



Policy name: Progressive Transfers for Indeterminate Sentence Prisoners Policy Framework

Issue Date: 14 November 2024

Implementation Date: 12 December 2024

Replaces the following documents (e.g. PSIs, PSOs, Custodial Service Specs) which are hereby cancelled: none

Introduces amendments to the following documents: N/A

Action required by:

X	HMPPS HQ	X	Governors
X	Public Sector Prisons		Heads of Group
X	Contracted Prisons	X	The Probation Service
	Under 18 Young Offender Institutions		Other providers of Probation and Community Services
	HMPPS Rehabilitation Contract Services Team		

Mandatory Actions: All groups referenced above must adhere to the Requirements section of this Policy Framework, which contains all mandatory actions.

For Information: By the implementation date Governors¹ of Public Sector Prisons and Contracted Prisons must ensure that their local procedures do not contain the following:

- **Local transfer criteria drafted by the prison that is not supported by a national published Policy Framework on Gov.uk.**

Governors must ensure that any new local policies which they develop because of this Policy Framework are compliant with relevant legislation, including the Public-Sector Equality Duty (Equality Act, 2010). All groups must ensure that when handling personal data, they must have comprehensive and proportionate arrangements for collecting, storing, and sharing information, as set out in PSI 3/2018, The Data Protection Act 2018, General Data Protection Regulation, The Freedom of Information Act 2000, Environmental Information Regulations 2004. For any data protection enquiries please contact InformationmgmtSecurity@justice.gov.uk.

Section 6 of the Policy Framework contains guidance to support the implementation of the mandatory requirements set out in section 4 of this Policy Framework. Whilst it will not be mandatory to follow what is set out in this guidance, clear reasons to depart from the guidance should be documented locally. Any questions concerning departure from the guidance can be sent to the contact details below.

Scope

¹ In this document the term Governor also applies to Directors of Contracted Prisons.

This Policy Framework applies to:

- Unreleased and recalled adult indeterminate sentenced prisoners (ISPs) in custody².

This Policy Framework does not apply to:

- Determinate³ sentenced prisoners (unless also serving an indeterminate sentence);
- ISPs transferring to open conditions after a decision by the Secretary of State for Justice⁴;
- The Category A/ Restricted Status⁵ management process;
- Prisoners transferring within the Children and Young Peoples Secure Estate (CYPSE) and those transferring from the CYPSE to the Adult Estate⁶;
- ISPs released on licence and then remanded into custody on new charges but who have not formally been recalled. These prisoners should be treated as unconvicted;
- Prisoners held solely under Immigration powers (IS91s) to whom [PSI 52/2011](#) 'Repatriation and Removal of Foreign Nationals' applies;
- The process for cross-jurisdictional transfers⁷; and
- The technical arrangements for movement between prisons, outside of the consideration of a progressive transfer, such as booking and managing a secure move through existing staff procedures and digital platforms.

² For the purpose of this Policy Framework, the ISP population is considered to be those serving life and Imprisonment for Public Protection (IPP)/Detention for Public Protection (DPP) sentences, in the Adult Estate, including those who have been recalled when subject to an indeterminate licence, and those serving youth equivalent sentences that are now in the Adult Estate.

³ The transfer and categorisation process for determinate sentenced prisoner is set out in the [Security Categorisation Policy Framework](#) on Gov.uk.

⁴ The consideration of a Parole Board recommendation for a transfer to the Open Estate, see the [Generic Parole Process](#) on Gov.uk

⁵ The Category A/ Restricted Status management process is set out in [PSI 08/2013](#) (National Security Framework 'Category A Function: The Review of Security Category – Category A / Restricted Status Prisoners'); [PSI 09/2013](#) ('Management and Security of Cat A Prisoners – External Movement'); [PSI 43/2017](#) (National Security Framework 'Category A Function – Management and Security of Cat A Prisoners – Internal'); and [PSI 09/2015](#) (National Security Framework 'Category A Function: The Identification, Initial Categorisation and Management of Potential and Provisional Category A / Restricted Status Prisoners').

⁶ The transfer process of prisoners transferring from the Youth Estate to the Adult Estate is set out in the [Transition of Young People from the Children and Young People Secure Estate to Adult Custody Policy Framework](#) on Gov.uk.

⁷ The process for cross-jurisdictional transfers for indeterminate sentenced prisoners is set out in the [Generic Parole Process Policy Framework](#) on Gov.uk.

This Policy Framework must be considered in conjunction with national Policy Frameworks and guidance relating to ISPs, categorisation and Category A/Restricted Status ISPs.

How will this Policy Framework be audited or monitored: HMPPS Prison Group Directors, the Director of the Probation Service and Youth Offending Teams (YOT) in England and Director of HMPPS in Wales will monitor compliance with the mandatory requirements set out in this Policy Framework. HMPPS contract management will hold providers to account for the delivery of mandated requirements as required in the contract.

Resource Impact: The requirements laid out in this Policy Framework are designed to have a minimal impact on resources. Within this Policy Framework, there are a number of revised processes that largely do not have resource implications for prisons or the Probation Service. This Policy Framework supports existing decision-making processes for transfers.

There are resource implications for HMPPS arising from mandated escalation protocol in this Framework. It has been confirmed that the resource implications for the Probation Service and prisons are resourced within the Offender Management in Custody (OMiC) model.

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Approved by OPS for publication: Helen Judge, Chair, Operational Policy Sub-board,
November 2024

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1. **Purpose**

- 1.1 When applied correctly, a transfer to another prison can provide opportunities for ISPs to progress within their sentence plan, so that where they engage with those opportunities, they will have more evidence for the Parole Board that their risk could be managed in an open prison, or in the community upon release. This policy outlines the procedure for considering the progressive transfers of ISPs in the Prison Estate efficiently. It is for use by all HMPPS staff involved in the process of managing ISPs and considering their progressive transfers, and includes a section outlining who should be involved in these decisions.
- 1.2 This Policy Framework sets out the requirements and associated guidance to support decisions which fall to be made with regard to these progressive transfers – and thereby ensure that decisions are defensible, consistent, timely and effective. The requirements, constraints and guidance of this Policy Framework should be applied within existing transfer processes and attached to appropriate staff roles in line with existing responsibilities in relation to the transfer process.
- 1.3 All references to ‘transfers’ or ‘moves’ in this Policy Framework should be considered in the context of progressive transfers (see guidance paragraph 6.5 for examples), unless otherwise stated. This can include transfers between prisons of the same category in the Closed and Open Estates or between categories A to C in the Closed Estate.
- 1.4 All references to ‘prisoner’ or ‘prisoners’ in this Policy Framework should be considered in the context of indeterminate sentenced prisoners or ‘ISPs’.
- 1.5 All references to the ‘Secretary of State’ in this Policy Framework refer to the Secretary of State for Justice.
- 1.6 Although not the focus of this Policy Framework, all reference to ‘open conditions’ in this Policy Framework applies to both the adult Men and Women’s Estate. It may also refer specifically to Category D⁸ in the Male Estate. To find information on moves to open conditions, see the [Generic Parole Process Policy Framework](#).

2. **Evidence**

- 2.1 As part of the Government’s response to the [Justice Select Committee’s \(JSC\) report into the IPP sentence](#), the Government accepted the Committee’s recommendation to review the IPP Action Plan and shared the outcome of the review with the Committee on 26 April 2023, accessible here: [Letter from the Lord Chancellor and Secretary of State for Justice on the Imprisonment for Public Protection Action Plan \(parliament.uk\)](#). This Policy Framework contributes to the ‘Policy’ workstream within the Action Plan.
- 2.2 The JSC report highlighted some of the key concerns with regard to the impact of transfers. Moving prisoners through the Prison Estate efficiently is vital for their access to rehabilitation and progression opportunities. Such prisoners may need to move to access interventions; demonstrate a reduction in risk following re-categorisation; and to plan for eventual release, when eligible. Some specialist interventions, such as those which are part

⁸ Prisoners who are either assessed as presenting a low risk or whose previously identified risk factors are now assessed as manageable in low security conditions.

of the Offender Personality Disorder (OPD) provision, are available only in certain prisons in the estate and there are often only a small number of options for where a prisoner can transfer to.

- 2.3 It is important that prisoners progress down through the different levels of security categorisation. Accessing lower security conditions (where risk is assessed as manageable by the prison) demonstrates that a prisoner can manage their own risks in less secure environments as part of their rehabilitation. It also helps them slowly to become accustomed to conditions closer to those they will experience in the community after release, especially if they initially reside in an Approved Premise (AP). The more time that prisoners spend getting accustomed to lower security conditions, the better prepared for re-settlement they will be, and this can translate to their risk being more manageable in the community, should they be released.
- 2.4 Where appropriate, access to interventions can provide prisoners with the opportunity to better understand, address and learn to manage their own risks, and provides opportunities to demonstrate this understanding and reflection on risk to the Parole Board in a more structured way.
- 2.5 Often, the pace at which a progressive move takes place is important, particularly where a parole hearing is relatively close. Even short delays can lead to a prisoner having insufficient time to realise the impact of their transfer on their parole outcome. Delays in progression even years before a parole review can lead to feelings of frustration and hopelessness in prisoners, which can be very damaging to a prisoner's engagement with their own progression and sentence plan. The more frustrated prisoners get, the more likely they are to behave in ways which further jeopardise their progression, due to frustration or hopelessness. Such behaviours might include reduced cooperation or engagement with staff, and may also include increased self-harm or suicide attempts.
- 2.6 The HMPPS Rehabilitation Strategy is available to HMPPS staff on the [HMPPS Intranet](#).

3. Outcomes

- 3.1 This Policy Framework will achieve the following:
- a consistent approach is applied when transferring prisoners for progressive reasons.
 - progressive transfers for prisoners are focused on clear, fair and informed decision making;
 - transferring prisoners in a timely manner where it is appropriate and necessary for the transfer to take place;
 - prisons demonstrating the reasons for a transfer and providing this information to prisoners in an understandable way before a transfer taking place; and
 - a clear route for escalating individual cases through the management line when an impasse is reached.

4. Requirements

Overview

- 4.1 All women's prisons and prisons holding men (including reception⁹, training¹⁰ and resettlement¹¹ prisons) must make every reasonable effort to facilitate the progression of prisoners, taking into account their parole timetable and sentence planning needs.
- 4.2 Prisons identified as an option for a progressive move will be considered as a potential 'receiving prison'¹² for the prisoner. Prison staff at the receiving prison must engage with the sending prison¹³, in line with existing transfer procedures and this Policy Framework, until lines of enquiry have concluded or a transfer is agreed.
- 4.3 Prison staff in the sending and receiving prisons must resolve any disagreements between establishments as promptly as possible to reduce the chances of delays for prisoners who need to transfer. Where an agreement cannot be reached between sending and receiving prisons, cases must be escalated in a timely manner (i.e. within 2 weeks) adhering to the Escalation Protocol at requirement paragraphs 4.26 and 4.30. Prison staff must also follow the requirements in section 3.11 ("Transfer of individuals during a Parole Board review") of the [Generic Parole Process Policy Framework](#) and section 4.17 ("Parole Board Oral Hearings") of the [Recall, review and re-release of recalled prisoners Policy Framework](#) on Gov.uk where there is a disagreement with regard to parole directions.
- 4.4 Sending and receiving prison staff must prepare and support prisoners in acclimatising to new living conditions before and after a progressive move, e.g. providing prisoners with information regarding the intended receiving prison and new regime, where requested and available. Sending prison staff must inform the prisoner of the reasons for their transfer before the transfer takes place, unless there is clear evidence that this would negatively impact security or investigative processes.
- 4.5 Sending prisons must notify the receiving prison where a prisoner has a history of suicide attempts/ self-harm or where they have been on an Assessment, Care in Custody and Teamwork (ACCT) case management approach and provide an overview of potential risk factors associated with transfer.
- 4.6 Progressive transfers out of the Long Term & High Security Estate (LTHSE) must be pursued wherever it is safe and appropriate to do so, in the context of prisoner's sentence planning and progression needs.

⁹ Reception Prison – An establishment holding prisoners during their early days in custody. These prisons support the courts and move sentenced prisoners to a suitable training or resettlement prison.

¹⁰ Training Prison – An establishment holding sentenced adult male prisoners. These prisons support prisoners to settle into the prison environment and engage with rehabilitation programmes.

¹¹ Resettlement Prison – An establishment with the specific focus of supporting prisoners as they prepare for release.

¹² Receiving Prison - The establishment that the prisoner should transfer to. Staff at this establishment should prepare for the transfer and arrival of the prisoner.

¹³ Sending Prison - The establishment where the prisoner currently resides, also referred to as the 'holding prison'. Staff at this location should have identified the need for transfer.

- 4.7 Within the Women's Estate, there is a cohort of ISPs being managed under the Women's Estate Case Advice and Support Panel (WECASP). Transfers for those prisoners must be discussed within the WECASP forum and the WECASP will ensure that such move is progressive and meets the sentence planning and progression needs of the prisoner, as well as supporting the prisons with handovers and transition arrangements. For more information, see guidance paragraphs 6.19 to 6.23.
- 4.8 Prisoners convicted of terrorism offences (TACT prisoner), offences where the judge ruled there was a terrorist connection (TACT-connected prisoner), and any other offence where the individual is identified as posing a terrorist risk (Terrorist Risk prisoner) are managed by counter terrorism (CT) case management processes. The transfer of these prisoners must be discussed and agreed in accordance with the Managing Extremism Amongst Offenders in Custody and Community Policy Framework.
- 4.9 Once a prisoner's parole review has commenced, sending prison staff (e.g. the prison caseworker for the latest parole review) or the prisoner's Prison Offender Manager (POM) must notify the Public Protection Casework Section (PPCS) of plans to transfer a prisoner before the transfer has taken place. Where notification before the transfer has not taken place, staff will need to provide a clear reason for this to PPCS, see section 3.11 ("Transfer of individuals during a Parole Board review") of the [Generic Parole Process Policy Framework](#) and section 4.17 ("Parole Board Oral Hearings") of the [Recall, review and re-release of recalled prisoners Policy Framework](#) on Gov.uk.
- 4.10 When HMPPS is operating under temporary national command structures, the HMPPS senior leadership may temporarily agree that decisions can be made outside of this Policy Framework in exceptional circumstances. This must be evidenced in the prisoner's case notes where their potential transfer has been affected.
- 4.11 Population Management Unit (PMU) will prioritise ISP transfers. Sending prison staff must clearly identify where a prisoner is transferring when requesting transport for such moves using the Book a Secure Move platform.

Considering a Progressive Transfer

- 4.12 Prison and HQ staff making decisions about transfers, in both receiving and sending prisons, must ensure they are familiar with relevant policies, including those relating to sentence planning, security categorisation, terrorist risk, parole, recall and care and management of prisoners who are transgender. The relevant Policy Frameworks have been linked throughout this document.
- 4.13 The decision by prison staff to transfer a prisoner must be proportionate (i.e. balanced) and evidence based, see guidance paragraph 6.1 for more information. As part of their evidence, sending prison staff must briefly be able to clearly demonstrate that the transfer is appropriate and what will be gained from that transfer with consideration given to the prisoner's sentence plan. Examples of progression-focussed reasons for a transfer are located in guidance paragraph 6.5.
- 4.14 Decisions by prison staff concerning the progressive transfer of prisoners must be made using a multi-disciplinary approach, with consultation of appropriate colleagues, on a case-by-case basis to avoid potential bias, see guidance paragraphs 6.10 to 6.16.
- 4.15 In some cases, decisions will be made adjacent to this Policy Framework which must be adhered to, such as in the case of certain specialist units with a need to be more selective to protect the integrity of those units e.g. the [Progression Regime](#). Sending prison staff

must document and keep a record of the rationale for these decisions by, for example, updating case notes on Digital Prison Services (DPS).

- 4.16 Prisons must ensure that the prisoner's safety and wellbeing are considered when telling a prisoner about a transfer decision (particularly where it may be perceived as a negative decision), and thereafter. Consideration must be given as to whether the prisoner should be assessed under the ACCT¹⁴ process.
- 4.17 Prisons must consider the safety of staff and take appropriate safeguarding action where there is an increased risk posed by prisoners as a result of a transfer, particularly where it may be perceived as a negative decision.

Acceptance by Receiving Prisons

- 4.18 Receiving prisons must accept a transfer unless they can evidence clear reasons to refuse or 'reject' a proposed move to that specific establishment, see constraint and guidance paragraphs 5.3 to 5.4 and 6.1 to 6.9.

Refusal by Receiving Prisons

- 4.19 Decisions taken by potential receiving prisons to refuse a progressive transfer to that specific establishment must be balanced by consideration of the prisoner's sentence planning needs, see constraint and guidance paragraphs 5.3 to 5.4 and 6.1 to 6.9.
- 4.20 The views of the current POM or Community Offender Manager (COM) must be taken into consideration when the receiving prison is considering refusal of a progressive transfer to that specific establishment.
- 4.21 Sending prison staff and the POM must explore alternative options for progression, including other potential receiving prisons or progression opportunities within the holding prison, to mitigate any negative impact of a refusal from a potential receiving prison or Secretary of State (for moves to open only) on a prisoner's progression.

Transfer Timeframes

- 4.22 A transfer must be arranged as soon as possible once it has been considered, especially if required by a transgender Complex Case Board (CCB – see guidance paragraphs 6.35 to 6.37) or Women's Estate Case Advice and Support Panel (see guidance paragraphs 6.19 to 6.23), unless sending prison staff are able to provide clear evidence that the transfer is not appropriate.

Parole Reviews

- 4.23 Sending and receiving prison staff must follow the requirements in section 3.11 ("Transfer of individuals during a Parole Board review") of the [Generic Parole Process Policy Framework](#) on Gov.uk where a parole review is underway. This is to ensure that a transfer does not disrupt the parole review. For more information on transfers during a parole review, see guidance paragraphs 6.61 to 6.63.
- 4.24 Sending prison staff must transfer prisoners as soon as possible following the conclusion of a parole review, where HMPPS staff identify this as appropriate, see guidance paragraphs 6.1 to 6.7. Where acceptance by an identified receiving prison has not been obtained within

¹⁴ Refer to [PSI 64/2011 Managing prisoner safety in custody](#) for more information.

2 weeks of issuing the Secretary of State letter to the prisoner setting their next review, prison staff must follow the Escalation Protocol, see requirement paragraphs 4.26 to 4.30.

Recall Reviews

- 4.25 Sending and receiving prison staff must follow the requirements in section 4.17 (“Parole Board Oral Hearings”) of the [Recall, review and re-release of recalled prisoners Policy Framework](#) on Gov.uk where a recall review is underway. For more information on transfers following a prisoner’s return to custody, see guidance paragraphs 6.61 and 6.64 to 6.68.

Transfer Escalation Protocol

- 4.26 Where sending and receiving prisons are unable to reach agreement on the transfer of a prisoner and the reasons do not adhere to this Policy Framework, sending prison staff must escalate cases within their management line to prompt further discussion and consideration with receiving prison staff. Where a decision is not reached at each level of management, the case must be escalated further.
- 4.27 Escalation of progressive transfers must take place within a reasonable timeframe (i.e. within 2 weeks). Sending and receiving prison staff must ensure that use of the escalation protocol does not negatively impact the prisoner, such as causing further delays to their progression, where possible. For more information with regard to the escalation protocol, see guidance paragraphs 6.70 to 6.76.
- 4.28 Where the Governor (or delegated member of staff) at the sending and receiving prisons do not reach a decision, sending prison staff must raise individual cases with the relevant Prison Group Director’s (PGD’s) Staff Officer. The Staff Officer(s) for the sending and receiving prisons must take and agree the final decision unless the case requires further escalation due to exceptional circumstances.
- 4.29 Where the sending and receiving prisons are situated in different prison groups, the Staff Officer for the sending prison’s group must discuss the case with the Staff Officer for the receiving prison’s group to reach a decision. In exceptional cases, where an agreement cannot be reached between Staff Officers, the case must be raised with the relevant PGDs for them to take the final decision.
- 4.30 Sending and receiving prisons must make every effort to resolve transfer related issues within their operational line before escalating to Staff Officers.

5. Constraints

- 5.1 Prison Governors and staff must not set local transfer criteria or restrictions that would arbitrarily or negatively impact or restrict the progression of prisoners.
- 5.2 Whilst some prisons may have concentrated their population of ISPs into a single location/unit (sometimes referred to as a 'Lifer Unit'), lack of spaces on such units must not, in itself, be used as a reason to refuse a transfer.

Considering a Progressive Transfer

- 5.3 Receiving prison staff must not refuse to accept prisoners solely due to the indeterminate nature of their sentence, or where they are of interest to Home Office Immigration Enforcement (HOIE). Each decision must be made on a case-by-case basis, in line with published Policy, especially where the prisoner is being considered for a specialist unit that has its own eligibility and/or suitability criteria.
- 5.4 Receiving prison staff must not refuse a transfer for extraneous reasons, such as Incentive Scheme status, past adjudications or where the prisoner is on an ACCT (see constraint and guidance paragraphs 5.1 to 5.4, 6.7 to 6.9 and 6.41). For example, Category C prisons must not refuse to accept prisoners transferring from the LTHSE solely on the grounds that they have spent an extended period in high security conditions.

6. **Guidance**

- 6.1 It is important to remember that all decisions with regard to a prisoner's transfer must be proportionate and evidence-based. This means that factors contributing to decisions should be weighed against the benefits or impact of a transfer for/on the prisoner and their progression. Where asked to justify their decision to approve or refuse a specific prisoner's transfer, sending and receiving prison staff should be able to provide evidence of the reasons for their decision and record the decision itself by updating, for example, case notes on DPS.
- 6.2 This Policy Framework should be used alongside actioning existing processes relating to prisoner progression and transfer. For example, a transfer may be initially considered during a MAPPA meeting or meetings to review a prisoner's sentence plan. Governors should clearly stipulate who is responsible for identifying transfers for indeterminate sentence prisoners (e.g. the POM). Where necessary, Governors may delegate any requirement under this process to suitable grades within their establishment as long as that person has the necessary knowledge and skills to perform that requirement.
- 6.3 Where the prison identifies that the prisoner will require documents or spoken language to be translated (including the use of British Sign Language – BSL - translators), for example due to a disability or language barrier, the sending prison must ensure that the receiving prison is notified as soon as possible. Guidance on translating documents into the Welsh Language as part of [HMPPS' Welsh Language Scheme](#) can be found on Gov.uk. It is the responsibility of the prison to arrange for the translation of HMPPS documents.
- 6.4 The sending prison should share the details of any reasonable adjustments required by the prisoner with the receiving prison. The receiving prison should take steps to meet a prisoner's required reasonable adjustments.

Progressive Transfers

- 6.5 A 'progressive transfer' refers to a move from one prison to another prison site to enable any of the following (non-exhaustive):
- Access to Offending Behaviour Programmes (OPB) and/or other interventions;
 - Access to bespoke and/or specialist units and wings;
 - Access to treatment or an environment in support of physical and/or mental health needs¹⁵ (including neurodivergence, d/Deaf, personality disorder and trauma needs);
 - Access to Social Care;
 - Access to behavioural or emotional management or support;
 - Access to education;
 - Access to assessment for Release on Temporary Licence (for those in the Open Estate);
 - Access to community-based initiatives (for those in the Open Estate);
 - Access to Home Office (HO) Immigration staff based in prisons;

¹⁵ There is work underway to develop a separate remission strategy for those returning to custody following detention under the Mental Health Act 2010.

- Fostering and maintaining ties to family and significant others¹⁶ (usually achieved by closer proximity);
- Evidencing a period of stability in a familiar prison environment; or
- Engagement with other ‘protective factors’¹⁷.

Considering a Progressive Transfer

6.6 Prison staff should consider the impact that a transfer may have on the following:

- Parole/Recall Reviews;
- Sentence plan and rehabilitative activities;
- Physical and mental health/wellbeing and treatment (including access to medication);
- Social Care Plans;
- Substance misuse and access to rehabilitative services;
- Support or reasonable adjustments that are in place for prisoners with safeguarding needs, including risk of victimisation (particularly within the Women’s Estate);
- Behavioural and emotional management;
- Peer support schemes and faith services/groups (lack of access potentially leading to feelings of loneliness);
- Physical environment and access to services (lack of access potentially leading to feelings of loneliness);
- Support or reasonable adjustments that are in place for prisoners with neurodivergent or disability needs (including d/Deaf prisoners);
- Contact or support from family or significant others;
- Access to meaningful activity including access to work, education and assessment for Release on Temporary Licence (ROTL) as lack of access can lead to demotivation; and
- Public protection controls and restrictions which the receiving prison must continue to implement (e.g. proximity to the victim when in the Open Estate).

6.7 Staff should not make assumptions with regard to a prisoner’s needs, especially concerning protected characteristics¹⁸. It is important that both sending and receiving prisons have open discussions with a prisoner to discuss their needs before they transfer.

6.8 Prison staff should only refuse a progressive transfer where the decision is not proportionate (e.g. there are security or substantial operational or public protection concerns relating to the prisoner in question which means that the receiving prison is specifically not appropriate) or there is little evidence in support of the transfer, see

¹⁶ For information and guidance for prison staff on supporting the maintenance and development of prisoners’ relationships with family, significant others and friends, see the [Strengthening Prisoners Family Ties Policy Framework](#) and [PSI 16/2011 Managing prison visits](#) on Gov.uk.

¹⁷ ‘Protective Factors’ - Positive conditions or attributes (skills, strengths, resources, supports or coping strategies) that help prisoners deal more effectively with stressful events to improve the lives of prisoners or the safety of others.

¹⁸ For more information on ‘Protected Characteristics’, see the Equality Act 2010.

requirement and guidance paragraphs 4.12 to 4.16 and 6.1. The following situations are examples of where it might be acceptable to refuse a transfer:

- Reasons¹⁹ which make the proposed receiving prison specifically inappropriate to house the prisoner in question; or
- The proposed receiving prison is not equipped to provide the intervention or service that the progressive move is aiming to enable. For instance, a specific course or programme is not in fact provided by the proposed receiving prison.
- There is clear evidence that the prisoner in question is not ready to engage in the identified intervention. Some interim work could be undertaken to improve their ability to engage in the identified intervention.

6.9 Those who are violent or pose an increased risk of harm to others through violent behaviours should be considered under the mandated violence reduction case management model – [Challenge, Support and Intervention Plan \(CSIP\) – Internal HMPPS Staff Link](#). Under this model, prisoners should not be transferred for the sole reason that they are violent as this will not address the problem; however, prison security is paramount.

Multi-disciplinary decision-making

- 6.10 The POM and COM (where allocated) should carefully consider what the best transfer options are for a prisoner and consult with any proposed receiving prison. It is best practice to ensure that the allocated COM is updated throughout the transfer process. It is important that those making the decision seek the appropriate advice and input before coming to a decision to ensure that it is proportionate and evidence-based, see guidance paragraph 6.1. Examples of those that should be consulted (where applicable) when considering a progressive transfer request are as follows:
- 6.11 Offender Management Unit (OMU) and Observation, Classification and Allocation (OCA) – Receiving prison OMUs will be the department that makes the final decision on a transfer (unless the case has been escalated, see requirement paragraphs 4.26 to 4.30). They should take into account everything outlined in this Policy Framework, and also keep in mind the estate wide responsibility to progress ISPs. It is the role of the OMU to consult with wider prison colleagues as required. Prison OCA staff may not have the necessary expertise around management and progression of ISPs to make an informed decision, so the wider OMU should always be involved. Where an ISP's case is being considered for refusal, prison staff should ensure that the Head of Offender Management Services is consulted on the case and given the opportunity to make the final decision as the sending prison may challenge this decision.
- 6.12 Psychology Services and clinical staff – Psychology Services play an important role in the management of ISPs, so if there are questions raised about a transfer, OMUs should request views from psychology colleagues. They will be able to offer a view on how the move will be of benefit to a prisoner, and what they will be able to do for the prisoner at the new establishment. There may also be a need for the OMU to consult other clinical services (e.g. the previous Responsible Clinician for those previously detained under the Mental

¹⁹ Reasons may include, but are not limited to: requirements for single-cell occupancy for health or security reasons; proximity to co-defendants or other persons of interest/concern; or accessibility concerns often linked to health.

Health Act 2010), to ensure that the establishment can manage any complex mental health issues or neurodivergent needs.

- 6.13 Interventions staff – If a move is proposed to access a certain intervention, you are advised to request views from interventions staff. If the proposal is to move a prisoner as far as is practical to access an Offending Behaviour Programme (OBP) or other intervention, the assessment should take place before the move wherever possible, to reduce the likelihood of rejection for the course, making the move pointless in some cases. If the proposed intervention is to address a specific risk, then this risk should not be used as a reason to refuse the transfer, this can lead to prisoners remaining at a prison that cannot help them address their risks.
- 6.14 Safety Team – Input from the safety team that will support a greater understanding of safety concerns the prisoner may have. This can include, an overview of relevant history of self-harm to understand what the triggers and drivers for this may have been in the past; risk factors associated with transfer which may supported decision making; the management of the transfer; and provide handover information for the receiving establishment. The safety team may also hold information about safety concerns that have been raised by families or significant others.
- 6.15 OPD Services - Where an OPD service is being considered as part of the transfer process please ensure that the prisoner has been accepted into that service and that the clinical team are actively supporting the move. Equally if transferring out of an OPD service that the clinical team are aware and support the onward transfer.
- 6.16 Regional Counter Terrorism Team (RCTT) or prison Counter Terrorism Unit (prison CTU) – For prisoners identified as posing a terrorist risk, the RCTT or prison CTU can provide advice about how the risk might be affected by the proposed transfer. All proposed transfers of these prisoners are discussed and agreed at CT case management meetings. The RCTT or prison CTU complete the relevant risk assessment and share it with the proposed receiving prison before transfer to inform decision making. Further details about the transfer of terrorist risk prisoners can be found in guidance paragraphs 6.50 to 6.54.

Security re-categorisation

- 6.17 Each prisoner is given a security category in line with the [Security Categorisation Policy Framework](#) on Gov.uk. Categorisation decisions take into account multiple factors, such as risk of abscond, risk to the public²⁰, risk of serious ongoing criminality from custody, risk of violence or harm to others in custody, and disorder that impacts the regime. Prisons should, therefore, avoid using any factors considered in the categorisation process as reasons to refuse a move, as these have already been assessed and taken into account when assigning prisoner security categories.
- 6.18 Prisons using their own individual assessment of risk based on local acceptance criteria, contrary to this Policy Framework (see constraint paragraph 5.1), as a reason to refuse a move creates inconsistency across the estate, impeding the progression of the indeterminate population. There will be cases where specific security concerns relating to the prisoner in question do warrant refusing a move, but these should be on robust grounds of safety, with all rationale discussed with the sending prison and documented. Prisons

²⁰ For more information on assessing and managing a prisoner's risk during their time in custody and in preparation for release, see [PSI 18/2016 \(Public protection manual\)](#).

should also refrain from asking for significant 'periods of stability' for reasons of security, where a regime or intervention does not specifically require it.

Transfers within the Women's Estate

- 6.19 Transfers can be particularly stressful and unsettling for women in prison and can increase a person's risk of self-harm, as well as being traumatic (Kelman et al, 2022²¹). For these reasons, transfers should be considered carefully, and minimised where possible.
- 6.20 For those ISP Women already managed under WECASP, the panel can support and assist with identifying suitable new locations that would offer those women the interventions needed to support with progression through their sentence. For those ISP women who are presenting with particularly complex needs and where they may be struggling to access interventions identified on their sentence plan, prison staff should consider referring into WECASP for support in this area. For more information on the underpinning principles of WECASP and for referral criteria, see the [Women's Estate Case Advice and Support Panel \(WECASP\) Policy Framework](#) on Gov.uk or contact WECASP - WECASP@justice.gov.uk.
- 6.21 It is important to recognise that prisoners in the Women's Estate are categorised differently to those in the Male Estate. In addition to this, prison staff in the Women's Estate should remember that prisoners are eligible to be considered for unaccompanied day release (RDR) from the point of reaching open status in the Women's Estate, following a letter approving a move to open conditions from the SSJ. This means that prisoners should not necessarily wait for a transfer before beginning ROTL processes as this can significantly impact their progression. For more information on ROTL, see the [Release on Temporary Licence \(ROTL\) Policy Framework](#) on Gov.uk.
- 6.22 For more information on the operational management of people in the Women's Estate, contact the HMPPS Women's Directorate: womensdirectorate@justice.gov.uk. Alternatively, for Policy enquiries, contact the Women's Operational Policy and Strategy Team, HMPPS Women's Directorate - womensteam@justice.gov.uk.
- 6.23 The Women's Estate Psychology Service (WEPS) also support prisons in managing a prisoner's risk and provide advice on how to work responsively with women to meet their specific needs. For more information on the services provided by WEPS, contact - womensestatepsycholo@justice.gov.uk.

Transfers for Young Adults

- 6.24 'Young Adults' are defined as being aged 18 to 25 years old (inclusive). This Policy Framework will apply to those in the Adult Estate only.

²¹ J Kelman et al. (2022) - How Does a History of Trauma Affect the Experience of Imprisonment for Individuals in Women's Prisons: A Qualitative Exploration. Available at: <http://www.tandfonline.com/doi/full/10.1080/08974454.2022.2071376>.

- 6.25 Young Adults in custody have a complex range of developmental and neurodivergent needs which can affect adjustment and response to custody; be challenging for staff to manage effectively; and impact on prison stability²² & ²³.
- 6.26 It is important that prison staff familiarise themselves with how procedural justice²⁴ may impact the attitude and behaviour of Young Adults in custody.
- 6.27 Receiving prison staff should consider a bespoke induction process, particularly for Young Adult women, which can meet the different learning needs and styles of the prisoner. This induction could begin before the prisoner has transferred to the receiving prison. In addition to this, prison staff should consider including age appropriate peer mentors as part of this process where possible and appropriate to do so.
- 6.28 For more information on how to manage Young Adult women, see the [Transfers within the Women's Estate](#) section of this Policy Framework at 6.19 to 6.23.
- 6.29 For more information on the management of Young Adults, contact - youngadultsteam@justice.gov.uk.

Transfers for Prisoners from Ethnic Minority Backgrounds

- 6.30 It is important that prisoners from ethnic minority backgrounds are encouraged to engage with support services where needed and that maintaining access to these services is taken into account when a transfer is considered. Prison staff should ensure that they make enquiries about their support needs prior to a transfer taking place.
- 6.31 Receiving prison staff should focus on building rapport with prisoners from ethnic minority backgrounds, creating an environment where they feel understood, respected, and safe to seek help.
- 6.32 Prison staff should ensure prisoners from an ethnic minority background are supported in maintaining relationships with their family, where appropriate. This can be advantageous for their mental health and also play an integral role in rehabilitation and progression.
- 6.33 It is important that prison staff familiarise themselves with operational guidance available to staff on the management of prisoners from ethnic minority backgrounds.
- 6.34 For more information on the management of prisoners from ethnic minority backgrounds, contact: HMPPSDiversity_Inclusion@justice.gov.uk.

Transfers for Transgender Prisoners

- 6.35 Prison staff should remember that additional structured risk assessments and resources, in the form of the Transgender Complex Case Board, are required before a prisoner is

²² Achieving better outcomes for young adult men: evidence-based commissioning principles - <https://www.gov.uk/government/publications/achieving-better-outcomes-for-young-adult-men-evidence-based-commissioning-principles>

²³ McGuire, J. (2015). What works in Reducing Reoffending in Young Adults: A Rapid Evidence Assessment. Ministry of Justice Analytical Summary - <https://www.gov.uk/government/publications/reducing-reoffending-in-adults-what-works>

²⁴ 'Procedural Justice' - The extent to which someone perceives the way processes are applied and decisions are made by people in authority to be fair and just.

allocated or transferred to separate accommodation which does not match their legal gender.

- 6.36 Whilst the most appropriate location for the prisoner is being considered, they should be held in a suitably supportive environment which can manage their risks and needs.
- 6.37 For more information on how to manage transgender prisoners, see [The Care and Management of Individuals who are Transgender Policy Framework](#) on Gov.uk or contact HMPPSTransgender@justice.gov.uk.

Transfers for Prisoners with Physical and Mental Health and Social Care Needs

- 6.38 It can sometimes be difficult to identify a suitable receiving prison where a prisoner has complex health needs that require them to reside in a prison location with or near certain facilities. Prison staff should consider the impact that a transfer would have on a prisoner's health needs, see guidance paragraph 6.6.
- 6.39 Staff should remember that prisoners may be concerned about access to their medication, especially in an open prison, and will need clear instruction on how they should navigate this.
- 6.40 It is important that staff in the sending and receiving prisons work together to mitigate any difficulties that may arise during this type of transfer. It is advisable to include health care and Local Authority Social Care providers for both prisons in these conversations to support continuity of care and to ensure that care needs are met throughout the transfer process.
- 6.41 It is important that sending prisons provide relevant risk information, including raising the need for mental health support, to receiving prisons and ensure that the safety team at the sending prison are aware of the prisoner's risk to self prior to transfer. Staff should remember that prisoners can be safely transferred on an open ACCT and receiving prisons cannot refuse to accept a prisoner for the sole reason that they are on an ACCT. For more information on transferring prisoners supported by ACCT, see the [Transferring Prisoners Supported by ACCT](#) document on the HMPPS Intranet.
- 6.42 The potential for a prisoner to transfer to a secure hospital should not negatively impact a progressive transfer to another prison, where it is safe for the transfer to take place. A prison should factor in the likelihood of a transfer to a secure hospital in their rationale for considering a progressive transfer. It is important that the receiving prison have a complete understanding of the prisoner's mental health and safety concerns prior to the transfer.
- 6.43 Where a prisoner is remitted back to custody from a secure hospital, the Responsible Clinician should be consulted as part of the consideration for a transfer where appropriate. For remissions from a mental health provision, it is important that both prison staff that will be managing/supporting the individual as well as staff from the prison health provider attend the Section 117 aftercare meetings.
- 6.44 For more information on sharing information, contact the Health and Social Care Team - health@justice.gov.uk.

Transfers for Foreign Nationals within the English and Welsh Estate

- 6.45 It is important that sending and receiving prisons are aware the Foreign National Offender's (FNO) deportation status. FNOs in prison that are of interest to the Home Office (HO) should have access to specific resources to assist their progression journey such as access to HO Immigration staff in prison. This is only available at select prisons.

- 6.46 FNOs in prison that are not of interest to the HO will not be deported and, therefore, will not need access to HO Immigration staff in prison and so can be considered for other initiatives, such as the Progression Regime.
- 6.47 It's important that prison staff recognise that FNOs with family members that live abroad can have additional challenges in maintaining contact and may need additional support to foster and maintain family ties. If their family members are unable to attend extended visits due to being abroad, it would be beneficial for them to take part in secure social video calling or for friends or significant others to visit to still maintain healthy relationships. Often these ties are strengthened by a closer proximity and can be one of the reasons for a progressive transfer, see guidance paragraphs 6.5 to 6.6.
- 6.48 When communicating a decision regarding a transfer, prison staff should ensure that access to an interpreter is provided where required due to a language barrier, in line with HMPPS translation processes.
- 6.49 For more information on the management of FNOs in prison, please contact the FNO Hub: FNOOperationalDelivery@justice.gov.uk.

Transfers for prisoners who pose a terrorist risk

- 6.50 Terrorist risk may be an important factor in determining the suitable placement of a prisoner. The Managing Extremism Amongst Offenders in Custody and Community Policy Framework sets out requirements and guidance relating to the management of TACT prisoners, TACT-connected prisoners and Terrorist Risk prisoners. It is important to check DPS alerts to identify if the prisoner being considered for transfer poses a terrorist risk. Prisoners must not be told about these alerts or if they are subject to CT case management processes.
- 6.51 The transfer of TACT, TACT-connected and high risk Terrorist Risk prisoners is agreed centrally following consultation with the Joint Extremism Unit (JEXU), and the LTHSE CT Team where required.
- 6.52 Staff who wish to transfer a prisoner who poses a terrorist risk should contact their RCTT or prison CTU who will raise the transfer for discussion at the CT case management meeting. The RCTT or prison CTU will complete a risk assessment of the proposed transfer, which is shared with JEXU or the LTHSE CT Team who then share it with the proposed receiving prison to inform their decision making.
- 6.53 Receiving prisons must balance the terrorist risk a prisoner poses with their sentence planning needs when deciding whether to accept a proposed transfer. JEXU may choose to use its own internal escalation route if the transfer of a prisoner is refused but JEXU is of the view that the transfer will improve the management of the prisoner's terrorist risk. There may also be occasions where the proposed receiving prison would increase a prisoner's terrorist risk (e.g. because of the make-up of the population, non-associations, significant stability issues, or CT specific risks or capability at the receiving prison). In these circumstances, JEXU will help to identify an alternative receiving prison.
- 6.54 For further details about the transfers of prisoners who pose a terrorist risk please contact the National Operations and Assurance Team in JEXU: NOAT.Operations@justice.gov.uk.

Transfers out of Long Term and High Security Estate (LTSHE)

- 6.55 Many ISPs in the Male Estate will spend a significant portion of their sentence in the LTHSE, as this is often the best place for their sentence planning needs. While a prisoner

will have access to interventions to be able to address their risks in the LTHSE, it is important they are able to demonstrate their reduction in risk to the Parole Board. This can be done by prisoners participating in a wide range of interventions, but also by accessing lower security conditions where appropriate.

- 6.56 The move out of a prison they have been in for several years can be a challenging time for prisoners, therefore it is important the right move is identified. LTHSE prisons should consider when the right time is for prisoners to start work to progress towards a lower security category. The categorisation process, along with sentence planning and discussions with their POM, COM (where allocated) and keyworker should help understanding of when a move is appropriate. Category C prisons should be open to these prisoners moving from the LTHSE and should not use the lengthy time spent in the LTHSE as the sole reason to class them as risky and refuse a transfer.
- 6.57 The sending prison should make reasonable efforts to prepare a prisoner for a move out of the LTHSE. Similarly, the receiving prison has a responsibility to acclimatise the prisoner (e.g. providing prisoners with information regarding the intended receiving prison and new regime, where requested and available) to lower security conditions upon their arrival.

Movement out of Reception Prisons in the Male Estate

- 6.58 Following the initial period after being sentenced, Reception prisons are rarely the correct location for an ISP. ISPs should therefore be moved on from Reception prisons at the earliest opportunity after sentence to more suitable locations in line with security categorisation processes, so that they can start to adjust to prison life and to begin the process of progressing through their sentence. Establishments should make every effort to accommodate moves from Reception prisons. Not only is it not in a prisoner's interest to spend time in a prison not set up for their needs, it is vitally important that these establishments free up space for the Courts. Reception Prisons should follow the National Allocation Protocol and the relevant Offender Flow Models ²⁵ to ensure timely transfers.
- 6.59 Prisoners will be returned to Reception Prisons following recall or following discharge from a secure hospital. Recalled prisoners need to be moved on from Reception Prisons as soon as possible in line with the [Recall, review and re-release of recalled prisoners Policy Framework](#) and the [Security Categorisation Policy Framework](#) on Gov.uk, as they will need to begin work to address their risks and reasons for recall in plenty of time before their next parole hearing, see guidance paragraphs 6.64 to 6.68 for more information. Spending significant time in a prison which does not cater for their sentence planning needs can reduce motivation to engage and lead to a loss of trust in the system. It also blocks beds that could and should be used for other, more suitable prisoners.
- 6.60 For more information on the National Allocation Protocol and Offender Flows Model, contact: offenderflowsandconfiguration@justice.gov.uk.

Transfer Timeframes

- 6.61 Where appropriate, sending and receiving prisons should use the National Allocation Protocol and the Offender Flows Model²⁵ to ensure prisoners are being moved in a timely

²⁵ HMPPS staff can access a copy of these documents by contacting offenderflowsandconfiguration@justice.gov.uk.

manner e.g. 20 working days, see guidance paragraph 6.10. However, prisons should remain flexible with these timeframes depending on the specific needs of prisoners, and should take a common sense approach if a prisoner needs to transfer to access sentence planning work. For further guidance on sentence planning and how transfers fit into this, please see the Progressive Transfers for Indeterminate Sentence Prisoners Leaflet and Progressive Transfer Timelines available for staff on EQuiP.

Parole Reviews

- 6.62 Establishments will be aware that transfers should usually be avoided during a prisoner's parole review; progression is an important exception to this. It is unhelpful to delay a progressive move until after a prisoner's parole review has been completed, as this will reduce the time that a prisoner has to work on reducing their risks, and evidencing any reduction in risk, before the next Parole review. Prisoners will often begin the processes associated with a new parole review fairly shortly after completing their previous one. This often means that sending prisons will not pursue progressive transfers once a parole review commences so as not to disrupt the process. The optimum time for a prisoner to transfer is as soon as they receive a letter from PPCS, on behalf of the Secretary of State which concludes a parole review. Prisons should, therefore, give consideration to what prisoners' next progression activities will be, via the sentence plan, with a view to organising any progressive transfers as soon as possible following the conclusion of the previous parole review. This is to enable a progressive transfer to take place in good time and to reduce the chances of negatively impacting the next parole review and, therefore, impeding the progression of the prisoner.
- 6.63 Where a parole review has already commenced, prisons may organise a progressive transfer where a decision not to move the prisoner would have a detrimental effect on their progression. These decisions must be made collaboratively with those managing the prisoner and PPCS and should be in line with the Transfers chapters of the [Recall, review and re-release of recalled prisoners Policy Framework](#) and the [Generic Parole Process Policy Framework](#) on Gov.uk. If a parole oral hearing has already been scheduled, then the move should only take place if the date and time of the hearing can be honoured by the receiving prison, see the [Parole Board Oral Hearing Administration & Attendance Policy Framework](#) on Gov.uk.

Recall Reviews

- 6.64 Prisoners that have returned to custody following a recall will not be able to go to open conditions without an acceptance letter from the Public Protection Casework Section (PPCS) on behalf of the Secretary of State, following a parole review or exceptional transfer decision.
- 6.65 Prison staff should not transfer a prisoner if arrangements have been made for the COM to contact the prisoner to discuss the recall and Part B report within 15 working days of the prisoner's return to custody, as a prison move would delay this meeting. This is a critical meeting for all indeterminate recalled prisoners as it helps to set the context for their recall, rebuild any professional relationship breakdown and importantly instil hope with the focus being on what they need to do in terms of working towards their re-release. The POM is often the best person to facilitate these meetings.
- 6.66 This meeting will also assist the COM to complete the Part B report. The Parole Board will not accept a Part B report where the COM has not made contact with the prisoner. Prior to the meeting, the COM should ensure that consideration has been given to where the prisoner will be transferred to following their first 15 working days in the reception prison. This meeting should facilitate communication between the COM and POM to work together

when recommending where the prisoner moved to. For more information, see the [Recall Best Practice Guide: working with recalled prisoners](#) on Gov.uk.

- 6.67 In some cases, where a receiving prison is able to facilitate the meeting between the COM and the prisoner, such as via video-link, a transfer could take place. However, where a potential receiving prison is not able to facilitate this meeting, a transfer should not take place until after the meeting has concluded and the Part B has been disclosed to the prisoner. For more information on this meeting, see point 4.10.2 of the [Recall, review and re-release of recalled prisoners Policy Framework](#) on Gov.uk.

Accessing Regimes and Interventions

- 6.69 Moves will often be to allow a prisoner to access an intervention, OBP, or a specific regime. This should be taken into account when considering a progressive transfer. Interventions and regimes are likely to have specific criteria that must be met for a prisoner to be eligible and these conditions will often stipulate a 'period of good behaviour'. Prisons should consider accepting a move even if this condition is not met, as prisoners can then be given time at a new establishment to meet this requirement, perhaps in a separate part of the prison to the regime they intend to locate on. Prisoners that cannot access interventions often struggle the most to progress through their sentence plan. Prisons should consider how an intervention or progressive move may support a prisoner towards eventual release. Prisons should also consider how to put the right support and reasonable adjustments in place to enable prisoners with neurodivergent needs to engage in interventions. Neurodiversity Support Managers in prisons will be able to offer guidance.

Escalation Protocol

- 6.70 The mandatory requirements for the Escalation Protocol can be found in requirement paragraphs 4.26 to 4.30.
- 6.71 Should there be disagreement between the sending and receiving prison for a transfer to take place, then discussion should take place between OMU departments (e.g. the respective Heads of OMU) at the sending and receiving prisons in an attempt to reach consensus. It is important to bear in mind, when these discussions take place, that the progression of a prisoner is the responsibility of both the sending and receiving establishment, see requirement paragraph 4.1 for more information.
- 6.72 If the matter is not resolved following these discussions, then the case will need to be escalated within the operational line at the sending prison, and ultimately to the Governing Governor. At each level, every reasonable effort must be made to come to an agreement and should not be escalated to the next level without a real attempt to reach consensus. These discussions and escalations must happen in a timely manner (i.e. a decision is reached within 2 weeks) as delays to a transfer can be damaging to the progression of a prisoner.
- 6.73 If agreement cannot be reached, then the case will be escalated to the receiving PGD's Staff Officer. They will then have a final say on whether a transfer takes place and where to. Escalation of a case is a last resort and should only be used if agreement cannot be made after significant effort to resolve any identified transfer issue.
- 6.74 It is also important to bear in mind the passage of time when escalating individual cases at various levels and staff should promptly escalate cases at each stage as necessary. Prompt decisions should be taken so as to enable timely progression of prisoners.

- 6.75 It is important to consider when would be the most appropriate time to notify a prisoner of the outcome of the escalation process. For example, it may be best to notify the prisoner once a final decision has been made; however, this should be considered on a case by case basis to ensure that expectations are managed. Staff should remember that the decision (whether positive or negative) could have an impact on the prisoner's risk to self as transfer can be a risk factor for self-harm and suicide, see requirement paragraph 4.5 and guidance paragraph 6.41.
- 6.76 Use of this Policy Framework should minimise the number of cases that need to be escalated, as it sets out guidelines for how progressive transfers should be agreed. It is important though, that when a disagreement does arise, and discussion cannot yield a solution, that escalation does occur. This will ensure that the time spent waiting for agreement is minimised, so a transfer can either go ahead, or work to identify another move can begin.