



# HM Prison & Probation Service

**Director General of Operations**  
**HM Prison and Probation Service**  
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Miss Laurinda Bower  
HM Area Coroner for Nottingham City and Nottinghamshire  
The Council House  
Old Market Square  
Nottingham  
NG1 2DT

26 January 2023

Dear Miss Bower,

Thank you for your Regulation 28 report of 21 December 2023, addressed to the Minister for Prisons and Probation. 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 Thomas' 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 expressed concerns regarding both the local and national system of in-cell ligature point risk assessments and for prisons to have access to safer cells.

We recognise that prisoners may feel vulnerable during their time in custody and HMPPS uses the Assessment, Care in Custody, Teamwork (ACCT) case management approach to support people at risk of self-harm and suicide. As part of any case review, those present will consider a range of measures to mitigate risk, including the prisoner's location and whether any possessions need to be removed or returned, and this may include moving the prisoner to a cell that is more appropriate to manage their risk. While HMP Nottingham does not have a ligature-resistant cell, there are four gated cells which can be used if the prisoner's risk has escalated to a degree that warrants their observation levels being raised to constant supervision.

At a national level, HMPPS has undertaken a review of ligature-resistant cells, which have been designed to eliminate ligature points as far as possible. The review included their build standards and how they are used to support prisoners in crisis. Our aim is to ensure that cells that are fitted with ligature-resistant features are available as an option for staff managing prisoners in crisis, and that they retain those features in full working order and do not deviate from the standard over time. All new prisons and major additions, such as new wings, are usually built without ligature points in cells. For older prisons, HMPPS has begun to convert a number of cells to the same standard. Due to the high costs associated with this renovation work, priority is being given to

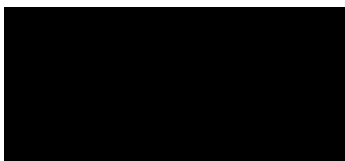
those prisons who have had a recent prevalence of self-inflicted deaths. As such, it is not possible at this stage to mandate the introduction of ligature-resistant cells in every prison.

With regards to your concerns pertaining to in-cell ligature point risk assessments and the availability of ligature point maps, we expect staff to be aware of the potential for a prisoner to be equally at risk of ligaturing at any position in the cell, as well as to the possibility that a ligature point may not be used in all circumstances that require immediate action to preserve life. Prisoners assessed as high risk of suicide should either have their observation level increased or they should be relocated into a gated cell, if doing so would not be detrimental to the prisoner's welfare.

Since Mr Thomas' death, HMPPS has implemented a revised version of the ACCT case management approach across the prison estate, which has been designed to improve the support given to prisoners at risk of self-harm or suicide and to assist them in making positive, long-term changes to lower their risk in the future. In conjunction to this, we are developing a safety training package for staff which will improve understanding of suicide and self-harm prevention, which will be delivered to all new members of staff who have prisoner contact.

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

Yours sincerely,

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Director General of Operations