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Correctional, Public and Private Mental Health
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POA Circular 080/2026

For information: England & Wales, Northern Ireland, Scotland, Special Hospitals, Private Sector, Immigration Services

30th September 2026

Dear Colleagues

NATIONAL CHAIR UPDATE SEPTEMBER 2026

Please bring the contents of this Circular to the attention of all POA members.

IMMIGRATION STATUS

The POA have been made aware of confusion surrounding the exemption status of foreign national Prison Officers. POA members should note that the salary threshold exemptions for Prison Officers until December 2027 applies to all Prison Officer grades bands 3-5, as confirmed below:

"We are content that the provisions should not impede career progression and other roles which fit within the same Standard Occupational Classification (SOC 3314) code, such as Supervising Officers (Band 4) and Prison Custody Managers (Band 5). Individuals in these roles should be able to benefit from the original concession arrangements."

CAPITA

I want to acknowledge that we are very aware that the situation with Capita and delays to pensions, death benefits and the medical inefficiency process remain ongoing. As a Union we have an escalation route but only to escalate cases where bereavement or severe financial hardship are a factor. Please email the office at Cronin House for support if you require some assistance with any cases like this.

Another escalation route available to you is to write to your local MP. This actually seems a more effective route at present. We meet weekly with other trade unions and the Cabinet Office where we can report particular issues and common themes but unfortunately there is no quick fix. Along with the other Unions we will continue to push for the pension administration to be brought back in house but even if we do achieve this longer term, it doesn't help the people being affected now. The current focus remains on resolving the backlog. The annual benefit statements should now be available online via the CAPITA Civil Service Pensions web site but again, issues with the accuracy of them have also been raised. We are doing what we can but absolutely acknowledge that the current position is unacceptable and it should never have been allowed to happen.

Members affected by CAPITA can access FAQ's via the enclosed link. If your annual pension benefits statement is inaccurate (there is a good chance it is), raise it with CAPITA via the e mail address on their website.

https://www.civilservicepensionscheme.org.uk/memberhub/your-pension/yearly-pension-updates/annual-benefit-statement/abs-faqs/

WRITTEN SUBMISSIONS INDEPENDENT PRISON REVIEW

Enclosed for your information are the POA written submissions covering the Independent Review into Prisons in England and Wales. Amber Rudd is overseeing the Independent Review into Prisons in England and Wales. The submission date has now closed, with expected recommendations and a completed report due by the year end.

NALOXONE

POA members are reminded that we are still in a National Dispute over HMPPS plans to force all Bands 3-5 to administer the prescription drug Naloxone. Despite our best efforts the employer has refused to accept that this alters our terms and conditions (which it clearly does) and they intend to mandate its use.

Some disingenuous Governors are now telling staff that it is mandatory for them to train in its use and are attempting to force staff onto Naloxone training.

For the avoidance of doubt, the only people who are trained in Naloxone are volunteers and new recruits. No Prison Officer can be forced to administer Naloxone even if they are trained. We will not stand back and witness staff being bullied by senior leaders.

All POA members are encouraged to reflect on the voluntary tasks they currently perform for an employer that continues to treat them with contempt.

No POA member is obliged to volunteer for any additional task that is not contained within their job description or forms part of their terms and conditions.

PAY SUBMISSIONS

I can confirm that the POA written Pay Submissions for the remit group pay award 2027/28 have been completed and submitted within the deadline. I am not aware if HMPPS have submitted their proposals on time.

All the best.

MARK FAIRHURST
National Chair

ENCLOSURE

INDEPENDENT REVIEW: PRISONS IN ENGLAND AND WALES – POA SUBMISSIONS

JULY 2026

INVEST . RESTORE . PROGRESS

Independent Review Of the Prison System in England and Wales

POA Written Submissions

"INVEST- RESTORE-PROGRESS"

Foreword

This submission is informed by the latest official statistics published by the Ministry of Justice (MoJ), His Majesty's Prison and Probation Service (HMPPS), HM Inspectorate of Prisons (HMIP), NHS England and other government bodies. These datasets present a consistent picture of a prison system operating under sustained and increasing pressure. While individual indicators fluctuate over time, the overall trajectory demonstrates worsening challenges across security, safety, staffing, estate condition and prison capacity.

The Prison Officers' Association considers that these pressures are systemic rather than temporary. They reflect the cumulative effects of increasing prisoner numbers, an ageing estate, workforce instability and the growing complexity of the prison population. The evidence considered throughout this submission demonstrates that the prison system is experiencing multiple, interconnected pressures rather than isolated operational problems. Security threats from organised crime and drone technology, record levels of violence, overcrowding, deteriorating infrastructure, workforce shortages and increasing mental health needs all reinforce one another and cannot be addressed independently.

Official Government statistics consistently support the operational concerns raised by the Prison Officers' Association. They show a prison estate operating with limited resilience, rising demand and insufficient long-term investment.

The POA therefore concludes that the challenges facing the prison system require a coordinated programme of structural reform rather than incremental policy adjustments. Our recommendations set out a practical framework for delivering that reform and are grounded in both operational experience and the available evidence base. They offer a roadmap for creating a prison system that is more secure, safer for staff and prisoners, better equipped to rehabilitate offenders and more resilient in the face of future challenges.

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Executive Summary

The Prison Officers' Association (POA) welcomes the opportunity to contribute to the Independent Review of Prisons in England and Wales. As the professional trade union representing the overwhelming majority of operational Prison Officers and other frontline grades across the public and private prison estate, the POA is uniquely placed to provide evidence of the challenges facing prisons and the risks confronting the service both now and in the future.

Our members work at the forefront of one of the most demanding and complex areas of public service. They witness first-hand the consequences of sustained underinvestment, overcrowding, deteriorating infrastructure, organised criminality, increasing violence, staffing shortages and the growing complexity of the prison population. The experiences of our members demonstrate that many of these issues are no longer isolated operational difficulties but represent systemic risks that threaten the safe, secure and effective operation of the prison system.

The POA believes that the prison system has reached a critical juncture. Many of the pressures currently experienced were foreseeable and have developed over many years. Decisions relating to staffing reductions, prison closures, estate maintenance, capital investment and workforce planning have combined to create an environment in which prisons are increasingly reactive rather than proactive. Successive governments have sought to manage rising demand through short-term interventions rather than long-term strategic investment. The consequence is a prison estate operating under sustained pressure with limited resilience to respond to emerging threats.

Security remains one of the most significant challenges facing the prison system. The industrial scale use of drones to deliver illicit items into prisons has fundamentally altered the threat landscape. Organised criminal gangs continue to exploit weaknesses in physical security by using drones to deliver controlled drugs, mobile telephones, SIM cards, charging equipment, weapons and other prohibited articles directly to prisoners. Despite the increasing sophistication of these

methods, the POA believes that the response has been too slow and insufficiently robust. The continued use of drones presents not only a threat to good order and discipline but increasingly constitutes a national security concern. Advances in drone technology mean payload capacities continue to increase, creating a realistic future risk that firearms, ammunition or equipment capable of facilitating escapes could be delivered into prisons unless effective counter-drone technology and enhanced physical security measures are implemented. More concerningly, the advancement in drone capability heralds an increased risk of escape.

The POA believes that investment in security infrastructure must now become an urgent national priority. This should include secure exercise yards through the installation of overhead netting or fully enclosed facilities where operationally appropriate, tamper-resistant window grilles, enhanced perimeter protection and modern counter-drone technologies capable of preventing unauthorised drones from accessing prison airspace. Financial constraints can no longer be accepted as justification for delaying investment where the consequences may include serious organised crime, terrorism, or the escape of dangerous prisoners.

The Review must also address the increasing risks associated with staff corruption. While the overwhelming majority of Prison Officers demonstrate exceptional professionalism and integrity, organised criminal gangs deliberately target vulnerable or inexperienced staff. The POA has long expressed concern regarding recruitment processes that rely entirely for Band 3 Prison Officers upon remote assessments without meaningful face-to-face evaluation. We believe that current vetting arrangements require significant strengthening, whilst initial training does not adequately prepare new officers for the realities of working within complex custodial environments, with greater emphasis placed upon recognising prisoner manipulation, conditioning and corruption. Recruitment standards should inspire public confidence and ensure that those entrusted with maintaining prison security are appropriately assessed before appointment.

Safety and decency remain intrinsically linked to staffing levels, overcrowding and the deteriorating condition of much of the prison estate. The continuing backlog of maintenance, following years of underinvestment and ineffective outsourced maintenance arrangements, has left many prisons operating with ageing infrastructure that is increasingly difficult to maintain safely. Modern prisons should provide safe, decent accommodation conducive to rehabilitation, with prisoners held wherever possible in single-cell accommodation equipped to support education, digital learning and constructive activity. However, persistent overcrowding means that such aspirations remain beyond reach for much of the prison estate.

The level of violence experienced by Prison Officers has become unacceptable. Official statistics continue to demonstrate historically high levels of assaults against staff alongside persistently high levels of prisoner self-harm and deaths in custody. These figures reflect the increasingly volatile nature of the prison environment and the cumulative effect of overcrowding, illicit drugs, organised criminal activity, mental ill health and insufficient staffing. The POA remains concerned that not all operational staff have access to the full range of personal protective equipment, including PAVA and batons, despite the significant risks they face on a daily basis.

The prison capacity crisis represents a failure of long-term strategic planning rather than an unforeseen emergency. Population projections have consistently indicated rising demand for prison places, yet investment in new accommodation has failed to keep pace. As a consequence, governments have increasingly relied upon emergency measures including early release schemes, temporary accommodation and legislative changes affecting release dates to manage capacity pressures. Such measures risk undermining public confidence in the criminal justice system and diminish victims' confidence that sentences imposed by the courts will be fully served.

Staffing remains perhaps the greatest indicator of whether prisons can operate safely and effectively. Although recruitment has increased in recent years, the Service continues to

experience high levels of attrition, sickness absence and operational inexperience. Too many experienced officers have left the Service without being replaced by individuals possessing equivalent operational knowledge or life experience. This has created a workforce imbalance whereby increasingly experienced prisoners interact daily with comparatively young inexperienced staff. The POA believes that substantially higher staffing levels, improved pay, enhanced career progression, better welfare support and consideration of lower aged retirement arrangements are essential if the Service is to recruit and retain the calibre of staff required for the future.

The prison population itself has also become significantly more complex, volatile and less respectful towards authority figures. Prisons now accommodate increasing numbers of individuals with serious mental health conditions, neurodiversity, substance misuse issues and complex behavioural needs. While Prison Officers continue to perform their duties with professionalism and compassion, prisons are not hospitals and cannot substitute for secure mental health facilities. Greater investment in health services and improved partnership working across government will be essential if prisons are to fulfil their primary purpose safely and effectively.

The POA believes that the Independent Review provides an opportunity to establish a long-term strategic vision for the prison system founded upon sustained investment rather than short-term crisis management. The recommendations emerging from this Review must recognise that security, staffing, infrastructure, rehabilitation and public protection are mutually dependent. Investment in one area without addressing the others will not deliver the resilient prison system that the public, staff and prisoners deserve.

The POA therefore urges the Review to adopt a long-term, evidence-based approach that prioritises national security, restores operational resilience, modernises the prison estate,

strengthens staffing and creates a prison system capable of protecting the public while delivering safe, decent and rehabilitative custody for future generations.

This submission sets out the POA's evidence and recommendations across each of the areas identified within the Terms of Reference and reflects the collective experience of those who work every day on the front line of the prison system.

Abstract

As the recognised professional trade union representing the overwhelming majority of operational Prison Officers, Operational Support Grades and other specialist staff working throughout the public and private sector prison estate, the POA is uniquely positioned to provide evidence based upon the lived experiences of those responsible for maintaining the safety, security and good order of prisons across England and Wales.

The POA has consistently engaged with successive governments, His Majesty's Prison and Probation Service (HMPPS), the Ministry of Justice and Parliament to promote policies that improve public protection, staff safety and prisoner rehabilitation. Our members perform one of the most demanding roles in the public sector, operating in environments characterised by increasing violence, organised criminality, deteriorating infrastructure, overcrowding, staff shortages and an increasingly complex prison population. The operational experience of our members provides invaluable insight into the challenges currently facing the prison system and the strategic risks that must be addressed if prisons are to remain capable of protecting the public whilst fulfilling their rehabilitative purpose.

The POA welcomes the decision to undertake a comprehensive review of the prison system. However, we would observe that many of the issues identified within the Terms of Reference have been repeatedly highlighted by the POA over many years. The risks now facing the prison service are not unforeseen or sudden in their emergence. They are the consequence of long-term policy decisions, insufficient investment, workforce reductions, estate deterioration and a failure to undertake meaningful strategic planning to meet predictable future demand.

For over a decade, the POA has consistently warned of the consequences of overcrowding, the erosion of experienced staffing, the deteriorating condition of the prison estate and the

increasingly sophisticated methods employed by organised criminal gangs to undermine prison security. Too often these warnings have not resulted in timely action. Instead, successive governments have responded to emerging crises through short-term operational measures rather than implementing the sustained investment necessary to build a resilient prison system capable of meeting future challenges.

The POA believes that this Review presents an important opportunity to move beyond crisis management and establish a long-term strategic vision for the prison estate. Such a vision must be founded upon realism, recognising that prisons cannot continue to absorb increasing operational demands without corresponding investment in infrastructure, staffing, technology and security. The Review should not simply identify the challenges currently facing prisons but should provide a clear roadmap for ensuring that the prison system remains fit for purpose over the coming decades.

The Terms of Reference identify four principal areas of strategic risk: security; safety and decency; capacity; and staffing. In the view of the POA these issues are inextricably linked and cannot be considered in isolation. Weaknesses in one area inevitably create additional pressures elsewhere. For example, overcrowding increases violence and self-harm, reduces access to education and purposeful activity, increases pressure upon staff and creates additional opportunities for organised criminality to flourish. Similarly, insufficient staffing reduces the ability to deliver safe regimes, supervise prisoners effectively, detect corruption and respond proactively to emerging security threats.

The Review also recognises the wider societal factors influencing the prison system, including demographic change, technological developments, sentencing trends and the increasing complexity of those committed to custody. The POA strongly supports this broader strategic approach. Today's Prison Officer is required to manage prisoners presenting with significant mental health conditions, neurodiversity, serious substance misuse disorders, violent extremism,

organised criminal affiliations and increasingly sophisticated methods of communication facilitated by modern technology. These challenges bear little resemblance to those faced by previous generations of prison staff and require corresponding changes in policy, training, staffing and investment.

The continued evolution of organised crime presents one of the most significant strategic threats identified within the Terms of Reference. Criminal networks operating both inside and outside prisons have demonstrated remarkable adaptability, exploiting developments in drone technology, encrypted communications, financial crime and cyber-enabled criminality to undermine prison security. The prison service must remain capable of responding at least as quickly as those seeking to compromise it. The POA does not believe that this has consistently been achieved.

Equally concerning is the growing disparity between the experience of the prisoner population and the relative inexperience of many newly recruited officers. Years of high attrition and reduced retention have resulted in the loss of significant operational expertise across the prison estate. Whilst recruitment campaigns have increased staffing numbers, experience cannot be replaced quickly. Many prisons now contain prisoners serving lengthy sentences who possess decades of custodial experience and who understand how to manipulate systems, exploit inexperienced staff and facilitate organised criminal activity. This imbalance creates additional operational risk and reinforces the need to improve recruitment, training, mentoring and retention.

The POA also welcomes the Review's recognition that prisons operate within a wider criminal justice system and that effective prison management depends upon collaboration across government departments and partner agencies. Many of the pressures experienced within prisons originate elsewhere, including delays in mental health transfers, increasing court activity, sentencing policy, community service provision and the availability of suitable accommodation

upon release. Effective prison policy cannot therefore be developed in isolation from the wider criminal justice system.

While this submission necessarily identifies areas where the POA believes government policy has fallen short, it is intended to be constructive in both its analysis and its recommendations. Prison Officers remain committed to delivering safe, secure and rehabilitative regimes despite increasingly challenging circumstances. Our members continue to demonstrate exceptional professionalism, courage and resilience every day whilst protecting the public, maintaining order and supporting rehabilitation. However, professionalism alone cannot compensate indefinitely for structural deficiencies within the prison system.

The POA believes that the central question for this Review is not whether the prison service can continue to function under existing pressures, but whether it can continue to do so safely, securely and effectively without significant long-term investment. In our assessment, the answer is unequivocally no. Incremental improvements will not resolve problems that have developed over many years. A strategic programme of sustained investment and reform is now required.

This submission therefore addresses each of the themes identified within the Terms of Reference by examining the current risks, identifying emerging threats, analysing the underlying causes of those pressures and setting out practical recommendations that the POA believes are necessary to secure the future resilience of the prison system. Our recommendations are informed by the operational experience of frontline staff, supported wherever possible by official Ministry of Justice and HMPPS data, and guided by the principle that safe prisons are fundamental to public protection, the rule of law and confidence in the criminal justice system.

The POA hopes that this Review will mark a turning point in the development of prison policy. It is an opportunity to replace reactive short-term responses with a coherent long-term strategy that recognises prisons as a critical component of national infrastructure, deserving of sustained investment commensurate with their essential role in protecting society. The POA stands ready to

work constructively with the Independent Review, the Ministry of Justice and His Majesty's Prison and Probation Service to ensure that the recommendations arising from this Review deliver meaningful and lasting improvements for staff, prisoners and the general public.

SECTION 1

SECURITY

The Drone Threat

1 The greatest change to prison security in recent years has been wide scale and consistent drone-enabled organised crime. What began as isolated incidents involving the delivery of mobile telephones has evolved into an organised criminal enterprise operating across much of the prison estate.

2 Official Ministry of Justice statistics demonstrate that more than 1,000 drone incidents (1712) were recorded across prisons in England and Wales during the most recent reporting year, representing a substantial increase (43%) compared with previous years (*HMPPS Annual Digest 2024-2025*). The true number is likely to be considerably higher, as not every drone entering prison airspace is detected or successfully intercepted. The Ministry of Justice has also stated that drone incidents have increased by 770% between 2019 and 2023**.** Many prisons now experience repeated drone activity every week. Some establishments located close to urban areas report multiple incursions during a single night. The POA believes that drone incursions have become an established method of organised criminal supply rather than an emerging threat.

3 Drones are now routinely used to deliver illicit drugs, mobile telephones, SIM cards, charging equipment, tobacco, psychoactive substances, weapons including lock knives and machetes and other prohibited articles directly to prison cell windows, within prison grounds and on exercise yards. Intelligence from across the prison estate suggests organised criminal gangs operate with increasing confidence, often making multiple deliveries during the hours of darkness and, increasingly, in daylight.

4 The consequences extend far beyond the introduction of contraband. Every successful drone delivery strengthens organised criminal networks operating both inside and outside prisons. Drugs

fuel debt, intimidation, violence and corruption. Mobile telephones enable prisoners to continue directing organised crime from within custody, intimidate witnesses, coordinate drug supply, facilitate fraud, exploit vulnerable members of the public and continue criminal enterprises with little interruption to their incarceration.

5 The POA is particularly concerned by the increasing sophistication of drone operations. Organised crime gangs have demonstrated an ability to exploit technological advances far more rapidly than the prison service has adapted its security response. Modern commercial drones possess greater range, enhanced payload capability, improved navigation systems and increasingly sophisticated autonomous flight functions. These developments mean that future threats cannot simply be assessed against today's methods of operation.

6 The POA believes it is no longer appropriate to regard drone incursions solely as a prison security issue. They represent an organised criminal threat requiring a coordinated national response involving the Ministry of Justice, Home Office, police forces, intelligence agencies, the Civil Aviation Authority, the Armed Forces and technology providers.

The Risk of Firearms Entering Prisons

7 The POA believes the next stage in the evolution of drone-enabled organised crime is deeply concerning. Commercially available drones continue to increase in carrying capacity. Some heavy-lift drones available internationally are capable of transporting payloads in excess of 100 kilograms (See Annex A). Whilst such platforms are not commonly encountered within the prison estate at present, criminal gangs continue to adapt rapidly to technological developments. The POA believes it is only a matter of time before attempts are made to introduce firearms or component parts into prisons using drone technology. This concern is not hypothetical. Operational intelligence has already resulted in emergency lockdowns and extensive searches at two prisons following credible intelligence suggesting that firearms may have been delivered by

drone. Although these incidents did not ultimately result in confirmed recoveries, they demonstrate that the threat is imminent.

8 The consequences of a firearm entering a prison are almost unimaginable. Such an event would fundamentally alter the security landscape, placing staff, prisoners and the wider public at immediate risk. It would create opportunities for hostage-taking, organised escapes, targeted killings and acts of terrorism involving individuals already in custody.

9 The rapid development of drone technology further compounds this threat. Whilst current criminal use primarily involves relatively small payloads, payload capacities continue to increase as technology evolves. The POA believes Government must anticipate future capabilities rather than simply reacting after a serious security breach has occurred. In short, we need to be proactive rather than reactive.

10 The prison estate contains some of the most dangerous offenders in Europe, including Category A prisoners, organised crime leaders, terrorists and individuals convicted of offences involving national security.

11 The POA is increasingly concerned that existing physical security measures have failed to keep pace with the evolving threat environment. Organised criminal gangs no longer need to physically enter prison grounds to compromise security. Modern drones enable prohibited articles to be delivered directly to individual prisoners with remarkable accuracy whilst operators remain outside prison perimeters.

12 If illicit equipment is regularly delivered over time including mobile phones, cutting tools, climbing equipment or weapons, the possibility of facilitating the escape of a dangerous prisoner becomes increasingly realistic. Although escapes from secure prisons remain rare, the consequences of even one successful escape involving a Category A prisoner would be catastrophic.

13 The development of drones capable of lifting a prisoner from the prison grounds to aid an escape is unthinkable. We struggle to understand why there has been such resistance and lethargy in

sourcing technology that can block both drone and mobile phone signals, as we understand both resources exist. The POA therefore believes prison security should now be regarded as an integral component of national security rather than solely an operational responsibility of HMPPS.

14 The POA recognises that HMPPS piloted counter-drone technology at a number of establishments and continues to evaluate emerging technologies. However, our members remain concerned that the pace of implementation has consistently lagged behind the speed with which organised criminals adopt new methods. Too often, security improvements follow major incidents rather than preventing them. This reactive approach has characterised much of the prison service's response to drone incursions. Whilst organised crime has demonstrated agility and innovation, procurement processes, funding mechanisms and bureaucratic decision-making have frequently delayed operational responses.

15 The POA believes that lessons should have been learned much earlier. Had decisive investment been made when drone incursions first emerged, the scale of the current threat may have been significantly reduced. Technology alone will not solve the drone problem.

16 The POA believes that substantial investment in physical security infrastructure is now essential.

Priority should be given to:

- *Fully enclosed exercise yards at high-security establishments where operationally feasible.*
- *Anti-drone netting covering exercise yards across the closed prison estate.*
- *Tamper-resistant cell window grilles designed to prevent deliveries directly to accommodation to be installed in every closed prison.*
- *Improved perimeter surveillance using radar, thermal imaging and artificial intelligence-assisted detection.*
- *Greater use of physical barriers around vulnerable reception points.*
- *Enhanced CCTV coverage capable of identifying both drone operators and retrieval parties.*

- *Improved lighting around vulnerable perimeter areas.*
- *The immediate introduction of mobile phone and drone signal blockers in every closed prison.*

Prison Security

17 Security infrastructure should be designed with future threats in mind rather than merely addressing current methods of criminality. The POA rejects any suggestion that financial pressures should delay these improvements. The financial cost of implementing enhanced physical security is insignificant when compared to the consequences of a successful escape, terrorist incident or major organised crime operation directed from within custody.

18 Alongside physical security improvements, Government must significantly accelerate the deployment of effective counter-drone technologies. The POA recognises that legal and regulatory considerations exist regarding the interception or disabling of unmanned aerial drones. However, technological solutions already exist internationally that enable detection, identification, tracking and lawful disruption of unauthorised drones operating within protected airspace. Every prison should benefit from an integrated counter-drone capability proportionate to its security category and operational risk.

19 The POA further recommends that prison airspace should receive statutory protection equivalent to that afforded to other elements of the United Kingdom's critical national infrastructure.

Organised Criminal Gangs

20 Organised criminal gangs continue to exert considerable influence within prisons. Their objectives extend beyond the supply of illicit items. Organised crime seeks to undermine prison authority, corrupt staff, intimidate prisoners, recruit associates, facilitate external criminal activity and generate substantial profits through debt, violence and exploitation.

21 Drugs such as synthetic cannabinoids and nitazines have transformed prisoner behaviour. Their unpredictable effects contribute significantly to violence, medical emergencies, self-harm, debt and intimidation. The presence of organised criminal networks also places considerable pressure

upon vulnerable prisoners and their families, who may become indebted through addiction and subsequently exploited for criminal purposes.

22 The POA believes intelligence capability should be strengthened through greater investment in dedicated security departments, intelligence analysis, digital investigation and closer partnership working with law enforcement agencies.

The threat of Staff Corruption

23 The overwhelming majority of Prison Officers demonstrate exceptional professionalism, integrity and commitment throughout their careers. However, organised criminal gangs actively seek opportunities to corrupt staff and exploit weaknesses in recruitment, training and support.

24 The POA has long expressed reservations regarding the current recruitment process. The POA believes that a process relying heavily upon remote assessment and online interviews does not provide sufficient opportunity to assess applicants' suitability for one of the most challenging roles in the public sector. Face-to-face assessment should once again become a mandatory element of recruitment. We also believe the current vetting process requires significant strengthening. Prison Officers exercise considerable authority and are entrusted with access to highly sensitive information and secure environments. Vetting arrangements must therefore command the highest possible level of public confidence.

25 The POA also has serious reservations regarding policies that permit close relatives of convicted serious organised criminals to serve in operational prison roles without enhanced scrutiny. While every applicant must be assessed fairly and without unlawful discrimination, associations via family connections with serving criminals may create vulnerabilities capable of being exploited by organised crime gangs. Where such circumstances arise, enhanced risk assessment and ongoing monitoring should form part of a strengthened vetting regime.

Recruitment and Initial Training

26 Security begins with competent staff. The POA believes the current Prison Officer Entry Level Training package does not adequately prepare recruits for the realities of modern prison life. Although recruits receive instruction in legislation, procedures and personal safety and restraint techniques, insufficient emphasis is placed upon understanding prisoner psychology, manipulation, conditioning, organised criminal methods and the gradual process through which staff may be groomed for corruption.

27 Experienced prisoners often possess decades of custodial experience and understand how to identify vulnerable staff, exploit personal circumstances and cultivate inappropriate relationships over extended periods. New officers require far greater preparation to recognise these risks before entering operational environments. We recommend that training should include comprehensive modules delivered by full-time tutors (not seconded), who are experienced operational Prison Officers with a minimum of 5 years in post, corruption investigators and behavioural psychologists focusing upon manipulation, organised crime methodologies, professional boundaries and ethical decision-making.

Emerging Cyber Threats

28 The Review identifies cyber security as an emerging risk. Increasing digitisation across prisons presents significant operational opportunities but also introduces new vulnerabilities. Electronic records, digital communications, biometric systems, security management platforms and technology-enabled rehabilitation all depend upon resilient cyber security. Organised criminals have already demonstrated advanced cyber capabilities in the wider criminal justice environment. The prison service must therefore ensure that cyber resilience develops alongside wider digital transformation. Cyber security should become an integral component of operational security planning rather than being regarded solely as an information technology issue.

29 The POA recommends that the Independent Review should propose:

- *A nationally coordinated counter-drone strategy treating drone incursions as a national security threat.*
- *Immediate investment in anti-drone netting, enclosed exercise yards and tamper-resistant window grilles.*
- *Accelerated deployment of integrated counter-drone detection and mitigation technology across the prison estate.*
- *Legislative measures providing enhanced protection of prison airspace.*
- *Increased investment in prison intelligence departments and organised crime investigations.*
- *Mandatory face-to-face recruitment assessments for all operational Prison Officers.*
- *Strengthened vetting standards incorporating enhanced assessment where applicants may present identifiable vulnerabilities to organised criminal exploitation.*
- *A comprehensive review of Prison Officer initial training with significantly greater emphasis on prisoner conditioning, corruption prevention, intelligence awareness and organised crime.*
- *Greater collaboration between HMPPS, policing, intelligence agencies and national security partners to address evolving threats.*

Conclusion

30 Security within the prison system is no longer simply about preventing escapes or controlling contraband. It is about protecting the integrity of the criminal justice system, safeguarding those who work within it and preventing organised criminal gangs from using prisons as bases from which to continue offending. The threat landscape has changed fundamentally, yet the pace of institutional adaptation has not kept pace. The POA believes that only sustained investment in people, infrastructure, intelligence and technology, underpinned by a recognition that prison security is an essential component of national security, will ensure that the prison system remains capable of meeting the challenges of the coming decades.

SECTION 2

SAFETY AND DECENCY

31 The Prison Officers' Association believes that safety and decency are the foundation upon which every successful prison system must be built. Secure prisons cannot operate effectively unless they are safe for those who live and work within them, and rehabilitation cannot be delivered in an environment characterised by violence, fear, deteriorating living conditions and chronic overcrowding. The safety of Prison Officers, prisoners, contractors and visitors must remain the first priority of His Majesty's Prison and Probation Service (HMPPS), yet the evidence demonstrates that the prison system is operating under sustained pressures which increasingly undermine this objective.

32 The Terms of Reference identify safety and decency as key strategic themes, encompassing the condition of the prison estate, how prisoners are accommodated, overcrowding, violence and self-harm. In the opinion of the POA, these are not separate issues but symptoms of a prison system that has endured years of underinvestment and reactive decision-making. The operational reality experienced daily by our members is one in which deteriorating infrastructure, excessive prisoner numbers, insufficient staffing and increasingly complex prisoner needs combine to create unsafe working and living environments.

33 The physical condition of much of the prison estate has become one of the greatest barriers to delivering safe, decent and rehabilitative custody. Many prisons continue to operate from Victorian or mid-twentieth century buildings that were never designed to accommodate the modern prison population. Decades of inadequate capital investment have resulted in ageing accommodation, failing infrastructure, obsolete utilities and buildings that are increasingly expensive to maintain.

34 The POA believes the decision to outsource prison maintenance and works services in June 2015 marked a significant turning point in the deterioration of the prison estate. Whilst intended to

deliver efficiencies and improved value for money, the practical experience of our members has been one of delayed repairs, inconsistent standards, poor contract management and increasing deterioration across the estate.

35 The most recent HMPPS Annual Report and Accounts identifies an estimated maintenance backlog exceeding £1.8 billion across the prison estate. This is not merely an accounting issue. Every outstanding repair represents a potential operational risk. Broken windows, defective locks, failing heating systems, leaking roofs, unreliable plumbing, damaged cell furniture, insecure fencing and malfunctioning security systems all directly affect the safe operation of prisons. The cumulative effect of years of deferred maintenance has left many establishments operating in conditions that neither staff nor prisoners should be expected to tolerate. Officers routinely work in environments affected by damp, mould, poor ventilation, outdated electrical systems and infrastructure that frequently fails under the demands placed upon it.

36 This level of deterioration would be unacceptable in any other critical public service and should not be accepted within the prison system. The POA strongly believes that incremental repairs alone will not resolve the structural deficiencies of the prison estate. Many establishments have now reached the point where continued refurbishment represents poor value for money compared with replacement through modern purpose-built accommodation.

37 The Government should therefore commit to a long-term programme of prison modernisation focused upon replacing or refurbishing outdated accommodation with secure, energy-efficient establishments and wings designed to meet the operational demands of the twenty-first century, ensuring deteriorating public sector prisons are brought up to acceptable humane standards if it is not practical to replace them.

38 Modern prisons should provide single-cell accommodation as the standard wherever operationally possible. Single-cell occupancy improves dignity, privacy, infection control, safety and rehabilitation whilst reducing many of the tensions associated with overcrowded shared accommodation. Cells should also be equipped with secure digital technology capable of

supporting education, family contact, healthcare appointments and rehabilitative interventions under controlled conditions. Such technology has the potential to improve purposeful activity whilst reducing unnecessary prisoner movement and enhancing operational efficiency.

39 Investment in modern accommodation is therefore an investment in both security and rehabilitation. Overcrowding remains one of the most persistent and damaging problems facing the prison system. For many years prisons have operated beyond their intended certified normal accommodation figures, with accommodation originally constructed for single occupancy frequently housing two prisoners and, in some cases, more. This places immense strain upon physical infrastructure, staff resources and rehabilitative services.

40 The latest official statistics on prison overcrowding in England and Wales, *(Ministry of Justice / HM Prison and Probation Service (HMPPS) Annual Digest 2024 to 2025*)**,** confirm that 21,616 prisoners were held in overcrowded accommodation during the year to 31 March 2025, which equates to one in four prisoners (25%) being held in crowded conditions. Overall, 72% of prisons in England and Wales were overcrowded during 2024–25, an increase from the previous year.

41 The POA believes overcrowding undermines every aspect of prison life. It increases violence. It increases self-harm. It increases frustration. It increases prisoner debt. It increases the availability and demand for illicit drugs. It places greater pressure upon healthcare services. It restricts access to education, employment and rehabilitation. It reduces time out of cell. It damages relationships between staff and prisoners. Most importantly, overcrowding prevents prisons from delivering the constructive regimes necessary to reduce reoffending.

42 The POA fully supports the principle that every prisoner should have access to a full working day involving education, vocational training or meaningful employment. Such regimes improve behaviour, reduce violence and better prepare prisoners for release. Unfortunately, current levels of overcrowding make this aspiration unattainable across much of the prison estate. Education departments, workshops and activity spaces simply do not possess sufficient capacity to accommodate current prisoner numbers. Even where facilities exist, staffing shortages frequently

prevent their full utilisation. It is also beyond the realms of our understanding as to how the current Government can promote rehabilitation whilst simultaneously cutting education budgets by 25% across the board. The result is that many prisoners spend excessive periods confined to their cells with limited opportunities for purposeful activity. Such conditions contribute directly to frustration, deteriorating mental health and increased violence.

Violence Against Staff

43 The POA remains deeply concerned by the continuing rise in violence against Prison Officers. Official Safety in Custody statistics continue to demonstrate historically high levels of assaults upon staff across the prison estate. Violence within prisons has changed significantly over the past decade. Prison Officers now routinely deal with assaults involving organised criminal gangs, psychoactive substances, gang-related feuds, improvised weapons and spontaneous unprovoked attacks upon staff undertaking their normal duties.

44 According to official statistics (*Safety in Custody Statistics, England and Wales: Deaths in Prison Custody to March 2026; Assaults and Self-harm to December 2025*), there were 31, 345 assault incidents in prisons in England and Wales in the 12 months to December 2025, an increase of 2.7% on the previous year. Prisoner-on-prisoner assaults increased by 6% to 21,203, Assaults by prisoners on staff were recorded at 10,142, amounting to 28 assaults on staff every day. while serious assaults on staff hit 908. Serious prisoner-on-prisoner assaults increased by 6% to 2,610. Self-harm incidents were recorded at 72,753, which remains historically high. There were 352 deaths in Prison custody and 67 self-inflicted deaths. Nine homicides were recorded , amounting to the highest number in the published time series, compared with six in the previous 12 months.

45 These figures demonstrate that violence has become an enduring operational challenge rather than an isolated occurrence. The POA is particularly concerned that the statistics measure

recorded incidents only. They do not fully capture the wider psychological impact upon staff who routinely work under the constant threat of violence, intimidation and aggression.

46 Behind every statistic is an officer who has reported for duty expecting to return home safely but instead has suffered physical injury, psychological trauma or both. The nature of assaults has also changed. Our members increasingly report serious assaults involving improvised weapons, bodily fluids, repeated punches and kicks, head injuries, fractures and attacks carried out under the influence of synthetic drugs or simply as an act of unprovoked violence. It appears that HMPPS has learned little from the solutions to reducing violence that the Covid pandemic highlighted- less prisoners unlocked with increased staffing ratios significantly reduces violent incidents (*Violence Reduction Project Report*).

47 Prison Officers routinely intervene to prevent assaults between prisoners, acts of self-harm, hostage situations, fires and serious disorder. They do so knowing that violence has become normalised rather than an exceptional occurrence. No other emergency service should be expected to tolerate such levels of workplace violence without comprehensive protection and meaningful consequences for offenders. The POA remains concerned that not all operational Prison Officers are equipped with PAVA incapacitant spray, rigid bar handcuffs, protective body armour , slash resistant utility vests or extendable batons despite routinely working in some of the most dangerous environments within the public sector. Every officer should have access to appropriate personal protective equipment based upon operational risk rather than establishment type or national policy.

Violence Between Prisoners

48 Violence between prisoners remains persistently high and has become increasingly influenced by organised criminal activity. Many incidents arise from drug debts, organised crime, gang rivalries, intimidation or disputes relating to illicit items introduced into prisons. Others result from

overcrowding, frustration, mental illness or the inability of establishments to provide predictable regimes due to population pressures and staffing shortages.

49 Prison Officers frequently intervene in violent incidents at considerable personal risk to protect vulnerable prisoners and restore order. The POA believes reducing prisoner violence requires a comprehensive strategy addressing staffing levels, illicit drugs, purposeful activity, intelligence gathering and effective behaviour management rather than relying solely upon disciplinary processes after incidents have occurred.

Self- Harm and Deaths in Custody

50 The continuing prevalence of self-harm within prisons remains one of the most distressing aspects of prison life. Official Ministry of Justice statistics show well over 70,000 recorded incidents of self-harm annually (*Safety in Custody Statistics HMPPS)*, representing the highest levels ever recorded. Female prisons continue to account for disproportionately high rates of self-harm, although incidents have also risen significantly across the male estate. Prison Officers are often the first to respond when prisoners attempt to take their own lives or inflict serious injury upon themselves. Many officers experience repeated exposure to traumatic incidents including suicides, attempted suicides, severe self-mutilation and emergency medical interventions. The psychological impact upon staff should not be underestimated.

51 Despite their professionalism, Prison Officers receive limited support following repeated exposure to trauma. The cumulative emotional burden contributes significantly to stress-related illness, PTSD, sickness absence and premature departure from the Service. The POA believes considerably greater investment is required both in prisoner mental health services and on-site face to face post-incident psychological support for staff.

52 Although rare, homicides within prisons represent the ultimate failure of safety and continue to rise with a recorded 9 homicides within the last 12 months *(Safety in Custody Statistics HMPPS)*. Every homicide has profound consequences for victims' families, prisoners, staff and public

confidence in the prison system. Such incidents often arise from a combination of violence, organised criminality, mental illness, inadequate supervision due to insufficient staffing levels , overcrowding and the insistence from senior leaders that a full regime must be facilitated at all costs despite the inherent risks to staff and prisoners.

53 Safety and decency are inseparable from rehabilitation. Prisoners held in clean, secure and humane environments are significantly more likely to engage constructively with education, vocational training, offending behaviour programmes and employment opportunities. Conversely, prisons characterised by overcrowding, violence and deteriorating living conditions inevitably struggle to deliver meaningful rehabilitation. The POA firmly believes that prisons should provide safe accommodation, decent living conditions and purposeful daily activity whilst maintaining firm discipline and public protection. A prison that is safe and decent is also more secure.

Mental Health

54 The prison population has become significantly more complex. Official government and NHS research consistently demonstrates that prisoners experience significantly higher rates of mental illness than the general population. Studies commissioned by the Ministry of Justice and NHS England (NHS England (2016). *Health and Justice: Commissioning Intentions 2017/18*), estimate that around half of all prisoners have symptoms consistent with anxiety or depression. A significant proportion suffer from personality disorders. Many prisoners have experienced childhood trauma, abuse or neglect. Rates of psychosis are several times higher than those found within the wider community. Substance misuse and alcohol dependency frequently coexist with mental illness. Neurodevelopmental disorders such as Autism Spectrum Disorder (ASD) and Attention Deficit Hyperactivity Disorder (ADHD) are substantially overrepresented. The prison population has therefore become considerably more clinically complex over recent decades. The

POA believes that many prisons now function as de facto mental health institutions despite lacking the staffing, skill set, infrastructure and clinical resources necessary to fulfil that role.

55 Many prisoners would be more appropriately accommodated within secure health settings rather than prisons. Prison Officers are not mental health professionals, yet they increasingly find themselves managing individuals experiencing acute psychiatric crises, severe emotional distress and complex behavioural disorders. Whilst some officers may receive mental health awareness training, this cannot substitute for specialist clinical expertise. The privatisation of prison health care has not improved the service. Healthcare providers struggle to recruit staff, do not meet the requirements of their contracts and create additional pressure on prisons by insisting that prisoners are escorted to hospitals for the most basic of treatments that prison Hospital Officers previously used to facilitate. The POA believes Government must significantly increase secure mental health capacity to ensure that prisons do not become default providers of psychiatric care for those whose primary need is medical treatment rather than punishment.

56 R**ecommendations**

The POA recommends that the Independent Review should propose:

- *A fully funded long-term prison estate modernisation programme replacing outdated accommodation with modern secure establishments and refurbishing those prisons that cannot be practically replaced.*
- *Elimination of the prison maintenance backlog through direct capital investment and the return of an insourced service.*
- *Progressive replacement of overcrowded shared accommodation with modern single-cell accommodation.*
- *A national strategy to reduce overcrowding through increased capacity and robust community sentences rather than continued emergency measures.*

- *Investment enabling every prisoner to access a full-time programme of education, vocational training or employment.*
- *Universal provision of appropriate personal protective equipment, including PAVA , stab/slash resistant utility vests, rigid bar handcuffs and batons, to operational Prison Officers in every establishment.*
- *Enhanced violence reduction strategies integrating intelligence, staffing, rehabilitation and behaviour management.*
- *Increased investment in prison mental health services and secure psychiatric facilities.*
- *Comprehensive on-site face to face psychological support services for Prison Officers following traumatic incidents.*

Conclusion

57 The POA believes that safety and decency cannot be delivered through policy statements alone. They require sustained investment in people, infrastructure and operational capacity. The deteriorating condition of the prison estate, persistent overcrowding, record levels of violence and continuing prevalence of self-harm demonstrate that the current system is operating beyond sustainable limits. Prison Officers continue to display extraordinary professionalism and resilience in managing these challenges, but dedication cannot compensate indefinitely for structural deficiencies. A modern prison system must provide safe workplaces for staff, humane conditions for prisoners and an environment in which rehabilitation can genuinely flourish. Achieving these objectives will require long-term political commitment, substantial capital investment and a recognition that safe and decent prisons are fundamental to public protection and confidence in the criminal justice system.

SECTION 3

CAPACITY

58 The Prison Officers' Association believes that the current prison capacity crisis represents one of the greatest strategic failures in the history of the prison system. The shortage of prison places was neither unforeseen nor unavoidable. It is the consequence of successive governments failing to align prison capacity with sentencing policy, demographic change and projected increases in the prison population.

59 The Terms of Reference identifies prison capacity as a fundamental issue affecting the future sustainability of the prison system. However, capacity cannot simply be measured by the number of certified normal accommodation places available. True capacity is determined by whether prisons can safely accommodate the population whilst delivering secure, decent and rehabilitative regimes supported by sufficient staffing, infrastructure and healthcare provision. Many establishments continue to accommodate prisoners in cells originally designed for single occupancy but now routinely occupied by two prisoners. Some prisons have operated above 150 per cent of their Certified Normal Accommodation and have done for decades (*HMPPS Annual Digest 2024-2025).* The consequences extend far beyond living conditions.

60 The POA has consistently warned successive governments that prison population projections pointed towards an inevitable capacity crisis. Ministry of Justice forecasts have, for many years, anticipated significant increases in prisoner numbers driven by population growth, tougher sentencing policy, increased police officer recruitment, greater prosecution rates and longer custodial sentences for serious offences. Despite these projections, the pace of prison construction has failed to match demand. Rather than investing proactively in additional capacity, governments increasingly relied upon temporary accommodation, emergency operational measures and overcrowding to absorb rising prisoner numbers,

whilst simultaneously closing 23 public sector prisons with the loss of over 10,500 cell spaces. The POA considers this to have been a serious failure of strategic planning. A resilient prison system cannot be developed through reactive policy making. Capacity should always anticipate future demand rather than merely responding once a crisis has emerged.

61 The current capacity crisis cannot be understood without recognising the long-term effects of austerity measures introduced following the coalition Governments policy decisions from 2010. Significant reductions in public expenditure resulted in the closure of 23 public sector prisons and the loss of more than 10,500 prison places. At the same time, over 7000 experienced Prison Officers left the service through voluntary exit schemes. Whilst these measures generated short-term financial savings, they substantially reduced the resilience of the prison estate.

62 The POA repeatedly warned that prison population growth would eventually exceed available capacity and that rebuilding lost accommodation would require many years of sustained capital investment. Those warnings were not acted upon with sufficient urgency. The result has been a prison estate operating permanently close to maximum capacity with little flexibility to respond to unexpected increases in demand, major incidents or essential refurbishment programmes.

Emergency Measures and Early Release Schemes

63 The POA remains deeply concerned by the increasing reliance upon emergency measures to manage prison capacity. Recent years have seen the introduction of exceptional early release schemes and the use of police cells and legislative changes affecting the proportion of custodial sentences served before release. Whilst the POA recognises the immediate operational pressures facing Government, these measures should never become a substitute for providing sufficient prison places. The release of prisoners significantly earlier than originally anticipated risks undermining public confidence in the criminal justice system.

Victims of crime rightly expect that sentences imposed by the courts will be served in accordance with judicial intention. Frequent changes to release arrangements create uncertainty and may diminish confidence in the administration of justice. The POA believes that capacity shortages should never dictate sentencing policy or release arrangements.

64 The recent prison capacity crisis has resulted in the introduction of exceptional operational measures, including temporary early release schemes, changes to automatic release arrangements; use of police cells under Operation Safeguard, temporary accommodation units and accelerated prison construction programmes. Whilst the POA recognises the necessity of emergency measures during periods of exceptional pressure, they should never become routine methods of managing prison capacity. The POA is particularly concerned that changes allowing prisoners to be released after serving just a third of their custodial sentence risk undermining public confidence in the criminal justice system whilst heaping an unmanageable workload on an under resourced Probation Service that is struggling to cope with current workloads. Victims of crime rightly expect sentences imposed by the courts to be implemented as intended. Capacity shortages should never dictate sentencing policy. Instead, prison capacity should be sufficient to accommodate those who the courts determine should be deprived of their liberty.

65 The POA rejects any suggestion that overcrowding constitutes an acceptable method of increasing prison capacity. Housing two prisoners in accommodation designed for one does not create additional capacity in any meaningful operational sense. It simply transfers pressure onto staff, healthcare services, education departments, offender management units, kitchens, reception areas and prison infrastructure. Overcrowding increases wear and tear on buildings, contributes to violence and frustration, reduces access to purposeful activity and significantly restricts opportunities for rehabilitation. The POA believes that the long-term objective should be to eliminate overcrowding by constructing sufficient modern accommodation to meet projected demand whilst progressively removing outdated

accommodation from operational use, and where this is not practical, refurbishing existing sites so they meet modern humane standards.

66 The prison population is becoming increasingly complex as sentencing policy evolves. Longer custodial sentences for serious violent and sexual offences are entirely appropriate in protecting the public. However, they inevitably increase demand for long-term prison accommodation. Similarly, the growth in recalls to custody and increased prosecution activity will continue to place upward pressure upon the prison population. The POA therefore believes that future prison planning must be based upon realistic long-term projections rather than optimistic assumptions regarding population growth. Planning should incorporate demographic trends, sentencing policy, police recruitment, organised crime, terrorism, mental health and the increasing complexity of offender management.

67 The POA acknowledges there is a need to construct modern prisons but believes they should remain in the public sector and greater urgency is required .The privatisation of prisons has not been the success that Governments envisaged. HMP Birmingham and HMP Lowdham Grange have both been returned to the public sector after private sector failings, whilst HMP Millsike is experiencing substantial staffing and stability issues . Future establishments should be designed around operational efficiency, security, rehabilitation and staff safety. They should incorporate modern digital infrastructure, secure healthcare facilities, vocational training spaces, education centres, appropriate staff facilities and accommodation capable of adapting to future operational requirements. However, building new prisons alone will not solve the capacity crisis if existing establishments continue to deteriorate faster than they can be replaced or modernised.

68 A comprehensive long-term estate strategy should therefore combine new construction with systematic replacement of unsuitable accommodation and sustained investment in maintaining and modernising the remaining estate. It is recognised that violence appears to be exacerbated by boredom, frustration, dirty and dilapidated physical conditions, and lack

of meaningful activity (Violence Reduction Project Report). A modernisation programme would therefore assist in reducing the unprecedented levels of violence now experienced within prisons.

SECTION 4

Staffing

69 The POA considers staffing to be the single most important determinant of whether prisons can operate safely, securely and effectively. Buildings, technology and policy are important components of the prison system, but none can substitute for experienced, well-trained and properly supported Prison Officers. Every aspect of prison life depends upon having sufficient staff available to supervise prisoners, gather intelligence, maintain order, deliver rehabilitation and respond to emergencies.

70 For many years the POA has warned that staffing levels have failed to keep pace with the increasing complexity of the prison population. Whilst recruitment campaigns have increased headline staffing numbers, operational experience demonstrates that the Service continues to experience significant shortages of experienced frontline staff. The latest statistics (*HMPPS Workforce Statistics to March 2026*) show that there are 21,984 Band 3–5 prison officers in post on 31 March 2026. This represents a reduction of 732 (3.2%) compared with March 2025.which is the third consecutive year in which officer numbers have declined despite continued recruitment activity.

71 Although overall staffing numbers have increased significantly since the workforce reductions experienced during the early exit schemes between 2010-15, the POA remains concerned that headline figures do not accurately reflect the number of officers available to deliver daily prison regimes. The issue is therefore not simply one of recruitment but of retention, experience and operational resilience.

Staffing Levels

72 The official workforce statistics continue to demonstrate that a significant proportion of Prison Officers have comparatively short service. The House of Lords Justice and Home Affairs Committee highlighted that, of the officers leaving during the year ending March 2025:almost 30% had less than one year's service; and almost 58% had less than three years' service. This demonstrates two significant workforce risks. First, HMPPS continues to lose newly recruited officers before substantial operational experience has been acquired. Secondly, experienced officers are increasingly being replaced by staff who require considerable supervision, mentoring and professional development before they can confidently manage the complexities of modern prison life. The POA believes this has fundamentally altered the balance of experience within many prisons. Increasingly experienced prisoners are interacting with increasingly inexperienced staff. That imbalance creates opportunities for manipulation, conditioning, corruption and violence. Recent publications (*HMPPS Workforce Statistics to March 2026*) indicate annual leaving rates for Band 3–5 Prison Officers of around 10% and thousands of officers (2312) leaving operational roles in the previous 12 months. Whilst recent figures suggest a modest improvement in turnover compared with previous years, the POA believes these levels remain unsustainable over the longer term. Operational experience takes many years to acquire. Every experienced officer who resigns represents a loss of knowledge that cannot be replaced by recruitment alone.

73 The POA notes that staffing levels in the early 1990s exceeded current operational levels despite the prison population at that time being less than double the prison population of today (42,000 prisoners) . In 1996 there were 24,398 Officers compared to 21984 today, a staggering difference of 2400 less Prison Officers despite a doubling of the prison population which now exceeds 86000 (*Historical prison officer numbers (1979–1997): House of Commons Hansard Written Answer, 29 July 1997).*

74 The role of the modern Prison Officer has also changed fundamentally. Today's officers are expected to manage organised crime, terrorism, complex mental health conditions, neurodiversity, violent extremism, serious violence, sophisticated technology, and enhanced safeguarding responsibilities, whilst simultaneously delivering rehabilitative regimes and maintaining security. The POA believes current staffing levels in establishments are insufficient to meet these demands safely. The POA therefore considers that staffing levels should be increased significantly over the coming decade, ideally doubled in every prison. A substantial increase in frontline staffing would enable fuller regimes, greater supervision, improved intelligence gathering, increased access to rehabilitation and significantly enhanced safety for staff and prisoners alike.

75 Headline staffing figures often fail to reflect the number of staff actually available for operational duties. On any given day across much of the prison estate, non-effective levels are officially assumed to be approximately 20 per cent. However, the practical experience of local POA Branches suggests that operational non-effective rates frequently exceed 30 per cent once sickness absence, maternity leave, annual leave, temporary promotion, detached duty, training commitments, restricted duties, initial Officer training and vacancies are considered. This means that establishments often begin each day with significantly fewer staff available than staffing models assume. It is common for a fully staffed prison to experience staffing levels of minus 20 or higher on each day. The operational consequences are immediate. Regimes are curtailed. Education is cancelled. Workshops remain closed. Healthcare appointments are postponed. Exercise periods are reduced. Rehabilitation programmes are delayed. Staff are required to work excessive overtime and rest day duties. Prisoners spend longer locked in their accommodation. The resulting frustration inevitably contributes to violence and instability.

Attrition and Retention

76 Recruitment alone will not resolve staffing shortages if experienced staff continue to leave the Service at unacceptable rates. Official workforce statistics (*HMPPS Workforce quarterly Statistics)* continue to demonstrate significant levels of resignation and turnover, particularly amongst officers with relatively short service. Despite these shocking statistics the POA has concerns over the attitude that HMPPS have taken by stating resignation rates are lower than in previous years and most prisons are near to their full staffing compliment. This misguided positivity does not detract from the reality at the frontline which demonstrates that most new recruits leave the service within the first three years of joining and more and more experienced staff are looking for alternative employment. If, as HMPPS would have people believe, things are so 'rosy' why is there a need to shore up prison regimes with a continuous stream of detached duty staff, some of whom are forced to live away from their families for weeks at a time?

77 The POA believes the reasons staff leave the service are well understood. Violence has increased. Workloads have intensified. Public scrutiny has grown. Pay has not kept pace with the responsibilities, risks and threats staff face both inside and outside of the workplace, work-life balance has deteriorated, mental health support remains inconsistent, the retirement age is too high and there is a severe lack of visible leadership, empathy or support for frontline staff from senior leaders.

78 Many officers conclude that the risks associated with the role are no longer matched by appropriate reward. Retaining experienced staff should therefore become a strategic priority equal to recruitment. Experience is one of the most valuable assets within any prison. Experienced officers possess operational judgement that cannot be taught quickly. They recognise early indicators of violence, understand prisoner behaviour, identify manipulation, build professional relationships and intervene before minor incidents escalate into major disorder. Years of high turnover have created an increasingly inexperienced workforce at

precisely the same time that the prisoner population has become more sophisticated. The removal of the Senior Officer rank as line managers and the relaxation of the criteria for promotion has led to an increasingly inexperienced middle manager cohort struggling to lead their staff without any training once they are promoted. Many prisoners have spent decades within the custodial system and possess a detailed understanding of prison routines, policies and vulnerabilities.

79 The POA believes the Government must address the current imbalance where increasingly experienced prisoners exploit increasingly inexperienced staff through manipulation and conditioning which in turn leads to corruption and creates an unacceptable operational risk. Greater emphasis must therefore be placed upon mentoring, professional development and retaining experienced officers.

Sickness Absence and Staff Welfare

80 Prison Officers experience levels of occupational stress rarely encountered elsewhere in the public sector. Exposure to violence, self-harm, suicide, medical emergencies, trauma, organised criminal intimidation and repeated confrontation inevitably affects psychological wellbeing. Sickness absence remains one of the greatest operational challenges facing HMPPS. Official workforce data indicate that Prison Officers lost more than 300,000 working days through sickness during the year ending March 2025, averaging approximately 13 days per officer (*HM Prison and Probation Service Workforce Quarterly Statistics: December 2025*)**.** Although sickness has multiple causes, the POA believes three factors predominate: physical injuries arising from assaults; musculoskeletal injuries associated with control and restraint; and psychological illness including anxiety, depression and post-traumatic stress resulting from repeated exposure to violence, deaths in custody and self-harm. Mental and behavioural disorders (mental ill health) accounted for the single largest cause of sickness absence across HMPPS, amounting to 41% of all working days lost**.** The POA remains

concerned that psychological support following traumatic incidents remains inconsistent across the prison estate. Improving staff wellbeing should be regarded not simply as a welfare issue but as an operational necessity.

81 The POA believes that every officer involved in serious assaults, deaths in custody, attempted suicides or other traumatic events should receive immediate access to professional psychological support delivered by clinicians experienced in trauma and based on site so they may access this professional support immediately. Supporting staff wellbeing is not simply a welfare issue; it is essential to operational resilience and staff retention.

Recruitment

82 The POA remains concerned that recruitment processes have prioritised speed over robustness and quantity over quality. As previously outlined within the security section of this submission, the POA believes face-to-face assessment should once again form part of recruitment processes. Equally important is improving the attractiveness of the profession.

83 Prison Officers exercise powers comparable to those of other emergency services yet remuneration has not consistently reflected the increasing complexity and danger associated with the role , neither has it matched the incremental pay of comparable occupations, most notably the Police.

84 We believe that improved pay, clearer career progression and recognition of the unique demands of prison work are essential if HMPPS is to attract candidates with greater life experience and retain them throughout their careers. The POA also believes serious consideration should be given to reviewing retirement arrangements for operational Prison Officers. The physical and psychological demands of maintaining order within increasingly violent prisons until state pension age is impractical and unrealistic. A lower retirement age for frontline operational staff would better reflect the realities of the role and assist recruitment and retention by making the profession more attractive. For example, an 18-

year-old recruit joining the Prison Service today would be expected to work for 50 years on the frontline before accessing a full pension and enjoying a full career. No other uniformed, frontline service that deals with the level of complexities and violence that Prison Officers experience is expected to replicate that scenario.

85 The POA believes workforce planning should move beyond annual recruitment targets. Instead, HMPPS should adopt a strategic workforce model considering prison population projections, sentencing trends, prisoner complexity, violence, retirement forecasts, experience profiles, anticipated attrition and training capacity. Such planning should extend over a timescale significantly more significant than individual Spending Review periods.

86 The growing number of prisoners presenting with serious mental health conditions places additional pressure upon staff. Prisons increasingly accommodate individuals whose primary needs are clinical rather than custodial. Some, not all Prison Officers, receive a 3-hour mental health awareness training package but are not qualified mental health practitioners. The POA believes too many individuals remain in prison because of inadequate secure psychiatric provision elsewhere within the health system. Greater investment in secure mental health facilities would improve outcomes both for vulnerable prisoners and for the staff responsible for their care.

87 The POA is increasingly concerned that assaults upon Prison Officers are not consistently met with sentences that reflect their seriousness. Assaulting a Prison Officer represents an attack upon the authority of the State and those responsible for protecting the public. We believe sentencing should provide a clear deterrent and demonstrate unequivocally that violence against emergency workers within prisons will attract significant additional punishment. Greater consistency in prosecuting and sentencing those responsible for assaults would improve staff confidence in the criminal justice system.

88 Prisons continue to rely upon the professionalism and goodwill of frontline staff to compensate for structural workforce deficiencies. Unless significant improvements are made

to pay, retention, welfare, professional development, retirement age and staffing levels, the prison service will continue to struggle to deliver safe, secure and rehabilitative custody.

89 Recommendations

The POA recommends that the Independent Review should:

- *Develop a long-term workforce strategy linked to projected prison population growth.*
- *Increase frontline staffing in all establishments significantly (ideally doubled) to enable safe and rehabilitative regimes.*
- *Consider reintroducing the Senior Officer and Principal Officer rank with a minimum of 4 years' experience prior to promotion.*
- *Reduce non-effective staffing through improved workforce planning and retention.*
- *Introduce a comprehensive staff retention strategy focused on experienced officers.*
- *Increase Prison Officer pay to improve recruitment and retention.*
- *Significantly lower the retirement age for operational staff.*
- *Strengthen psychological support following traumatic incidents.*
- *Expand mentoring and professional development for newly recruited officers.*
- *Improve mental health provision across both prisons and secure healthcare.*
- *Ensure assaults on Prison Officers attract robust investigation, prosecution and sentencing.*

90 <u>Conclusion</u>

The prison system cannot function without sufficient numbers of experienced, motivated and properly supported staff. Every challenge identified within this Review—security, safety and decency, staffing, capacity and rehabilitation, is ultimately dependent upon the people responsible for delivering prison services every day. The POA believes that investment in the workforce is not simply one element of prison reform; it is the foundation upon which all other reforms depend. Without a long-term commitment to improving staffing levels, retention, pay, training, a lower retirement age and staff welfare, the prison system will

continue to struggle to meet the expectations placed upon it by Government, the judiciary and the public.

Summary of Strategic Priorities

91 The POA recommends that Government should:

- *Recognise prisons as Critical National Infrastructure.*
- *Introduce a fully funded National Prison Security Strategy.*
- *Deliver a National Counter-Drone Programme.*
- *Replace or modernise older prisons through a long-term Estate Renewal Programme.*
- *Eliminate chronic overcrowding.*
- *Increase frontline Prison Officer staffing significantly.*
- *Reform recruitment, vetting and professional standards.*
- *Expand and modernise Prison Officer training.*
- *Improve pay, lower retirement age and improve staff retention.*
- *Strengthen staff protection and sentencing for assaults.*
- *Expand secure mental health provision.*
- *Restore full rehabilitative prison regimes.*
- *Modernise prison technology and cyber resilience.*
- *Improve staff wellbeing and psychological support.*
- *Introduce independent strategic oversight of the prison system.*

Summary and Conclusion

92 The Prison Officers' Association believes that England and Wales require a fundamental reset of prison policy. The evidence presented throughout this submission demonstrates that the challenges facing the prison system are systemic, interdependent and the result of decades of underinvestment, reactive policymaking and insufficient long-term planning.

93 The recommendations contained within this submission are not intended as isolated reforms but as a comprehensive programme for modernising the prison system over the next twenty years. They recognise that security, staffing, estate condition, capacity, rehabilitation and workforce wellbeing are inseparable. Improvements in one area cannot be sustained without corresponding investment in the others.

94 The POA firmly believes that prisons must once again become institutions that are secure, safe, decent and rehabilitative. Achieving this will require political commitment, sustained funding and a willingness to place operational evidence at the centre of policymaking.

95 The POA therefore respectfully invites the Independent Review to adopt these recommendations as the basis for a long-term national strategy that restores confidence in the prison system, better protects the public, improves outcomes for prisoners and provides Prison Officers with the resources, support and professional recognition necessary to carry out one of the most demanding roles in public service.

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Annex A: Drones

Annex A

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