



HM Prison & Probation Service

Director General Prisons
HM Prison and Probation Service
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Email: [REDACTED]

Laurinda Bower
HM Area Coroner
Nottingham City and Nottinghamshire
The Council House
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7 March 2025

Dear Miss Bower,

Thank you for your Regulation 28 report of 17 January 2024 addressed to the Minister of State for Prisons, Parole and Probation following the inquest into the death of Kane Boyce at HMP Lowdham Grange on 3 October 2021. I am responding on behalf of His Majesty's Prison and Probation Service (HMPPS) as Director General of Prisons.

I know that you will share a copy of this response with the family of Mr Boyce, and I would 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.

Following evidence heard at the inquest you have raised a concern about the quality of the Early Learning Review (ELR) in this case. As you point out, ELRs conducted by Group Safety Leads (GSLs) are a potentially very helpful way of quickly identifying key learning from deaths, enabling prompt action to address any issues arising from them. The practice of undertaking them was initiated by the GSLs, and they do not form part of our policy on responding to a death in custody as set out in chapter 12 of PSI 64/2011. Perhaps as a result we have been aware of considerable variation in practice, and I acknowledge that the resulting reports have not always been as useful as they could be.

In 2021 the National Safety Team issued guidance and a standard template to assist those conducting the reviews and to bring greater consistency to the reports, which improved the overall quality. Being implemented during the COVID-19 pandemic meant our ability to deliver face-to-face training was limited and as such we have continued to work to improve the quality of ELRs, including holding a workshop with GSLs in July 2022 at which the National Safety Team shared the results of a review of a sample of reports and provided feedback designed to improve practice in the conduct of the reviews and the writing of the reports.

We continue to monitor the quality of ELRs and to share feedback on them with GSLs. We are currently working on a new policy framework on the follow-up to deaths in custody (replacing PSI 64/2011) and intend to use that to mandate the early learning review process, and to make clear that it is the responsibility of the Prison Group Director to satisfy themselves of the quality of the ELR before signing the report off. Alongside the new policy framework, we will issue a revised standard template and a refreshed guidance document.

We also held a workshop with GSLs in April 2024 to offer additional upskilling, including input from our psychology team. This was followed up with an offer of individual feedback to GSLs to help them to build their skills and confidence in this area.

I would like to assure you that HMPPS' approach to investigations following a death in custody is to ensure that all learning is identified and used to improve our practices and understand where things have gone wrong in our management of prisoners. It is therefore vital that staff are encouraged to be honest about their actions and accept where they may not have met the standards required of them. Internal investigations are often commissioned following a death in custody, with the findings of these made available to both the Coroner and Prisons & Probation Ombudsman to assist in their investigations.

I take our responsibility to assist the Coroner to properly explore the circumstances of any death extremely seriously, and our staff are reminded by senior leaders and our legal team of the need to be completely transparent in their statements and live evidence, and we will always seek to made admissions where appropriate.

It is my expectation that providers in the contracted estate take the same approach, both organisationally and individually to adhere to the same policy frameworks, mandated instruction and legal requirements as a public sector site.

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 that you have raised.

Yours sincerely



Director General of Prisons