

Action Plan in response to the PPO Report into the death of Mr Luke Clarke on 07/04/2020 at HMP Wormwood Scrubs

Rec No	Recommendation	Accepted / Not accepted	Response Action Taken / Planned	Responsible Owner and Organisation	Target Date
1	<p>The Governor and the Head of Healthcare should ensure that staff manage prisoners at risk of suicide and self-harm in line with PSI64/2011, including that prison and healthcare staff:</p> <ul style="list-style-type: none"> •share all information that affects risk; •start ACCT monitoring procedures when a prisoner has significant risk factors, or record their reasons for not doing so; and •review the prisoner's level of risk whenever there is an event or change of circumstances that could impact on risk. 	Accepted	<p>A new version of ACCT (version 6) was rolled out nationally in July 2021, and by the end of July 2021, 97% of operational staff had received awareness training on the new version and how to use ACCT to support prisoners at risk of self-harm and suicide. The training provides guidance on identifying risks and triggers, reviewing an individual's level of risk, when necessary, advice on when to open an ACCT, and what to record if the decision is made not to open an ACCT.</p> <p>The national safety team delivered risks and triggers training to all band 4 and band 5 staff and are completing the same training with healthcare nurses.</p> <p>A notice to staff (NTS) was published in July 2021 and reissued in February 2022 highlighting the importance of identifying risk of suicide and self-harm, and of managing those potentially at risk during the first few days in custody.</p>	Deputy Governor and Head of Safety HMPPS	Completed



			<p>Prison managers in the safety team and early days in custody team held a thematic learning meeting with the Deputy Governor on deaths in custody in November 2021. This was led by an NHS nurse consultant and endeavoured to draw together learning from deaths in custody since the pandemic, focusing on how teams can work together to identify risk and support prisoners in their first days in custody.</p>		
2	<p>The Governor should ensure that first night procedures are in place for all prisoners entering the prison in line with PSI 07/2015, including that:</p> <ul style="list-style-type: none"> •prisoners are offered the opportunity to take a bath or shower before being located into a cell overnight; •staff ask newly arrived prisoners if they need to telephone their legal advisor or to address urgent domestic issues; and •first night information is provided to all newly arrived prisoners. 	Accepted	<p>The first night procedures in place are in accordance with PSI 07/2015. There is a first night induction package, which includes prisoner peer support workers.</p> <p>There are currently three multi-occupancy cells in the first night centre that have ensuite facilities, enabling prisoners to shower at any time. The remaining cells are made up of double and single cells and these prisoners are offered a shower on arrival if they arrive in the establishment at a time when it is safe to facilitate this. All prisoners are offered a shower within 24hrs of being in the establishment, and offered a phone call in line with public protection procedures to address any urgent domestic issues or to speak with their legal advisor.</p> <p>Mr Clarke's death occurred at the beginning of the pandemic, and following immediate learning from this, alongside clear national guidance, improvements have been made to enable staff to provide additional support to prisoners who are required to isolate upon arrival in the Protective</p>	<p>Head of Early Days in Custody and Head of Safety HMPPS</p> <p>Head of Safety and Head of Function and Covid-19 Lead HMPPS</p>	Completed



			Isolation Unit (PIU). There is now a process in place to ensure that the necessary level of support, including access to phone calls, showers, and induction advice is consistent, and this is quality assured by the unit manager who checks the PIU check list each day. This is also signed by the Duty Governor who carries out checks on 10% of prisoners located in the PIU. In addition, spot checks are carried out to ensure that the daily checklist has been completed and that prisoners have received the expected first night procedures.		
3	The Governor should ensure that first night monitoring procedures are in place for all newly arrived prisoners, wherever they are located.	Accepted	<p>Since April 2020 first night monitoring procedures have been in place for all prisoners who are required to transfer from reception to the PIU. The procedures in place mirror those of the first night centre, ensuring that prisoners receive the same support.</p> <p>Healthcare screenings also take place on the PIU and a quality assurance process has been embedded to ensure that first night monitoring procedures are being delivered in line with expectations.</p>	<p>Head of Early Days in Custody HMPPS</p> <p>Head of Healthcare Practice Plus Group (PPG)</p>	Completed
4	The Governor should ensure that all roll checks and welfare checks are conducted in line with local policy.	Accepted	All staff are briefed on the expectations of carrying out roll checks and welfare checks. Wing managers oversee the completion of these checks, including the recording of them. Orderly Officers conduct spot checks at night and there are further quality assurance exercises conducted by the Deputy Governor (using CCTV) to ensure that checks are completed as expected.	Head of Safety, Head of Security and COVID-19 Lead HMPPS	Completed



			<p>Any misconduct identified through these checks will be investigated and challenged accordingly.</p> <p>A local staff guidance document on the PIU was issued in April 2020 and reissued in February 2021. A copy is stored in a shared drive for staff to access as needed. This guidance was also issued as a NTS and included guidance on the process for prisoners isolating on arrival, including carrying out roll checks and welfare checks.</p>		
5	The Governor should ensure that this report is shared with Officer B and Officer D and that a senior manager discusses the Ombudsman's findings with them.	Accepted	A copy of the report was shared with named staff and the Head of Safety, and the Deputy Governor discussed the Ombudsman's findings with them.	Head of Safety and Deputy Governor HMPPS	Completed
6	The Head of Healthcare should ensure that there is a system in place to obtain direct information from the appropriate provider when trying to establish a diagnosis.	Accepted	PPG have worked with NHS England and community providers to implement SystemOne into all criminal justice community services such as courts and police stations. This allows for information to be recorded directly onto a prisoner's medical record and can then be accessed by healthcare staff at the prison upon arrival as long as the prisoner's identity is confirmed.	Head of Healthcare PPG	Completed
7	The Head of Healthcare should ensure that healthcare staff are aware of current advice on PPE and that it is discussed with them.	Accepted	The guidance for PPE has always been shared by PPG since the start of the COVID-19 pandemic and updates will continue to be shared as guidance changes and knowledge increases.	Head of Healthcare PPG	Completed



8	The Head of Healthcare should share this report with Nurse A and discuss the Ombudsman's findings with her.	Accepted	The named nurse is an agency member of staff and no longer works with PPG or at HMP Wormwood Scrubs. The Head of Healthcare has informed her last known agency but has been unable to have a direct conversation.	Head of Healthcare PPG	Completed
9	A senior manager from Practice Plus Group (from outside Wormwood Scrubs) should offer healthcare staff named in this report an opportunity to discuss and reflect on it and identify and address any outstanding training and support needs.	Accepted	PPG will complete an internal learning session into the death of Mr Clarke facilitated by the London Patient Safety and Clinical Quality Lead.	Head of Healthcare PPG	March 2022
10	The Head of Healthcare and the Governor should jointly use this report as a basis for considering what systems and processes are now in place to ensure that similar issues do not recur.	Accepted	The guidance for PPE and COVID-19 was fluid in the early days and systems were not established as this was a global pandemic. Robust policies and systems are now in place which have been directed by a clear HMPPS Strategy, in line with Public Health England advice.	COVID-19 Lead HMPPS Head of Healthcare PPG	Completed
11	The Head of Healthcare should share this report with the principal pharmacist and Nurse B so that they are aware of the Ombudsman's findings.	Accepted	The Head of Healthcare has shared a copy of the report with named staff and discussed the Ombudsman's findings with them.	Head of Healthcare PPG	Completed
12	The Governor should ensure all staff complete and comply with Information Assurance Training.	Accepted	A global email was sent to all staff in December 2020 to remind staff of the requirement to	Head of Safety HMPPS	Completed



			complete the online annual Information Assurance Training. This reminder was reissued in 2021.		
13	The Governor should share this report with the duty governor and CM A.	Accepted	The Deputy Governor has shared a copy of the report with named staff and discussed the Ombudsman's findings with them.	Deputy Governor HMPPS	Completed
14	The Prison Group Director for London should write to the Ombudsman setting out what he has done to satisfy himself that the culture at Wormwood Scrubs is one that fosters good and appropriate care for all prisoners.	Accepted	The Prison Group Director (PGD) for London has written to the Ombudsman outlining the work being done to address these findings.	PGD for London HMPPS	Completed

