

Action Plan – Ketheeswaren Kunarathnam. HMP Wormwood Scrubs. Self - Inflicted. 23/02/2018

No	Recommendation	Accepted/Not Accepted	Response	
1	<p>The Home Office should ensure that immigration staff working in prisons are clear on the criteria for transfer to an IRC, and that they seek a transfer at the earliest opportunity for detainees whose continued detention in prison is putting them at risk of suicide and self-harm.</p>	Part Accepted	<p>Home Office Criminal Casework and HMPPS have agreed to ensure decisions for Immigration Detention occur at least 30 days prior to Custodial Release where sentence length permits. This will include an explanation given to the individual with the reasons for detention, if appropriate, well in advance of the end of a criminal sentence. This will provide the individual with the opportunity to seek legal advice on their immigration status and the Criminal Caseworker can engage earlier with the individual. In addition to this, every case will be reviewed at 24 hours by the Detention Gatekeeper. Where an individual has a short sentence, processes are in place to notify the individual as swiftly as possible and, where possible, at least 7 days prior to custodial release.</p> <p>At present, the nature of some offences means that a transfer from prison to an IRC is not appropriate; however detailed work into the needs of vulnerable detainees is being taken forward following the publication of the Shaw Report 2018 (recommendations 3, 4 and 25).</p>	<p>Criminal Casework</p> <p>31/11/18</p> <p>Ongoing</p>
2	<p>The Governor and Head of Healthcare should ensure that staff manage prisoners and immigration detainees at risk of suicide or self-harm in line with national guidelines, including that they:</p> <ul style="list-style-type: none"> • set specific and meaningful care map actions, identifying who is responsible for them and reviewing progress at each review; • ensure that all relevant parties are 	Accepted	<p>The Safety team will implement a booking system to ensure consistent case management and multi-disciplinary attendance at ACCT reviews. This will be quality checked by functional heads with a further level of scrutiny carried out by the Deputy Governor.</p> <p>The Safety team will share Learning Bulletins to give additional guidance to staff and relevant issues will also be discussed at the monthly safety meeting.</p> <p>Staff will be reminded through a Notice to Staff about the</p>	<p>Head of Safety</p> <p>November 18</p>

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	<p>invited to contribute to case reviews, including immigration staff where appropriate;</p> <ul style="list-style-type: none"> • set the frequency of observations based on the level of risk the individual presents; and • ensure ACCT checks are carried out at the agreed frequency and that they are at unpredictable times. 		<p>importance of carrying out ACCT checks at agreed but irregular intervals.</p>	
3	<p>The Home Office should ensure that immigration staff in prisons see detainees regularly, in particular when the detainee's immigration concerns are putting them at risk of suicide and self-harm.</p>	Accepted	<p>Immigration staff working within the prison estate are instructed to complete Wing Visitor Books. First and foremost this is required for staff safety. Should there be an incident on the wing HMPPS staff need to know of all individuals who are present on the wing at the time of any incident. Immigration staff working within the prison estate are advised of this requirement during their induction to their respective prisons by HMPPS staff, usually as part of their key training, and also as part of formal induction to working within the prison estate conducted by senior Immigration staff.</p> <p>A formal instruction will go out to Immigration staff as a reminder to ensure this process is followed. Local Chief Immigration Officers will carrying out weekly checks of Wing Visitor Books to ensure this instruction is adhered to and to countersign their staff's entries. Regional HM Immigration Inspectors will further audit this process when visiting establishments.</p> <p>CC will liaise with HMPPS to request a formal instruction to go out to prison Governors about the importance of inviting I Immigration</p>	<p>Criminal Casework (POP) 30/11/18</p>

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			<p>Officers to ACCT reviews.</p> <p>These cases are discussed at the prison multidisciplinary Complex Case Weekly meetings. Immigration are represented at these meetings.</p>	
4	The Home Office should ensure that immigration staff use the prison wing's visitor book to record when they are on a wing and who they are visiting.	Accepted	<p>Immigration staff working within the prison estate are instructed to complete Wing Visitor Books. First and foremost this is required for staff safety. Should there be an incident on the wing HMPPS staff need to know of all individuals who are present on the wing at the time of any incident. Immigration staff working within the prison estate are advised of this requirement during their induction to their respective prisons by HMPPS staff, usually as part of their key training, and also as part of formal induction to working within the prison estate conducted by senior Immigration staff.</p> <p>A formal instruction will go out to Immigration staff as a reminder to ensure this process is followed. Local Chief Immigration Officers will carrying out weekly checks of Wing Visitor Books to ensure this instruction is adhered to and to countersign their staff's entries. Regional HM Immigration Inspectors will further audit this process when visiting establishments.</p> <p>CC will liaise with HMPPS to request a formal instruction to go out to prison Governors about the importance of inviting IOs to ACCT reviews.</p>	Criminal Casework (POP) 30/11/18
5	The Governor and Head of Healthcare should ensure that all staff are aware of the management of food refusal policy	Accepted	The food refusal policy will be reviewed and amalgamated with the current health policy to ensure a whole prison policy is published and shared with staff.	Head of Healthcare November

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	and audit its use.			2018
6	The Governor should amend and reissue Governor's Order GO/16, to advise staff that the same principles apply during the day as at night.	Accepted	A revised Governor's Order will be published. In addition the Local Security Strategy will be revised and any necessary amendments made.	Head of Security November 2018
7	The Governor should ensure that all prison staff are made aware of and understand the need to use appropriate codes to communicate a medical emergency, in line with national and local instructions.	Accepted	A Notice to Staff has been re-issued to all staff with specific communications to high risk areas, such as the Segregation Unit and First Night Centre. Where incorrect codes are used, the Safety Team will follow up with the staff involved to ensure there is learning as a result.	Head of Safer Custody Completed