

Action Plan – Mr Andrew Fenn at HMP Lowdham Grange – Self-Inflicted on 04/10/2018

No	Recommendation	Accepted/Not Accepted	Response	Target date for completion and function responsible
1	<p>The Director and Head of Healthcare should ensure that staff manage prisoners at risk of suicide and self-harm in line with national guidelines, in particular that they:</p> <ul style="list-style-type: none"> • complete the immediate action plan, assessment interview, first case review and post-closure review within the set timescales; • hold multidisciplinary case reviews where possible, to include mental health staff where appropriate; • set caremap actions that are specific, time bound and meaningful, tailored to the individual to reduce their risks and update them at each case review; • hold case reviews when scheduled, and additional case reviews as necessary; • complete all ACCT paperwork fully and 	Accepted	<p>All staff were reminded in February 2019 via a notice to staff that they must manage prisoners at risk of suicide and self-harm in line with PSI 64/2011 Safer Custody. Staff were also reminded that they must complete the immediate action plan, assessment interview, first case review and post-closure review within the set timescales for all prisoners on an ACCT, and update a prisoner's record promptly with any important information and significant events. Staff were also reminded about holding multidisciplinary case reviews, which include mental health staff where appropriate at these reviews, including setting care map actions that are specific, time bound and meaningful, tailored to the individual to reduce their risks, and updating these at each case review. Staff are expected to hold case reviews when an appointment has been made and hold additional case reviews when this becomes necessary. In line with this, ACCT case managers received refresher training between January 2018 and April 2019 about these different aspects of the ACCT process.</p> <p>In February 2019, HMP Lowdham Grange were selected as a trial prison for ACCT Version 6 and are undergoing the support and implementation of PILOT. This includes additional support from the national and regional safety teams who offer continual, impartial advice on improvements and good practice in the implementation of the ACCT process at the establishment.</p> <p>There is also a quality assurance system in place for senior managers within the establishment to check all ACCT documents. Further to this, closed ACCTs are quality assured monthly in the Safer Prisons meeting, in line with the PILOT recommendations</p>	<p>Director Assistant Director Residential Safety Head of Healthcare Completed</p>

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	<p>accurately; and</p> <ul style="list-style-type: none"> • update a prisoner's record promptly with important information and significant events. 		<p>In March 2019, the Director allocated administrative support to the Residential Safety Team. The Residential Safety administrator is now responsible for the scheduling and recording of completed ACCT reviews, and checking that all ACCT paperwork is fully and accurately recorded.</p>	
2	<p>The Director should review the effectiveness of HMP Lowdham Grange's violence reduction policy and its delivery, specifically ensuring:</p> <ul style="list-style-type: none"> • effective identification and management of victims and alleged perpetrators; • effective support and protection for apparent victims with meaningful objectives and long-term solutions, which address their individual situations; • the risk of suicide or self-harm to victims of bullying and intimidation is considered; and • accurate and timely record keeping. 	Accepted	<p>A full review of the Safer Custody and Violence Reduction Strategy took place in January 2019 led by the Assistant Director of Residential Safety. Key Functional Heads attended and contributed to the review. A Safer Prisons Strategy was developed outlining key priorities for 2019/20.</p> <p>The staff group were made aware of the revised strategy via a notice to staff and signposted to its availability on the Lowdham Grange intranet site.</p> <p>The final version was authorised and issued to colleagues by the Director in March 2019 incorporating both matters in a Safer Prisons Strategy and Operating Policy.</p> <p>Following National Implementation of Challenge, Support and Intervention Plan (CSIP), HMP Lowdham Grange went live with this in February 2019. This allows for specific case management and supervision of those at heightened risk of committing an act of violence in custody, and ensures effective identification and management of victims and alleged perpetrators;</p> <p>In February 2019, a new developed management enquiry form was initiated which allowed for clearer identification if an individual is the victim or perpetrator of a specific incident. These forms are shared with all relevant departments and investigated and the reasons documented by the person</p>	<p>Director Assistant Director Residential Safety Completed</p>

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			<p>investigating, including clear pathways of support offered for the victim and appropriate challenge to the perpetrator.</p> <p>In March 2019, the Weekly Intervention Meeting (WIM) that was held at HMP Lowdham Grange was re-drafted to the Safety Intervention Meeting (SIM) to work alongside the implementation of CSIP. The SIM meeting discusses all prisoners who have been placed on the concern file, complex case management individuals, CSIP prisoners, those located in segregation and those at risk on ACCT who need additional support, and identifies action to be taken with meaningful objectives identified for each prisoner. All actions are recorded in the minutes.</p> <p>In February 2019, the Residential Safety team who are responsible for updating the concern files, were reminded via e-mail of their responsibilities when recording outcomes of the SIM meeting in the prisoner concern files and on NOMIS, that there must be accurate and timely record keeping.</p>	
3	The Director should ensure that sufficient numbers of staff are assigned to wear Body Worn Video cameras and that they activate them at the earliest opportunity during any reportable incident.	Accepted	<p>The main communication team were reminded via a staff briefing in February 2019 that they must verbally announce over the prison radio net for all staff arriving or in attendance of an incident to activate their body worn video cameras. In February 2019, the prompt cards to support colleagues in the main control room were adapted to remind staff to turn on their body worn video cameras.</p> <p>In April 2019, all staff were also issued with a Director's notice to remind them about the importance of activating their body worn video cameras at the earliest opportunity, during any emergency incident.</p>	Director Assistant Director Security and Operations Completed

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			<p>Body worn video cameras are not subject to prison service instructions at HMP Lowdham Grange, however the use and issuing of body worn video cameras is discussed at the Security Committee meeting held once a month to monitor operational usage and from February 2019 all Custodial Operational Managers have been tasked to include the importance of activating body worn video cameras in their daily briefings with Prison Custody Officers.</p>	
4	<p>The Director should remind staff that when an observation panel is covered and a prisoner fails to respond, arrangements should be made to enter the cell as quickly as possible, particularly in the case of prisoners being monitored under ACCT arrangements.</p>	Accepted	<p>A notice to staff was issued in April 2019 reminding staff that when an observation panel is covered and a prisoner fails to respond, arrangements must be made to enter the cell as quickly as possible, particularly in the case of prisoners being monitored under ACCT arrangements.</p> <p>Staff were also reminded that they must make a dynamic risk assessment as to whether a situation they are presented with will delay any intervention, and if it does, then they must activate their personal alarm button to ensure that appropriate staff respond immediately. In the event of an emergency where a prisoner is unresponsive to visual or verbal communication, or there is a clear threat to life then the staff member is required to request immediate assistance of the Ambulance Emergency Service through the radio net by calling a medical emergency code.</p>	<p>Director Assistant Director Residential Safety Completed</p>
5	<p>The Head of Healthcare should review the use of telephone consultations to ensure assessment and ongoing support is provided in line with best practice, as</p>	Accepted	<p>As of January 2019, the telephone triage services has ceased at HMP Lowdham Grange. This was in line with the feedback from patients and staff that a telephone contact was not the best way to appropriately assess an individual. In its place, the employment of a new mental health duty worker in January 2019 has meant that a staff member is now rostered to be able to pick up any urgent referrals following any incident of self-harm or crisis and be able</p>	<p>Head of Healthcare Completed</p>

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	set out in NICE Guidance (NG66) Mental Health of Adults in contact with the Criminal Justice System.		to attend to the individual for a face to face consultation and assessment, including explore if further mental health support is needed. During the weekday, a mental health nurse will also see the individual who is at risk. At the weekends the mental health team are tasked with this role, so there is regular face to face support for all prisoners. These practices are in line with the NICE Guidance (NG66) Mental Health of Adults in contact with the Criminal Justice System.	
6	<p>The Director and Head of Healthcare should ensure substance misuse services are effective and:</p> <ul style="list-style-type: none"> • attend ACCT reviews when appropriate to do so; • provide swift access to appropriate support; • assessments which consider all relevant information, including drug tests; and • communicate with the mental health team and prison staff about individuals' presentation and specific needs. 	Accepted	<p>In February 2019, all ACCT case managers and healthcare staff were reminded by e-mail that all relevant staff, including healthcare and substance misuse service representative attend all ACCT reviews where necessary.</p> <p>ACCT Case Managers were also reminded in training, which took place from January to April 2019 that referrals to substance misuse services must be swiftly activated at the initial onset of an ACCT being opened and that ongoing support from Mental Health colleagues is provided throughout the ACCT process where appropriate.</p> <p>Healthcare staff attend the operational morning meeting each day and ensure that all prisoners highlighted as a concern through presenting as being either at risk of self- harm, or through use of illicit substances, are assessed and discussed with the multidisciplinary team held in the healthcare team briefing at lunchtime, in the healthcare department and visited within 24hrs, to ensure that all pathways are considered and the individual receives appropriate access to those pathways. This is recorded via SystmOne.</p>	<p>Director Assistant Director Residential Safety Head of Healthcare Completed</p>