





Independent Advisory Panel on Deaths in Custody

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The Rt. Hon. Matt Hancock MP Secretary of State for Health and Social Care

Dear Secretary of State,

COVID-19 vaccinations for all prisoners and prison staff

Thank you for your letter of 23 March in which you outlined advice from the Joint Committee on Vaccination and Immunisation (JCVI). We are grateful for your ongoing commitment to keep matters under review and to act in response to the best scientific evidence available.

You and your department and the JCVI will have received, and have under urgent consideration, the comprehensive report by the Scientific Group on Emergencies (SAGE) on the transmission of COVID-19 in prison settings produced on 25 March and published on 23 April:

The IAPDC advices that there are three main grounds for this report to prompt immediate action to enable you to meet your obligation to protect lives:

- Public health In its report SAGE issues a clear warning that 'Prisons will remain at high risk of outbreaks even when disease levels in the community are low because importation of a single case can lead to a large outbreak (High confidence). Without high levels of immunity or continued intensive control measures prisons could in future become amplifiers or reservoirs of infection, including variants of concern (High confidence)'.
- Prison health SAGE issues a clear warning that 'The current severe restrictions employed have a highly negative effect on mental health of prisoners and their families and rehabilitation (High confidence). In the absence of universal vaccination of staff and prisoners it is likely that these measures will need to be continued for many more months (High confidence)'.

• The principle of equivalence - SAGE records evidence of higher levels of infection in prison than in the general population, higher rates of hospitalisations and higher associated mortality in prisoners and prison officers. The report highlights health inequalities and significantly higher levels of risk and vulnerability. Prison staff, as part of protective services, are now considered by ONS to be the occupational group most at risk of contracting the virus. On JCVI advice your department has already applied the principle of equivalence, with reasoning, to other vulnerable populations, such as the residents and staff in care homes and, more recently, people who are homeless and carers. In November 2018, Government accepted the recommendation made by the Health and Social Care Committee following its inquiry into prison healthcare, to define 'the principle of equivalence in healthcare'. Our reading of this is that greater need calls for a commensurate response in order to achieve equitable health outcomes and, in this case, keep people safe:

For people in custody, COVID has meant being held in a prison within a prison. While severe restrictions and extreme isolation imposed at the outset of the pandemic undoubtedly saved lives, the toll on mental and physical health is high and rising. What amounts to a massive, unregulated, and now needlessly protracted, experiment in extreme social isolation in our prisons must be brought swiftly and carefully to a close.

Universal vaccination will enable the NHS in prisons and HMPPS to focus on recovery and introduce measures to mitigate risk and prevent self-inflicted and other deaths in custody. Of the almost 17,000 men, women and young people who have contracted COVID in custody since the pandemic began, many are still incarcerated and will be suffering from long COVID. Additional support for prisoners and staff will need to be introduced.

It is vital to act now on the evidence and modelling from, and conclusions drawn by, your own scientific advisors to protect the lives of prisoners, staff and the wider community. SAGE provides clear and pressing reasons to vaccinate people held in prison settings and the staff who care for them, not piecemeal by age, but all at once and immediately. The IAPDC believes that you have a sound scientific basis for making the right decision. We were pleased to note that the SAGE report attracted straightforward reporting to that effect in the Mail, Guardian, Mirror, Standard, Times, Metro and other media sources.

As ever, Juliet Lyon

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