

Rachael C Griffin
HM Senior Coroner for Dorset
The Coroner's Office for the County of Dorset
Town Hall
Bournemouth
BH2 6DY

[REDACTED]
C/O Healthcare
HMP Guys Marsh
Shaftesbury
Dorset
SP70AH

By email: coroner@bournemouth.gov.uk

7th August 2018



Dear Madam,

Regulation 28: Prevention of Future Deaths report, Andrew Craig

Your Ref: RCG/03237-2016/LJ

Thank you for your Regulation 28 Prevention of Future Deaths Report issued to Care UK on 25th June 2018 following the inquest into the death of Mr Andrew Craig at HMP Guys Marsh, who sadly passed away on 16th September 2016. Care UK would like to express its sincere condolences to Mr Craig's family and friends.

As of 1st April 2017, Care UK has been the main provider of healthcare services at HMP Guys Marsh. There is a sub-contracting arrangement in place with EDP Drug and Alcohol Services in respect of the provision of the substance misuse service. This response addresses the matters of concern in so far as they relate to Care UK. For ease, we have outlined some actions that the prison service has agreed to undertake insofar as they impact on healthcare. Our response should also be read in conjunction with the separate response from the prison service.

The actions below form part of the overall action plan across healthcare and the prison service.

The matters of concern which you raised are highlighted in bold with the response set out below each concern.

Matter of Concern 1:

The use of drugs on the Units at HMP Guys Marsh is rife and these drugs can be transferred between inmates at any time. One of the occasions when prescription drugs can be concealed in order that they can be distributed by Prisoners, is following the dispensing of medication at the Healthcare Unit's medication hatch.

Response:

We are aware that medication is diverted from the Healthcare department and we have already implemented a number of factors that will help to reduce this.

We have CCTV working in this area and we follow the adjudication process if diverting of medication is observed. All healthcare staff understand that if they suspect a patient is concealing medication then they can confront the patient and ask them to show the evidence that the medication has been swallowed. However, we don't think it is practical or appropriate to embed this practice into every individual medication administration. The prison service is looking at creating a specific job description for the officer working within the healthcare department which will improve the management of behaviour in the medication queues and help prevent diversion.

Action: See below table which outlines the actions that have been implemented:

Objective	Immediate action	Training	To be completed by
Review the role and responsibilities of the officer working within healthcare.	New Job Description that identifies the expectations and responsibilities.	n/a	Prison Service
Ensure staff have the relevant substance misuse training to identify diversion techniques and understand behaviours.	All relevant staff invited to partake in the RCGP Substance Misuse training to enhance understanding.	RCGP online substance misuse training.	Healthcare Completed 27 th June 2018
	ISMS agreed to provide a training package to all healthcare staff.	ISMS department to arrange in house training.	November 2018

Matter of Concern 2

Evidence was given by the Head of Healthcare, [REDACTED] that there are 3 allocated times during the day when Prisoners collect medication. During these times, there are around 70 prisoners collecting their medication. The room can be quite chaotic and loud, and prisoners can be in close contact clambering over each other. She described the hatch as overloaded. This is an ideal scenario to pass medication to one another without detection.

Response:

We have made some changes to our practice already to improve this situation. We have reviewed our prescribing in line with the 'In Possession Policy' and as a consequence, the number of prisoners in receipt of supervised medication in the morning and evening has been reduced to approximately 55 patients per medication dispensing times.

We have marked the floor in front of the dispensary with a large green box that indicates to the patients where they are able to stand, in order to respect confidentiality and allow for patient privacy.

The healthcare staff are aware that they must not start medication rounds until there is a prison officer present.

The prison service coordinates and controls the level of attendance for medication by calling individual units to send their patients. However, we acknowledge that we need to manage this better and have requested that smaller numbers attend so that the healthcare waiting area doesn't get overcrowded.

A medication list is sent to each unit every day and only the patients on this list should be allowed to collect medication.

Action: We have implemented the actions outlined in the table below:

Objective	Immediate action	To be completed by
Place written guidance on individual dispensaries to educate the purpose of the green box.	Make a poster that clearly advertises the purpose of the green box.	Healthcare 23 rd July 2018
Ensure officers enforce patient confidentiality and privacy to prevent potential bullying of vulnerable patients.	Officers to encourage prisoners to respect other prisoner's personal space to prevent bullying and knowledge of personal information.	Prison Service
Continue to monitor Not In Possession (NIP) status of patients and change to weekly or monthly possession when safe to do so.	Review NIP patients during medication management meeting. Patients booked for review with pharmacy technicians if appropriate changes could be made.	Healthcare
Review the process of coordinating and controlling the amount of patients in the healthcare waiting area at one time, as currently we have three wings at a time arrive in healthcare which could be 20+ prisoners.	Create a new job description for the Prison Officer detailed to work within healthcare. Review the volume of prisoners attending healthcare at each medication session.	Prison Service
Continue to encourage prison wing staff to use the lists provided for approved patients for medication.	All prison staff reminded of the purpose of medication list and how they must to adhere to it.	Prison Service

<p>Improve the appearance and furnishing within the waiting area.</p>	<p>Replace broken chairs</p> <p>Increase seating capacity</p> <p>Paint the waiting area and remove graffiti.</p>	<p>Prison Service</p> <p>Completed 16th July 2018</p>
---	--	--

Matter of Concern 3.

During the routine medication dispensing, there are no checks done to confirm that Prisoners have actually swallowed the medication. This can allow them to retain the medication for redistribution.

Response:

Whilst we understand the diversion of medication happens we do not think it is acceptable to ask for visual evidence each time. We do not have the ability within the medication queues to ensure prisoners show us they have swallowed their medication. We have a physical wall between medical staff and the patient and would not be able to ensure this happens. Due to confidentiality reasons we do not feel it would be appropriate for officers to check patient's mouths either. However, healthcare staff do ask to check a patient's mouth if we have reason to believe that a patient has diverted their medication.

Currently the officer working within healthcare could be any prison officer in the establishment which doesn't provide any consistency. Expressions of interest have been sent out on a notice to staff to have a pool of officers that will be attached to healthcare. This will enable consistency and enhance sharing of information between healthcare and prison staff.

Plans to move the ISMS dispensary to the healthcare department have been discussed. This will enable us to dispense all controlled drugs under the same scrutiny and security as ISMS medication. However this requires investment by the prison.

Action: The prison service has implemented the actions outlined in the table below:

Objective	Immediate action	To be completed by
<p>Expressions of interest sent out to staffing group for a dedicated group of prison staff to work within healthcare.</p>		<p>Prison Service</p>
<p>All cells to have suitable secure storage facilities to store weekly and monthly medication.</p>	<p>This task is being carried out via the decanting and refurbishing of each unit.</p>	<p>Prison Service</p>

Capital bid to move the ISMS dispensary to the healthcare department.	Governor to write capital bid.	Prison Service
---	--------------------------------	----------------

Matter of Concern 4.

At the last inspection by Her Majesty's Inspectorate of Prisons these issues were raised and attempts have been made to improve the situation. There are now Prison Officers at the Healthcare department during dispensing times, but usually only one Officer stood in the room where the medication hatch is located and another outside the room. Despite these changes, Mrs Jameson advised that the arrangements at medication dispensing times continue to be an ongoing problem that facilitates the illicit supply of prescription drugs in the Prison. She advised that the process could be made safer and more secure. Similar concerns were also raised by one of the Prison GPs [REDACTED]

Response:

The role of the Healthcare Prison Officer needs to be addressed and organised by the prison service.

Action: The prison service has implemented the actions outlined in the table below:

Objective	Immediate action	To be completed by
Review the role and responsibilities of the officer working within healthcare	New Job Description that identifies the expectations and responsibilities.	Prison Service
All cells to have secure safes to store in possession medication.	These have already been ordered and will be incorporated as each wing is refurbished.	Prison Service

Matter of Concern 5.

[REDACTED] also gave evidence that the Prison is overwhelmed with illicit drug use, particularly psychoactive substances and that the Healthcare team receive 3 emergency calls a week at HMP Guys Marsh to assist in resuscitating Prisoners from drug overdoses.

Response:

This is predominantly a matter for the prison service in terms of looking at how to reduce and control the use of illicit drugs within the prison.

As you heard evidence on, the HMP Guys Marsh has large amounts of new psychoactive substance ("NPS") use. These drugs cause a variety of problems in the prison estate, in addition to drug overdoses such as debt, bullying, diverting medication, staff assaults, conditioning of staff, on going illegal activity and prisoner on prisoner assaults.

The table below details the amount of NPS incidents that are responded to by healthcare each month from April 2017 – July 2018:-

Month	NPS incidents requiring treatment
April 2017	8
May 2017	6
June 2017	22
July 2017	22
August 2017	27
September 2017	14
October 2017	21
November 2017	17
December 2017	39
January 2018	29
February 2018	33
March 2018	21
April 2018	44
May 2018	22
June 2018	18
July 2018	30

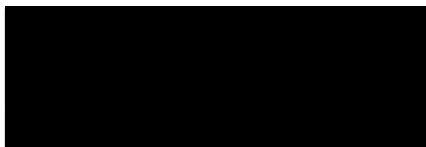
We have worked closely with the prison service to provide first aid training by prison staff.

Objective	Immediate action	To be completed by
Healthcare staff to provide a bite size training first aid session.	Lead Nurse and Paramedic to provide this training.	Healthcare Completed 2 nd July 2018
Prison CM's to have bespoke emergency response training.	Training arranged via external provider. Training is named as COIL (Custody Officer Immediate Life Support)	Prison Service
On-going health promotion advertised around the estate highlighting the risks of using NPS	New posters sourced from NHS England	Healthcare Completed 19 th July 2018

We are committed to providing a high quality healthcare service at HMP Guys Marsh and are doing everything we can to ensure that prisoners are as safe as possible and receive the best quality care. We will ensure that the lessons arising from this inquest are not just implemented at HMP Guys Marsh but across Care UK's services.

We trust that the above responses provide the information that you require but please do not hesitate to contact us if Care UK can be of any further assistance.

Yours sincerely



**Head of Healthcare
HMP Guys Marsh
On behalf of Care UK**