

# Action Plan in response to the PPO Report into the death of Mr Liam Bentley on 06 June 2022 at HMP Swaleside

Rec No	Recommendation	Accepted / Not accepted	Response Action Taken / Planned	Responsible Owner and Organisation	Target Date
1	The Governor and Head of Healthcare should ensure that all staff have a clear understanding of their responsibilities to identify prisoners at risk of suicide and self-harm in line with national instructions and, in particular, the need to record, share and consider relevant information about risk, and start ACCT procedures when indicated.	Accepted	<p>The prison is being supported by the group safety team to upskill staff on ACCT procedures. This has included training sessions and floor walking exercises, with a focus on identifying risks and triggers for suicide and self-harm and skills for completing the ACCT care plan.</p> <p>Staff are regularly reminded that risk levels can increase around certain dates, such as anniversaries, parole hearings, and other significant events. A database has been created to capture key dates so that staff can be made aware of these and consider any potential increase in an individual's level of risk of suicide or self-harm.</p> <p>A restructure of the safety team is underway and will include involving clinical psychologists in the safety work who will assist with the upskilling of staff.</p>	Head of Safer Custody HMPPS	May 2023



			<p>There is a whole prison approach to understanding and identifying prisoners who are at risk of suicide and self-harm, with relevant teams attending the weekly safety intervention meeting (SIM) and monthly safety scrutiny meeting. Safety analysts are working closely with residential units to provide a clearer understanding of violence and self-harm, with findings discussed at the safety scrutiny meeting.</p> <p>General guidance on ACCT procedures have been republished for all staff and there is now a safety notice board on each residential unit to display posters as a visual reminder.</p>		
2	<p>The Governor and Head of Healthcare should ensure that prisoners who are self-secluding are managed in line with local guidelines, including that:</p> <ul style="list-style-type: none"> <li>•pre-assessments are completed within 24 hours;</li> <li>•the first review and management plan are completed within 25 hours; and</li> <li>•healthcare staff and other support services are invited and contribute to all reviews where their support is relevant.</li> </ul>	Accepted	<p>The process for managing individuals who self-isolate is being reviewed and the recommendations made will be considered and included as part of the review. The updated guidance will be re-published and shared as part of an action to upskill staff in managing those who self-isolate.</p>	<p>Head of Safer Custody</p> <p>HMPPS</p>	May 2023
3	<p>The Director General of Operations for HM Prison and Probation Service (HMPPS) should ensure that clear measures are</p>	Accepted	<p>Recruitment campaigns remain ongoing for both prison officers and operational support grades (OSGs), including an enhanced level of marketing activity for HMP Swaleside. The prison</p>	<p>Director General of Operations</p> <p>HMPPS</p>	Ongoing



<p>implemented as a matter of urgency to recruit and retain sufficient operational and specialist staff at HMP Swaleside to reinstate purposeful activity and support prisoners' progression.</p>	<p>staff pay award for 2022/23 was announced in July 2022. The award delivered an increase in base pay of at least 4% for all staff between bands 2 to 11, alongside further targeted pay rises for our lowest paid staff of up to £3,000. HMPPS is closely monitoring the impact of this significant investment into pay on recruitment and retention. HMPPS has submitted its evidence to the prison service pay review body for consideration as to the PSPRBs recommendations on the 2023/24 pay award. To support the immediate progress of the regime, HMP Swaleside is included in the national relocation campaign which allows HMPPS to allocate prison officers to establishments with the most acute recruitment challenges.</p> <p>In addition, as part of efforts to bolster recruitment and retention, HMP Swaleside is in receipt of Market Supplements, meaning that Band 3 officers at HMP Swaleside receive an additional £2,000 per year in their pay compared to sites which do not receive the supplement.</p> <p>In October 2022, the Standards Coaching Team commenced their deployment to HMP Swaleside. The aims of the Standards Coaching Team are to promote consistent best practice across routine tasks, show how to create positive staff-prisoner relationships, encourage the use of Five-Minute Interventions and build confidence in staff with</p>		
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			<p>less experience. The Standards Coaching Team is made up of eight experienced uniformed staff band 4 and 5 staff embed for 16 weeks on the wings.</p> <p>If establishments feel that their staffing levels require it, they can seek support through processes managed nationally at an Agency level via the Strategic Enhanced Resourcing Support (SERS) panel. All applications to the SERS panel are considered thoroughly and support available includes overtime payments and detached duty staff from other establishments.</p>		
4	The Head of Healthcare should ensure that all prisoners, who are not taken to hospital as advised, receive appropriate follow-up care.	Accepted	All prisoners that have been recommended to go to hospital but are not able to attend are added to the emergency response nurse ledger for the following day. The prisoner's welfare is checked and re-presented to prison staff for hospital attendance if required.	Head of Healthcare  Oxleas NHS Foundation Trust	Completed
5	The Governor should ensure that all information indicating bullying and intimidation is fully coordinated and investigated and that apparent victims are effectively supported and protected.	Accepted	A safety briefing has been delivered to staff on the importance of identifying victims and perpetrators of bullying, and it has been agreed that victims and apparent victims will now be managed under the Challenge, Support and Intervention Plan (CSIP) process. CSIP is the violence reduction case management model used across the prison estate focusing on supporting those who pose a raised risk of violence. CSIP can also be used to monitor and provide additional support to victims and apparent victims of violence.	Head of Safer Custody  HMPPS	May 2023



			Other indicators of bullying will be identified via the safety team and communicated to residential managers to explore further where necessary. Bullying will be a consideration in the debt strategy which is due to be reviewed in 2023.		
6	The Governor should ensure that staff complete roll checks as required, by looking carefully through the cell door observation panel and taking appropriate action if there are any immediate concerns for the wellbeing of a prisoner.	Accepted	<p>Roll checks are reported to the orderly officer as per the local security strategy and signed for in the residential assurance pack.</p> <p>This process is assured through ad-hoc checks carried out by supervising officers and covert testing by the security department. Roll checks are also subject to PPO recommendation testing.</p> <p>Multiple safety briefings have been delivered, the latest in December 2022, to highlight the importance of carrying out roll checks and to re-iterate the actions required when staff find an observation panel covered.</p>	<p>Head of Safer Custody</p> <p>HMPPS</p>	Completed
7	The Governor should ensure that prisoners who block their cell door observation panels are challenged, blockages are removed, and frequent offenders receive appropriate disciplinary action or support.	Accepted	A protocol will be developed for staff to refer to around the covering of observation panels and staff have been reminded at safety briefings of the importance of challenging prisoners who have blocked their observation panels to ensure the safety and security of those on the wing.	<p>Head of Safer Custody</p> <p>HMPPS</p>	May 2023
8	The Governor should ensure that prison staff liaise with families following a death in custody in line	Accepted	The contingency plan for a death in custody contains the instruction to appoint a family liaison officer (FLO). The need for additional FLOs is	<p>Head of Safer Custody</p> <p>HMPPS</p>	Completed



	<p>with national instructions, including that:</p> <ul style="list-style-type: none"> <li>•a family liaison officer is appointed as soon as possible;</li> <li>•the family liaison officer maintains contact with the bereaved family and provides appropriate information and support; and</li> <li>•funeral expenses are offered and the deceased's property returned to their family within appropriate timeframes.</li> </ul>		<p>known but training has not been available. As of February 2023, there are now four trained FLOs.</p> <p>The FLO ensures that the next of kin is contacted as soon as possible, property is returned, and that support is offered with funeral arrangements and reasonable expenses.</p>		
9	<p>The Head of Healthcare should ensure that all patients who are prescribed medication licenced for ADHD have physical health checks and ongoing monitoring in line with National Institute for Health and Care Excellence (NICE) guidelines.</p>	Accepted	<p>A list of all patients on ADHD medication will be provided to the mental health team monthly to ensure that all health checks are completed.</p> <p>The mental health team manager will audit this each month to ensure that there is compliance with monitoring.</p>	<p>Head of Healthcare</p> <p>Oxleas NHS Foundation Trust</p>	May 2023
10	<p>The Head of Healthcare should ensure that prisoners who do not collect their medication are monitored and reviewed in line with local policy.</p>	Accepted	<p>There is a local operating procedure that was developed in June 2022 to support staff with managing prisoners who miss doses of medication. All prisoners that do not collect their medication are reported back during the lunchtime handover.</p> <p>There is a critical medicines list displayed on the wall in all medication hatches to remind staff that a critical missed medicine must be escalated and that there is a stock of these in the central pharmacy.</p>	<p>Head of Healthcare</p> <p>Oxleas NHS Foundation Trust</p>	Completed



			The pharmacist conducts a monthly audit on missed medications.		
11	The Head of Healthcare should ensure that all prisoners with a history of substance misuse are referred to the prison's substance misuse team when they arrive.	Accepted	All prisoners with a history of substance misuse identified during reception screening are referred to the substance misuse services team. This is audited by the health and wellbeing co-ordinator to assess compliance.	Head of Healthcare  Oxleas NHS Foundation Trust	Completed
12	The Governor and Head of Healthcare should ensure that a copy of this report is shared with all staff named in this report and that a senior manager discusses the Ombudsman's findings with them.	Accepted	All named staff have access to the report and have been invited to a meeting to discuss the Ombudsman's findings and recommendations.	Head of Safer Custody  HMPPS	Completed

