



# Health and safety guidance for short scrutiny visits during the COVID-19 outbreak

## Introduction and context

1. HM Inspectorate of Prisons (HMI Prisons) has introduced short scrutiny visits as part of an adapted methodology to enable us to report on the treatment of and conditions for detainees during the COVID-19 pandemic. We will adhere to national public health advice and to the 'do no harm' principle at all times. This guidance sets out key processes that staff must follow and actions they must take when carrying out short scrutiny visits, to reduce risks to themselves, their household, prison staff and detainees.
2. The most recent World Health Organisation (WHO) guidance, published in March 2020, offers a comprehensive guide on the *Preparedness, prevention and control of COVID-19 in prisons and other places of detention*.
3. Staff are advised to familiarise themselves with this document for their own safety and the safety of others. Additional guidance below is based on specific HMI Prisons working practices.

## Who will be involved in short monitoring visits?

4. The WHO guidance is explicit about the importance of oversight and independent scrutiny during the pandemic:

'The COVID-19 outbreak must not be used as a justification for objecting to external inspection of prisons and other places of detention by independent international or national bodies whose mandate is to prevent torture and other cruel, inhuman or degrading treatment or punishment; such bodies include national preventive mechanisms under the Optional Protocol to the Convention against torture.'

*(Preparedness, prevention and control of COVID-19 in prisons and other places of detention, p.5)*

5. Most HMI Prisons staff will be asked to support the short scrutiny programme in some capacity, even if they are unable to undertake visits. Short scrutiny visits will be carried out by two to three inspectors, including a health care inspector.

## Key workers

6. The Ministry of Justice has agreed that inspectors carrying out short scrutiny visits will be designated as key workers, and will be issued with documentation to confirm this to any authorities seeking to understand the reason for travel. This should also allow staff to register and arrange key worker child care if required.

## Exclusions

7. Staff who are classified as more vulnerable to severe illness as a result of Covid-19 and/or who have recognised medical conditions are not required to attend the short scrutiny visits. In addition, national guidance indicates that some staff may also be at additional risk due to their caring responsibilities or family situations. These staff are required to discuss this with their line manager so that alternative working arrangements can be put in place.

## Frequency of deployment

8. HMI Prisons aims to reduce the likelihood of transferring the virus between establishments. While all possible steps will be taken to mitigate the risk of HMI Prisons staff contracting the virus while on a visit, the risk cannot be eliminated entirely. The programme therefore includes a 14-day hiatus for each inspector between visits to ensure that those who may have come into contact with the virus at one prison will have an adequate period to identify any emerging active infection before entering another site.

## Staff with symptoms

9. Staff may also contract the virus in the community. All staff must report any clinical signs of infection to their line manager and the Secretariat immediately, and must begin an appropriate length of self-isolation before returning to work. Symptoms may include a **high temperature** - this means you feel hot to touch on your chest or back (you do not need to measure your temperature); and a **new, continuous cough** - this means coughing a lot for more than an hour, or three or more coughing episodes in 24 hours (if you usually have a cough, it may be worse than usual). Staff are also expected to comply with the national social distancing guidance outside their household to reduce the risk of contracting the virus.

## Risk assessment

10. Before visiting an establishment, the team leader will consult with the Deputy Chief Inspector and Secretariat to undertake a dynamic risk assessment - based on information received from the establishment and additional intelligence gathered in the preceding 24 hours - to determine if the site remains suitable to visit. This will be carried out the day before deployment and revisited on arrival at the establishment.

## Travelling to and from establishments

11. Using public transport presents additional risk of infection. HMI Prisons staff should reduce this risk by using their own cars where possible, arranging a long-term hire car, or - for colleagues who do not drive - arranging for a taxi with a dividing screen between driver and passenger to take them from their home to the establishment (see paragraphs 18–20). Deployments will take into consideration where inspectors live and where they are able to travel to in a day, to eliminate the need for overnight stays in a hotel.

## Using your own car

12. A current Driving on Duty Risk Assessment should be in place. Newly completed forms should be sent to Lesley Young, Head of Finance, HR and Inspection Support and Umar Farooq, HR Manager. **Car insurance held by the member of staff must include business use.** Members of staff who need to arrange an increase of the level of insurance will not be able to recover any charges levied by their insurers. A copy of the insurance policy showing the required level of cover should be lodged with Lesley Young, Head of Finance, HR and Inspection Support and Umar Farooq, HR Manager.
13. Due to the current circumstances, members of staff should not carry passengers. If sharing cars is unavoidable, a single passenger can be carried for a short journey. The passenger should sit in the rear seat, behind the front passenger seat - giving the greatest separation distance between the two people in the vehicle.
14. Mileage claims should be made at the standard rate via SOP.

## Enterprise hire cars

15. Requests for cars should be made as normal by contacting Caroline Fitzgerald, Inspection Support Officer. Enterprise are delivering and collecting **all** cars. They will **not accept** any 'walk-in' or 'collect at branch' requests - those requests will be converted to delivery/collection bookings, with customers being charged the relevant fees. Caroline will advise on any issues.
16. When possible, members of staff should request a long-term hire from their first deployment until the completion of their last deployment. This will reduce the risks involved in changing vehicles and multiple pick-ups and drop offs. If retaining hire cars will cause problems with parking permits or other issues, please raise the matter and the costs involved with Lesley Young, Head of Finance, HR and Inspection Support.
17. Enterprise car hire are cleaning their hire vehicles between customers, but when first using the car, members of staff should check that the car is safe to use, including by cleaning the seat, steering wheel and controls.

## Taxis

18. Staff who do not drive should use taxis to attend deployments. Where possible, taxis with screens between the driver and passenger should be used to reduce the risk of infection. Members of staff should sit behind the front passenger seat to ensure maximum separation from the driver.
19. In London the following websites have pre-booking options which should be used:  
<https://www.londonblacktaxi.net/>  
<https://www.dialacab.co.uk>
20. Claims for fares should be made in the usual way via SOP and members of staff should ensure they include reference to the costs (which could be significant) incurred in carrying out key work due to COVID-19 in a note against the claims.

## Refuelling

21. Where possible, staff should use garages that offer a 'pay at pump' option, and should wipe the handle of the petrol pump before use. While balancing the need to refuel on multiple occasions, staff should aim to keep the refuelling costs below the limits permitted for contactless payment (most banks have raised the limit on debit and credit cards to £45 to

reduce the need to use keypads to make payments). Staff should sanitise their hands when they have finished refuelling.

## Hotels

22. Hotels will not be used during short scrutiny visits; staff who are unable to travel to reach the establishment by the agreed arrival time will be reallocated.

## Reducing transmission of the COVID-19 virus

23. The WHO identifies two main ways to transmit the infection (see section 7.3):

- *infection can be spread to people who are nearby (within 1 metre) by breathing in droplets coughed out or exhaled by a person with the COVID-19 virus; or*
- *people may become infected by touching contaminated surfaces or objects (fomites) and then touching their eyes, nose or mouth (e.g. a person may touch a doorknob or shake hands and then touch their own face).*

## Washing hands

24. Staff should wash their hands frequently and for at least 20 seconds. They should do this on arrival at an establishment, immediately when arriving back at home, and frequently during the visit. Staff should be aware that keys, locks, gates, railings and door handles are a high-risk contamination point. Staff should avoid touching their face after making contact with these surfaces. See page 8 for a practical guide on hand washing.

## Hand sanitiser

25. All staff should carry hand sanitiser if possible. It is more efficient for staff to purchase this themselves and claim back the costs from HMI Prisons. Staff should check that the sanitiser is effective against viruses.

## Clothing

26. HMI Prisons aims to prevent carrying the virus into an establishment by initiating specific precautions on arrival. Staff should wear clean clothing in the establishment, changing on arrival and departure. When returning home, clothing worn during the visit should be laundered at the maximum approved temperature: all underwear, towels and household linen should be washed at 60C (140F) or at 40C (104F) with a bleach-based laundry product to prevent germs from spreading.

## Bringing items into an establishment

27. Staff must limit the quantity of items they bring into an establishment. Laptops are not required. Bags should not be carried around wings unless attached to the person. Notepads should not be placed on surfaces, and pens should remain in the inspector's possession and not placed in the mouth.

## Keys

28. HMI Prisons staff should familiarise themselves with, and then comply with, the local guidance on hygiene requirements for key handling (for example, wiping down keys before and after use).

## Eating

29. Staff are encouraged to bring their own food and appropriate utensils, and to wash their hands thoroughly before eating all food, including fruit and sweets. All items taken home from the prison should be thoroughly washed and packed away after use.

## Social distancing

30. HMI Prisons staff are expected to maintain a two-metre distance from others while on the short scrutiny visit. Staff should be aware that some landings are less than two metres in width and should consider this when moving around the prison, making every effort to plan a route which enables them maintain distance from others.

## Visiting a normal wing/location

31. Staff should be careful when entering areas where air flow is limited, such as small offices and cells. Encourage people to talk in open spaces. Do not talk to prisoners through the gaps in cell doors as air flows can be directed to either person's face. If you wish to speak to a prisoner directly, the advice is to do this with the door open and standing at least two metres apart. Staff are reminded to undertake the usual security arrangements when opening a cell. When walking down narrow corridors and through gates, staff should be courteous, give way to others, and avoid these areas during any specified movements such as meals and exercise.

## Visiting a cohorted unit

32. Establishments are required to designate three separate units: a Reverse Cohorting Unit for the temporary separation for newly received prisoners; a Protective Isolation Unit for the temporary isolation of symptomatic prisoners; and a Shielding Unit for the temporary isolation of those prisoners within the NHS England vulnerable persons cohort for 12 weeks. Symptomatic prisoners may also be isolated in their cells. HMI Prisons staff should pay attention to any signage or briefing notes that identify areas where prisoners may be isolated due to COVID-19 and exclude themselves from contact to prevent cross infection. HMI Prisons staff should not enter these cohorted units without agreement from the team leader and appropriate personal protective equipment (PPE) (see below for more detail).
33. Please be aware that some prison staff may use the term cohort to describe any group of prisoners. For example, they may use it to mean cohorting well prisoners, or key workers, which are not outlined in the specific guidance about cohorted units.

## Interviewing prisoners in isolation

(This includes prisoners on cohorted units for their own protection and the protection of others due to COVID-19.)

34. Staff should **not** interview in person prisoners in isolation unless in exceptional circumstances and with agreement of the team leader. Where possible, alternative methods to speak to prisoners should be used, such as speaking on the telephone. Where this is not possible, and where you need to interview an isolated prisoner in person, staff should use personal protective equipment (PPE).

## Personal protective equipment (PPE)

35. HMI Prisons is trying to avoid using PPE, which is in short supply nationally. The short scrutiny methodology has been designed to make visiting possible without the use of PPE. However, there may be exceptional circumstances in which we need to interview a prisoner in isolation in person. In this case, having exhausted all other methods of communication

(such as over the phone), inspectors should discuss this with the team leader and PPE should be used. HMI Prisons has secured a modest supply of PPE for this purpose. Should PPE not be available on a specific occasion, it will **not** be possible to interview the individual in person.

36. The minimum level of PPE that staff should wear when interviewing prisoners in isolation or on cohorted units is:
- disposable gloves
  - disposable medical mask
  - a disposable full gown or apron
  - disposable eye protection (e.g. face shield or goggles).

### **Working in close proximity with others**

37. When engaging with prisoners who are isolated due to suspected or confirmed COVID-19, HMI Prisons staff should maintain social distancing as well as using PPE. Staff should keep contact to a minimum to reduce exposure. When talking face-to-face with prisoners suspected or diagnosed with COVID-19, staff will need to ensure they follow local guidance: for example, you may usually ask the prisoner to step outside a cell to talk, which would not be acceptable. At the end of the exposure to the prisoner, it is imperative that staff immediately and safely remove PPE as outlined in the guidance below.
38. Putting on and taking off your PPE correctly is important (see guidance below). The establishment will facilitate the disposal of any PPE, but please ensure that you ask staff about any specific procedures for disposal and the location of the clinical waste bins. You must wash your hands immediately after removing PPE.
39. For all staff, PPE must be changed after each interaction with a suspected or confirmed case. In the unlikely event of PPE being required for a prolonged period, it must be renewed every four hours.

### **Interviewing prisoners who are being shielded**

40. Wherever possible, HMI Prisons staff should use alternative methods of interviewing prisoners who are isolated or cohorted for their own protection due to medical risk (for example, those being shielded as per NHS advice), such as speaking on the telephone. If, in exceptional circumstances, HMI Prisons staff wish to interview a shielded prisoner in person, they must agree this with the team leader, seek consent from the shielded group, and comply with the local policy on social distancing and PPE.

### **Visiting health care**

41. It is possible that health care may be used to isolate prisoners with suspected COVID-19 or who are being isolated for their own protection. Staff entering these wings should ensure that they are conversant with the local protocol for entering and leaving the area, in line with both social distancing and PPE.

### **Emergency resuscitation**

42. Staff must not attend any emergency resuscitation incidents as this will require an additional level of PPE due to the aerosol effect of the procedure.

## **Feeling unwell**

43. If HMI Prisons staff begin to feel unwell while on site or feel that they have developed symptoms of COVID-19 they should be vigilant in maintaining social distance and arrange to leave the establishment as soon as possible. They must inform a team member prior to leaving, and the team leader must inform the establishment as soon as possible

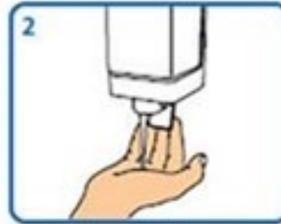
## **After a visit**

44. Should an inspector develop symptoms shortly after visiting an establishment, they must let their team leader and Lesley Young, Head of HR, Finance and Inspection Support know immediately. Lesley will inform HMPPS. Similarly, should an outbreak be identified in an establishment shortly after inspectors have visited, HMPPS will alert HMI Prisons via the designated point of contact (Lesley Young).

# Hand-washing technique with soap and water



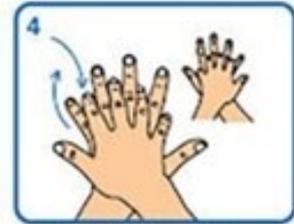
1 Wet hands with water



2 Apply enough soap to cover all hand surfaces



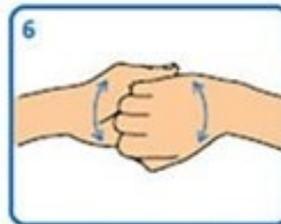
3 Rub hands palm to palm



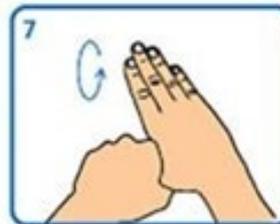
4 Rub back of each hand with palm of other hand with fingers interlaced



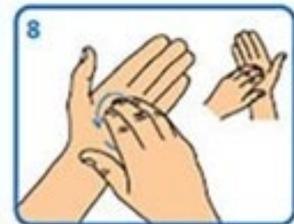
5 Rub palm to palm with fingers interlaced



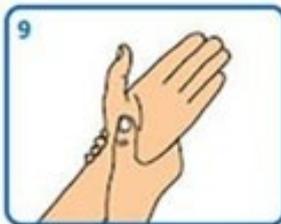
6 Rub with back of fingers to opposing palms with fingers interlocked



7 Rub each thumb clasped in opposite hand using a rotational movement



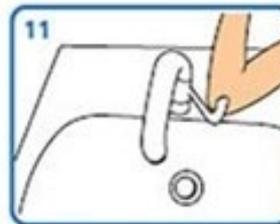
8 Rub tips of fingers in opposite palm in a circular motion



9 Rub each wrist with opposite hand



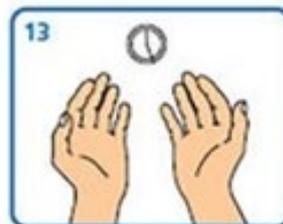
10 Rinse hands with water



11 Use elbow to turn off tap



12 Dry thoroughly with a single-use towel



13 Hand washing should take 15-30 seconds

## Putting on personal protective equipment (PPE)

The order of putting on PPE is: apron, facemask, visor and gloves.



### Apron

- Pull over head and fasten at back of waist



### Facemask

- Secure ties or elastic bands at middle of head and neck
- Fit flexible band to bridge of the nose
- Fit snug to face and below chin



### Visor

- Place over face and eyes and adjust to fit



### Gloves

- Extend to cover wrist

### Use safe work practices to protect yourself and limit the spread of infection.

- Keep hands away from face
- Change gloves between tasks and when torn or heavily contaminated
- Limit surfaces touched
- Regularly perform hand hygiene

## Removing personal protective equipment (PPE)

PPE should be removed in an order that minimises the potential for cross-contamination.

The order of removing PPE is: gloves, apron, visor and facemask.



### Gloves

- Grasp the outside of the glove with the opposite gloved hand; peel off
- Hold the removed glove in the gloved hand
- Slide the fingers of the ungloved hand under the remaining glove at the wrist
- Peel the second glove off over the first glove



### Apron

- Unfasten or break ties
- Pull apron away from neck and shoulders lifting over head, touching inside only
- Fold or roll into a bundle



### Visor

- Handle only by the headband or the sides



### Facemask

- Unfasten the ties – first the bottom, then the top
- Pull away from the face without touching front of facemask

### Perform hand hygiene immediately after removing all PPE.

All PPE should be removed before leaving the area and disposed of in a sealed plastic bag in a household wheelle bin.

## Useful websites

### **World Health Organisation**

*Preparedness, prevention and control of COVID-19 in prisons and other places of detention*

[http://www.euro.who.int/\\_\\_data/assets/pdf\\_file/0019/434026/Preparedness-prevention-and-control-of-COVID-19-in-prisons.pdf?dm\\_i=21A8,6SM73,FLWT3F,R7PLZ,I](http://www.euro.who.int/__data/assets/pdf_file/0019/434026/Preparedness-prevention-and-control-of-COVID-19-in-prisons.pdf?dm_i=21A8,6SM73,FLWT3F,R7PLZ,I)

### **GOV.UK**

*Coronavirus (COVID-19): what you need to do*

<https://www.gov.uk/coronavirus>

*Guidance on social distancing for everyone in the UK*

<https://www.gov.uk/government/publications/covid-19-guidance-on-social-distancing-and-for-vulnerable-people/guidance-on-social-distancing-for-everyone-in-the-uk-and-protecting-older-people-and-vulnerable-adults>

*Stay at home: guidance for households with possible coronavirus (COVID-19) infection*

<https://www.gov.uk/government/publications/covid-19-stay-at-home-guidance/stay-at-home-guidance-for-households-with-possible-coronavirus-covid-19-infection>

### **Taxis**

London Black Taxis

<https://www.londonblacktaxi.net/>

Dialcab

<https://www.dialcab.co.uk>