Action Plan in response to the PPO Report into the death of

Mr Michael Pugh on 29 June 2024 at HMP Swaleside

Rec No	Recommendation	Accepted / Not accepted	Response Action Taken / Planned	Responsible Owner and Organisation	Target Date
1	The Governor should introduce a robust audit process to check the accuracy of recorded ACCT checks against CCTV to assure herself that there is not a systemic issue with false entries.	Accepted	HMP Swaleside introduced a monthly ACCT CCTV quality assurance (QA) check in November 2024. This process involves a member of the Senior Leadership Team selecting an ACCT document at random during routine night assurance checks. They take a note of the details recorded within it, including timings of ACCT check observations for the preceding 24-hour period, before viewing CCTV footage and any available body worn video camera footage to examine the accuracy of the recorded ACCT checks. Any discrepancies discovered are escalated to the Deputy Governor to consider whether further action should be taken, which may include the commissioning of a formal investigation.	Head of Safety, HMPPS	Completed
2	The Director General of HMPPS should communicate to Governors	Accepted	The Director General will issue a notice to Governors outlining the expected action to be	Director General, HMPPS	February 2025

OFFICIAL - FOR PUBLIC RELEASE

and Directors his expectation that in all but the most exceptional of circumstances, when there is	taken should cases of apparent falsification of ACCT records be discovered.	
evidence of making deliberate false entries, a formal investigation is instigated and, in appropriate circumstances disciplinary action follows.	Any identified incidences of apparent falsification of ACCT records must be reported to the police, and if a criminal investigation does not take place, an internal investigation must be commissioned.	