



Interim Director General of Operations
HM Prison and Probation Service
8th Floor Ministry of Justice
102 Petty France
London SW1H 9AJ

HM Prison & Probation Service

Ian Brownhill, Assistant Coroner for Kent, and Medway
Kent and Medway Coroners' Service
Oakwood House
Oakwood Park
Maidstone
Kent
ME16 8AE

9 February 2026

Dear Mr. Brownhill,

REGULATION 28 REPORT TO PREVENT FUTURE DEATHS: MR AZROY DAWES-CLARKE

Thank you for your Regulation 28 report of 29 July 2025, addressed to The Secretary of State for Justice and The Secretary of State for Health and Social Care. I am responding as the Interim Director General of Operations for HMPPS.

As with my earlier responses to the other PFDs you issued following this inquest, I know that you will share a copy of this reply with Mr. Dawes-Clarke's family and again 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.

You have raised a concern about the management of the medical emergencies in prison, including how roles and responsibilities are understood.

It is essential that all staff understand their responsibilities when responding to a medical emergency, including actions relating to resuscitation, the use of restraints, and the removal of ligatures. Local procedures are in place at HMP Elmley to support a coordinated and effective response, and staff have been directed to adhere to these consistently.

HMPPS policy on responding to medical emergencies is set out in Prison Service Instruction 03/2013. Operational staff are responsible for ensuring that appropriate medical support is summoned promptly – whether from on-site healthcare services or the ambulance service – and for enabling healthcare professionals to access and treat the individual without delay. While prison staff will often be the first on scene, they are not expected to lead medical interventions beyond the scope of first aid or CPR where healthcare professionals or paramedics are present. Their role is to support, facilitate, and assist clinical staff as required.

I am aware that NHS England Health & Justice have issued a Use of Force (UoF) Framework which outlines and provides clarity on roles and responsibilities for healthcare staff where there is planned or unplanned use of force. This includes the requirement that healthcare attend all general alarms when on site and remain in

attendance if a UoF incident is ongoing. To continually monitor the patient throughout the UoF incident and intervene where necessary for any immediate health concerns. The NHS England Health & Justice guidance has been shared with UoF Coordinators across all prisons and will be included in the new HMPPS framework and guidance, which is due to be reviewed and published at the end of the year.

At HMP Elmley, staff have been formally reminded of their obligation to request healthcare assistance immediately during any unplanned restraint, in line with local and national procedures. Similarly, Oxleas staff have been reminded of their contractual requirement to remain with the individual throughout the medical emergency until paramedics have assumed responsibility and the prisoner has been taken to hospital.

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 issues identified.

Yours sincerely,

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Interim Director General of Operations