



# Health and safety guidance for full inspections during the COVID-19 pandemic

Updated 21 December 2022

## Introduction and context

1. As the country continues to recover from the COVID-19 pandemic, HM Inspectorate of Prisons (HMI Prisons) has reverted to its full scored inspection framework. This guidance is continually updated to reflect the latest health and safety advice and sets out key processes that staff must follow and actions they must take when carrying out full inspections to reduce risks to themselves, their household, prison staff and detainees.
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 full 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-19 alert levels and restrictions and will update this guidance as required.
3. 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*

4. 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 full inspections?

5. Most HMI Prisons staff will be asked to support the inspection programme in some capacity, even if they are unable to undertake visits. We will keep under review the number of inspection staff deployed on these visits. Full inspections will normally be carried out over two weeks, with a two-day visit by four or five members of HMI Prisons' staff to carry out a detainee survey in week one. This will be followed by a five-day visit by approximately 10 HMI Prisons and partner inspectorate staff the following week.

### Exclusions

6. NHS guidance identifies individuals who are at high risk from COVID-19: 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 from COVID-19 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.
7. 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

8. As part of the Government's 'Living with Covid-19' plan for England, prisons are included in the list of vulnerable settings where testing will continue under certain circumstances. HM Prisons and Probation Service (HMPPS) no longer have a national position on the COVID-19 response. This is now delegated to local management arrangements informed by local health advice. HMI Prisons staff are no longer required to complete routine PCR or lateral flow device tests (LFDs) before they leave home for an inspection. However, they should continue to comply with the testing requirements for staff at the establishment being inspected, and the prison will provide the test kit.
9. If a member of staff tests positive whilst out on inspection, they must return home immediately and avoid contact with other people where possible. The remaining members of the inspection team may wish to complete an additional LFD test as a precaution, but they can continue with the inspection unless they themselves test positive.
10. 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.
11. Any staff member who tests positive for COVID-19 must inform their line manager and the Secretariat immediately and try to stay at home and avoid contact with other people.

### Staff with symptoms

12. While staff are no longer legally required to self-isolate if you have COVID-19, the latest NHS guidance (<https://www.nhs.uk/conditions/coronavirus-covid-19/self-isolation-and-treatment/when-to-self-isolate-and-what-to-do/>) advises that you should try to stay at home and away from others to avoid passing on the virus. All staff must report any clinical signs of infection to their line manager and the Secretariat immediately and try to stay at home and avoid contact with other people for 5 days, which is when they are most infectious. This 5-day period starts from the day after the test was completed. You should also if possible avoid meeting people at higher risk from COVID-19 for 10 days, especially if their immune system means they're at higher risk of serious illness from COVID-19, even if they've had a COVID-

19 vaccine. Staff can return to work from day 6 if they feel well enough to do so.

13. Symptoms may include a **high temperature** – this means feeling 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.

## Travelling to and from establishments and the office

### Driving

14. 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.
15. 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 it is safe to use, including by cleaning the seat, steering wheel and controls.
16. If a member of staff uses their own vehicle, mileage claims should be made via SOP as usual. This will be at the higher rate for all journeys e.g. the longer journey from home to the establishment and back, and shorter journeys between the hotel and establishment during the inspection.
17. 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 paragraph 6 above), they may claim the Standard Rate mileage for all parts of the journey.
18. 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.
19. The coordinating inspector should liaise with research and inspector team members ahead of the inspection to identify the transport requirements of each member of staff, explore taxi availability and agree a transport plan with all members of the team.

## Reducing transmission of the COVID-19 virus during an inspection

20. 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 one 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**

21. 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 the hotel or at home, and frequently during the inspection. 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 below for a practical guide on hand washing.

## **Hand sanitiser**

22. All staff should carry hand sanitiser if possible. Hand sanitiser 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 an establishment**

23. Staff must limit the quantity of items they bring into an establishment as far as possible. Bags should not be carried around wings unless attached to the person. Notepads should not be placed on surfaces, and pens should remain in staff possession and not placed in the mouth. Laptops and cameras may be brought into the establishment but should be wiped down on arrival and at regular intervals.

## **Keys**

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

## **Eating**

25. 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**

26. It is recommended that HMI Prisons staff continue to maintain a two-metre distance from others during the inspection where possible. Staff should be aware that some landings are less than two metres wide and should consider this when moving around the prison, making every effort to plan a route which enables them to maintain distance from others.

## **Face masks and coverings**

27. There is no longer the requirement for HMPPS staff in prisons and young offender institutions (YOIs) to wear face masks/coverings as standard, but there will be local discretion in high-risk areas as determined by prison governors using risk assessments and local health advice. HMI Prisons staff should comply with the face mask wearing requirements for staff at the establishment being inspected.
28. There is no longer the requirement for Home Office staff in immigration removal centres (IRCs) and short-term holding facilities (STHFs) to wear face masks/coverings as standard, but there will be local discretion as determined by centre managers. HMI Prisons staff should comply with the face mask wearing requirements for staff at the IRC or STHF being visited or inspected.

## **Visiting a normal wing/location**

29. Staff should be careful when entering areas where air flow is limited, such as small offices and cells. They should encourage people to talk in open spaces and should not talk to prisoners through the gaps in cell doors as air flows can be directed to either person's face. If staff 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 door. 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.

## **Speaking to prisoners on the Reverse Cohorting Unit or Protective Isolation Unit**

30. Establishments are no longer expected as standard to designate two separate units: a Reverse Cohorting Unit (RCU) for the temporary separation for newly received prisoners; and a Protective Isolation Unit (PIU) for the temporary isolation of symptomatic or COVID-19 positive prisoners. However, prisons can reintroduce these measures if a need is determined locally, informed by public health partners. HMI Prisons staff should therefore pay attention to any signage or briefing notes that identify areas where prisoners may be isolated due to COVID-19.
31. 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.
32. Inspection staff visiting RCUs or PIUs in person should do so with the agreement of the team leader. Where possible, alternative methods to speak to these prisoners should be used, such as speaking on the telephone. Where this is not possible, and where you need to interview a prisoner from the RCU or PIU in person, staff should follow the guidance below on using PPE.

## **Personal protective equipment (PPE)**

33. There may be circumstances in which you are asked to wear PPE by a member of prison staff in order to access a prisoner. The minimum level of PPE that staff should wear when interviewing prisoners who are being reverse cohorted or isolated because they are symptomatic is: disposable gloves, disposable medical mask, disposable full gown or apron, disposable eye protection (e.g. face shield or goggles).
34. When engaging with these prisoners, 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 of having or diagnosed with COVID-19, staff should 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.
35. Putting on and taking off PPE correctly is important (see guidance below). The establishment will facilitate the disposal of any PPE, but you should 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.
36. 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**

37. Those prisoners whom NHS England defines as at high risk from COVID-19 may have any

necessary protective measures included in their Personal Management Plans.

38. If HMI Prisons staff need to speak to a prisoner who has protective measures in place, they should follow the guidance given by the establishment. Staff should hold any conversations with shielding prisoners at a two-metre distance and wear a face mask or covering when distancing is difficult or where local protection processes require it. Where possible, HMI Prisons staff should visit those prisoners with protective measures in place first thing in the day, before visiting other locations in the establishment.

### **Visiting health care**

39. 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 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**

40. 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**

41. 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.

## **Preparing and distributing the survey**

42. HMI Prisons staff should ensure sensible hygiene precautions when conducting the survey and when in contact with paper questionnaires and other associated documents provided to prisoners, throughout the survey process. Staff should adhere to the handwashing and hand sanitiser guidance in paragraphs 21 and 22 at all times during the process.
43. If appropriate, questionnaires in envelopes can be posted to sampled prisoners under their cell door and collected in the same way. If this is not possible, staff should maintain social distancing while conducting the survey. If social distancing cannot be achieved on a particular wing or unit, staff should consider withdrawing and attempt to complete the survey at another time.
44. Prisoners who state that they are unable to complete the questionnaire will be offered assistance from a researcher, ensuring that the establishment facilitates this safely in accordance with the principles of social distancing outlined in this guidance.
45. Where prisoners being cohorted are included in the selected sample, arrangements should be made to minimise risk of infection for both prisoners and HMI Prisons staff. Arrangements may include: distributing questionnaires to prisoners who are being shielded for their own protection before visiting other residential units; and distributing and collecting questionnaires from prisoners who are being isolated for others' protection just before leaving the establishment, and not going onto other residential units after this.
46. When handling the paper questionnaires for processing, staff should consider wearing protective gloves. Where possible, scanned images of the questionnaires should be used to type up any handwritten comments and the paper questionnaires should be safely archived in line with HMI Prisons' data retention policy.

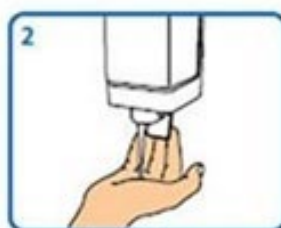
## After an inspection

47. Should a member of HMI Prisons staff 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



Wet hands with water



Apply enough soap to cover all hand surfaces



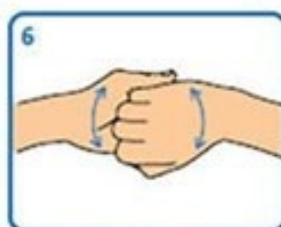
Rub hands palm to palm



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



Rub palm to palm with fingers interlaced



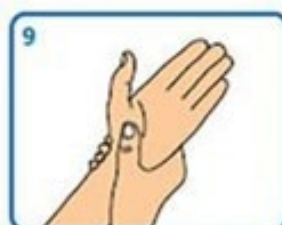
Rub with back of fingers to opposing palms with fingers interlocked



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



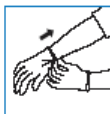
### Facemask

- 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](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>

***People with symptoms of a respiratory infection including COVID-19***

<https://www.gov.uk/guidance/people-with-symptoms-of-a-respiratory-infection-including-covid-19>

### **Taxis**

London Black Taxis

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

Dialacab

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