



HM Prison & Probation Service

Prisoner Escort and Custody Services
HM Prison and Probation Services
Unit 6, Forder Way
The Office Village
Cygnet Park
Peterborough PE7 8GX

Date: 25/1/2026

Crispin Oliver
Senior Assistant Coroner for
County Durham and Darlington

Response to Regulation 28 Report – Preventing Future Deaths

In the matter of: Steven Lee Ruddick

Dear Mr Oliver,

Thank you for your Regulation 28 Report dated 18 November 2025, issued following the conclusion of the inquest into the death of Mr Steven Lee Ruddick. HMPPS recognises the importance of Regulation 28 reports in identifying potential risks and supporting the shared objective of preventing future deaths. We are grateful for the careful consideration given to the evidence during the inquest and for bringing these matters formally to our attention.

We acknowledge the Coroner's concerns regarding differences in operational practice between police custody and HMPPS Prisoner Escort and Custody Services (PECS), particularly in relation to the management of detainees during toilet visits and the subsequent searching arrangements.

Scope of HMPPS responsibility

At the outset, it is important to clarify that HMPPS cannot offer a view or opinion on police custody practice, which operates under its own legal and policy framework. PECS suppliers are mandated to comply with HMPPS policy requirements, specifically those set out within the HMPPS External Escorts Framework, and do not exercise discretion to depart from those requirements.

Supervision during toilet use

HMPPS policy is explicit that, unless a prisoner is subject to a formally risk-assessed regime of constant supervision due to active suicide and/or self-harm risk, prisoners would not be supervised within toilet facilities in such close proximity to staff as to permit direct observation.

HMPPS policy group have been engaged as part of this response and have formally supported that direct observation during use of toilet facilities, outside of exceptional and clearly evidenced safety risk scenarios, would be highly disproportionate, overly intrusive,

and inconsistent with fundamental principles of dignity, privacy, and human decency. Such an approach would not align with HMPPS's duty and obligations, human rights principles, or established HMPPS policy standards.

Even in circumstances where constant supervision is justified due to acute safety risk, policy requires that the lowest level of intrusion compatible with safety is applied, with ongoing consideration of dignity and decency.

Use of restraints and escort arrangements

The HMPPS Directorate of Security have been consulted and jointly considered the issues raised and advises that the continued use of the escort chain, rather than standard handcuffs, remains a proportionate and appropriate control measure for HMPPS external escorts.

Any requirement for closer observation or alternative restraint arrangements would only be considered reasonable and in very exceptional acute cases, where there is clear, current, and formally assessed evidence of such risk, and even then, must remain consistent with the principle of minimum necessary intrusion.

Searching following toilet visits

PECS recognises the concerns raised in relation to searching following toilet visits. In response, suppliers searching standard operating procedures have been reviewed and confirmed as compliant with HMPPS policy and the PECS 'Authority' have provided reflective direction and briefing around risk based searching to both PECS suppliers.

HMPPS policy provides that, in these circumstances, a 'fully clothed' rub-down search is the appropriate and lawful method. It is acknowledged that, by their nature, such searches cannot eliminate all risk, and that in extreme and exceptional cases methods of secretion may remain undetectable despite proper application of the prescribed search procedures. This limitation is inherent and does not indicate a deficiency in policy or practice.

Conclusion

Having carefully considered the Coroner's concerns, HMPPS concludes that:

HMPPS policies are grounded in safety, proportionality, legality, and respect for decency and dignity.

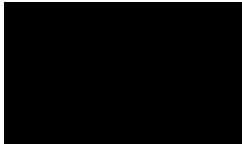
PECS suppliers are operating in accordance with mandated HMPPS policy and contractual requirements.

Introducing routine direct observation during use of toilet facilities would be intrusive, disproportionate, and incompatible with established HMPPS policy standards.

Accordingly, no changes to HMPPS policy or PECS operating procedures are proposed at this time.

HMPPS remains committed to continuous review of policy where evidence supports the need for change, and we are grateful to the Coroner for highlighting these matters. We trust this response assists in discharging our duty under Regulation 28.

Yours sincerely



**Senior Contract Manager
Prisoner Escort and Custody Services**

