted to return to their rooms from the yard at all times.

<b>DO23-19</b>	The Inspectorate recommends that contact between women in prison and their visitors be allowed during physical visits (as per Rule 28 of the Bangkok Rules), and that any decision to disallow contact should be clearly documented and reasoned on the grounds of individual risk.
<b>DO23-20</b>	Immediate practical steps should be taken to promote best release outcomes, including providing facilities to charge mobile phones and make calls from a landline, and the issuance of travel vouchers.

## Requests for Information

No.	Information Request	Action Owner
<b><u>Repeat Req.:</u></b> <b>MDOJREQ22-1</b>	<b><u>Repeat Request:</u></b> The Inspectorate would appreciate receiving detailed information about the work of the Department of Justice to implement the recommendations of 2022-2024 Review of Policy Options for Prison and Penal Reform, including the work of the proposed “multi-stakeholder taskforce to address the current accommodation crisis”.	Minister for Justice
<b><u>Repeat Req.:</u></b> <b>DGREQ23-1</b>	<b><u>Repeat Request:</u></b> The Inspectorate requests status updates on recommendations made based on findings from the 2023 Thematic Inspection: An Evaluation of the Provision of Psychiatric Care in the Irish Prison System, particularly those that were identified by the Irish Prison Service as requiring commitment and action from other bodies, including the National Forensic Mental Health Service. These recommendations are: MHT5, MHT6, MHT7, MHT11, MHT14, MHT23, MHT24 and MHT25.	IPS Director General
<b>DGREQ23-2</b>	The Inspectorate requests information on the progress to-date in the development and carrying out of the culture audit and the subsequent development of a culture roadmap, as committed to in the Irish Prison Service 2023-2027 Strategic Plan.	IPS Director General
<b>DOREQ23-1</b>	The Inspectorate requests information on the status of the prison-wide renovation plans to renovate and refurbish all houses in the Dóchas Centre.	Governor of the Dóchas Centre



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