



# HM Prison & Probation Service

**Director General of Operations**  
**HM Prison and Probation Service**  
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Mr Peter Nieto  
Senior Coroner for Derby and Derbyshire  
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12 August 2024

Dear Mr Nieto,

Thank you for your Regulation 28 report of 20 June 2024, addressed to the Secretary of State for Justice. 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 Ms Adam's 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 the guidance for completing Assessment, Care in Custody, Teamwork (ACCT) observations, the availability of fixed shower rails within the prison estate, personality disorder training and awareness available to staff, and the use of cellular confinement for prisoners who are supported through ACCT.

In April 2021, as part of a wider organisational change, HMP Foston Hall implemented ACCT version 6. The new version of the ACCT document was developed following a review of the previous version, and is designed to encourage a person-centred and multidisciplinary case management approach. In addition to the introduction of the new document, guidance documents that focus on various aspects including the ongoing record were produced to assist staff in conducting their duties. The ongoing record guidance clearly explains that observations should not be predictable but should be completed within a reasonable time frame to ensure there are not long gaps between checks and provides examples of such.

A ligature-resistant (LR) cell is one from which as many ligature points as possible have been removed, through the design and installation of furniture and fittings. This includes the door and window, electrical, heating and sanitary fittings, and other features such as shower curtain rails. Our long-term aim is to ensure that LR cells 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 a programme of work to convert a number of cells to the same standard.

Introduction to Mental Health Awareness training is included in the prison officer foundation course, which is designed to focus on key elements of the role to assist learners in the early stages of their career. Whilst the course does not directly reference personality disorder and learning disabilities, it does provide staff with effective communication techniques that can be used to interact with prisoners with various mental health conditions. Additionally, the training also provides guidance on how to refer prisoners to other agencies to ensure that the prisoner has holistic and appropriate support.

Cellular confinement is essentially the same process as segregation, except that it does not involve moving the prisoner to a dedicated segregation area. It does not of itself require a specialist cell, since not all prisoners undergoing cellular confinement will be at risk of self-harm. If that risk exists and it includes an increased risk of ligaturing, the prisoner can be moved to an LR cell where one is available. An alternative is a move to the segregation area, however this must be the exception for prisoners being supported through ACCT; and as segregation units are not required to have any LR accommodation, this may not be suitable.

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