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Assistant Coroner Jenny Goldring
London Inner South

21 November 2023

Dear Madam

The Inquest touching upon the death of Mr Manoel Santos

Thank you for your Report to Prevent Future Deaths issued pursuant to Regulation 28 Coroners (Investigations) Regulations 2013 dated 3rd October 2023 and following the inquest touching upon the death of Mr Manoel Santos, who sadly passed away on 2nd November 2020 whilst residing at HMP Belmarsh.

I would like to take the opportunity on behalf of Practice Plus Group to offer my sincere condolences to Mr Santos' family and friends for their loss.

This letter addresses the matters of concern insofar as they relate to Practice Plus Group (PPG). As you are aware, PPG were not the healthcare provider at the time of Mr Santos' death but are the current healthcare provider at HMP Belmarsh as of 1 June 2023.

Matter of Concern

There are a number of concerns raised in your report which relate to the timing of the IS91 notification, the signposting for legal advice about immigration matters, delays by SSHD and probation, the disclosure of SSHD internal reports and the opening of cell doors at night. As these matters do not relate to healthcare and PPG we do not propose to respond.

Another area of concern however is the communication between agencies to which you wrote the below concern.

Communication between agencies

1. Communication issues between the agencies dealing with immigration and sentence planning may lead to confusion and uncertainty for FNOs.
2. I appreciate that any legal advice to FNOs should be from a legal adviser. I am encouraged that the probation service (who employ community offender managers) is seeking to develop a cohort of probation officers specialising in FNOs and immigration.

There are now 201 SPOCs across 12 regions and a hub lead developing this model and leading engagement with the SSHD. There is no such model in the prison in respect of “prison offender managers” who also liaise with the SSHD about FNOs.

We cannot respond directly to the above as this relates to other agencies but we note your further comment in relation to actions to be taken:

- *Consideration as to how to ensure more effective communication/information exchange between the SSHD and the prison and Healthcare. (HMP Belmarsh, HMPPS, MOJ, SSHD, Practice Plus)*

Please find our response to this below.

Response

As noted within the statement of [REDACTED], Head of Healthcare, Healthcare attends the Safety Intervention Meeting (SIM), which takes place on a weekly basis. This is something that has been instigated since PPG took over the healthcare contract in June 2023.

As part of SIM, prisoners who are on immigration hold are highlighted and any concerns regarding those prisoners are discussed. These prisoners are then discussed in the mental health MDT (Multi-Disciplinary Team) referrals meeting. This meeting used to take place once a week but has since been increased to twice a week since PPG took over the contract. During this meeting the team will discuss the patient and their needs and then make a decision on whether support is required and what support can be offered. We now send the outcomes of our referrals meetings to Custodial Managers and Senior Officers so they are aware of what services are going to be engaging with the patients.

Should any patient require support, there are applications on the house blocks that prisoners can access to self-refer to the mental health team or speak to a staff member and ask to be referred to the team. There is a mental health mailbox officers can also use to refer patients into. This means that there are a variety of ways in which patients can access support and that this is connected into any discussions patients have with officers as well as healthcare staff.

We heard during the Inquest that medical information is sometimes required by other agencies, specifically the Home Office in this case. Requests for medical information are reviewed on a case by case basis in order to ensure that client confidentiality and data protection laws are adhered to. Requests go to the central admin mailbox and are usually completed by a particular staff member to ensure consistency. If that staff member is off then the requests are re-allocated. Requests are generally completed within the week and requests from the Home Office are normally prioritised.

In addition to Mr Santos' immigration status, bullying was also a key theme that was investigated during the course of the Inquest. When a prisoner discloses allegations of bullying to a member of healthcare staff, the Custodial Managers should be notified on the houseblock, a Datix should be completed, the Safeguarding Lead should be notified and a referral to the Safer Custody Team should be completed. Since October 2023 a form has been implemented which is completed and sent to the Safer Custody Team rather than it simply being an email. This ensures that all relevant information is passed on. The patient in question would then be placed on our Safeguarding Assurance Framework Log which ensures that staff are aware of who was referred and when. Patients will also be referred to our Multi-professional Complex Care Clinic to be discussed as an IMDT. These meetings can include GPs, Psychiatrists, Psychologists, substance misuse professionals, senior clinical leads, and social care teams which are currently provided by Greenwich Council. Patients will be discussed in the Mental Health referrals

meeting and the team could put in welfare checks or he may be offered low level intervention with the psychological services.

Mr Santos was also subject to ACCT (Assessment, Care in Custody and Teamwork) procedures during his time at HMP Belmarsh. This is another area of collaborative working, particularly between the prison and Healthcare. In the SIM meeting prisoners who are on ACCTs are discussed and any concerns raised regarding their mental health will be brought and discussed in the mental health referrals meeting. Each day a member of healthcare staff working in the houseblock treatment hatch for the day will attend the morning briefings held where they are informed of all patients located on the wing that are currently subject to ACCT protocols and any ACCT that requires a review that day. Attendance had previously been ad hoc but has since been made a routine practice to ensure consistency.

The total number of ACCTs on each houseblock and the number of reviews due/attended are reported to the clinical Lead at the daily Healthcare handover. Hotel 99, nurse in charge, should be informed if the staff at the medication hatch are not able to attend the review. If an ACCT was closed without healthcare presence, then the officers should inform a member of the team. We have a well-established process and robust communication between the prison and healthcare.

As a healthcare provider working in prisons we are aware of the need to ensure close, efficient and collaborative working with other agencies, particularly with HMPPS as healthcare staff and officers interact and work together daily. In addition to the specific points addressed above relating to issues at this inquest, the Head of Healthcare and the Deputy Head of Healthcare at Belmarsh meet with the Healthcare Governors on a weekly basis. The Head of Healthcare also meets with the number 1 Governor on a fortnightly basis. This is something which has been implemented since PPG took over the contract.

These meetings provide an opportunity for any issues, either general or prisoner specific, to be raised and action points discussed. Healthcare attend the daily morning meetings, drug strategy meetings and SIM meetings. Local Deliver Board meetings are also attended which are specifically to discuss the delivery of services including healthcare at Belmarsh. The Head of Healthcare also attends the Senior Management Team meetings. All of these provide various forums and opportunities for close working and communication between agencies.

I hope that the above information provides you with reassurance that work between agencies is more efficient and collaborative since November 2020.

Practice Plus Group is committed to ensuring the high quality provision of healthcare services to all prisoners at HMP Belmarsh. We will also ensure that the lessons learnt as a result of this inquest are shared across all of Practice Plus Group's services.

I do hope that this letter provided the necessary reassurance sought and if I can be of any further assistance you should not hesitate to contact me directly.

Yours sincerely


National Medical Director, Health in Justice, Practice Plus Group
