



# HM Prison & Probation Service

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28 October 2025

Dear Ms Griffin,

## **REGULATION 28 REPORT TO PREVENT FUTURE DEATHS – FRAZER WILLIAMS**

Thank you for your Regulation 28 report addressed to the Minister of State for Prisons, Parole and Probation, the Director General of His Majesty's Prison and Probation Service (HMPPS), and the Governor of HMP Guys Marsh as well as to other agencies. I am responding as Interim Director General of Operations for HMPPS and my response addresses all concerns relating to HMPPS on behalf of the above named recipients. I am grateful to you for allowing us additional time to respond and apologise for the delay in providing our response.

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.

Following evidence heard at the inquest, you have raised a number of concerns. I will address those for which HMPPS has responsibility in the order of which you have raised them.

Your report identifies a lack of guidance on the management of self-neglect in the prison setting. Informed by the learning from the investigations into Mr Williams' death, guidance for prison and probation staff on 'Managing Self-Neglect in Prisons and Approved Premises' was published on the HMPPS intranet in July 2024. This is designed to raise awareness of the issue amongst staff and to equip them to work in partnership with healthcare staff to safeguard people who self-neglect in a prison or an approved premise.

Your report describes a lack of quality assurance of the operation of the Assessment, Care in Custody and Teamwork (ACCT) process. The Prison Safety Policy Framework that was implemented on 1 January 2025 mandates the use of a quality assurance tool which involves a three-stage check of ACCT documents, including a weekly check of all open ACCT document. At Guys Marsh this local assurance process is supplemented by the regional Safety Team which attends the prison twice monthly to undertake ACCT assurance and provide feedback to the establishment.

Your report draws attention to the absence of a system for flagging missed ACCT reviews at Guys Marsh, and to the fact that relevant individuals were not being invited to reviews. A new booking tool was introduced in August 2024 to schedule reviews, and this also supports consistent attendance from relevant individuals. The safety team now highlights any reviews that have been missed to the Orderly Officer so that they can be rescheduled promptly.

Your report notes that key work at Guys Marsh was not operating in accordance with key work national guidance. This has not been possible because of staffing issues, but the prison has been operating a priority key work scheme, designed to ensure that the most vulnerable men are seen regularly. A new shift pattern was introduced in September 2024 detailing officers to carry out key work to increase the delivery of key work sessions beyond the priority group as well as providing consistency with sessions being delivered by the same key worker where possible.

I have noted your concern regarding the similarity in colour of cell doors and bedsheets, but I am not aware of any problems having arisen previous to this. I have passed your observations on to the national Safety Team to consider as part of their ongoing work on ensuring a safe physical environment for prisoners.

Your report draws attention to local procedures at Guys Marsh that did not comply with national policy on when to call an ambulance. The Governor has issued a Notice to Staff that explains that it is mandatory to call an ambulance when an emergency code is called, and compliance with this expectation is regularly reviewed.

Your report notes problems with the process for recording information about a prisoner's next of kin at Guys Marsh. This has been reviewed, and the Offender Management Unit is now involved to ensure that the process is managed effectively.

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

Yours sincerely,

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Interim Director General of Operations