

## Action Plan – Baby A at HMP Bronzefield – Status as at May 2021

### PPO Recommendations

#### Sodexo

Paragraph / Reference Number	Recommendation	Responsibility	Accept / Reject	Current Status	Target Comp. Date	Sodexo Position
1	The Director of Health and Justice for NHS England should consider the findings and recommendations in this report and ensure that the learning is applied across the women's estate. This should include recognition that the clinic-based community model of midwifery care is not appropriate to a custodial setting; and all pregnancies in prison are high risk.	Director of Health and Justice for NHS England				
2	The Director of Bronzefield, the SJS Healthcare Manager, the Head of Healthcare at Bronzefield, the Health and Justice Commissioning Lead for the NHS Surrey Heartlands Clinical Commissioning Group, and the Director of Midwifery at Ashford and St Peter' Hospitals NHS Foundation Trust (ASPH) should:  Work together to urgently re-profile and update the maternity service provision at Bronzefield to reflect the increased demand since the closure of HMP Holloway; and	Sodexo CCG ASPH	Accepted	In Progress	31/05/21	An Enhanced Midwifery Service provided by ASPH and Commissioned by CCG has been developed in conjunction with Sodexo. The service is nearing completion of the mobilisation phase.
2a	Ensure that the maternity service is sufficiently resourced to provide an appropriately qualified midwifery lead to oversee all aspects of perinatal care;	Sodexo CCG ASPH	Accepted	In Progress	30/06/21	The new Enhanced Midwifery Service provided by ASPH is sufficiently resourced to provide the required qualified midwifery lead.
2b	Ensure that the maternity service is sufficiently resourced to provide the development of a maternity pathway for prisoners that	Sodexo NHSE ASPH	Accepted	Complete		The process for women who decline to engage with services and access to psychological and psychiatric services for support commenced 22/02/2021.

	includes a process for those women who decline to engage with services and access to psychological and psychiatric services for support;					
2c	Ensure that the maternity service is sufficiently resourced to provide a forum for everyone that provides clinical care to pregnant women to discuss individual cases and that relevant discussion is recorded in SystmOne;	Sodexo CCG ASPH	Accepted	Complete		<p>Pregnancy Review Boards were established in October 2019; these boards are held fortnightly providing a forum for holistic and whole system case discussion, information sharing / collation and care planning. The forums are attended by the proximal networks involved in the care and management of the resident; these do include primary care, midwifery, offender supervisors, social services, keyworkers and the Maternity/MBU team.</p> <p>Team Leader from the Primary Care team, has been identified as the MBU lead who also has oversight of the caseload and attends MBU boards</p>
2d	Ensure that the maternity service is sufficiently resourced to provide remote access for the ASPH midwives to SystmOne;	Sodexo CCG ASPH	Accepted	In progress	30/06/21	<p>SystmOne is an NHS-owned and operated system. In prison settings, NHSE contract SystmOne provision directly with the North East London Commissioning Support Unit (NELCSU). Sodexo will support any local arrangements to facilitate access. All midwives have been issued S1 log in and access on site to the S1 terminals in healthcare.</p>
2e	Ensure that the maternity service is sufficiently resourced to provide training in trauma-informed care, recognising early signs of labour and neonatal and child resuscitation procedures;	Sodexo CCG ASPH	Accepted			<p>A comprehensive annual training plan will be finalised, with annual review. Training and development activities have been increased substantially within the last 12 months; these include;</p> <ul style="list-style-type: none"> <li>First aid and Intermediate life support</li> <li>Recognising the Early Signs of Labour</li> <li>Peri-Natal Wellbeing &amp; Awareness Recognising Early Signs of Labour awareness package</li> <li>Becoming Trauma Informed (BTI)</li> </ul> <p>A programme of training for all staff is underway in Parent Infant relationship / Perinatal Mental Ill Health / Perinatal Mental Wellbeing &amp; Awareness</p> <p>Safeguarding Awareness training</p>
2f	Ensure that the maternity service is sufficiently resourced to provide appropriate emergency resuscitation equipment for children and neonates;	Sodexo CCG ASPH	Not Accepted	In progress	30/06/21	<p>Guidance has been received from CCG on appropriate equipment: "Standard basic first aid equipment should be available at all times, and we do not recommend that Bronzefield makes specialist neonatal equipment available. Basic items such as gloves, incontinence sheets, towels and blankets should suffice. We would recommend removing any other specialised equipment and handing it to the midwives for removal, safekeeping or disposal at their discretion. The maternity delivery pack on site should be held within the health care unit, securely, within the pharmacy. The midwife on site has the responsibility to check the pack is in date, and to replace or update it when necessary".</p>

2g	Ensure that the maternity service is sufficiently resourced to provide guidance on how to respond to births in prison;	Sodexo CCG ASPH	Accepted	In progress	30/05/21	Guidance has been received from CCG: " In the event of a possible emergency situation, the prison staff should employ the same procedures as they would for any other potentially serious emergency. Staff should start basic first aid, call for health care support and call for an ambulance. The advice of the 999 call taker should be followed. It would not be reasonable to expect any staff member to undertake specialist neonatal resuscitation. This would apply also for the care of the mother. "
3	The SJS Healthcare Manager should establish a clear process for emergency responses to births in Bronzefield to ensure that immediate practical basic assistance can be provided.	Sodexo	Accepted	Complete		Guidance received from CCG: "The focus on preparing for an expedited or unexpected labour/birth should be on prevention of an emergency situation. This would amount to swift responses to cell bells, and an understanding among all prison and health care staff that labour can occur at any stage of pregnancy. Any women who may potentially be experiencing signs of labour should receive immediate support from health care staff to determine whether labour is suspected and /or imminent. Prison staff must take appropriate action if the woman is in suspected labour. Prison staff should call 999 and take the advice of the ambulance service call handler. Prison staff should ensure that they call with accurate information to assist appropriate vehicle and crew to assist. If the ASPH midwife is onsite, they should be informed immediately. "
4	The Director of Bronzefield, the SJS Healthcare Manager and the Director of Midwifery at ASPH should each commission an independently facilitated session for their staff to enable a reflective discussion of this case	Sodexo ASPH	Accepted	In progress	30/09/21	Sodexo propose that any independently facilitated discussion takes place when commissioning and delivery arrangements are finalised, such that staff can be made aware of any new pathways and responsibilities
5a	The Sodexo Healthcare Manager should obtain external expert advice about the level of training and expertise that should be available in the prison in relation to neonatal and child resuscitation	Sodexo	Accepted	Complete		Advice was received from CCG, who consulted appropriately. This guidance has been written into local procedures. (See 2g)
5b	The Sodexo Healthcare Manager should obtain external expert advice about the resuscitation equipment that should be provided	Sodexo	Accepted	Complete		Advice was received from CCG, who consulted appropriately. This guidance has been written into local procedures. (See 2f)
6	The Sodexo Healthcare Manager should obtain external expert advice about the resuscitation equipment that should be provided	HMPPS	Accepted	In progress	30/06/21	<b>Head of Custodial Contracts Group, HMPPS</b>  A letter will be sent to the PPO to outline the following position: 1. HMPPS Controllers work collaboratively with NHSE Commissioners to identify any areas of concern around the delivery of healthcare services. Where concerns are highlighted, HMPPS engages with NHSE to seek further assurance and will apply contractual remedies where improvements are not made. Assurance is also provided through the Quarterly Contract Review Meeting (QCRM) that is chaired by a senior representative from HMPPS. Healthcare is a standing agenda item and the NHSE

						<p>Commissioner attends the meeting or provides a report for consideration, highlighting any areas of concern. If additional clinical expertise is required to either provide support to the Provider or to offer clinical assurance reports to HMPPS, NHSE's H&amp;J Quality team works in partnership with commissioners, PHE and HMPPS. They are able to offer bespoke and routine quality assurance visits and remote support. At Bronzefield the provider (Sodexo) was supported to meet NHSE/ Service Specifications and to report into the QCRM with NHSE/ H&amp;J Commissioners available to comment and advise HMPPS on any areas of concern.</p> <p>2. HMPPS Controllers ensure the Ministry of Justice healthcare contractor aligns their clinical governance responsibilities with the NHS healthcare commissioners' clinical governance arrangements – this is done through the Local Delivery Boards and healthcare Partnership Boards (CCG, PHE, social care, HMPPS, NHSE, primary care, SMS and MH providers, Lived Experience) which allows the Director and Controller to fulfil their responsibilities and obligations</p>
7	The Director of Bronzefield should commission a local investigation into the failure to respond to Ms A's request for a nurse and to answer her cell bell on the night of 26 September 2019 and consider whether disciplinary action is appropriate	Sodexo	Accepted	Complete		2 local investigations are complete and have been progressed appropriately
8	The Director and Head of Healthcare at Bronzefield should remind all staff of their responsibility to open ACCT procedures if they consider that a prisoner may pose a risk to herself	Sodexo	Accepted	Complete		Reissued 27/01/2021
9	The Head of Healthcare at Bronzefield should share this report with Nurse 3 and discuss the Ombudsman's findings	Sodexo	Accepted	Required Post Report Publication	30/06/21	To be completed when final report published.
10	The Director of Bronzefield, the SJS Healthcare Manager, the Head of Healthcare at Bronzefield, the Health and Justice Commissioning Lead for the NHS Surrey Heartlands Clinical Commissioning Group, and the Director of Midwifery at ASPH should each address the relevant further recommendations from the clinical review (listed at Annex 3) and should each provide an action plan setting out their	Sodexo CCG ASPH	Accepted	In progress	30/06/21	Action plan developed as part of the response.

## Health Commissioners

Paragraph / Reference Number	Recommendation	Responsibility	Accept / Reject	Current Status	Target Comp. Date	Health Commissioners Position
1	<p>The Director of Health and Justice for NHS England should consider the findings and recommendations in this report and ensure that the learning is applied across the women's estate. This should include recognition that the clinic-based community model of midwifery care is not appropriate to a custodial setting; and all pregnancies in prison are high risk.</p>	<p>Director of Health and Justice for NHS England</p>	<p>Accepted</p>	<p>In Progress</p>	<p>30/06/21</p>	<p><b>Director of Health and Justice for NHS England</b></p> <p>NHS England and NHS Improvement (NHS EI) undertook a review of prison perinatal mental health services across the English women's estate during 2019 which included perinatal mental health service specification for the South Region women's estate. This specification was due to be implemented during 2020 however the COVID-19 pandemic has impacted on this plan.</p> <p>In January 2021, NHS EI convened a national, multi-agency women's estate perinatal pathway steering group to respond equitably, across 12 prisons, to support the needs of mothers and their babies in custody; to share learning, best practice and identify learning from Serious Incidents where features of perinatal care have been identified. Key stakeholders of this steering group include women with lived experience, commissioners from NHS EI and CCG, HMPPS and private prison representatives, statutory and non-statutory provider services. The steering group will maintain links with the work of the National Mother and Baby Unit Clinical Reference Group and National Health and Justice Clinical Reference Group. The PPO investigation report and Clinical Review into the care of Ms A and Baby A will be shared and the findings will inform the work of this steering group.</p> <p>The perinatal steering group will report into the newly formed National Women's Health, Social Care and Fabric Review Group. The National Women's Prison Review, established January 2021 has convened to improve the health and well-being of women in prison, reduce inequalities and improve outcomes for women in prison and upon their release ensuring equity of access to the full range of high quality health and social care. Objectives of this group include key lines of enquiries into specialised mother and baby units and will undertake a meta-analysis into factors including deaths in custody and transfer and remissions under MHA over the past 3 years to inform findings and recommendations. The Specialist Commissioning/Health and Justice Delivery group (SCHJDG) is NHS England and NHS Improvements (NHSE/I) national leadership forum providing systematic assurance performance and oversight for NHSE/I's Health and Justice commissioning responsibilities for Prisons and other places of detention, through both the national and regional teams. This includes oversight of the quality, safety and patients' experiences of these commissioned services with a focus on improving health outcomes and reducing variation across England. The Women's Review Group will ultimately report into this group for NHSE/I and in turn the Perinatal Pathway Steering Group</p>

						<p>will report into the Review Group.</p> <p>NHS EI H&amp;J have shared the PPO and supporting joint Clinical Review/Child Death Review investigation report with the Chief Midwife and Head of Safeguarding.</p>
2	<p>The Director of Bronzefield, the SJS Healthcare Manager, the Head of Healthcare at Bronzefield, the Health and Justice Commissioning Lead for the NHS Surrey Heartlands Clinical Commissioning Group, and the Director of Midwifery at Ashford and St Peter' Hospitals NHS Foundation Trust (ASPH) should:</p> <p>Work together to urgently re-profile and update the maternity service provision at Bronzefield to reflect the increased demand since the closure of HMP Holloway; and</p>	<p>Sodexo CCG ASPH</p>	Accepted			<p>CCG, NHSE/I and ASPH met and decided on an action plan to include 3 phases:</p> <ol style="list-style-type: none"> <li>1. Collaboratively design and agree service specification including interface with health visiting and perinatal mental health service as well as other partner services such as prison health care, sexual health, substance misuse etc. It will demand a bespoke pathway for babies and children in prison to ensure equitable access to healthcare and other services.</li> <li>2. Scoping, costing and procurement - ASPH has been invited to and agreed to cost the service spec once agreed, and commissioners from NHSE, CCG and HMPPS will agree how to jointly fund the service.</li> <li>3. Mobilisation, implementation and establishment of the service including robust arrangements for governance, quality and safety management going forward. This will be an iterative process commencing at the agreement of the service specification and moving on into the long term governance arrangements.</li> </ol> <p>Enhanced Maternity Service model proposed by ASPH and HMP Bronzefield is being mobilised. Recruitment underway, some midwives are in post and delivering services already. This has been implemented by ASPH at risk. This has increased the offer available to women who need the service and is a robust interim model.</p>
2a	<p>Ensure that the maternity service is sufficiently resourced to provide an appropriately qualified midwifery lead to oversee all aspects of perinatal care;</p>	<p>Sodexo CCG ASPH</p>	Accepted			<p>Commissioning lines have been agreed. Specialist commissioning will devolve commissioning responsibility to Surrey Heartlands CCG who will work with ASPH to ensure that governance frameworks, quality improvement and assurance structures are in place and regularly reviewed.</p> <p>Once the national Service Specification has been agreed we will be able to scope any additional resource required. Joint funding has been agreed. A detailed workforce plan will be integrated within the mobilisation plan.</p>
2b	<p>Ensure that the maternity service is sufficiently resourced to provide the development of a maternity pathway for prisoners that includes a process for those women who decline to engage with services and access to psychological and psychiatric services for support;</p>	<p>Sodexo NHSE ASPH</p>	Accepted			<p>Perinatal mental health service is being mobilised, and this service is well placed to support women who find it difficult to engage with services. The interface between perinatal mental health and maternity services is described in the service specification and will be monitored to ensure it is robust and supportive for staff and women who are using the service. The service is designed to deliver high levels of Continuity of Care, supporting the development of high quality relationships between women and maternity team. Multi-professional team meetings will bring together all professionals supporting the delivery of high quality perinatal healthcare in Bronzefield. The needs of this vulnerable population will be embedded within the Inequalities Workstream in the SH ICS First 1000 Days Programme. Opportunities for joint training will be</p>

						identified.  The Service specification has been widely consulted. National work will continue to develop a national service specification. The local specification will be implemented until such time as it is superseded.
2c	Ensure that the maternity service is sufficiently resourced to provide a forum for everyone that provides clinical care to pregnant women to discuss individual cases and that relevant discussion is recorded in SystmOne;	Sodexo CCG ASPH	Accepted			Health Commissioners will ensure that robust governance and quality oversight are evident at Pregnancy Review Boards, and appropriate action planning as a result of Forum discussion is undertaken. Health Commissioners have agreed a structure for the Pregnancy Review boards with HMPPS. This agreed approach enables health professionals to have access to contemporaneous, relevant health records. Maternity records will be paper based and accessible to the woman and those treating her.
2d	Ensure that the maternity service is sufficiently resourced to provide remote access for the ASPH midwives to SystmOne;	Sodexo CCG ASPH	Accepted			CCG will work collaboratively with NHSE/I that all midwives should have access to SystmOne in HMP Bronzefield and record their notes contemporaneously as is best practice.
2e	Ensure that the maternity service is sufficiently resourced to provide training in trauma-informed care, recognising early signs of labour and neonatal and child resuscitation procedures;	Sodexo CCG ASPH	Accepted			<ul style="list-style-type: none"> <li>•HMP Bronzefield will have a dedicated trauma informed midwifery service and all maternity service staff will have 'trauma informed care' as part of their mandatory training</li> <li>•The PNS mental health service will be a core member of the pregnancy review board so that trauma informed pathways are agreed and supported (monitored via quarterly KPI reporting to commissioners)</li> <li>•The PNS mental health service will provide a rolling programme of trauma informed perinatal training to the establishment (monitored via quarterly KPI reporting to commissioners)</li> <li>•Guidance regarding neonatal resuscitation was developed in consultation with subject matter experts and regional colleagues. This has been taken up by HMP Bronzefield.</li> </ul>
2f	Ensure that the maternity service is sufficiently resourced to provide appropriate emergency resuscitation equipment for children and neonates;	Sodexo CCG ASPH	Not Accepted			<p>The Director of HMP Bronzefield will ensure that:</p> <ul style="list-style-type: none"> <li>• although not related to this incident, there is at all times a member of staff allocated to the MBU, who as a minimum, is trained in first aid, whilst within the prison there is always a member of staff on duty who is trained in paediatric first aid including child/adult resuscitation (not neonatal) who can be called to the MBU if required</li> <li>• there is a contingency plan/policy in place for child protection, first aid including paediatric first aid and resuscitation, which should include advice for managing such events, and which provides mothers with detailed guidance as to what to do in an emergency</li> <li>• each baby has a child care plan setting out how the best interests of the child will be maintained and promoted during the child's residence in the unit</li> </ul> <p>Separate advice has been provided and implemented for dealing with neonatal resuscitation</p>
2g	Ensure that the maternity service is sufficiently resourced to provide guidance	Sodexo CCG ASPH				The interim service specification describes implementation of best practice and arrangements for midwife led prenatal and postnatal education.

	on how to respond to births in prison;					
3	The SJS Healthcare Manager should establish a clear process for emergency responses to births in Bronzefield to ensure that immediate practical basic assistance can be provided.	Sodexo				
4	The Director of Bronzefield, the SJS Healthcare Manager and the Director of Midwifery at ASPH should each commission an independently facilitated session for their staff to enable a reflective discussion of this case	Sodexo ASPH				
5a	The Sodexo Healthcare Manager should obtain external expert advice about the level of training and expertise that should be available in the prison in relation to neonatal and child resuscitation	Sodexo				
5b	The Sodexo Healthcare Manager should obtain external expert advice about the resuscitation equipment that should be provided	Sodexo				
6	The Sodexo Healthcare Manager should obtain external expert advice about the resuscitation equipment that should be provided	HMPPS				
7	The Director of Bronzefield should commission a local investigation into the failure to respond to Ms A's request for a nurse and to answer her cell bell on the night of 26 September 2019 and consider whether disciplinary action is appropriate	Sodexo				
8	The Director and Head of Healthcare at Bronzefield should remind all staff of their responsibility to open ACCT procedures if they consider that a prisoner may pose a risk to herself	Sodexo				
9	The Head of Healthcare at Bronzefield should share this	Sodexo				



	report with Nurse 3 and discuss the Ombudsman's findings					
10	The Director of Bronzefield, the SJS Healthcare Manager, the Head of Healthcare at Bronzefield, the Health and Justice Commissioning Lead for the NHS Surrey Heartlands Clinical Commissioning Group, and the Director of Midwifery at ASPH should each address the relevant further recommendations from the clinical review (listed at Annex 3) and should each provide an action plan setting out their response	Sodexo CCG ASPH	Accepted	In progress	30/06/21	An action plan has been developed and agreed and is a dynamic document, and will be formalised by June 2021 in line with NHSE/1.

**ASPH**

Paragraph / Reference Number	Recommendation	Responsibility	Accept / Reject	Current Status	Target Comp. Date	ASPH Position
1	The Director of Health and Justice for NHS England should consider the findings and recommendations in this report and ensure that the learning is applied across the women's estate. This should include recognition that the clinic-based community model of midwifery care is not appropriate to a custodial setting; and all pregnancies in prison are high risk.	Director of Health and Justice for NHS England				
2	The Director of Bronzefield, the SJS Healthcare Manager, the Head of Healthcare at Bronzefield, the Health and Justice Commissioning Lead for the NHS Surrey Heartlands Clinical Commissioning Group, and the Director of Midwifery at Ashford and St Peter' Hospitals NHS Foundation Trust (ASPH) should:  Work together to urgently re-profile and update the maternity service provision at Bronzefield to reflect the increased demand since the closure of HMP Holloway; and	Sodexo CCG ASPH	Accepted			ASPH has participated in the discussions regarding actions to address the recommendation, in partnership with the CCG and NHSE/I.  The Obstetrician attends pregnancy review boards whenever possible. There is a Lead midwife in post supporting new recruits. Recruitment is currently underway for 6th team member and maternity cover. Sonography is taking place at ASPH which is not optimal but does provide a safe solution until equipment can be procured.
2a	Ensure that the maternity service is sufficiently resourced to provide an appropriately qualified midwifery lead to oversee all aspects of perinatal care;	Sodexo CCG ASPH	Accepted			A continuity of carer team to incorporate care for vulnerable women including women residing at HMP Bronzefield has been established.  The Willow team has been recruited; a lead midwife is in place. Head of Midwifery has oversight of the service. The sonography time has been mobilised, and once the equipment has been procured, the frequency of clinics within the prison will be increased. Consultant obstetrician time is planned and will commence as soon as funding is agreed. The consultant already attends pregnancy review boards to contribute to the multidisciplinary team discussion.
2b	Ensure that the maternity service is sufficiently resourced to provide the	Sodexo NHSE ASPH	Accepted			The process for women who decline to engage with services and access to psychological and psychiatric services for support commenced 22/02/2021. The interface between perinatal mental

	development of a maternity pathway for prisoners that includes a process for those women who decline to engage with services and access to psychological and psychiatric services for support;					<p>health and maternity services has been described in the service specification and will be monitored to ensure it is robust and supportive for staff and women who are using the service.</p> <p>The Willow team is ready for mobilisation although onboarding of one more midwife has to take place and one member of the team will be going on maternity leave so will require cover. The team interfaces with the perinatal mental health team and the prison complex case manager. Trauma informed approach training has taken place and is improving the engagement with people who find it challenging to engage with services.</p>
2c	Ensure that the maternity service is sufficiently resourced to provide a forum for everyone that provides clinical care to pregnant women to discuss individual cases and that relevant discussion is recorded in SystmOne;	Sodexo CCG ASPH	Accepted			Pregnancy Review Boards were established in October 2019; these boards are held fortnightly providing a forum for holistic and whole system case discussion, information sharing / collation and care planning. The forums are attended by the proximal networks involved in the care and management of the resident; these do include primary care, midwifery and obstetric (maternity), offender supervisors, social services, keyworkers and the Maternity/MBU team.
2d	Ensure that the maternity service is sufficiently resourced to provide remote access for the ASPH midwives to SystmOne;	Sodexo CCG ASPH	Accepted			<p>ASPH reports that the midwives all have access to SystmOne on site and remote access is being addressed. Additional laptops and tablets are expected in June 2021.</p> <p>Sodexo is currently ensuring that all members of the team have logins. This will be completed by 14/05/2021</p>
2e	Ensure that the maternity service is sufficiently resourced to provide training in trauma-informed care, recognising early signs of labour and neonatal and child resuscitation procedures;	Sodexo CCG ASPH	Accepted			Trauma informed training has taken place for ASPH staff and improved awareness of engagement approaches. Advice has been formulated and issued to HMP Bronzefield regarding neonatal resuscitation and advising early advice from 999 service if early signs of labour are identified. Work is commencing with 999 services and HMP Bronzefield to develop an ambulance attendance at prison protocol to ensure delays are engineered out of the process.
2f	Ensure that the maternity service is sufficiently resourced to provide appropriate emergency resuscitation equipment for children and neonates;	Sodexo CCG ASPH	Not Accepted			ASPH has worked with colleagues to develop advice for HMP Bronzefield regarding equipment that should be available for neonatal resuscitation. It was agreed that no equipment in excess of basic infection control PPE and blankets should be supplied, and only basic life support should be implemented on advice from 999.
2g	Ensure that the maternity service is sufficiently resourced to provide guidance on how to respond to births in prison;	Sodexo CCG ASPH				The Enhanced maternity model is part of the service specification that has been widely consulted and will be implemented as an interim measure until the national service specification can be agreed.
3	The SJS Healthcare Manager should establish a clear process for emergency responses to births in Bronzefield to ensure that immediate practical basic	Sodexo				

	assistance can be provided.					
4	The Director of Bronzefield, the SJS Healthcare Manager and the Director of Midwifery at ASPH should each commission an independently facilitated session for their staff to enable a reflective discussion of this case	Sodexo ASPH				Surrey Heartlands CCG will pull learning from across stakeholders into a learning event, and ASPH will be part of the development of that learning and the event to deliver it.
5a	The Sodexo Healthcare Manager should obtain external expert advice about the level of training and expertise that should be available in the prison in relation to neonatal and child resuscitation	Sodexo				
5b	The Sodexo Healthcare Manager should obtain external expert advice about the resuscitation equipment that should be provided	Sodexo				
6	The Sodexo Healthcare Manager should obtain external expert advice about the resuscitation equipment that should be provided	HMPPS				
7	The Director of Bronzefield should commission a local investigation into the failure to respond to Ms A's request for a nurse and to answer her cell bell on the night of 26 September 2019 and consider whether disciplinary action is appropriate	Sodexo				
8	The Director and Head of Healthcare at Bronzefield should remind all staff of their responsibility to open ACCT procedures if they consider that a prisoner may pose a risk to herself	Sodexo				
9	The Head of Healthcare at Bronzefield should share this report with Nurse 3 and discuss the Ombudsman's findings	Sodexo				
10	The Director of Bronzefield, the SJS Healthcare Manager, the Head of Healthcare at Bronzefield, the Health and Justice Commissioning Lead for the NHS Surrey Heartlands	Sodexo CCG ASPH	Accepted	In Progress	30/06/21	Action has been taken to address each recommendation, including mobilisation of the Willows team and increased obstetric clinical cover to deliver the proposed enhanced maternity model.

	<p>Clinical Commissioning Group, and the Director of Midwifery at ASPH should each address the relevant further recommendations from the clinical review (listed at Annex 3) and should each provide an action plan setting out their response</p>					
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## Clinical Recommendations

### Sodexo

Paragraph/ Reference Number	Recommendation	Responsibility	Accept / Reject	Current Status	Target Comp. Date	Sodexo Position
1  PPO 2b	Sodexo and ASPH must establish a maternity pathway which follows best practice and which makes clear roles, responsibilities and systems of escalation. This must include a process for those women who fail to engage with services and should include access to psychological and psychiatric service assessment and support	Sodexo CCG ASPH	Accepted	In progress	30/06/21	An Enhanced Midwifery Service provided by ASPH and Commissioned by CCG has been developed in conjunction with Sodexo. The service is nearing completion of the mobilisation phase. The process for women who decline to engage with services and access to psychological and psychiatric services for support commenced 22/02/2021.
2  PPO 2 2a	ASPH and the CCG must review as a matter of urgency the resource available to provide this service. This should be informed by the issues identified in this report and by the experiences of the staff who work there at present. Any proposed changes should be subject to robust risk assessment and consideration of possible consequences	Sodexo CCG ASPH	Accepted	In Progress	30/06/21	An Enhanced Midwifery Service provided by ASPH and Commissioned by CCG has been developed in conjunction with the Sodexo. The service is nearing completion of the mobilisation phase.

3 PPO 5a	Sodexo healthcare must identify an appropriately qualified clinical midwifery lead to help them consider all aspects of perinatal care within HMP Bronzefield and to develop a more comprehensive pathway and to offer effective leadership	Sodexo CCG ASPH	Accepted	Complete		The new Enhanced Midwifery Service provided by ASPH is sufficiently resourced to provide the required qualified midwifery lead.
4 PPO 2d	ASPH and the prison should ensure that midwives have remote access to the SystemOne records from their hospital base	NHSE CCG ASPH	Accepted	In Progress	30/06/21	SystemOne is an NHS-owned and operated system. In prison settings, NHSE contract SystemOne provision directly with the North East London Commissioning Support Unit (NELCSU). Sodexo will support any local arrangements to facilitate access
5	The prison director and the Sodexo corporate head of healthcare must review the remit of the maternity liaison committee to ensure that it is appropriately focused on its task of improving quality and systems	NHSE CCG ASPH				<p>Pregnancy Review Boards were established in October 2019; these boards are held fortnightly providing a forum for holistic and whole system case discussion, information sharing / collation and care planning. The forums are attended by the proximal networks involved in the care and management of the resident; these do include primary care, midwifery, offender supervisors, social services, keyworkers and the Maternity/MBU team.</p> <p>Team Leader from the Primary Care team, has been identified as the MBU lead who also has oversight of the caseload and attends MBU boards</p>

<p>6</p> <p>PPO 2c</p>	<p>Ensure that the maternity service is sufficiently resourced to provide remote access for the ASPH midwives to SystmOne;</p>	<p>Sodexo ASPH</p>	<p>Accepted</p>	<p>In Progress</p>	<p>30/06/21</p>	<p>SystmOne is an NHS-owned and operated system. In prison settings, NHSE contract SystmOne provision directly with the North East London Commissioning Support Unit (NELCSU). Sodexo will support any local arrangements to facilitate access</p> <p>Midwife cover is now provided five days per week with onsite System One access. In addition the Obstetrician has on site access to System One</p>
<p>7</p> <p>PPO 2c</p>	<p>Sodexo healthcare needs to establish a robust and reliable system for effective information sharing between the MBU and the healthcare team</p>	<p>Sodexo</p>	<p>Accepted</p>	<p>Complete</p>		<p>Pregnancy Review Boards were established in October 2019; these boards are held fortnightly providing a forum for holistic and whole system case discussion, information sharing / collation and care planning. The forums are attended by the proximal networks involved in the care and management of the resident; these do include primary care, midwifery, offender supervisors, social services, keyworkers and the Maternity/MBU team.</p> <p>Team Leader from the Primary Care team, has been identified as the MBU lead who also has oversight of the caseload and attends MBU boards</p>
<p>8</p>	<p>The head of healthcare at HMP Bronzefield must review the oversight and support arrangements for MBU with a view to developing effective clinical leadership, clinically appropriate decision making and day to day operational clarity for staff</p>	<p>Sodexo CCG ASPH</p>	<p>Accepted</p>	<p>Complete</p>		<p>An Enhanced Midwifery Service provided by ASPH and Commissioned by CCG has been developed in conjunction with Sodexo. The service is nearing completion of the mobilisation phase. Operational staff working within MBU are overseen by the MBU Manager, who reports directly to the Prison Director. In addition, a senior manager with responsibility across HMPs Bronzefield and Peterborough ensures proper coordination of training, adherence to required standards. Clinical leadership with respect of babies or children sits within the remit of the Visiting Midwife.</p>



9	<p>Sodexo should ensure that its operational systems are compliant with the intercollegiate document 'Safeguarding Children and Young People: Roles and Competencies for Healthcare Staff'.</p> <p>1. <a href="https://www.rcn.org.uk/professional-development/publications/pub-007366">https://www.rcn.org.uk/professional-development/publications/pub-007366</a></p> <p>2. <a href="https://www.rcn.org.uk/professional-development/publications/pub-007366">https://www.rcn.org.uk/professional-development/publications/pub-007366</a></p>	Sodexo	Accepted	Complete	<p>Training for all healthcare and operational staff working within MBU will include levels 1, 2 and 3 as set out within 'Safeguarding Children and Young People: Roles and Competencies for Healthcare Staff'. As per the document's guidelines, training at level 3 will include the training required at level 1 and 2 and will negate the need to undertake re-fresher training at levels 1 and 2 in addition to level 3.</p> <p>For clarity, healthcare staff will level 3 training which includes:</p> <p>Initial training Professionals will complete the equivalent of a minimum of 8 hours education, training and learning related to safeguarding/child protection.</p> <p>Refresher training Over a three-year period, professionals should be able to demonstrate refresher education, training and learning, equivalent to a minimum of eight hours.</p>
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10	Sodexo healthcare should ensure that it has an effective clinical protocol to ensure that records of pregnant women who have a child protection plan for their unborn child are appropriately flagged according to national guidelines	Sodexo	Accepted	Complete		<p>Once a patient has been highlighted as having a child protection plan for their unborn child at Reception, a referral is made to MBU (Note that this happens by default for all women coming into the prison who have a pregnancy test or who self-report pregnancy)</p> <p>The Midwife documents this on SystemOne as well as ensuring the information is shared with the Primary Care Team.</p> <p>MBU boards, where the Safeguarding Midwife and the Healthcare Team Leader are in attendance, include discussions and progress updates on all women where a child protection plan is in place.</p> <p>The Safeguarding Midwife liaises with the Community Safeguarding Team whenever a child protection plan exists</p>
11	Sodexo healthcare should ensure that minutes of child protection meetings and copies of child protection plans are obtained for all pregnant women where there is a child protection plan in place	Sodexo	Accepted	Complete		The fortnightly Pregnancy Review Boards are a documented forum for information sharing which includes consideration of all child protection plans obtained (and actions should the plans not have been made available) for pregnant women coming into prison
12	The head of healthcare should ensure that in cases where safeguarding issues are identified consideration must be given to obtaining previous history via community medical records. Concerns with regard to information sharing should not stand in the way of effective safeguarding	Sodexo	Accepted	Complete		Safeguarding issues are managed as part of the MDT, MBU boards, which ensures that all partners involved in the care of the patients are aware of the need to share all information relating to safeguarding. The Healthcare Team Leader representing the Primary Care Team has responsibility for ensuring that all community health records are obtained, and that these are properly documented on SystemOne

13	The head of healthcare and the lead GP should review the system and revise the process for identifying community GPs, identification of the GP can be made via the "Lost GP" service if only incomplete details are held. The revised process should ensure that women are asked for details of their GP on more than one occasion to allow time for reflection and recall	Sodexo	Accepted	Complete		All patients coming into the Prison are asked for consent to contact their GPs. Summary Care Records are also be accessed through SystemOne and/or the NHS Spine database where a summary of records from community GPs can be accessed; this applies and enables access of any previous records even if the GP is not known.  In cases where Summary Care Records cannot be accessed, a further request for records is sent to the community GP
14 PPO 3	The head of healthcare at HMP Bronzefield must establish a clear process for emergency responses involving births in the prison to ensure that immediate practical basic assistance can be provided	Sodexo	Accepted	Complete		Guidance has been received from CCG: " In the event of a possible emergency situation, the prison staff should employ the same procedures as they would for any other potentially serious emergency. Staff should start basic first aid, call for health care support and call for an ambulance. The advice of the 999 call taker should be followed. It would not be reasonable to expect any staff member to undertake specialist neonatal resuscitation. This would apply also for the care of the mother. "
15 PPO 2e	The prison director, the head of healthcare and the director of midwifery at ASPH must commission further training in relation to trauma informed care in action to be undertaken jointly by prison clinical staff and midwives. This training must be focused on prioritising the pregnant women's needs above those of the general custodial environment, effective processes of working together and clear communication	Sodexo ASPH	Accepted	In Progress	30/06/21	A comprehensive annual training plan will be finalised, with annual review. Training and development activities have been increased substantially within the last 12 months; these include; First aid and Intermediate life support Recognising the Early Signs of Labour Peri-Natal Wellbeing & Awareness Recognising Early Signs of Labour awareness package Becoming Trauma Informed (BTI) A programme of training for all staff is underway in Parent Infant relationship / Perinatal Mental Ill Health / Perinatal Mental Wellbeing & Awareness Safeguarding Awareness training
16	The Board level oversight and governance from ASPH of the service it provides at the prison should be reviewed to provide assurance that clinical and other risks are assessed and mitigated where possible	ASPH				

17	ASPH must ensure that appropriate professional clinical supervision is provided for the midwives working at HMP Bronzefield. Supervision external to the team providing the service should be considered to counteract the effects of a small specialised and isolated service. Ideally this supervision should be external to the team and contain within it, reflection on the effects of the custodial environment	ASPH				
18	ASPH must review and adapt the frequency and management of regular safeguarding supervision for their safeguarding specialists to develop their understanding of the wider safeguarding processes, identification of risk and raising concern whilst ensuring their compliance with the supervision process. Attendance at such supervision must be mandatory and regular appraisal of engagement with the process should be undertaken for each individual	ASPH				
19 PPO 4	The prison director, the Sodexo head of healthcare and the Director of Midwifery at ASPH should commission an independently facilitated session for their staff to enable a reflective discussion to consider all aspects of this case	Sodexo ASPH	Accepted	In Progress	30/09/21	Sodexo propose that any independently facilitated discussion takes place when commissioning and delivery arrangements are finalised, such that staff can be made aware of any new pathways and responsibilities
20	Sodexo health and Cimmaron should consider the need for regular and consistent GP input to ensure a degree of clinical continuity. At the time of the incidents described the general practitioners were mainly peripatetic locums	Sodexo	Accepted	Complete		There are now regular GPs on specific days of the week and since the incident a Lead GP has been appointed for HMP Bronzefield, who acts as a point of contact for all GPs. The Lead GP is also responsible for the clinical standards of GPs and ensuring that all GPs are briefed on complex cases as well as learning from any incidents

21	The head of healthcare and the lead GP of the prison health service with input from the maternity service should review the role of the GP in the provision of maternity care and establish what this needs to be in a custodial environment	Sodexo ASPH CCG	Accepted	in Progress	30/06/21	<p>An Enhanced Midwifery Service provided by ASPH and Commissioned by CCG has been developed in conjunction with the Sodexo. The service is nearing completion of the mobilisation phase. The process for women who decline to engage with services and access to psychological and psychiatric services for support commenced 22/02/2021.</p> <p>The role of the prescribing GP and any other prescribers in respect of maternity care within the prison is commensurate with the community for both re- and postnatal care. The Prison GP will provide for all primary care aspects, and any prescribing for pre or postnatal care, following the direction of specialist maternity services where necessary.</p>
22	Sodexo health and Cimmaron should review the present system for discharge communication to community GPs in case where significant health and health related issues have occurred. In these cases a detailed discharge summary should be created and sent to the GP with a view to provide on-going care	Sodexo	Accepted	Complete		<p>All patients who have received healthcare input leaving the Prison have a GP summary provided to them and send to their community GP.</p> <p>In addition, as soon as a pregnant resident is either planned to be released or released (unplanned), the MBU team now notifies the Midwifery Team who will ensure that the relevant midwifery team local to the release address of the patient is notified and a referral is made</p>

23	The Local area CDR Team/CDOP should define how they will review the circumstances of all baby and child deaths (live and stillborn) occurring in HMP Bronzefield to identify learning and areas of good practice. Links should be made to any national fora to maximise learning	CDR/CDOP				
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24	The Director of HMP Bronzefield and the Corporate leads for health and quality at Sodexo must review the safeguarding roles and responsibilities for babies living within the MBU for the times when the Nursery is not in operation in line with Working Together to Safeguard Children (HM Government, 2018) in order to produce a clear policy and procedure for staff to follow. In addition, this review should consider the need for such approaches in the wider prison to ensure that staff understand their responsibilities in safeguarding unborn children	Sodexo CCG ASPH	Accepted	In Progress	30/06/21	An Enhanced Midwifery Service provided by ASPH and Commissioned by CCG has been developed in conjunction with the Sodexo. The service has been mobilised. The process for women who decline to engage with services and access to psychological and psychiatric services for support commenced 22/02/2021. Within the new service specification, clear roles and responsibilities have been defined. This includes a requirement to work effectively together in all aspects of delivery of care, including responsibilities to safeguard the unborn child
25 PPO 2e	Sodexo healthcare should ensure that safeguarding children training for all staff working on the MBU is provided at an appropriate level and that training is mandatory for this staff group	Sodexo	Accepted	Complete		As per recommendation 9 above, safeguarding children training is provided to all staff working on the MBU
26 PPO 2e	Sodexo healthcare should ensure that all staff who work on MBU access annual paediatric specific resuscitation and basic first aid training	Sodexo ASPH	Accepted	In Progress	30/06/21	A comprehensive annual training plan will be finalised, with annual review. Training and development activities have been increased substantially within the last 12 months; these include; First aid and Intermediate life support Recognising the Early Signs of Labour Peri-Natal Wellbeing & Awareness Recognising Early Signs of Labour awareness package Becoming Trauma Informed (BTI) A programme of training for all staff is underway in Parent Infant relationship / Perinatal Mental Ill Health / Perinatal Mental Wellbeing & Awareness Safeguarding Awareness training

<p>27</p> <p>PPO 5a 5b</p>	<p>Sodexo healthcare should obtain external expert advice about the level of training and expertise that should be available in the prison in relation to neonatal and child resuscitation. This should include advice about the equipment that should be provided</p>	<p>Sodexo</p>	<p>Accepted</p>	<p>Complete</p>		<p>Guidance has been received from CCG: " In the event of a possible emergency situation, the prison staff should employ the same procedures as they would for any other potentially serious emergency. Staff should start basic first aid, call for health care support and call for an ambulance. The advice of the 999 call taker should be followed. It would not be reasonable to expect any staff member to undertake specialist neonatal resuscitation. This would apply also for the care of the mother. "Guidance has been received from CCG on appropriate equipment: "Standard basic first aid equipment should be available at all times, and we do not recommend that Bronzefield makes specialist neonatal equipment available. Basic items such as gloves, incontinence sheets, towels and blankets should suffice. We would recommend removing any other specialised equipment and handing it to the midwives for removal, safekeeping or disposal at their discretion. The maternity delivery pack on site should be held within the health care unit, securely, within the pharmacy. The midwife on site has the responsibility to check the pack is in date, and to replace or update it when necessary".</p>
<p>28</p> <p>PPO 10</p>	<p>Sodexo in discussion with NHSE and Surrey Heartlands CCG should consider the most direct method to deliver care to the mothers, babies and children living as a family unit within the MBU</p>	<p>Sodexo CCG ASPH</p>	<p>Accepted</p>	<p>In Progress</p>	<p>30/06/21</p>	<p>An Enhanced Midwifery Service provided by ASPH and Commissioned by CCG has been developed in conjunction with the Sodexo. The service is nearing completion of the mobilisation phase. The Health Visitor and GP service level is captured within the CCG commissioning review to ensure provision is commissioned appropriately, accessibility is considered and services are governed / contract managed effectively.</p>



## Health Commissioners

Paragraph/ Reference Number	Recommendation	Responsibility	Accept / Reject	Current Status	Target Comp. Date	Sodexo Position
1  PPO 2b	Sodexo and ASPH must establish a maternity pathway which follows best practice and which makes clear roles, responsibilities and systems of escalation. This must include a process for those women who fail to engage with services and should include access to psychological and psychiatric service assessment and support	Sodexo CCG ASPH	Accepted	Complete		The Service specification has been drafted and describes pathway in line with best practice and clinical guidelines, as well as the findings of the Ockenden Report. The interface between maternity and perinatal mental health services is described.
2  PPO 2 2a	ASPH and the CCG must review as a matter of urgency the resource available to provide this service. This should be informed by the issues identified in this report and by the experiences of the staff who work there at present. Any proposed changes should be subject to robust risk assessment and consideration of possible consequences	Sodexo CCG ASPH	Accepted	Complete		<p>A working group was formed, consisting of reps from CCG, NHSE/I and ASPH to manage this recommendation, and agreed to address this action in 3 phases, namely</p> <ol style="list-style-type: none"> <li>1. Develop the service specification</li> <li>2. Complete the scoping, costing and procurement (including implementation of interim arrangements if required)</li> <li>3. Mobilisation of service, including establishment of governance, quality and safety arrangements</li> </ol> <p>Working group has delivered the interim service specification and will inform the national specification. Formal commissioning is underway.</p>
3  PPO 5a	Sodexo healthcare must identify an appropriately qualified clinical midwifery lead to help them consider all aspects of perinatal care within HMP Bronzefield and to develop a more comprehensive pathway and to offer effective leadership	Sodexo CCG ASPH	Accepted	Complete		<p>The Working group have addressed commissioning arrangements and decided on joint funding of the service.</p> <p>ASPH provides specialist midwifery advice through their Head of Service for Maternity. Surrey Heartlands CCG has worked closely with ASPH to ensure that the pathway is entrenched in the local service specification and that this interfaces with all other health services going into Bronzefield.</p>

4 PPO 2d	ASPH and the prison should ensure that midwives have remote access to the SystemOne records from their hospital base	NHSE CCG ASPH	Accepted	Complete		<p>The CCG ensure that there is clear guidance regarding overall management of access and use of information including requesting clinical and other information regarding women who are referred to the maternity service</p> <p>CCG requested logins for new staff to ensure all can access systems appropriately. HMP Bronzefield has actioned this request.</p>
5	The prison director and the Sodexo corporate head of healthcare must review the remit of the maternity liaison committee to ensure that it is appropriately focused on its task of improving quality and systems	NHSE CCG ASPH	Accepted with caveat as to terminology	Complete		<p>It is not clear what the "maternity liaison committee" refers to. However, the pregnancy review boards, which are the multidisciplinary discussion boards that take place every fortnight and consider the pregnant women holistically, provide the liaison function and focus on quality improvement.</p>
6 PPO 2c	Ensure that the maternity service is sufficiently resourced to provide remote access for the ASPH midwives to SystemOne;	Sodexo ASPH				
7 PPO 2c	Sodexo healthcare needs to establish a robust and reliable system for effective information sharing between the MBU and the healthcare team	Sodexo				
8	The head of healthcare at HMP Bronzefield must review the oversight and support arrangements for MBU with a view to developing effective clinical leadership, clinically appropriate decision making and day to day operational clarity for staff	Sodexo CCG ASPH	Accepted	In Progress	30/06/21	<p>The interim service spec describes leadership, operational oversight and support arrangements.</p> <p>The interim service specification is being implemented. This will ensure effective assurance of leadership and operational quality through robust relationships between commissioners, the provider and HMP Bronzefield.</p>

9	<p>Sodexo should ensure that its operational systems are compliant with the intercollegiate document 'Safeguarding Children and Young People: Roles and Competencies for Healthcare Staff'.</p> <p>1. <a href="https://www.rcn.org.uk/professional-development/publications/pub-007366">https://www.rcn.org.uk/professional-development/publications/pub-007366</a></p> <p>2. <a href="https://www.rcn.org.uk/professional-development/publications/pub-007366">https://www.rcn.org.uk/professional-development/publications/pub-007366</a></p>	Sodexo				
10	<p>Sodexo healthcare should ensure that it has an effective clinical protocol to ensure that records of pregnant women who have a child protection plan for their unborn child are appropriately flagged according to national guidelines</p>	Sodexo				
11	<p>Sodexo healthcare should ensure that minutes of child protection meetings and copies of child protection plans are obtained for all pregnant women where there is a child protection plan in place</p>	Sodexo				
12	<p>The head of healthcare should ensure that in cases where safeguarding issues are identified consideration must be given to obtaining previous history via community medical records. Concerns with regard to information sharing should not stand in the way of effective safeguarding</p>	Sodexo				

13	The head of healthcare and the lead GP should review the system and revise the process for identifying community GPs, identification of the GP can be made via the "Lost GP" service if only incomplete details are held. The revised process should ensure that women are asked for details of their GP on more than one occasion to allow time for reflection and recall	Sodexo				
14 PPO 3	The head of healthcare at HMP Bronzefield must establish a clear process for emergency responses involving births in the prison to ensure that immediate practical basic assistance can be provided	Sodexo				
15 PPO 2e	The prison director, the head of healthcare and the director of midwifery at ASPH must commission further training in relation to trauma informed care in action to be undertaken jointly by prison clinical staff and midwives. This training must be focused on prioritising the pregnant women's needs above those of the general custodial environment, effective processes of working together and clear communication	Sodexo ASPH				
16	The Board level oversight and governance from ASPH of the service it provides at the prison should be reviewed to provide assurance that clinical and other risks are assessed and mitigated where possible	ASPH				

17	ASPH must ensure that appropriate professional clinical supervision is provided for the midwives working at HMP Bronzefield. Supervision external to the team providing the service should be considered to counteract the effects of a small specialised and isolated service. Ideally this supervision should be external to the team and contain within it, reflection on the effects of the custodial environment	ASPH				
18	ASPH must review and adapt the frequency and management of regular safeguarding supervision for their safeguarding specialists to develop their understanding of the wider safeguarding processes, identification of risk and raising concern whilst ensuring their compliance with the supervision process. Attendance at such supervision must be mandatory and regular appraisal of engagement with the process should be undertaken for each individual	ASPH				
19 PPO 4	The prison director, the Sodexo head of healthcare and the Director of Midwifery at ASPH should commission an independently facilitated session for their staff to enable a reflective discussion to consider all aspects of this case	Sodexo ASPH				
20	Sodexo health and Cimmaron should consider the need for regular and consistent GP input to ensure a degree of clinical continuity. At the time of the incidents described the general practitioners were mainly peripatetic locums	Sodexo				

21	The head of healthcare and the lead GP of the prison health service with input from the maternity service should review the role of the GP in the provision of maternity care and establish what this needs to be in a custodial environment	Sodexo ASPH CCG	Accepted	Complete		The GP service has been included as part of the Maternity Services pathway which is now operational.
22	Sodexo health and Cimmaron should review the present system for discharge communication to community GPs in case where significant health and health related issues have occurred. In these cases a detailed discharge summary should be created and sent to the GP with a view to provide on-going care	Sodexo				

23	The Local area CDR Team/CDOP should define how they will review the circumstances of all baby and child deaths (live and stillborn) occurring in HMP Bronzefield to identify learning and areas of good practice. Links should be made to any national fora to maximise learning	CDR/CDOP	Accepted	Complete		<p>"Following the unexpected death of a baby at a local Surrey Prison, the CDR Team were invited to support the investigation by the Prison and Probation Ombudsman (PPO) and an NHS England Independent Clinical Reviewer following recommendation from the incumbent Secretary of State for Justice. This report has led to significant changes and improvements to service not only across the prison estate and local midwifery provider but also national policy as the team were involved in providing comment on draft policy for both Her Majesty's Prison and Probation Service (HMPPS) and Her Majesty's Inspectorate of Prisons (HMIP).</p> <p>The CDR Team are now providing support to Mother's in prison who lose a child to create memory boxes and trinkets, support arranging a funeral that facilitates full parental choice, ashes collection and the option of a private goodbye with their baby in the prison chapel. There has been agreement between the Prison and CDR team that a Child Death Review will also take place after every stillbirth occurring within the prison to ensure optimum learning opportunities and to provide an external report to the prison capturing learning and the identification of care excellence. This review will also capture the views of the mother and staff. The Child Death Review for a baby or child within a secure setting such as a prison has been embedded into the CDR pathway and agreed with the Prison management.</p>
24	The Director of HMP Bronzefield and the Corporate leads for health and quality at Sodexo must review the safeguarding roles and responsibilities for babies living within the MBU for the times when the Nursery is not in operation in line with Working Together to Safeguard Children (HM Government, 2018) in order to produce a clear policy and procedure for staff to follow. In addition, this review should consider the need for such approaches in the wider prison to ensure that staff understand their responsibilities in safeguarding unborn children	Sodexo CCG ASPH	Accepted	Complete		Verified with ASPH that safeguarding midwives are in post, accessing clinical supervision and management support

<p>25 PPO 2e</p>	<p>Sodexo healthcare should ensure that safeguarding children training for all staff working on the MBU is provided at an appropriate level and that training is mandatory for this staff group</p>	<p>Sodexo</p>				
<p>26 PPO 2e</p>	<p>Sodexo healthcare should ensure that all staff who work on MBU access annual paediatric specific resuscitation and basic first aid training</p>	<p>Sodexo ASPH</p>				



<p>27</p> <p>PPO 5a 5b</p>	<p>Sodexo healthcare should obtain external expert advice about the level of training and expertise that should be available in the prison in relation to neonatal and child resuscitation. This should include advice about the equipment that should be provided</p>	<p>Sodexo</p>				
<p>28</p> <p>PPO 10</p>	<p>Sodexo in discussion with NHSE and Surrey Heartlands CCG should consider the most direct method to deliver care to the mothers, babies and children living as a family unit within the MBU</p>	<p>Sodexo CCG ASPH</p>	<p>Accepted</p>	<p>In Progress</p>	<p>30/06/21</p>	<p>"This recommendation will be met by the work carried out by the health and commissioning working group that has been convened.</p> <p>Public Health Principal has been invited to join the working group and oversees the provision of health visiting. Clinical and managerial supervision is in place for health visitors. The contract and commissioning arrangements will be reviewed when commissioning lines for maternity services are agreed.</p> <p>Work has begun to ensure that assurance regarding the health visiting offer is robust, the contract reviewed and appropriate, and equality of access to healthcare, education and other opportunities for children living in their family unit within HMP Bronzefield.</p> <p>"</p>

## ASPH

Paragraph/ Reference Number	Recommendation	Responsibility	Accept / Reject	Current Status	Target Comp Date	ASPH Position
1  PPO 2b	Sodexo and ASPH must establish a maternity pathway which follows best practice and which makes clear roles, responsibilities and systems of escalation. This must include a process for those women who fail to engage with services and should include access to psychological and psychiatric service assessment and support	Sodexo CCG ASPH	Accepted	Complete		ASPH has developed an enhanced maternity service model which forms part of the local draft service specification for maternity services at HMP Bronzefield. The specification describes the interface between maternity service, perinatal mental health and prison staff to improve engagement and support for new and expectant mothers.
2  PPO 2 2a	ASPH and the CCG must review as a matter of urgency the resource available to provide this service. This should be informed by the issues identified in this report and by the experiences of the staff who work there at present. Any proposed changes should be subject to robust risk assessment and consideration of possible consequences	Sodexo CCG ASPH	Accepted	Complete		ASPH worked with Bronzefield to review the capacity and demand of the maternity service and used this review to inform the proposed enhanced maternity model.

3 PPO 5a	Sodexo healthcare must identify an appropriately qualified clinical midwifery lead to help them consider all aspects of perinatal care within HMP Bronzefield and to develop a more comprehensive pathway and to offer effective leadership	Sodexo CCG ASPH	Accepted	Complete		Willow team is the midwifery team delivering maternity services within HMP Bronzefield, led on site by the team leader with senior support and clinical supervision by the Head of Midwifery. The consultant obstetrician also offers clinical leadership and support.
4 PPO 2d	ASPH and the prison should ensure that midwives have remote access to the SystmOne records from their hospital base	NHSE CCG ASPH	Accepted	Complete		Logins to SystmOne have been requested for all staff.
5	The prison director and the Sodexo corporate head of healthcare must review the remit of the maternity liaison committee to ensure that it is appropriately focused on its task of improving quality and systems	NHSE CCG ASPH	Accepted	Complete		ASPH Consultant obstetrician and other staff attend the pregnancy review boards to discuss the healthcare needs of new and expectant mothers within HMP Bronzefield.
6 PPO 2c	Ensure that the maternity service is sufficiently resourced to provide remote access for the ASPH midwives to SystmOne;	Sodexo ASPH	Accepted	Complete	30/06/21	ASPH staff now have access to System One and Sodexo ensure that all new staff have appropriate access to IT systems  Midwife cover is now provided five days per week with onsite System One access. In addition the Obstetrician has on site access to System One

<p>7 PPO 2c</p>	<p>Sodexo healthcare needs to establish a robust and reliable system for effective information sharing between the MBU and the healthcare team</p>	<p>Sodexo</p>				
<p>8</p>	<p>The head of healthcare at HMP Bronzefield must review the oversight and support arrangements for MBU with a view to developing effective clinical leadership, clinically appropriate decision making and day to day operational clarity for staff</p>	<p>Sodexo CCG ASPH</p>	<p>Accepted</p>	<p>In progress</p>	<p>30/06/21</p>	<p>ASPH will accept the contract and deliver against the service specification as soon as formally agreed. Current delivery has been mobilised at risk.</p>

9	<p>Sodexo should ensure that its operational systems are compliant with the intercollegiate document 'Safeguarding Children and Young People: Roles and Competencies for Healthcare Staff'.</p> <p>1. <a href="https://www.rcn.org.uk/professional-development/publications/pub-007366">https://www.rcn.org.uk/professional-development/publications/pub-007366</a></p> <p>2. <a href="https://www.rcn.org.uk/professional-development/publications/pub-007366">https://www.rcn.org.uk/professional-development/publications/pub-007366</a></p>	Sodexo				
10	<p>Sodexo healthcare should ensure that it has an effective clinical protocol to ensure that records of pregnant women who have a child protection plan for their unborn child are appropriately flagged according to national guidelines</p>	Sodexo				
11	<p>Sodexo healthcare should ensure that minutes of child protection meetings and copies of child protection plans are obtained for all pregnant women where there is a child protection plan in place</p>	Sodexo				

12	The head of healthcare should ensure that in cases where safeguarding issues are identified consideration must be given to obtaining previous history via community medical records. Concerns with regard to information sharing should not stand in the way of effective safeguarding	Sodexo				
13	The head of healthcare and the lead GP should review the system and revise the process for identifying community GPs, identification of the GP can be made via the "Lost GP" service if only incomplete details are held. The revised process should ensure that women are asked for details of their GP on more than one occasion to allow time for reflection and recall	Sodexo				
14 PPO 3	The head of healthcare at HMP Bronzefield must establish a clear process for emergency responses involving births in the prison to ensure that immediate practical basic assistance can be provided	Sodexo				

<p>15</p> <p>PPO 2e</p>	<p>The prison director, the head of healthcare and the director of midwifery at ASPH must commission further training in relation to trauma informed care in action to be undertaken jointly by prison clinical staff and midwives. This training must be focused on prioritising the pregnant women's needs above those of the general custodial environment, effective processes of working together and clear communication</p>	<p>Sodexo ASPH</p>	<p>Accepted</p>	<p>Complete</p>		<p>ASPH staff have attended trauma informed care training and feedback has been that this was helpful and helped to create a new approach towards engaging people who find it difficult to engage with healthcare staff.</p>
<p>16</p>	<p>The Board level oversight and governance from ASPH of the service it provides at the prison should be reviewed to provide assurance that clinical and other risks are assessed and mitigated where possible</p>	<p>ASPH</p>	<p>Accepted</p>	<p>Complete</p>		<p>The Willow team is subject to the same quality and governance assurance as all other teams in ASPH, including cyclical reporting through the maternity service to the Trust Board.</p>
<p>17</p>	<p>ASPH must ensure that appropriate professional clinical supervision is provided for the midwives working at HMP Bronzefield. Supervision external to the team providing the service should be considered to counteract the effects of a small specialised and isolated service. Ideally this supervision should be external to the</p>	<p>ASPH</p>	<p>Accepted</p>	<p>Complete</p>		<p>The Willow team will deliver the HMP Bronzefield maternity service, under the leadership of the clinical lead and the Head of Midwifery. They will form part of the ASPH wider team and will access support, training and supervision in the same way as their colleagues within the hospital environment. They will have the additional support they need from the team leader overseeing delivery of service in HMP Bronzefield.</p>

	team and contain within it, reflection on the effects of the custodial environment					
18	ASPH must review and adapt the frequency and management of regular safeguarding supervision for their safeguarding specialists to develop their understanding of the wider safeguarding processes, identification of risk and raising concern whilst ensuring their compliance with the supervision process. Attendance at such supervision must be mandatory and regular appraisal of engagement with the process should be undertaken for each individual	ASPH	Accepted	Complete		Safeguarding midwives are currently in post and engage with clinical supervision and appraisals as part of their practice and personal development plans.
19 PPO 4	The prison director, the Sodexo head of healthcare and the Director of Midwifery at ASPH should commission an independently facilitated session for their staff to enable a reflective discussion to consider all aspects of this case	Sodexo ASPH	Accepted	Not due	30/09/21	ASPH will work in partnership with Surrey Heartlands CCG who will draw together learning from across all stakeholders and put a learning event together to share the learning once the arrangements have been fully mobilised.



20	Sodexo health and Cimmaron should consider the need for regular and consistent GP input to ensure a degree of clinical continuity. At the time of the incidents described the general practitioners were mainly peripatetic locums	Sodexo				
21	The head of healthcare and the lead GP of the prison health service with input from the maternity service should review the role of the GP in the provision of maternity care and establish what this needs to be in a custodial environment	Sodexo ASPH CCG	Accept	Complete		ASPH engages with the pregnancy review boards, in which healthcare and primary care can raise any issues with maternity care of individual women in prison. Consultant obstetrician and midwife advice is available between each board.
22	Sodexo health and Cimmaron should review the present system for discharge communication to community GPs in case where significant health and health related issues have occurred. In these cases a detailed discharge summary should be created and sent to the GP with a view to provide on-going care	Sodexo				

23	<p>The Local area CDR Team/CDOP should define how they will review the circumstances of all baby and child deaths (live and stillborn) occurring in HMP Bronzefield to identify learning and areas of good practice. Links should be made to any national fora to maximise learning</p>	CDR/CDOP				
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24	<p>The Director of HMP Bronzefield and the Corporate leads for health and quality at Sodexo must review the safeguarding roles and responsibilities for babies living within the MBU for the times when the Nursery is not in operation in line with Working Together to Safeguard Children (HM Government, 2018) in order to produce a clear policy and procedure for staff to follow. In addition, this review should consider the need for such approaches in the wider prison to ensure that staff understand their responsibilities in safeguarding unborn children</p>	Sodexo CCG ASPH	Accepted	Complete		Safeguarding midwives are in post and deliver perinatal care in Bronzefield. The local authority provides health visiting services into the MBU.
25 PPO 2e	<p>Sodexo healthcare should ensure that safeguarding children training for all staff working on the MBU is provided at an appropriate level and that training is mandatory for this staff group</p>	Sodexo				

26  PPO 2e	Sodexo healthcare should ensure that all staff who work on MBU access annual paediatric specific resuscitation and basic first aid training	Sodexo ASPH	Accepted	Complete	All ASPH staff who attend HMP Bronzefield have appropriate training in paediatric resuscitation and immediate support.
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<p>27</p> <p>PPO 5a 5b</p>	<p>Sodexo healthcare should obtain external expert advice about the level of training and expertise that should be available in the prison in relation to neonatal and child resuscitation. This should include advice about the equipment that should be provided</p>	<p>Sodexo</p>				
<p>28</p> <p>PPO 10</p>	<p>Sodexo in discussion with NHSE and Surrey Heartlands CCG should consider the most direct method to deliver care to the mothers, babies and children living as a family unit within the MBU</p>	<p>Sodexo CCG ASPH</p>	<p>Accepted</p>	<p>Complete</p>		<p>ASPH has drafted the enhanced maternity service model which describes the offer and will work with colleagues to ensure delivery interfaces with other services to hand care over to primary care and local authority commissioned health visiting as appropriate.</p>