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& Local Government



Fire and Rescue Authorities Operational Guidance

GRAs
generic risk assessments

GRA 3.9

Fighting fires in places
of lawful detention

Generic Risk Assessment 3.9

Fighting fires in places
of lawful detention

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SECTION 1

Generic Risk Assessment 3.9

Fighting fires in places of lawful detention

Scope

This generic risk assessment examines the hazards, risks and control measures relating to fighting fires in places of lawful detention (eg prisons, courts, police cells, and secure children homes etc).

Activities which involve specific significant hazards, eg responding to an emergency, are covered in other generic risk assessments.

This, as for all generic risk assessments, provides a starting point for Fire and Rescue Authorities to conduct their own assessments within the context of local conditions and existing organisational arrangements.

Significant hazards and risks

The role of the Fire and Rescue Authority is to rescue all persons from an emergency situation and to extinguish fires within the remit of the legislative requirement.

It is not the role of the Fire and Rescue Authority to assist in the quelling of disturbances, riots or other similar type of incidents within the confines of places of lawful detention, nor must Fire and Rescue Authority equipment be used for this purpose, either by fire and rescue personnel or other on-site staff.

The hazards to fire and rescue personnel relate to:

a) Restricted access

All places of lawful detention have, by design, restricted access and egress. This may pose a number of difficulties to personnel when attempting to deal with fire and rescue situations. These include:

- limited choice of approach to the incident, eg it may only be possible to approach a fire from downwind
- restricted appliance movements and rendezvous points
- difficulty and delay in accessing the scene of operations

- difficulty in maintaining a safe access to and egress from the scene of operations
- secure and restricted working environment where large amounts of equipment may have to be carried to the scene of operations.

b) Behaviour and possible hostilities from Detainees

When dealing with fire incidents within the confines of a prison, or other places of lawful detention, the behaviour from detainees can be unpredictable and lead to hostilities against fire and rescue service personnel. Other types of potential threats from detainees are:

- further deliberate outbreaks of fire
- ambush and possible hostage taking
- missiles being thrown, eg debris, sharps etc
- verbal threats of violence or intimidation
- physical violence/assault
- dirty protests involving human excrement (biological hazard)
- infection from bodily fluids, needle stick or other sharp injuries.

Security gates and doors

Access to or egress from any part of the premises will be restricted and will require the assistance and cooperation of authorised on-site staff. Security gates/doors, whether electronic or manually operated, partition the various parts of the premises to permit the authorities to isolate areas in situations of unrest or unruly behaviour and to maintain security and control.

Attention must be drawn to self-locking doors, eg prisons, police stations, court premises, detention centres etc. DCOL 38/1978¹ informed Fire and Rescue Authorities of these doors and identified the concerns posed for personnel safety. The doors are designed to self-lock on being closed and will require familiarisation training and instruction for personnel who have places of lawful detention within their area of responsibility – including ‘cross border’ risks.

Consideration must be made by the Incident Commander of the terminology used by other agencies to avoid confusion; for example, prison staff refer to floor levels with ground floor being referred to as Floor 1.

Roofs, walls and other structures may be fitted with razor wire which is intended to prevent escape or unauthorised access.

Communication

Due to the construction and layout of places of lawful detention, communication may be difficult. Fireground communications must be tested for effectiveness as part of any

¹ HM Prisons: Self-locking cell doors ‘Dear Chief Executive Letter’ 38/1978 Home Office Guidance 67/1978 issued 7 November 1978

planning processes and at a fire and rescue incident. Alternative communication methods may be required and all personnel must be familiar with the evacuation procedure. The use of available close circuit television must be considered at the outset of operations as it can provide valuable information in respect of fire location and situation awareness.

Key control measures

Planning

Planning is the key to enhancing the safety of firefighters and others likely to be affected by Fire and Rescue Authority operations. Each Fire and Rescue Authority's integrated risk management plan will set standards and identify the resources required to ensure safe systems of work are maintained.

Fire and Rescue Authorities must assess the hazards and risks in their area relating to this generic risk assessment. The assessment must include other Authority's areas where 'cross border' arrangements make this appropriate.

Site-specific plans must be considered for locations where the hazards and risks are significant and plans must take into account and specify any variation from the normal operational capability of personnel, appliances and equipment. In particular, recognition must be given to the physical and psychological pressures that an operational incident may apply to fire and rescue personnel.

Site specific plans must include:

- levels of response
- relevant standard operating procedures
- tactical considerations, including rendezvous points, appliance marshaling areas and access points
- identification and, where necessary, the formal notification to person(s) responsible for the site of any Fire and Rescue Authority operational limitations.

Planning is underpinned by information gathering, much of which will be gained through inspections or visits by fire and rescue personnel, for example, those covered by section 7(2)d and 9(3)d of the *Fire and Rescue Services Act 2004*.

Information must also be gathered and used to review safe systems of work from sources both within and outside the Fire and Rescue Authority, including:

- incident de-briefs
- health and safety events
- local authorities
- local resilience forums.

Involving others in planning is an effective way to build good working relations with partner agencies and other interested parties, such as site owners.

Fire and Rescue Authorities must ensure that systems are in place to record and regularly review risk information and to ensure that new risks are identified and recorded as soon as practicable.

Fire and Rescue Authorities must ensure that the information gathered is treated as confidential, unless disclosure is made in the course of duty or is required for legal reasons.

Fire and Rescue Authorities must consider the benefits of using consistent systems and formats to record information from all sources. Consideration must also be given to how timely access will be provided to information to support operational decision-making.

Information needs will vary in proportion to the size and nature of the incident and the category of the establishment's detainees. The capacity of fire and rescue personnel to assimilate information will vary in relation to the complexity of the incident. Therefore, arrangements may need to be flexible and be based on more than one system which may be available, control of the different systems will need to be scrutinized by the Incident Commander.

Operational risk assessments for places of lawful detention must be as comprehensive and detailed as possible. As layout will vary significantly from one establishment to another, it is important and necessary for the details of each operational plan to be determined by the Fire and Rescue Authority with regards to local circumstances and after full consultation with the relevant authority.

The operational plan must be evaluated and refined by training and, wherever possible, joint exercises involving the place of lawful detention and those fire crews most likely to attend any fire or other type of incident. It is imperative that Fire and Rescue Authorities are familiar with the provision of firefighting facilities within the confines of the establishment, particularly the location of water supplies.

Arrangements must be made with the relevant authority for agreed access to secure areas in any part of the establishment, including individual cells. Fireground communications must be tested for effectiveness within the confines the establishment. Fire and rescue, police and prison personnel or other employees must be familiar with agreed evacuation signals.

Competence and training

When formulating a competence and training strategy the Fire and Rescue Authority must consider the following points:

- Ensure specific risk assessments for this incident type are suitable and sufficient and that those tasked with carrying out the assessment and developing procedures are competent to do so
- Fire and Rescue Authorities must ensure their personnel are adequately trained to deal with the hazards and risks associated with operational incidents involving secure accommodation and places of lawful detention

- The level and nature of training undertaken must be shaped by informed training needs analysis that takes account of Fire and Rescue Authority guidance on the competency framework, National Occupational Standards and any individual training needs.

Specific training requirements for incidents involving places of lawful detention will include:

- dissemination of the standard operating procedure and site-specific operational tactical plans
- site-specific tactical exercises must be undertaken with other agencies or staff likely to assist at an actual incident.

Training outcomes must be evaluated to ensure that the training provided is effective, current and meets defined operational needs as determined by the Fire and Rescue Authority's integrated risk management plan.

Fire and Rescue Authorities must formulate a regular programme of training sessions and operational risk assessments. This will permit firefighters to familiarise themselves with fire appliance holding points, vehicular access to and within the grounds of the place of lawful detention, and to check that there are no obstructions to water supplies for firefighting purposes.

Firefighters must be familiar with the types of locks found in prisons and other places of lawful detention. They must know how to operate these locks and how to keep them in the open or slipped position in order to prevent personnel from being accidentally locked in cellular accommodation areas during firefighting operations.

It is equally important that firefighters must be familiar with operating the locking mechanisms whilst wearing full firefighting personal protective equipment, including gloves.

All fire and rescue personnel must be aware, through familiarisation training, of the security implications and protocols concerning the issue, use and safe return of keys within a prison or other place of lawful detention.

Proceeding to an incident

Under normal circumstances appliances responding to incidents in places of lawful detention will proceed with blue lights and audible warning devices when necessary. On the approach to a premises, and whilst manoeuvring within the precincts of the establishment both visual and audible warning devices must be cancelled.

Command and control

The Incident Commander must follow the principles of the current national incident command system.

Prior to committing personnel into any hazard area, the Incident Commander must take account of the actual information available regarding the incident at the time. This will assist them in making effective operational decisions in what are recognised as sometimes dangerous, fast moving and emotionally charged environments.

A thorough safety brief prior to deployment of all personnel who are required to be within the hazard zone must be carried out. Crews must be reminded of their role and any particular risks to their safety, eg violence, missiles etc.

All personnel must be briefed on detainee profiles, specific risks of violence, the locations of vulnerable detainees, risk of infection from dirty protests, bodily fluids etc and contingency plans, including areas for safe evacuation and decontamination.

Communication of new or changed risks must continue throughout the incident.

Utilising an inter-agency liaison officer and other sources of intelligence can assist the Incident Commander by advising on multi-agency tactics, designated safe routes, prioritisation of incidents etc.

It is essential that the Incident Commander maintain close liaison with the designated senior officer of the on-site authority throughout the time of Fire Authority involvement.

Appliances and equipment must be kept at a safe distance and in a secure area so as not to fall under the control of detainees. A 'safe distance' will depend upon the circumstances and must be decided after discussion with the relevant authority.

To ensure that all personnel are kept fully acquainted and briefed of all developments and to avoid any delays in response, a forward control point must be established as fireground control and will be responsible for co-ordinating all fire and rescue activities at the incident scene.

A rendezvous point/marshalling point for appliances must be agreed between the Fire and Rescue Authority and on-site authority.

As an integral part of operations all appliances and crews must establish and maintain radio contact with fireground control.

In the case of a fire in a prison, a senior Fire Authority officer must assume the role of 'fire liaison officer' and proceed to the prison incident command room where they will be part of the corporate incident command team. This will ensure full liaison and discussion between the Police Service and the on-site authority regarding the Fire Authority's role.

Fire and rescue personnel must be aware that in a prison establishment, the person in charge of the establishment will assume the role of Prison Service Incident Commander and will remain in overall control throughout the duration of the incident. The fire liaison officer will act as the link between the Prison Service Incident Commander and the Fire and Rescue Authority Incident Commander, who will remain in charge of all aspects of fire and rescue operations.

Local liaison must ensure that sufficient on-site staff are available to protect and guide fire crews, therefore, if necessary, they can unlock gates/doors and provide information regarding cell layout etc. Fire and rescue personnel must never work unaccompanied in a secure environment unless concerns for the safety of on-site staff are put at risk (eg smoke-logged areas or where other respiratory concerns are identified).

Fire and Rescue Authority equipment must not be loaned to other personnel for any purpose.

Fire crews must not be permitted to enter and operate in situations where there is an unacceptable risk of physical abuse by detainees. Fire Authority Incident Commanders must ensure that areas, which fire crews, are required enter, have previously been secured by the onsite authority or by the police.

Safety Officer(s)

The early appointment of one or more Safety Officer(s) will assist in supporting a tactical plan to address risks so they can be eliminated or reduced to an acceptable level.

Those undertaking the Safety Officer role must:

- be competent to perform the role
- ensure personnel are wearing appropriate personal protective equipment
- monitor the physical condition of personnel and/or general or specific safety conditions at the incident, in accordance with their brief
- take any urgent corrective action required to ensure safety of personnel
- update the Incident Commander or senior safety officer regarding any change in circumstances
- not be engaged in any other aspect of operations, unless this is required to deal with a risk critical situation.

Safety Officers must be adequately briefed regarding the nature of the incident prior to undertaking the task and have clear guidance as to their allocated task and the current prevailing hazards and risks. The Incident Commander must confirm that the Safety Officer understands:

- their role and area of responsibility
- allocated tasks
- lines of communication
- evacuation procedures.

The activities of a Safety Officer can be carried out by any of the Fire and Rescue Authority roles, but the complexity of the task, size of the incident and scope of responsibility must be considered by the Incident Commander when determining the supervisory level required.

Safety Officers must wear nationally recognised identification to indicate they are undertaking the Safety Officer role.

Fire and Rescue Authorities must ensure that training and other measures (such as aide-memoires) are in place and available to support those staff liable to undertake this role.

Evacuation signal

Fire and Rescue Authorities and the Prison Service use ACME Thunder Whistles. In the case of Fire and Rescue Authorities, short blasts on the whistle indicate that the area must be evacuated. However, in the case of the Prison Service, this would indicate a prison employee required assistance.

To avoid confusion between the signals, Fire and Rescue Authorities must liaise locally with the prison authority to discuss and identify an alternative assistance signal for prison staff during incidents where the Fire Authority is involved. This must be agreed during joint training exercises; familiarisation visits etc and written into local procedures for dealing with incidents within places of lawful detention.

Safety of firefighters

The safety of firefighters must be considered a major priority at any incident in a place of lawful detention. Fire and rescue Incident Commanders must not hesitate to withdraw crews if their personal safety is put at risk.

Fire crews must be briefed in the method of unlocking secure doors/gates. On no account must doors or gates be locked behind fire crews during an operational incident unless this is to secure safety. Secure and safe egress must be maintained at all times during the operational activity.

Under no circumstances must fire and rescue personnel be left to work alone in places of lawful detention. Firefighters must work in teams of a minimum of two, preferably accompanied by a designated member of on-site staff.

Consideration must be given to crews reporting back to the Incident Commander or entry control officer at a greater frequency than is standard if issues dictate greater communication levels are required.

When searching or firefighting in a cell, one member of the crew must remain at the cell door to prevent it from closing. Failure to do so could result in a crew member being trapped inside should the door be closed inadvertently by other crews or deliberately by a detainee.

Personal protective equipment

Fire and Rescue Authorities must ensure that any personal protective equipment provided is fit for purpose and meets all required safety standards. When choosing suitable protective garments, the standard of clothing worn beneath the specialist personal protective equipment must also be taken into account. Consideration must also be given to the selection of suitable sizes and gender specific requirements.

All personnel must use appropriate levels of service provided personal protective equipment and respiratory protection equipment as determined by the safe system of work.

Post incident

The following measures must be considered to help eliminate or remove risks after an incident, as appropriate to the nature and scale of the incident:

- Any safety events; personal injuries, exposure to hazardous substances or near-misses must be recorded, investigated and reported in line with legislative requirements such as *Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995*, etc
- Arrangements must be in place to either remove all contamination from personal protective equipment or to ensure it's safe and appropriate disposal and to check that the equipment maintains the agreed levels of integrity and protection for the wearer throughout its lifecycle
- As appropriate, occupational health support and surveillance follow-up
- Conduct de-briefing to identify and record any 'lessons learned' from the incident. De-briefs will range in complexity and formality proportionate to the scale of the incident and inline with individual Fire and Rescue Authority's procedures
- Consider any changes required to safe systems of work, appliances or equipment in the light of any lessons learned from de-briefs or from safety events
- Consider the need to review existing information held on a premises or location, or the need to add a new premises or location into future planning eg by adding to a visit or inspection programme
- Consider the need to refer to other agencies any concerns or issues that are identified at an incident. When sharing information, due regard must be paid to the need for confidentiality and the legal requirements arising from the *Data Protection Act*
- Staff must be supported and monitored to identify whether they are experiencing any adverse effects and to check whether they would benefit from accessing counselling and support services
- Consideration must be given to arranging for staff to make a contemporaneous written record of their actions. This information may be used to assist in any internal or external investigations or enquiries that follow any incident, eg the Coroner's Court, police / public enquiry, etc.

Technical references	
1	'Dear Chief Officer letter', 7/1991 – D Fire Standards in prison establishments: principles of design and standards of construction (the design guide) : Fire Precautions Manual for Prisons
2	HM Prisons: Self-locking cell doors 'Dear Chief Officer Letter' 38/1978 and Home Office guidance 67/1978 issued on the 7 November 1978
3	'Dear Chief Officer Letter' 5/1988 – E Fires in prison establishments, Home Office, 5 August 1988 and 'Dear Firemaster Letter' 7/1992 – L Home Office Technical Bulletin 1/1997
4	Decontamination procedures as identified in Manual of Firemanship book, 12, Part 2 and the protection against blood-borne infections in the workplace: HIV and Hepatitis, Advisory Committee on Dangerous Pathogens reports, HMSO, Crown copyright 1996. Third impression 1996
5	Integrated Personal Development System (IPDS) and Emergency Fire Service Role Maps
6	Building Disaster Assessment Group – Key research Findings Circular 55/2004 The Regulatory Reform (Fire Safety) Order 2005
7	Prison Act 1952 – Lawful Detention

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SECTION 2
Summary of Generic Risk Assessment 3.9

Fighting fires in places of lawful detention

Task – Pre-incident

Ref. No.	Activity	Hazard	Risk	Persons at risk	Control measures
1	Accessing premises	Limited choice of approach Restricted access	Not achieving successful outcome Delay in applying firefighting and rescue techniques	Detainees Employees Fire and rescue personnel	<p>Prevention</p> <ul style="list-style-type: none"> Engaging in planning meetings with organisers and other emergency responders Fire safety checks and advice Fire response cover available at the event or nearby, where required <p>Organisational risk control</p> <ul style="list-style-type: none"> Produce a standard operating procedure for fires in places of lawful detention

Ref. No.	Activity	Hazard	Risk	Persons at risk	Control measures
1 cont.					<ul style="list-style-type: none"> Identify and address training needs and competency requirements for fighting fires at places of lawful detention Incident Commanders to be competent at gathering relevant information, processing information and making decisions about risk. This also applies to firefighters in the risk area Situational awareness.

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Task – Initial stages of the incident

Ref. No.	Activity	Hazard	Risk	Persons at risk	Control measures
2	Positioning appliances, disembarking to approach the incident	Missiles being thrown at crews and/or vehicles Manual handling of equipment	Injuries to employees and others	Employees Fire and rescue personnel	Planning Liaison with authority Full personal protective equipment Manual handling training Safe distance Withdraw crews Information, instruction and training on hazards associated with places of lawful detention.
3	Firefighting in places of lawful detention	Fire, explosion Verbal abuse Sharp objects	Injuries to employees and others	Fire and rescue personnel Employees	Planning Full personal protective equipment On-site employee escort at all times apart from breathing apparatus operations All personnel under full supervision Information, instruction and training on hazards associated with places of lawful detention.

Task – As the incident develops

Ref. No.	Activity	Hazard	Risk	Persons at risk	Control measures
3 cont.	Firefighting in places of lawful detention	Slips and trips Arduous work Dehydration Self-locking doors Physical barriers or blockades Level of security Loss of extinguishing media	Injuries to employees and others	Fire and rescue personnel	Local security intelligence Situational awareness Sufficient personnel and resources available Continuous radio contact between crews and with Incident Commander Continuous liaison with relevant authority during incident Withdraw crews Crews work in minimum of teams of two Secure route.

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Ref. No.	Activity	Hazard	Risk	Persons at risk	Control measures
3 cont.	Fighting fires in places of lawful detention	Toxic or biological hazards Infectious diseases Hypodermic needles Physical assault	Injuries to employees and others	Fire and rescue personnel	Vaccination policy, hepatitis B, tetanus etc Planning Full personal protective equipment Prison/ other employee escort at all times apart from during breathing apparatus operations All personnel under full supervision Information, instruction and training on hazards associated with places of lawful detention Secure route Breathing apparatus if risks of airborne biological hazards are suspected or present Maintenance of secure access and egress.
	Detainees who do not have English as a first language		Injuries to detainees from not understanding instructions given in English	Detainees Fire and rescue personnel	Use of prompt cards for various languages Interpreter if available Use of local resources if possible.

Task – Post Incident

Ref. No.	Activity	Hazard	Risk	Persons at risk	Control measures
4	Emergency evacuation	Confusion with prison assistance signals	Risk of injury to fire fighting personnel and others	Employees Fire and rescue personnel	Continuous radio contact between crews and with Fire Authority Incident Commander Other locally agreed procedures with the authority.

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