



Health and safety guidance for service custody facilities inspections during the COVID-19 pandemic

Updated 14 January 2022

Introduction and context

1. HM Inspectorate of Prisons (HMI Prisons) has re-introduced the service custody facilities inspections programme to report on the treatment of and conditions for detainees, including during the ongoing COVID-19 pandemic. Inspections will promote transparency about the treatment and conditions of detainees in service custody, including any adjustments made in response to COVID-19, and will ensure that any lessons identified can be shared and acted upon.
2. HMI Prisons will continue to adhere to national public health advice, including any local restrictions in place in specific areas where we carry out service custody facilities inspections, and to the 'do no harm' principle at all times. HMI Prisons will continue to follow all national and local announcements relating to COVID alert levels and restrictions and will amend this guidance as required.
3. This guidance sets out key processes that staff must follow and actions they must take when carrying out inspections, to reduce risks to themselves, their household, service custody staff and detainees.
4. 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*. The 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. 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 inspections?

6. Three or four HMI Prisons staff will be involved in the inspection of each service custody facility.
7. All efforts will be made to minimise travel. Due to the geographical location of the service custody facilities however, it means that HMI Prisons staff will need to visit different service custody facilities on consecutive days.

Key workers

8. The Ministry of Justice has agreed that HMI Prisons staff carrying out inspections are designated as key workers and will be issued with documentation to confirm this.
9. As key workers, HMI Prisons staff are able to travel across the UK to undertake inspections, including between areas which may be under differing local COVID alert levels.

Exclusions

10. NHS guidance identifies individuals who are at high risk (clinically extremely vulnerable): see [Who is at high risk from coronavirus \(COVID-19\) – NHS \(www.nhs.uk\)](https://www.nhs.uk). While there is now no need for those individuals to formally shield, any HMI Prisons staff who are classified as high risk (clinically extremely vulnerable) will be given the opportunity to complete a risk assessment with their line manager to identify if they are able to visit establishments and whether any specific mitigating measures are required to support them to do so.
11. Staff who may also have additional risk due to their caring responsibilities or family situations should discuss with their line manager and complete an individual risk assessment to explore whether alternative working arrangements or mitigations can be put in place.
12. The risk assessment process will be kept under regular review. All existing individual staff risk assessments will be reviewed in light of any new national announcements and/or restrictions.

Staff deployment

13. The greatest risk posed by HMI Prisons staff to detainees and staff working in service custody facilities is that a member of the HMI Prisons team unknowingly contracts coronavirus in the community and brings it into the facility. Staff are expected to comply at all times with national social distancing and hygiene guidance, as well as with any local restrictions in the area in which they live, to reduce the risk of contracting the virus.
14. To mitigate this risk as far as possible, HMI Prisons has arranged weekly-at-home PCR testing for all staff to be deployed on inspections. The testing should normally be carried out on **Wednesday** each week. This should mean that staff have the result shortly before attending an inspection the following week, although this cannot be guaranteed. Staff are not required to have received the result of their latest test before attending an inspection.
15. Routine testing is designed to reduce risk and enable NHS Test and Trace processes, If a member of staff receives a positive result from a PCR test after they have already travelled away from home, they should wear personal protective equipment (PPE)-level face mask (not a face covering) and seek advice from NHS 111 on how to safely return home. HMI Prisons' Secretariat should be alerted and will assist with any travel or accommodation arrangements. If staff are staying in a hotel or using a hire car, they should make sure they inform hotel management on site and the Enterprise branch which supplied and, if different, will be collecting the hire car.

16. Staff who will be deployed in the field on a Wednesday should check the location of the nearest Royal Mail priority post box and the time of the last collection of the day from that location to return their completed PCR test. The nearest priority post box can be found on 'Services Near You' or on the Royal Mail app. Click the 'Show my nearest priority post boxes' tick box, then enter the postcode and select the address.
17. In addition, all staff undertaking inspection activity will complete lateral flow device tests (LFDs, previously referred to as LFTs) before they leave home and before they visit each service custody facility. If a member of staff tests positive, they must self-isolate immediately and see the latest government advice on whether a confirmatory PCR test is required. HMI Prisons staff should also comply with the testing requirements for staff at the service custody facility being inspected.
18. Any staff member who tests positive for COVID-19 must inform their line manager and the Secretariat immediately and begin a period of self-isolation.
19. The measures outlined in detail below are also designed to reduce and mitigate this risk where possible while undertaking inspections.
20. In addition, HMI Prisons aims to reduce the likelihood of transferring the virus between service custody facilities where there is a heightened risk that it might do so. All deployment decisions will take account of previous deployments as part of the dynamic risk assessment process. HMI Prisons will continue to follow all the risk mitigation measures outlined within this guidance.

Staff with symptoms

21. All staff must report any clinical signs of infection to their line manager and the Secretariat immediately, and must get tested (and receive the results) and 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); 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); and a **loss or change to your sense of smell or taste** – this means you have noticed you cannot smell or taste anything, or things smell and taste different to normal.
22. Staff who have been contacted by the NHS Test and Trace service and who have been instructed to self-isolate as a result must inform their line manager and the Secretariat immediately so that their deployments can be rearranged if required.
23. In line with community arrangements, close contacts who have received both doses of a COVID-19 vaccine can now use Risk Management Test (RMT) rather than self-isolation.
24. The RMT requires you to take a PCR test immediately, then daily LFDs for seven days. If the LFD is negative, staff can continue with normal work activities. Staff must self-isolate if they show any COVID-19 symptoms, no matter how mild, and take a further PCR test. They can only attend work if the PCR test is negative.
25. If staff are deployed during the time when they use the RMT, they must wear face masks in service custody facilities at all times while indoors or in close contact with others.
26. The RMT process requires staff to register their daily test results with the NHS and the Secretariat, to ensure there is a clear audit trail.
27. If an LFD result is positive during the RMT process, you must arrange a further PCR test and cannot be deployed unless a negative PCR test result is confirmed.

Risk assessment

28. After announcing the inspection, and before visiting the service custody facilities, the coordinating inspector will liaise with a single point of contact for the individual facilities to review whether there are any specific or developing COVID-19 risks in the area. The coordinating inspector and team leader will then consult with the Deputy Chief Inspector and Secretariat to undertake a dynamic risk assessment - based on information received from the service custody facilities and additional intelligence gathered, including from Public Health England, Ireland and Scotland, about community transmission in the local area – on the Friday before the start of the inspection. This dynamic risk assessment will determine if the inspection, or parts of it, should go ahead as planned.
29. All decisions about deployment will be made on a case-by-case basis having assessed the risks; HMI Prisons will **not** adopt a blanket approach to deployment based on local COVID alert levels.

Travelling to and from inspections

Driving

30. 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.
31. Staff should use Enterprise hire cars in keeping with HMI Prisons' usual policy. Requests for cars should be made as normal by contacting Caroline Fitzgerald, Inspection Support Officer. 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.
32. If a member of staff uses their own vehicle, mileage claims should be made via SOP as usual: at the Public Transport Rate for the longer journey from home to the inspection and back, and at the Standard Rate for shorter journeys during the inspection.
33. If it is agreed that a member of staff may use their own vehicle instead of a hire car specifically as a reasonable adjustment and mitigating measure on the basis of a personal risk assessment (see paragraphs 10-11 above), they may claim the Standard Rate mileage for all parts of the journey.
34. All staff using their own vehicle must have car insurance which includes 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.

Refuelling

35. 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 £100 to reduce the need to use keypads to make payments). Staff should sanitise their hands when they have finished refuelling.

Public transport

36. When travelling on public transport, including flights and trains, staff should follow government advice on travelling safely, the latest requirements for wearing face masks and be alert to any variances across the UK that may be in place at that time. See:
- England - [Coronavirus \(COVID-19\): safer travel guidance for passengers - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
 - Wales - [Travel and transport: advice \(COVID-19\) | GOV.WALES](https://gov.wales)
 - Scotland - [Advice on how to travel safely \(transport.gov.scot\)](https://transport.gov.scot)
 - Northern Ireland - [Travel advice and guidance | nidirect](https://nidirect)
37. The coordinating inspector will liaise with inspection team members to agree a transport plan ahead of the inspection.

Hotels and meals

38. Where a hotel stay is required, hotels will be selected through usual Ministry of Justice booking systems. HMI Prisons staff will only stay in hotels which have COVID-19 systems in place, and the hotel's guidance will be shared with HMI Prisons staff ahead of their stay.
39. When staying in hotels, staff should practise social distancing and wash their hands frequently, and particularly after touching common surfaces and high-use-areas.
40. In addition to any national restrictions, all staff should familiarise themselves with the local COVID alert level in the area in which they are staying and ensure they adhere at all times to local restrictions, including on mixing with people from another household (such as other HMI Prisons colleagues) in restaurants.
41. The Secretariat will provide advice on the hotel's meal arrangements and on nearby restaurants and supermarkets.

Reducing transmission of the COVID-19 virus during an inspection

42. The WHO guidance, *Preparedness, prevention and control of COVID-19 in prisons and other places of detention*, 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

43. Staff should wash their hands frequently and for at least 20 seconds. They should do this on arrival at a service custody facility, immediately when arriving back at the hotel or at home, and frequently during the visit. Staff should be aware that gates, railings and door handles are a high-risk contamination point. Staff should avoid touching their face after making contact with these surfaces. See below for a practical guide on hand washing.

Hand sanitiser

44. All staff should carry hand sanitiser, which should be used frequently in between hand washing opportunities. 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.

Bringing items into service custody facilities

45. Staff must limit the quantity of items they bring into a service custody facility as far as possible. Bags should not be carried around the facility 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. Laptops and cameras may be brought into the facilities but should be wiped down on arrival and at regular intervals.

Eating

46. 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 back to the hotel or home should be thoroughly washed and packed away after use.

Social distancing

47. HMI Prisons staff are expected to maintain a two-metre distance from others during the visit. Staff should be aware that some areas within service custody facilities may be less than two metres in width and should consider this when moving around, making every effort to plan a route which enables them to maintain distance from others.

Face masks

48. A face covering is made from any cloth or textile and covers the nose and mouth of the wearer. It is designed primarily to give protection to other people from any infection the wearer may have. A fluid resistant surgical mask, referred to in this document as a face mask, is a medical grade mask often work in a clinical or social care setting. It meets international approved safety standards and as such is considered Personal Protective Equipment. It provides protection for both the wearer and other people.
49. HMI Prisons staff will wear a face mask while in service custody facilities. Face masks can be worn for four hours continually and will then need to be changed. Each face mask should only be used once, regardless of the length of use. Staff should therefore expect to use a number of face masks during an inspection. Staff should follow the guidance below on how to put on and take off a face mask safely and seek advice from service custody staff on where to dispose of used masks.
50. HMI Prisons has made arrangements with the MoJ to procure regular supply of face masks to provide to staff undertaking inspections.

Speaking to detainees

51. Staff should be careful when entering areas where air flow is limited, such as small offices and living quarters. Encourage people to talk in open spaces. Do not talk to detainees through the gaps in room doors as air flows can be directed to either person's face. If you wish to speak to a detainee 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 asking service custody staff to open a detainee's room.

52. Some detainees may be isolated because they are suspected or confirmed to have COVID-19. If it is imperative that HMI Prisons staff need to interview these detainees, and there is no alternative means of remote communication, they should use personal protective equipment (PPE).
53. If inspectors need to interview a detainee who is isolated, they must agree this with the team leader. 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.
54. The minimum level of PPE that staff should wear when interviewing detainees who are being isolated because they are symptomatic is:
- disposable gloves
 - disposable medical mask
 - a disposable full gown or apron
 - disposable eye protection (e.g. face shield or goggles).
55. When engaging with detainees 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. At the end of the conversation with the detainee, it is imperative that staff immediately and safely remove PPE as outlined in the guidance below.
56. Putting on and taking off your PPE correctly is important (see guidance below). The service custody facility will help with 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.
57. 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.

Visiting health care

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

Emergency resuscitation

59. 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

60. 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 service custody facility as soon as possible. They must inform a team member prior to leaving, and the team leader must inform the service custody facility as soon as possible.

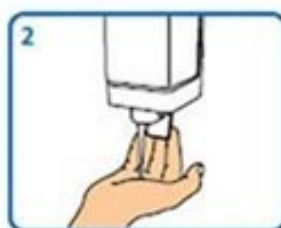
After a visit

61. Should a member of HMI Prisons staff develop symptoms shortly after visiting a service custody facility, they must let their team leader and Lesley Young, Head of HR, Finance and Inspection Support know immediately. HMI Prisons will inform MOD. Similarly, should an outbreak be identified in a service custody facility shortly after inspectors have visited, MOD will alert HMI Prisons via the designated point of contact (Lesley Young).
62. All HMI Prisons staff who develop symptoms should arrange to be tested at their local testing centre.

Hand-washing technique with soap and water



Wet hands with water



Apply enough soap to cover all hand surfaces



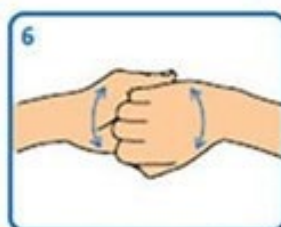
Rub hands palm to palm



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



Rub palm to palm with fingers interlaced



Rub with back of fingers to opposing palms with fingers interlocked



Rub each thumb clasped in opposite hand using a rotational movement



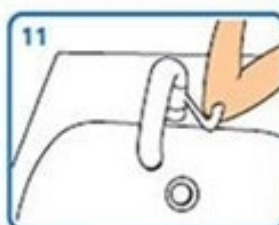
Rub tips of fingers in opposite palm in a circular motion



Rub each wrist with opposite hand



Rinse hands with water



Use elbow to turn off tap



Dry thoroughly with a single-use towel



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



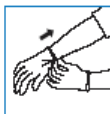
Facemask

- 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 wheellie 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

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>

Safer travel guidance for passengers

<https://www.gov.uk/guidance/coronavirus-covid-19-safer-travel-guidance-for-passengers>

Wearing a face covering: guidance on how to wear and make a cloth face covering

<https://www.gov.uk/government/publications/how-to-wear-and-make-a-cloth-face-covering/how-to-wear-and-make-a-cloth-face-covering>