

FOI HywelDda (Hywel Dda UHB - Freedom of Information)

From: [REDACTED] (Hywel Dda UHB - Head of Corporate Office)
Sent: 09 October 2020 11:26
To: [REDACTED]
Cc: [REDACTED] (Hywel Dda UHB - Chair); [REDACTED] (Chief Executive - Hywel Dda University Health Board); [REDACTED] (Hywel Dda UHB - Director Of Public Health)
Subject: RE: Penally Army Training Camp
Attachments: MOD Penally Site - Infection Prevention and Control

[REDACTED]
[REDACTED] (Director of Public Health) escalated her concerns to [REDACTED] in person – supported by the attached email (that sets out these concerns in more detail). In addition, a letter is also being sent today concerning the private nurse that will include a proposal for the service.

Regards
[REDACTED]
[REDACTED]

Cyfarwyddwr Cynorthwyol Gwasanaethau Cyfreithiol Corfforaethol a Materion Cyhoeddus/Assistant Director of Corporate Legal Services and Public Affairs

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Parc Dewi Sant/St David's Park
Heol Jobswell/Jobswell Road
Caerfyrddin/Carmarthen
SA31 3BB

Ffon/Telephone: [REDACTED]

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From: [REDACTED] <[REDACTED]>
Sent: 09 October 2020 10:10
To: [REDACTED] (Hywel Dda UHB - Head of Corporate Office) <[REDACTED]>
Cc: [REDACTED] (Hywel Dda UHB - Chair) <[REDACTED]>; [REDACTED] (Chief Executive - Hywel Dda University Health Board) <[REDACTED]>; [REDACTED] (Hywel Dda UHB - Director Of Public Health) <[REDACTED]>
Subject: Re: Penally Army Training Camp

Thanks for that. If you can inform me what these escalated concerns are I would be very grateful.

From: [REDACTED] (Hywel Dda UHB - Head of Corporate Office) <[REDACTED]>
Sent: Friday, October 9, 2020 9:14:45 AM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] (Hywel Dda UHB - Chair) <[REDACTED]>; [REDACTED] (Chief Executive - Hywel Dda University Health Board) <[REDACTED]>; [REDACTED] (Hywel Dda UHB - Director Of Public Health) <[REDACTED]>
Subject: RE: Penally Army Training Camp

Good morning [REDACTED]

To provide you with the latest position, I confirm that last night the Director of Public Health escalated two significant concerns at the Penally site formally to the Home Office:

1. COVID-19 management; and
2. Governance issues regarding the private nurse who has been placed on site by Clear Springs Ready Home but by the HO instruction.

Regards

Cyfarwyddwr Cynorthwyol Gwasanaethau Cyfreithiol Corfforaethol a Materion Cyhoeddus/Assistant Director of Corporate Legal Services and Public Affairs

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From: [REDACTED] (Hywel Dda UHB - Head of Corporate Office)

Sent: 08 October 2020 18:03

To: [REDACTED]

Cc: [REDACTED] (Hywel Dda UHB - Chair) <[REDACTED]>; [REDACTED] (Chief Executive - Hywel Dda University Health Board) <[REDACTED]>; [REDACTED] (Hywel Dda UHB - Director Of Public Health) <[REDACTED]>

Subject: RE: Penally Army Training Camp

Good afternoon [REDACTED]

In response to the two questions you raised yesterday:

- (i) *Could you urgently provide the evidence of your earlier advice to the HO that you refer to, and in which you advise against use of this site for Covid related reasons. This is vital as we have all been told that Covid compliance has been on the advice of PHW?*

Governance: the Director of Public Health of Hywel Dda UHB chairs:

- Daily check in calls with partners (1pm); and
- Twice weekly Health Response meetings.

To respond to your request for evidence, it may assist if I provide you with a timeline to support our position:

- 16 Sep 2020: At circa 2.45pm, Hywel Dda UHB (the HB) was contacted by the Home Office to confirm that the Penally site would be used as an Asylum Seeker Temporary accommodation site.
- 17 Sep 2020: At circa 9.30am, the HB immediately established a Health Resources Sub-Group, chaired by the Director of Public Health and comprising Public Health Wales (PHW), Pembrokeshire County Council (TTP Health Protection), and HB teams (Primary Care, Emergency Planning, Information Governance, Equality & Diversity, Withybush management and an Associate Medical Director). This Sub-Group includes members from Clear Springs Ready Homes.

- 18 Sep 2020: Following this meeting, the Director of Public Health sent an email to [REDACTED] and [REDACTED] (Clear Springs Ready Homes) with a detailed Risk Assessment, setting out 19 Infection Prevention points and actions, and 19 recommendations for Covid Planning; Infection Prevention; Medical Facilities; and Environmental Considerations; a copy of these two Tables are attached. To date, there has been some limited progress but these have not been implemented fully.
- 22 Sep 2020: Following a meeting of the Health Response Sub-Group, the Director of Public Health raised concerns with the Strategic Group [REDACTED], HO) and the Tactical Group [REDACTED]. These were about personal safety of HB staff attending the site; the need for warning of new young men arriving on site; and chasing responses to the recommendations provided on 18 Sep 2020 (attached).
- 28 Sep 2020: Following the arrival of a further 28 young men on the site that day, the Director of Public Health raised concerns with [REDACTED] and [REDACTED] (HO) about the lack of personal and health information needs for these young men. She also provided PH advice about the need for these young men to self-isolate for 14 days prior to arriving at the site. A response received the same day confirmed that the HO had tried to contact the HB at 8.30am that morning but failed (the men arrived at about 11.30am).
- 8 Oct 2020: There was a site visit today attended by all blue light services, PCC and Primary Care. Although there has been some progress in implementing the 19 recommendations, there remain a number of serious concerns, including:
 - The identified 18 isolation rooms were being used as bedrooms and were therefore unavailable;
 - Concerns around clinical governance about the nurse on site (agency);
 - Unknown health needs and personal information about these young men;
 - Unknown and unexpected arrivals on site.

This Health Resources Sub-group is focused on developing clear and specific action cards, protocols and guidance to support the Site Management Team implement the guidance given in the Infection Prevention & Control Risk Assessment (attached) and the Public Health Wales *Contingency Plan for the investigation and management of communicable diseases and Covid-19 in Penally Camp*. Both documents have been developed specifically for the Penally Site.

We asked the Home Office to delay housing men on this site until we were prepared, it decided not to do so. Work is still on-going and we are supporting Clear Springs Ready Homes to provide us with appropriate assurance regarding the implementation and maintenance of all required safeguards. For example, our specific concerns relate to the management of the 'rule of six' and the provision of all required hygiene facilities on site. You will note from the above that these concerns have been raised with Clear Springs Ready Home and the HO.

In addition, the HB's CEO attends the Strategic Engagement Group Wales weekly meetings, chaired by [REDACTED] of the Home Office. He has raised public health/COVID concerns repeatedly at this forum, including the fact we only have 5 ICU beds and 229 beds available in Wylhelms Hospital, that the site is unsuitable, and we are in the middle of a pandemic.

The HB's Head of Emergency Planning attends the Operational Group, chaired by [REDACTED] at Migration Wales, and has raised Hywel Dda UHB Covid concerns at this group.

The Chair and CEO wrote to the Home Secretary on 25 September 2020, asking that the decision to use the site be reversed. No response has been received.

- (ii) *In addition, on this morning's call the HO reconfirmed that asylum seekers will have undertaken 2 weeks quarantine. Are you saying that you have evidence that this is not the case?*

It is also our understanding (from learning, conversations and daily discussions between the health team and the management team) that the young men, prior to arriving at the Penally Site, are based in a large number of hotels across multiple London Boroughs and in Bristol. Whilst they are housed in hotel accommodation, which we have been assured comprise of single rooms with a bathroom, they are not detained and remain at liberty to leave their accommodation at any time and mix with their local

communities. Whilst they may be housed in this or similar accommodation for 14 days or more prior to being transferred to the Penally Camp, this does not constitute a formal 14-day self-isolation period, immediately prior to travelling to and arriving at the Penally Site. We raised our concerns and advice about this directly with the Home office on 28 September 2020. We have advised the men self-isolate on arrival. This was not accepted by the Home Office.

The evidence we have to support our continuing concerns includes concern identified at today's site visit when 16 young men were crowded around an indoor Pool Table and many close together in a queue to see the agency nurse.

If you think it would be helpful, [REDACTED] and [REDACTED] would like to invite you to have a discussion with them (and [REDACTED] and [REDACTED]) about this matter after tomorrow's political catch-up. Please let me know if you wish to take up this offer and I will arrange a Teams link.

Kind regards

[REDACTED]

[REDACTED]

Cyfarwyddwr Cynorthwyol Gwasanaethau Cyfreithiol Corfforaethol a Materion Cyhoeddus/Assistant Director of Corporate Legal Services and Public Affairs

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From: [REDACTED] <[REDACTED]>

Sent: 07 October 2020 16:33

To: [REDACTED] (Hywel Dda UHB - Head of Corporate Office) <[REDACTED]>

Subject: Re: Penally Army Training Camp

In addition, on this mornings call the HO reconfirmed that asylum seekers will have undertaken 2 weeks quarantine. Are you saying that you have evidence that this is not the case?

[REDACTED]

From: [REDACTED] (Hywel Dda UHB - Head of Corporate Office) <[REDACTED]>

Sent: Wednesday, October 7, 2020 4:13:14 PM

To: [REDACTED] <[REDACTED]>

Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]

(Hywel Dda UHB - Chair) <[REDACTED]>; [REDACTED] (Chief Executive - Hywel Dda University Health Board) <[REDACTED]>; [REDACTED] (Hywel Dda UHB - Director Of Public Health)

<[REDACTED]>; [REDACTED] (Hywel Dda Health Board - PA to the Chair, Vice-Chair & Independent Board Members) <[REDACTED]>

Subject: Penally Army Training Camp

Good afternoon

Please find attached a letter from the Chair, Chief Executive and Director of Public Health concerning Penally Army Training Camp.

Kind regards

Cyfarwyddwr Cynorthwyol Gwasanaethau Cyfreithiol Corfforaethol a Materion Cyhoeddus/Assistant Director of Corporate Legal Services and Public Affairs

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FOI HywelDda (Hywel Dda UHB - Freedom of Information)

From: [REDACTED]
Sent: 08 October 2020 17:51
To: [REDACTED]
Cc: [REDACTED] (Hywel Dda UHB - Director Of Public Health); [REDACTED] - Pembrokeshire CC; [REDACTED] (Hywel Dda UHB - ANP-Infection Prevention); [REDACTED] (Public Health Wales - Matrix House); [REDACTED]
Subject: MOD Penally Site - Infection Prevention and Control
Attachments: Action Card on Managing Suspected COVID-19 SU in Penally Camp v1.pdf; Action Card on Managing Confirmed COVID-19 SU in Penally Camp v1.pdf
Importance: High

Dear [REDACTED]

I refer to Tuesday's teleconference that was attended by:

[REDACTED] Senior Health Protection Nurse, Health Protection Division, Public Health Wales
[REDACTED] Advanced Nurse Practitioner (Infection Prevention and Control), Hywel Dda University Health Board (**Primary point of contact for infection prevention and control purposes**)
[REDACTED] Public Protection Manager (Health and Consumer Protection), Pembrokeshire County Council
[REDACTED] Project Manager COVID-19 Contact Tracing Team, Pembrokeshire County Council
[REDACTED] Operational Team Leader Wales, representing Clearsprings Ready Homes Ltd.

The meeting had been arranged to provide CRH Ltd. with an opportunity to update the organisations represented regarding the progress made in securing appropriate arrangements on site for infection prevention and control, with a key focus on the risk presented by COVID-19 disease, and to offer reassurance that matters were progressing in a positive direction.

While we appreciate the assistance that [REDACTED] sought to provide to the meeting, it quickly became evident that he was not the right person to be able to comment on these arrangements and what might be planned and could offer little assurance.

By the end of the meeting parties present were left with serious concerns which remain as follows:

- **Lack of information on the origin, history, health and disease status** of the service users. Linked to this it is unclear whether users will have been/will have undertaken a 14 day self-isolation period immediately before transferring to the Penally site or can be supported to do that on arrival.
- **Lack of infrastructure and facilities** to permit the establishment of limited contact groups, which will be key to minimising the risk of disease transmission throughout the site's population, with **scope for the rapid transmission of COVID-19 disease** in particular. While some consideration has recently been given to limiting the number of users sharing sleeping accommodation, these benefits will be negated by a lack of effective separation, physically or by time, in the use of toilets, washing and showering facilities, as well as by poor control over separation in other communal areas.
- Despite the fact the site has been operating a number of weeks and assurances were provided that additional **toilets and showers** would be procured to allow for better separation into contact groups, these have not yet been installed, yet the number of service users on site has continued to rise.
- The **cleaning and disinfection arrangements were viewed as insufficient to reduce the risk of disease transmission**, including as part of any COVID-19 disease prevention plan. This included routine cleaning and disinfection and the capacity to instigate additional cleaning and disinfection in response to an identified incident. Thrice daily cleaning by an external contractor is in itself insufficient.

- **Lack of clear arrangements as to how social distancing between groups will be organised and managed** from a practical perspective, which are critical from a COVID-19 disease control perspective.
- By admission **staffing levels on site are currently insufficient to allow for the effective monitoring and promotion/reinforcement of COVID-19 controls.**
- **No clear plans had been established for the effective management of suspected COVID-19 cases.** While a **limited number of isolation rooms** are currently available, dedicated toilet facilities, **showers and washing facilities were not associated with each unit**, let alone integral to, to allow for the service users to effectively self-isolate as required for disease containment purposes. In addition, the **arrangements for handling any potentially infected laundry and waste were unclear/not yet in place.** Given the lack of control measures in place the number of service users required to self-isolate might increase rapidly, exceeding the level of provision. It will also be important to ensure the effective separation of suspected cases from one another, given that some individuals might be COVID-19 positive while others might be suffering some other respiratory infection and be particularly vulnerable should they be exposed to COVID-19 infection on top.
- **Lack of clarity over how confirmed COVID-19 cases would be managed.** During the meeting it was suggested for the first time that anyone testing positive for COVID-19 disease would be returned to London by taxi. This presupposes that the individual/s concerned are well enough to travel. It is also unclear what provisions if any are currently in place for transfer to occur, how quickly this might be arranged, how this would be managed without risk to others or what capacity is available in London. Given the lack of adequate disease control measures in place on site, the mixing of the population and speed with which transmission might occur unchecked, especially given the potential for spread by asymptomatic and pre-symptomatic individuals, the number of service users requiring return has the potential to increase rapidly. While [REDACTED] indicated that if need be all 200+ of the sites occupants might need to return to London, he speculated whether presented with a large number of cases, they would probably need to be managed on site, again drawing attention to the inadequacies in the isolation arrangements.
- **Lack of a clear system for enabling contact tracing, with the support of interpreters as necessary,** both across the sites population and potential exposures that may arise in the local community.
- The **limited understanding and competence of Clearsprings representatives with regard to required health/infection prevention and control measures,** which may hinder the timely establishment of effective disease control measures and plans, with limited capacity to manage incidents that may arise, including but not limited to COVID-19 disease.
- While these concerns directly affect the **safeguarding of service users,** we are equally concerned given the freedom of movement at the **risk of disease transmission that might be presented to the local community,** where the prevalence of COVID-19 and other infectious diseases are relatively low.

Given the extent of our concerns and the risks identified, which would increase as the population grows, we would call for a temporary pause in further transfers to the site, pending arrangements on site being brought up to an appropriate standard.

These thoughts have been shared at senior levels of our respective organisations.

In moving forwards, we would ask that due consideration is given to our requests below.

Staffing numbers, roles, responsibilities and accountabilities

1. We would ask to be provided with details of personnel involved in the management and delivery of operations at the site, so that we have a clear understanding of the capacity and also roles, responsibilities and accountabilities from an infection prevention and control perspective. Please could work patterns/hours be broadly indicated so that the level of cover available at any given time is clear.
2. We would ask that this takes account of those responsible for standard operating arrangements and also those who would be involved when faced with an incident on site that requires escalation.

3. Contact details are requested for key personnel, so that we can communicate with the appropriate persons, or if it is easier that a single point of contact is offered for all matters, who can direct any communications to the most appropriate person for response.
4. Where activities are sub-contracted we would request that similar information is provided.

(Requested timescale: By Thursday 15 October at the latest)

Action Plans

5. Please could you provide copies of action plans and time schedules for addressing the infection prevention and control recommendations that were made following the two site visits on 18 September and any further measures that may be required to give effect to the advice and arrangements as set out in the Public Health Wales Contingency Plan for the Investigation and Management of Communicable Diseases and COVID 19 in Penally Camp v1 (created on the 21 September). The latter document provided to [REDACTED] and [REDACTED] on the 26th September.

It is recognised that compliance with these recommendations and advice will be fundamental to reducing the risk of disease transmission within the sites population and to the effective management of any cases/incidents of COVID-19 disease that may arise. The effective management of cases and incidents may not be practicable without the appropriate infrastructure, facilities and IPC arrangements.

(Requested timescale: By Thursday 15 October at the latest)

Company documentation

6. Please provide a list of all relevant documents utilised by the company from an infection prevention and control perspective e.g. risk assessments, SOPs, protocols, guidance (for both personnel and service users). These documents should make clear the standard operating arrangements and practices for the site, which should be designed to minimise the risk of infections being transmitted as well as any enhanced measures that may be required in response to an incident of disease.
7. Information to service users about social distancing measures and requirements both on and off site (incl. site rules), requirements relating to the wearing of face coverings, complying with track and trace arrangements, and information on respiratory and hand hygiene should all feature within this material.
8. While we have receive copies of certain documents at a fairly early stage, we are aware that some of these may have been revised in response to feedback received following the site visits on the 18 September, and we would therefore be grateful if you could provide up to date, electronic copies of these documents for our consideration, as well as any relevant documents not previously shared or which have been more recently developed.

(Requested timescale: By Thursday 15 October at the latest)

Action cards

9. To assist in the management of suspected and confirmed cases of COVID-19 on site we have attached two action cards for your use. As a matter of priority please could you endorse these arrangements and confirm your commitment to ensuring that these will be fully implemented, as required, with immediate effect. A further action card is being finalised covering the management of contacts of suspected/confirmed cases.

(Requested timescale: By Friday 9th October at the latest)

Site visit

10. We would be keen to arrange a further visit to the site in order to see first-hand the arrangements that have been put in place and to offer any further advice that might be needed or appropriate in order to support compliance.

(Requested timescale: Date to be arranged. Please confirm availability for relevant CRH Ltd representatives)

Review meetings

11. We would kindly request weekly meetings with the appropriate person/s from CRH Ltd. who can provide the group with an update on actions to comply with these requirements and wider developments on site – from an infection prevention and control perspective.

(Requested timescale: Date to be arranged. Please confirm availability for relevant CRH Ltd representatives)

Your prompt attention and response would be appreciated. Should you require any further information/assistance in the meantime please let us know.

Sent on behalf of:

██████████ – Pembrokeshire County Council

██████████ – Infection Prevention and Control, Hywel Dda University Health Board

██████████ – Health Protection, Public Health Wales

██████████
Public Protection Manager (Health and Consumer Protection) / *Rheolwr Diogelwch y Cyhoedd (Diogelwch Defnyddwyr a lechyd)*

Public Protection / *Amddiffyniad Cyhoeddus*

Pembrokeshire County Council / *Cyngor Sir Penfro*

County Hall / *Neuadd y Sir*

Haverfordwest / *Hwlfordd*

SA61 1TP

Tel / *Ffon* : ██████████

Fax / *Facs* : ██████████