



PRISONS ORG UK LTD

Opening up the Closed World of Prisons

PO Box 823

HIGH PEAK SK22 9AL

Tel 0845 474 0013. Fax 0844 8246411

e: customer.services@prisons.org.uk

Co Reg Number: 05949117. VAT Reg: 895-907166

Reg Office: *Calcutt Matthews, 19 North St, Ashford, Kent. TN24 8LF*

Peter Clarke

HM Chief Inspector of Prisons.

Victory House (6th Floor)

30-34 Kingsway

London WC2B 6EX

3rd August 2017.

Dear Peter,

No doubt you will have seen the media coverage on the serious issue of failing [fire safety in prisons](#) today?

I write to ask if you will in future take with you during your inspection of prisons specialist Guest Inspectors from all disciplines for which the Inspectorate does not have in-house experts - and especially one from the Crown Properties Fire Inspection Group (CPFIG) to inform you about fire safety in the prison you are inspecting?

Currently you do not concern yourself with inspecting fire safety, and I fail to understand this irrational approach.

But more seriously your current approach to prison inspections, and your failure to address fire safety, demonstrably results in reports that are completely misleading.

Let me explain.

Your approach is irrational because you do not concern yourself with 'fire safety' on the basis that fire safety is the responsibility of a separate statutory regulator - CPFIG.

Yet you always inspect and report on 'healthcare' during your inspections, despite the fact that healthcare is the responsibility of another separate statutory regulator, the Care Quality Commission (CQC).

This approach doesn't make any sense.

You report on healthcare because you take along with you a Guest Inspector from the CQC; so why not take with you a Guest Inspector from CPFIG to report on fire safety?

Both are critical issues of health and safety.

More seriously, however, your current flawed approach to this results in reports that are misleading, and here is why.

Between 20th February and 3rd March 2017 [you inspected HMP Coldingley](#) where you concluded in terms of 'Safety' that: "**Outcomes for prisoners were reasonably good against this healthy prison test.**"

But that simply wasn't true.

Three weeks after your Inspection, on 29th and 30th March 2017, [CPFIG Inspected Coldingley](#) and they found that in terms of fire safety the place was so dangerous they served the prison with a Statutory Non-Compliance Notice, giving them 28 days to correct the fire safety defects or they would issue a Crown Enforcement Notice.

CPFIG Inspection found failings, among other things, that included:

- The procedure is not always followed for removing cigarette lighters and matches from prisoners in Segregation who appear to be at increased risk of self-harming through fire.
- Normal and/or emergency lighting doesn't provide sufficient illumination to implement the Cell Fire Response plan including the removal of a prisoner from the cell.
- The measures to reduce the spread of fire and smoke were inadequate.
- There was insufficient evidence available to demonstrate the effectiveness of the smoke control arrangements for E wing after it was confirmed to have extraction only.
- The generic cell fire response plan was not suitable for the circumstances in which prisoners are not locked in their cells (night san).
- The training package delivered to staff does not provide sufficient practical instruction on the use of Inundation equipment.
- An insufficient number of prison staff members working in residential wings are in date with their training in RPE wearing.
- The number of trained prison response staff members available was not always sufficient to implement the cell fire response plan effectively.
- The fire safety measures were not always being tested and maintained in good condition and effective working order.

How on earth could you describe this less than a month earlier as a 'safe' prison?

Had you taken with you a Guest Inspector from CFIG during your inspection the fire safety failures identified less than a month after you left would have been identified sooner, removing the risk to life that your flawed approach allowed to continue unchecked - and which you signed off as 'safe'.

What we need is obvious: a joined up Prisons Inspectorate

You are the Chief Inspector of Prisons, and '*Prisons*' means what it says.

Conducting an inspection of a 'Prison' is not like some *a la carte* menu, where you pick and choose what parts you want to inspect and those you choose to ignore - it is the 'prison' as a whole that should attract your full attention; as indeed it used to do.

Lord Ramsbotham, HM Chief Inspector of Prisons from 1995 to 2001, told me in a recent email communication that during his time as Chief Inspector: "*We always took a Civil Engineer, who looked at Fire Safety, he once prevented HMP Canterbury from blowing up because he found that the boiler had been installed the wrong way round!*"

I do not mean to be rude, but you will be the first to admit that you have little experience of prisons, and certainly no operational experience of managing one. After 34 years as a police officer, and just over a year into your current job, it's hardly surprising.

Given that lack of operational prison experience it is vital that to discharge your obligations as Chief Inspector of Prisons properly you surround yourself with as many relevant experts as possible; and your lamentable failure to identify the serious fire safety defects at HMP Coldingley in March 2017 demonstrate beyond doubt that from this point on your inspection teams must include an expert on fire safety.

Grenfell changed everything, and that means it has to change things inside HM Prisons Inspectorate too.

With 2,580 fires in prisons during 2016, almost 50 blazes a week, having missed the glaringly obvious fire defects at Coldingley in March this year and after Grenfell, I hope to find that I am knocking at an open door.

I look forward to your response.

Kind regards

Yours sincerely,



Mark Leech FRSA

Editor: The Prisons Handbook.