



# HM Prison & Probation Service

**Director General Operations**  
**HM Prison and Probation Service**  
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Rachael Clare Griffin  
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Dear Ms Griffin

Thank you for your Regulation 28 report of 2 February 2023, addressed to the Governor of HMP Guys Marsh and the Chief Executive of NHS England. I am responding on behalf of His Majesty's Prison and Probation Service (HMPPS) as Director General of Operations.

I know that you will share a copy of this response with Mr Williams family, and I would first like to express my condolences for their loss. Every death in custody is a tragedy and the safety of those in our care is my absolute priority.

You have raised some concerns following evidence heard at the inquest, and I will address each of these in turn.

Prison Service Instruction (PSI) 16/2015 is the national policy for ensuring that establishments comply with their duty of care to all adult prisoners and young offenders. The policy mandates that Governors ensure efforts are made to safeguard prisoners and that all vulnerable adults at risk are supported and protected from harm and neglect.

As you are aware, all prisoners are potentially vulnerable, with individual health and care needs requiring proper assessment and management, and it for this reason that we aim to support them all through key work. Where we identify specific issues such as prisoners at risk of self-harm, violence, or concerns around abuse or neglect, HMPPS manage these through a range of processes such as the Assessment, Care in Custody Teamwork, Challenge Support and Intervention Plan, and safeguarding processes as set out in PSI 16/2015.

We do, however, recognise the gap around specific guidance on self-neglect and the HMPPS National Social Care Board – a partnership group, involving the Department of Health and Social Care, NHS England and the Association of Directors of Adult Social Services, alongside HMPPS policy and operational leads – is developing a workplan based on seven agreed priorities, one of which is to improve safeguarding practice in prison and approved premises.

The findings from your report will be used to inform the activities needed to deliver this commitment. In the interim, HMPPS will issue a learning bulletin to remind staff of the existing requirements to identify and refer prisoners for assessment who appear to be self-neglecting, and describe the actions that staff can take to support prisoners in such circumstances.

Locally, HMP Guys Marsh have recently introduced a Buddy (Peer Led Mentor) scheme to provide support for complex and vulnerable prisoners. There are currently seven Buddies in place, and the prison are working on increasing this number. You heard evidence during the inquest that the prison, are in the process of creating local guidance for caring for those at risk of self-neglect. I wish to assure you the prison is working in collaboration with healthcare to ensure this is published as soon as possible.

Key work is the foundation that supports prison safety by building relationships, and promoting opportunities for rehabilitation. While the Covid pandemic and staffing pressures have had a particularly negative impact on the key worker scheme across the prison estate, we are committed to ensuring that key work is fully reinstated across the male closed estate. With this in mind, the national Offender Management in Custody (OMiC) team will use evidence, data and learning to review and develop the current key work model to maximise the opportunity to deliver better outcomes directly associated with safety and reducing reoffending. This will include reviewing key work and OMiC sentence management, exploring ways in which the current delivery model can be made more flexible to better support delivery, taking into consideration different prison functions and prisoner cohorts.

All prison officers and staff receive an initial course of NOMIS training that includes the importance of record keeping. While staff do not undertake refresher training on the use of NOMIS, staff have received guidance on the new Digital Prison Service (DPS) reporting tool which allows easier access to record keeping. In addition to this, the safety team at HMP Guys Marsh have introduced an assurance check that ensures all prisoners have a case note recorded on DPS weekly. Those prisoners who have been identified as isolating, showing signs of self-neglect, or have identified social care needs must have a daily entry inputted.

In respect of your last concern, HMP Guys Marsh have introduced a new weekly meeting (Restrict Supply Tasking Group) which is attended by a multi-disciplinary team. The purpose of this meeting is to discuss and share information regarding the drug ingress into the prison, and to identify any specific strains and substances that are potentially dangerous. If the risks identified require further action, a Governor's Notice To Staff and a prisoners' notice highlighting the risks and concerns will be issued. Further to this, known prolific substance misuse users will be issued with harm minimisation guidance and support.

Thank you again for bringing your concerns to my attention. I trust that this response provides assurance that action is being taken to address the matters you raised.



Director General Operations