HM Prison & Probation Service

National Security Framework – Ref: NSF 5.1 Control of Internal Movement Function – Management and Security of Gate Services		
This instruction applies to: -		**Reference: -**
Prisons		**PSI 14/2011**
Issue Date	**Effective Date**	**Expiry Date**
Revised - 26/10/2020	26/10/2020	N/A
Issued on the authority of	HMPPS	
For action by	All staff responsible for the development and publication of policy and instructions. Governors/Directors of Contracted Prisons, Heads of Groups. In this document, the term Governor also applies to Directors of Contracted Prisons. **20/10/2020 –** this PSI has been edited to include the Enhanced Gate Security Policy (EGS) Operational Guidance as an Annex since EGS also involves the management of the Gate in approximately 50 prisons as part of the Security Investment Programme.	
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Associated documents	Related Service Specification Related Operating Models Related Direct Service Costs and Assumptions paper Related Cost Spreadsheets See: http://www.justice.gov.uk/about/directory-services.htm	
Audit/monitoring: Compliance with this instruction will be monitored by Audit and Corporate Assurance and through internal self-audit.		
Introduces amendments to the following documents: - This PSI, together with that on the "*Management and Security of Communication/Control Rooms and Internal Prisoner Movement*", from the "*Control of Movement*" Function within the National Security Framework replacing guidance within the previous Function 2 (Accounting and Control).		

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Executive summary

Background

1.1 This instruction is one of two Prison Service Instructions (PSIs) which form part of the Control of Movement Function of the National Security Framework. The other PSI in this Function is the "*Management and Security of Communication/Control Rooms and Internal Prisoner Movement*" Control of Movement instructions can be accessed via the National Security Framework website. This document also includes the Enhanced Gate Security Policy (EGS) Operational Guidance as an Annex since EGS involves the management of the Gate in approximately 50 prisons as part of the Security Investment Programme.

Desired Outcomes

1.2 Escapes are prevented.

1.3 Threats to the security, order and control of the establishment are detected and deterred.

1.4 Only authorised persons, vehicles, goods and other items enter and leave the establishment.

1.5 Crime is detected and deterred.

1.6 Movement through the gate is professional, consistent and timely.

1.7 Vehicle Movements within prison establishments are conducted safely and securely.

Application

1.8 This PSI is applicable to all prison establishments.

Mandatory Action

1.9 *All instructions included in the National Security Framework (NSF) are mandatory. The NSF incorporates mandatory requirements derived from specifications relevant to its specific policy areas. This PSI incorporates mandatory requirements derived from the Gate Services specifications, which are highlighted in the shaded boxes.*

1.10 *Governors and Directors of contracted prisons must ensure they have local security strategies in place to manage the Gate which are in accordance with the instructions set out in this PSI.*

Resource Impact

1.11 There may be some resource implications for establishments in updating local security strategies to ensure that they are in line with the requirements set out in this PSI.

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OPERATIONAL INSTRUCTIONS

Text within shaded boxes indicate requirements from the "*Provision of a Secure Operating Environment*" bundle of specifications, specifically the 'Gate Services' specification.

2. AUTHORISED ACCESS & EXIT

Only authorised (including statutory) persons, vehicles, property, mail and other items enter and exit the establishment.

2.1 Establishment Local Security Strategies must include instructions that cover the way in which security within the Gate area is to be maintained. The Gate area is that part of the prison through which people, vehicles and materials are allowed into and out of the establishment. Many Prison Rules have a bearing on Gate functions, chiefly: 41 searching of prisoners; 64 searching of staff; 70 prohibited articles; 71(1) power to stop; examine or search people or vehicles; 71(2) power of removal from a prison; and 79(2) right of access of members of Independent Monitoring Board to the prison YOI Rules 43, 63, 69, 70, 77(2).

2.2 The duties of Gate staff include:

- Identifying controlling and recording the authorised entry and exit of prisoners, people, vehicles and materials;
- Ensuring that searching procedures are carried out for individuals, vehicles and materials; and
- Preventing key loss by controlling the storage, issue and receipt of security keys.

2.3 In accordance with the provisions of the S19(1) of the Prison Act 1952, Prison Rule 79(2), YOI Rule 77(2), S20 and S48 of the Health & Safety at Work Act 1974 and S54 of the Food Act 1990, the following people have a statutory right to enter a prison at any time

- Justices of the Peace for the County or Borough of the prison or the prisoner in question;
- Members of the prison's IMB;
- Health & Safety Inspectors of the Health & Safety Executive (HSE) enforcing Health & Safety legislation;
- Local Authority Environmental Health Officers enforcing the 1990 Food Act or Food Safety (General Food Hygiene) Regulations 1995; and
- Members of the European Committee for the Prevention of Torture.

Note: special arrangements will apply to access rights for unannounced visitors during the NSF 8.1 Management and Security of Nights (PSI 24/2011)

2.4 *Local Security Strategies must reflect the individual circumstances of the establishment. Where an establishment has more than one Gate, these instructions apply to all Gates, regardless of the nature of operations/function of the Gate (e.g., delivery Gate only). The specific risks posed by the operation of multiple Gates must be taken into account in Local Security Strategies.*

2.5 The policy covering the security clearance necessary for individuals to access and move within an establishment is set out on the My Service website. *The level of security clearance varies according to the security category of the establishment and the rank or status of the person. Local Security Strategies must ensure that before being allowed access to the establishment staff, contractors and professional visitors have acquired the security competences appropriate to the environment in which they are to be employed.*

Entry and exit by staff, prisoners, visitors, contractors and vehicles is risk assessed controlled and monitored in accordance with the LSS.

2.6 *Prison management must issue local instructions for the secure entry and exit of every person, vehicle and item seeking to enter or leave the prison through the Gate. In particular staff must:*

- *allow only authorised people and vehicles in/out of the Gate;*
- *allow only authorised items in/out of the Gate. Those items that are prohibited by law within the prison without a specific authorisation are set out in* **See NSF 6.3 – "Conveyance and Possession of Prohibited Items and Other Related Offences" (PSI to be Published).** Other items may be prohibited locally;
- *record the names of all persons, and the registration numbers of all vehicles, entering/leaving the prison, together with the time of arrival/departure and next scheduled destination;*
- *record items leaving or being delivered to the Gate;*
- *ensure (where a prison has a vehicle lock or an inner and outer gate) that at least one gate (either the inner or outer gate) is secured when people and vehicles are entering or leaving. If the vehicle is too long for the lock, staff (and dogs if available) must be deployed to prevent prisoners escaping or absconding and be provided with searching equipment, e.g. torches, under body and overhead mirrors, for the search of vehicles.*

2.7 *Local Security Strategies must be in place to ensure that the entry and exit of visitors and vehicles through the Gate is managed in liaison with the communications room (control room in the High Security Estate).*

2.8 The circumstances in which an escort is required must be outlined in the Local Security Strategy emphasising:

- *that people and/or vehicles identified as requiring an escort within the establishment will not be allowed to enter until the escorting staff are available;*

- *that escorting staff must be competent to carry out the role, being conversant with local procedures and instructions including contingency plans, in receipt of up-to-date security awareness training / briefing, possessing a thorough knowledge of the geography of the establishment and being proficient in the use of the establishment's radio net and any technical aids or equipment associated with the escorting role;*

- *that where deemed necessary, staff must control and monitor those whom they are escorting from the point of entry to the point of exit and must be fully acquainted with the identities of their charges and the areas in the establishment to which they are permitted access;*

- *that vehicles and their occupants must be confined to areas to which prisoners do not have access, unless under escort or when a risk assessment or supplementary security measures determines otherwise; and*

- *that the responsibility to control and monitor the vehicles of visitors / contractors extends to the establishment's own vehicles.*

3. PRISONERS THROUGH THE GATE

An accurate and up-to-date establishment roll is maintained.

3.1 *Staff working in the Gate must record all prisoner movement through the Gate, maintaining an accurate and up-to-date establishment roll at all times. There must be a minimum of four mandatory roll checks each day.* NSF 5.2 - Management and Security of Communication Rooms/Control Rooms and Internal Prisoner Movement (PSI 13/2011)

3.2 *Staff must prevent the unauthorised exit and entry of prisoners.*

3.3 The entry and exit of prisoners in the establishment by vehicle must be secure.

3.4 Local guidance for staff working in the Gate must describe how to check the identity of prisoners passing through the Gate as part of outside work parties. Identity checks must also be completed for prisoners discharged and received on temporary licence (ROTL), and final discharge including checking identity details on the prisoner's licence.

3.5 Staff working in the Gate must know what action to take in case of escape, abscond or suspected escape or abscond. See local contingency plans as required by PSO 1400.

3.6 Staff working in the Gate must also know what action to take in the event of a temporary release failure (including prisoners returning to the establishment intoxicated or late, or in the event of a failure to return), an unlawfully at large prisoner surrendering to the establishment, or police returning prisoners who have been unlawfully at large. (See local contingency plans).

Staff, prisoners, visitors, contractors and vehicles are kept waiting for as short a period of time as possible (emergency vehicles are prioritised).

3.7 *Access to the prison must be managed in order to minimise waiting before access to the establishment is gained. Local policies must make provision for the timely and prioritised*

entrance and exit of emergency vehicles without compromise of security. Guidance on acceptable forms of identification for visitors may be found in NSF 10.1 - Management and Security at Visits (PSI 15/2011).

4. SEARCHING

A Core Entry Searching strategy for staff, prisoners, visitors, vehicles and contractors is agreed, documented and implemented to prevent unauthorised articles entering and leaving the establishment. (High Security Establishments).

4.1 *Prisons in the High Security Estate must ensure that their Local Security Strategies (LSS) contain full details of their entry/exit searching strategies for staff, visitors, prisoners, and contractors including the use of a metal detecting portal, an x-ray machine, handheld metal detecting wands and a rub down search of the person. Separate procedures must be drawn up for the searching of vehicles. All procedures should reflect the enhanced risks that unauthorised articles pose to the safety and security of the prison and must be submitted to the Director of High Security's office for approval. At all times searching must be conducted in a professional manner in accordance with* NSF 3.1 - Searching of the Person (PSI48/2010) and NSF 3.2 - Cell Area and Vehicle Searching (PSI 49/2010)

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An entry and exit searching strategy for staff, prisoners, visitors, vehicles and contractors is agreed, documented and implemented to prevent unauthorised articles entering and leaving the establishment and is proportionate to the risk assessed. (Non High Security establishments).

4.2 *Prisons outside of the High Security Estate must develop and document within their Local Security Strategies, procedures that deliver entry/exit searching strategies for staff, visitors, prisoners, contractors and vehicles. All searching must be conducted in a professional manner in accordance with* NSF 3.1 - Searching of the Person (PSI48/2010) and NSF 3.2 - Cell Area and Vehicle Searching (PSI 49/2010)and be proportionate to any risk that may have been identified.

5. PROHIBITED ITEMS

Staff, prisoners and visitors are aware of unauthorised items and local searching arrangements.

5.1 *Prison management must ensure visitors are made aware of items which they may not bring into the prison. Full details are outlined in* **NSF 6.3 – Conveyance and Possession of Prohibited Items and Other Related Offences (PSI xx/2011 Link here) (To be Published).**

Safe-Keeping of Firearms & Incapacitant Sprays

5.2 *Police officers are frequent visitors to prison establishments and local arrangements must be agreed for the safe keeping of firearms and incapacitant sprays. Except for some hostage situations, armed police officers are not permitted to take firearms (or any incapacitate sprays) beyond the Gate area of the prison and these items must be stored in a secure cupboard or safe for the duration of the officer's visit.*

5.3 *The Police Intelligence Officer must be involved in drawing up local protocols with visiting forces*.

5.4 In the event of the control of a prison being handed over to the Police, separate contingency plans managing the use of firearms and incapacitant sprays will be activated in accordance with PSO 1400 and The ACPO Guide to Prison Disputes.

Food

5.5 Visitors are only allowed to bring the following food into the prison, other than at the Governor's discretion: (Woodcock recommendation 15).

- baby food; and
- food brought in by approved ministers of religion for particular religious festivals if this cannot be provided by the prison. The bringing in of such food should always be agreed in advance by the prison.

6. INTERNAL VEHICLE MOVEMENTS

Vehicular movement within an establishment is authorised, controlled and supervised according to risk.

6.1 Staff in the Gate are responsible for ensuring that no vehicle requiring an internal escort is allowed entry until the escort is in place. *Local policies must ensure internal escorts for emergency vehicles are available in a timely manner.*

6.2 *Local security strategies must ensure that the movement of vehicles in the establishment is with prior authorisation of the communication room (control rooms in HSE establishments where enhanced security measures may be in place). Where no internal escort is required, staff working in the Gate must ensure that prior authorisation is granted.*

6.3 *Staff providing internal escorts for vehicles must be aware of the security and safety requirements of the establishment and of the vehicle to be escorted* Health and Safety Guidance Notes 04/2008.

6.4 *Vehicles and their occupants, when within the establishment, must be confined to areas to which prisoners do not have access, unless under escort or when a risk assessment or supplementary security measure determines otherwise.* NSF 5.2 - Management and Security of Communication Rooms/Control Rooms and Internal Prisoner Movement (PSI 13/2011)

Vehicles move to and from required destinations in a timely manner in order to meet the published local regime and requirements of other services.

6.5 The efficient movement of vehicles depends on efficient Gate processes to record and search vehicles and prioritise movements. *Staff working in the Gate and those escorting vehicles must have access to a copy of the published regime. The requirements of other services which may impact on the ability of escorts to be completed must also be available to staff.*

Where vehicles are not escorted a documented security risk assessment supports this.

6.6 Local security strategies must clearly set out the circumstances under which a vehicle will not receive an internal escort whilst within the prison. Vehicles are only permitted access to the establishment without internal escort following a detailed risk assessment which should consider the size and type of vehicle, the areas of the prison it requires access to, its final destination within the prison, and the likely impact on the daily regime. *Local risk assessments for these circumstances must be in place prior to the vehicles access.*
(This does not apply to the HSE).

Local Safe Systems of Work on workplace transport safety (Vehicle Escorts) are enforced.

6.7 Local safe systems of work which comply with the requirements of Health and Safety Guidance Notes 04/2008. *must be available to staff involved in supervising the movements of vehicles. All staff undertaking vehicle escorts must be trained and aware of the location and appropriate use of personal safety equipment clothing and methods of communication with the driver during the escort.*

Access to vehicles is only permitted in accordance with Security and Health & Safety risk assessments.

6.8 *The Local Security Strategy must set out processes that must be completed before any vehicles are allowed access into the prison. This must include a search in accordance with* NSF 3.2 - Cell Area and Vehicle Searching (PSI 49/2010), a risk assessment of the vehicles movements within the prison in accordance with Health and Safety Guidance Notes 04/2008**,** and the allocation of a trained escorting person (when required).

7. SECURITY KEY MANAGEMENT

Security keys are stored, allocated, issued, returned and accounted for in accordance with the LSS.

7.1 *The local security strategy must set out procedures for the secure storage, allocation, issue, return and safe keeping of security keys.*

- *All Class I, II and III security keys, including bunches of such but excluding handcuff keys, for use by staff must be given a number and stored in a key safe in the Gate;*
- *Spare security keys must be kept under arrangements set out in the Local Security Strategy;*
- *The storage and issue of all other keys (including restraint keys) must be set out in the Local Security Strategy;*
- *The Local Security Strategy must set out procedures for the location and use of Class I doubles keys and Class III master keys. The number of these keys must be limited;*
- *The local security strategy must set out secure and accountable arrangements for the issue and retrieval of keys;*
- *Instructions must be in place for the action to take in the event of a person arriving at the prison without a key chain;*

- *The key safe must be locked overnight or when not in use and only authorised staff may have access to the key safe;*
- *The numbered positions in the key safe must never be empty;*
- *Key safes must not be unlocked in the presence of prisoners or visitors;*
- *The Local Security Strategy must set out the frequency and type of key checks to be made and which member of staff must do each check, but the minimum check for every establishment is once daily after lock up each night. A record of each check must be made in the Gate Occurrence Book or equivalent;*
- *Arrangements must be in place to ensure that no key holder leaves the establishment with their keys;*
- *The local security strategy must set out procedures for the restricted use of keys during the night state;*
- *No keys may be taken out of the prison, other than as agreed in the local security strategy;*
- *A ledger of keys must be maintained;*
- *Staff using sports facilities in establishments during their own time must ensure keys are retained securely in their possession or returned to the Gate.*

8. CORPORATE IMAGE

'Front of house' customer service is professional and consistent and contributes to a secure environment.

Corporate Image (including signage, flags and other devices) is professional.

8.1 *Staff working in the Gate must be aware of the importance of professional conduct at all times and contribute to positive customer service. Managers must ensure unprofessional behaviour is challenged.*

9. INITIAL INCIDENT & EMERGENCY RESPONSE

The initial response to any incident and/or emergency is provided in accordance with national guidelines and local contingency plans.

9.1 *Staff working in the Gate must be aware of their role in local contingency plans for all types of incidents*.

EGS – Operational Guidance – Annex 1

1. Purpose

1.1 This Annex includes mandatory actions and operational guidance for prisons with Enhanced Gate Security (EGS). It instructs and guides on the procurement, maintenance and servicing of equipment, health and safety, staff training, audit arrangements and searching process associated with EGS. EGS is already active in high security establishments and this Annex standardises EGS across the sites receiving investment in Gate searching as part of the £100m investment going into prison security. Moreover, this guidance will apply to those establishments which have been identified as one of the 50 EGS priority sites.

1.2 EGS refers to the installation of X-ray baggage scanners, archway metal detectors (sometimes referred to as a 'portal') and hand-held metal detector wands in approximately 50 prisons in the closed estate as part of the Security Investment Programme (SIP). EGS also includes recruiting additional staff to carry out searches at the Gate and manage the searching process. It is designed to prevent the conveyance of unauthorised items by prison staff and professional and domestic visitors.

1.3 Although the exact number of sites receiving EGS could change, for the purpose of this document we will refer to the '50 prisons'. All 50 sites will be listed in this policy when formally announced.

1.4 This Annex refers to the following PSIs and policy frameworks:

- PSI 20/2011 - Prison Dogs
- PSI 10/2012 - Conveyance and Possession of Prohibited Items and Other Related Offences
- PSI 18/2015 - NOMS Health and Safety Arrangements for Radiation Safety of X Ray Security Equipment
- PSI 37/2015 – NOMS Health and Safety (HS) Arrangements for Risk Assessment
- PSI 07/2016 - Searching of the Person
- PSI 08/2016 - Dealing with Evidence
- Counter Corruption and Reporting Wrongdoing Policy Framework
- Crime in Prison Referral Agreement
- Use of X-Ray Body Scanners (Adult Male Prisons) Policy Framework

The EGS guidance is currently annexed to PSI 14/2011 - Management and Security of Gate Services. It will also be annexed to PSI 07/2016 - Searching of the Person and PSI 18/2015 - NOMS Health and Safety Arrangements for Radiation Safety of X Ray Security Equipment once a review of these policies has been completed.

Background

1.5 The Gate is a significant supply route for unauthorised items entering prisons. The presence of unauthorised items within a prison, such as mobile phones, weapons and drugs, presents a major security threat.

1.6 The use of drugs in prison is one of the biggest challenges facing our criminal justice system today. The scale of the problem is significant and has become more challenging in recent years with the emergence of psychoactive substances. There has also been an upward trend in the number of mobile phones in prisons in the last five years. Not only are mobile phones illegal items in a custodial environment, they are used to facilitate a range of other harmful activities. This includes the conveyance of other unauthorised items into the prison, for example drugs, weapons and further mobile phones, which could result in the intimidation of victims or other vulnerable people in the community. This growing illicit economy is incredibly harmful and is fuelled by debt and bullying, impacting the safety of both staff and prisoners.

1.7 HMPPS is continually working to shut down conveyance routes and disrupt and prosecute individuals who attempt to convey unauthorised items into our prisons. This investment in EGS is unprecedented and will allow more prisons to utilise the latest technology to shut down conveyance at the Gate.

Outcomes

1.8 By following the mandatory actions and guidance within this Annex it is expected that prisons can:

- Improve their capability to detect unauthorised items carried by visitors and staff attempting to enter establishments via the Gate.
- Contribute to a reduction of drugs and other unauthorised items being smuggled into their establishment.
- Contribute to a reduction in the risks posed by unauthorised items being smuggled into their establishment.
- Deter exploitation of vulnerable visitors or staff members to convey unauthorised items.
- Deter corrupt members of staff from attempting to transport unauthorised items into their establishment.

Key Roles

Head of Function: Governor grade responsible for the Gate complex.

Security/Operations Custodial Manager (CM): responsible for supporting OSG's as a line manager, supervising the maintenance of searching standards and quality assurance capability of equipment, monitoring EGS specific training and allocating staff to appropriate courses, ensuring that searching equipment is at optimum performance and acting as a local SPOC and link to SOCT. This post will usually be assigned to the Security/Operations function and the individual selected will be assigned the responsibilities under this guidance.

OSGs: staff working in the Gate area responsible for carrying out searching. OSGs who are trained in operating the X-ray baggage scanner will be those carrying out the daily safety check.

OSGs should also undertake visual checks of the archway metal detector to ensure it is not damaged.

Band 3 Officers: resource that can be deployed as required to support the Gate searching process, support areas of displacement, respond to incidents where powers of constable are required and enhance visible deterrence. Some sites have elected to substitute some OSG resource for Band 3 officers where 100% search can be maintained as an element of their resource configuration.

Dog handlers: 2 x dog handlers per site to be regionally managed but allocated and ring-fenced for use at selected priority sites. Handlers will be fully equipped under SIP funds and provided with a passive dog (for people search) and active dog for (building/vehicle/outside area search). 2 x handlers will not provide 100% provision at the Gate, due to dog rest and non-effective periods, however will provide a significantly enhanced unpredictable presence and targeted provision every day of the week.

For those sites that have elected to not have dog handlers as they already have the dog handler resource available to deliver EGS in their establishment, Band 4 supervising officers can be provided to support those objectives in regard to the first line of defence and to prevent the conveyance of unauthorised items into the establishment.

Radiation Protection Adviser (RPA): Nationally contracted third party responsible for providing advice on radiation protection and undertaking periodic inspections and surveys of the X-ray baggage scanner equipment and reviews of radiation safety.

Radiation Protection Supervisor (RPS): responsible for ensuring that the radiation operation is controlled in accordance with Local Rules and compliant with legislative requirements identified by the RPA. The RPS must have sufficient line management authority and time to undertake relevant duties. They will also oversee X-ray baggage scanner operators.

2. Procurement

2.1 In general, Public Sector Prisons must not purchase X-ray baggage scanners and archway metal detectors without the agreement of SOCT and outside of the current MOJ contract.

2.2 As part of the EGS procurement exercise, performance testing will be carried out to ensure that the new equipment meets the standards required for the custodial estate. This is to ensure that the equipment is effective and represents value for money and that prisons are offered appropriate support to plan for its use.

2.3 Following this roll-out of EGS to the 50 selected prisons, HMPPS prisons outside of the initial 50 can source X-ray baggage scanners and archway metal detectors from MoJ Commercial Contracted suppliers by contacting MoJ Commercial Security Category at mojprocurementsecuirty@justice.gov.uk and soct.countermeasures@justice.gov.uk.

2.4 Contracted Prisons, who have not been identified as part of the 50 prisons for EGS, are responsible for the purchasing and funding of their own X-ray baggage scanners and

archway metal detectors in the absence of an agreed arrangement. However, it is strongly recommended that they look at the specifications of equipment used in Public Sector Prisons to ensure that they source effective equipment which complies with legislative requirements and HMPPS' Requirements for Practice. Contracted Prisons are still required to comply with HMPPS policies and instructions.

3. Maintenance/Servicing

3.1 The Governor has ultimate responsibility for ensuring that equipment is maintained in accordance with the manufacturer's recommended maintenance schedule and technical specification. Maintenance arrangements will be communicated upon implementation. All maintenance schedules for the 50 prisons must be agreed with SOCT. For further information following installation, please contact mojprocurementsecuirty@justice.gov.uk and EGSPSMqueries@justice.gov.uk.

3.2 Service and maintenance records should be made available for audit purposes during the lifetime of the equipment. A written maintenance/service report will be provided for the X-ray baggage scanner and the RPS must ensure these reports are kept in the RPA Radiation Protection Book. Maintenance records for the archway metal detectors will be kept in each establishment with the security managers. This includes certification/re-certification of the mandatory verification of the calibration of the archway metal detector, which is discussed further in paragraph 7.3 of this guidance.

4. Audit Arrangements

4.1 For both Public Sector Prisons and Contracted Prisons the Quality Assurance audit will be undertaken by HMPPS Operational and Systems Assurance Group (OSAG) as part of the prison's Security Audit, and this will involve an audit of the physical searching process.

4.2 In addition, the prison service maintenance group will undertake statutory mandatory compliance audits (SMC) to ensure both Public Sector Prisons and Contracted Prisons meet the Ionising Radiation Regulations 2017 legislative duties in relation to the maintenance of X-ray baggage scanner equipment.

4.3 Health and Safety Assurance and monitoring will be undertaken by the HMPPS Health and Safety function as standard for all Public Sector Prisons, using the national health and safety audit and reporting tool. This audit will be used to monitor compliance with the Ionising Radiation Regulations 2017 for the X-ray baggage scanner equipment.

4.4 The Health and Safety processes may be different for Contracted Prisons and therefore, Contracted Prisons must have their own Health and Safety arrangements which ensure, so far as is reasonably practicable, the health, safety and welfare of all employees using all EGS equipment.

5. Pre-installation

5.1 Prisons receiving EGS from SIP will be given support from the implementation team in advance of installation to ensure that they are ready to receive the kit, e.g. ensuring that there is enough space for the equipment to operate effectively, that Local Rules are published and that staff have been trained in safe use of X-ray equipment etc.

5.2 Contracted Prisons must ensure that the Health, Safety & Executive are notified of any ionising radiation equipment and its use, which will be the X-ray baggage scanner in the context of EGS. If in doubt as to the Health, Safety & Executive registration status, Contracted Prisons should seek the advice of their appointed RPA regarding the requirements for Health, Safety & Executive registration. Individual notification for Public Sector Prisons is not required as this as this is undertaken centrally by the Ministry of Justice.

5.3 There are no pre-installation requirements for the archway metal detector and hand-held metal detector wand as this equipment does not use ionising radiation.

6. Installation/re-location of Equipment

6.1 New archway metal detector installations must be undertaken by a competent installer, who is typically the supplier. Once installed, archway metal detectors should not be moved. If it becomes necessary to relocate the archway metal detector, a further assessment is required and must be completed by an approved installer/contractor. All prisons should contact EGSPSMqueries@justice.gov.uk if they are considering moving the archway to an alternative location.

6.2 The hand-held metal detector wands are battery-operated and any new equipment is accompanied by a test piece that can be used to check that the equipment is working effectively.

6.3 Local trade unions should be consulted throughout the implementation process.

X-ray Baggage Scanners

Supplier-led Critical Examination

6.4 In accordance with PSI 18/2015 - NOMS Health and Safety Arrangements for Radiation Safety of X Ray Security Equipment, when new X-ray equipment is installed or existing equipment is moved to a new location Governing Governors and Heads of Groups must ensure that a Critical Examination is carried out by the installer before the equipment goes into use. Please refer to PSI 18/2015 - NOMS Health and Safety Arrangements for Radiation Safety of X Ray Security Equipment for further instructions on the Critical Examination.

6.5 The supplier will undertake a Critical Examination to ensure that:

- the safety features and warning systems operate correctly; and
- the equipment provides sufficient protection for all persons against exposure to radiation.

6.6 The supplier shall provide a written report on the outcome of the Critical Examination together with adequate information about the proper use, testing and maintenance of the X-ray baggage scanner. The RPS must ensure this report is kept in the RPA Radiation Protection Book and that any recommended requirements are undertaken during the daily and weekly operator checks (discussed further at paragraph 11.8).

RPA-led Radiation Safety Survey Inspection

6.7 The RPA must carry out a Radiation Safety Survey Inspection(s) of the X-ray baggage scanner as part of their visits to ensure that the machine is not operating outside of the authorised parameters and the equipment specification. These Radiation Safety Survey Inspection(s) will be undertaken:

- when first installed and prior to use;
- annually;
- if the equipment is re-located; or
- following the replacement of any component that directly affects radiation exposure.

6.8 For now, please refer to the Use of X-Ray Body Scanners (Adult Male Prisons) Policy Framework for further guidance on the Radiation Safety Survey Inspection(s) as this is applicable to the X-ray baggage scanner. The Radiation Safety Survey Inspection is produced by the RPA and sent to establishments, so establishments do not require a template of it. Please see paragraph 10.4 of this guidance for further details of this inspection.

7. Calibration of Equipment

Archway Metal Detector (SMD600 Plus – MI2 walk through metal and ferromagnetic detector)

7.1 The CEIA archway metal detector has a built-in functionality option setting, which is designed to detect threats pertinent to user requirements. Each unit is pre-programmed to the National Institute of Justice (NIJ) 0601 02 Standard, which is a recognised industry standard procurement aid for walk-through metal detectors for use in Concealed Weapon and Contraband Detection.

7.2 The NIJ 0601 02 standard also has a sub-setting ‘Object Size Class’, which is based on the ability to detect metallic objects that vary in size. The second sub-settings are: Large Object Size, Medium Object Size and Small Object Size. SIP are working to achieve some customised sub-settings ranging between these ‘Object Size’ classes, which will also be added to the calibration settings of each archway metal detector to provide the option of a more bespoke capability for sites.

7.3 Each archway metal detector will be programmed during installation. The archway settings should not be changed. If you would like to change the settings, please speak to your Head of Security in the first instance. As per the supplier installation and programming manual for the archway metal detector, a mandatory verification/re-certification of the calibration of the archway metal detector should be conducted every 12 months, and a record of this must be held on site. This task should be performed through the annual PPM plan or by prison staff if they have the right test kit. Please contact EGSPSMqueries@justice.gov.uk should you wish to change the settings.

X-ray Baggage Scanner

7.4 The X-ray baggage scanner is a fixed power output for the operator and requires no user calibration.

8. Radiation Safety - X-ray baggage scanner

Radiation Protection Advisor (RPA)

8.1 To comply with IRR17 HMPPS has a contract with a national radiological service provider to deliver the Radiation Protection Advisory (RPA) services for the Radiation Safety Survey inspections, Radiation Protection Supervisor (RPS) training and Local Radiation Advice. These services are a legal requirement for HMPPS to operate X-ray equipment.

8.2 RPA services are only required for the X-ray baggage scanner (and other X-ray equipment). Please refer to PSI 18/2015 - NOMS Health and Safety Arrangements for Radiation Safety of X Ray Security Equipment for comprehensive instructions on the responsibilities of the RPA.

Radiation Protection Supervisors (RPS)

8.3 Governors/Directors must appoint a competent and trained member of staff as the RPS for each area of the prison where an X-ray scanner, such as the X-ray baggage scanner, is used.

8.4 The RPS must ensure that the radiation operation is controlled in accordance with Local Rules and compliant with legislative requirements identified by the RPA. The RPS must undertake a weekly safety check of the X-ray baggage scanner equipment and record the results in the Radiation Protection Book. Please refer to PSI 18/2015 - NOMS Health and Safety Arrangements for Radiation Safety of X Ray Security Equipment for comprehensive instructions relating to the RPS role.

8.5 Carrying out weekly safety checks is included in the RPS 1-day course. There should be an RPS on duty at all times, which will mean that prisons should have more than one trained RPS and should consider displaying who is the RPS on duty each day.

Pregnant People

8.6 In regard to X-ray baggage scanner equipment, PSI 18/2015 - NOMS Health and Safety Arrangements for Radiation Safety of X Ray Security Equipment advises that it is not necessary to place restrictions on employees who are, or may become, pregnant though any concerns they raise should be addressed considerately. There is also no need to put any safeguards in place for pregnant visitors who will inevitably come into close proximity to this equipment at the Gate.

9. Electromagnetic Safety – Archway Metal Detector & Hand-Held Metal Detector Wands

9.1 Electromagnetic field (EMF) testing is carried out by the manufacturer(s) of the archway metal detector and hand-held metal detector wands, which is part of their obtaining the Conformity European (CE) marking for their products. Following this, there are no EMF testing requirements for the equipment as the archway metal detectors and hand-held metal detector wands use low intensity EMFs/non-ionising radiation similar to mobile phone transmission.

10. External Maintenance

Archway Metal Detectors

10.1 In order to maintain the equipment as per the manufacturer guidance and FM best practice, the service provider must carry out annual preventative maintenance visits on the archway metal detectors. The first year planned preventative maintenance (PPM) is included in the purchase price of the unit and should be conducted on or before the anniversary of installation. After this point establishments must raise their own Purchase Orders for annual maintenance. Further communications with instruction on this point will be issued by EGSPSMqueries@justice.gov.uk.

Hand-held Metal Detector Wand

10.2 Beyond the PAT, prisons should not seek out planned maintenance for the hand-held metal detector wands since this goes against the manufacturer's advice as the equipment has no moving parts to maintain. However, operators of the wand should undertake a pre-user check to look for any damage and battery discharge prior to use.

X-ray Baggage Scanners

Supplier

10.3 Supplier checks will be carried out on the X-ray baggage scanners once per annum. For further information during the lifetime of the SIP programme, please contact your local SPOC and link to SOCT. After the programme has ended, details will be provided by the SIP programme team around the ongoing maintenance process.

RPA visits

10.4 In accordance with PSI 18/2015 - NOMS Health and Safety Arrangements for Radiation Safety of X Ray Security Equipment, the RPA is responsible for visiting each prison where security X-ray equipment is used at a frequency determined by the RPA as appropriate for type and use of equipment. In accordance with PSI 18/2015 - NOMS Health and Safety Arrangements for Radiation Safety of X Ray Security Equipment, these visits will include an inspection and survey of X-ray security equipment (sometimes called the 'Radiation Safety Survey Inspection', referred to in paragraph 6.7), which will be the X-ray baggage scanner in the context of EGS, and reviews of radiation safety.

10.5 In accordance with PSI 18/2015 - NOMS Health and Safety Arrangements for Radiation Safety of X Ray Security Equipment, radiation dose rate measurements and checks on the safety and warning systems (including statutory checks for leakage of radioactive material where appropriate) will be carried out by the RPA during their regular visits to determine whether or not:

- The equipment continues to meet relevant standards,
- Operation of the equipment can be achieved whilst restricting doses to staff and other persons as far as is reasonably practicable.

10.6 PSI 18/2015 - NOMS Health and Safety Arrangements for Radiation Safety of X Ray Security Equipment also states that a report of the measurements and checks undertaken will be included in the visit report, which will include any recommendations for remedial action where this is required.

11. Prison-owned assessments and checks

Health and Safety Risk Assessment – All EGS Equipment

11.1 In accordance with PSI 37/2015 – NOMS Health and Safety (HS) Arrangements for Risk Assessment, the manager (the Head of Function) should lead the risk assessment process and retains the responsibility to ensure the completed assessment is suitable and sufficient. When completing the risk assessment, the Head of Function may wish to involve the establishment's Health and Safety Advisor(s) for specialist advice and support plus the operators of the equipment. For the X-ray baggage scanner equipment, the Head of Function may also wish to involve the RPS and, where necessary, the RPAs. Please refer to PSI 37/2015 – NOMS Health and Safety (HS) Arrangements for Risk Assessment for comprehensive instructions on undertaking, reviewing and amending health and safety risk assessments.

11.2 The Head of Function responsible for the risk assessment must ensure control measures identified are implemented and followed. Where additional control measures are identified to reduce the level of risk associated with a hazard these must be completed within the timescale specified by the risk assessment document.

Ionising Radiation Risk Assessment – X-ray Baggage Scanner

11.3 In accordance with HMPPS' Requirements for Practice and Regulation 8 of the Ionising Radiation Regulations 2017 (IRR17), before equipment is put into use every prison must undergo an initial Ionising Radiation Risk Assessment of the potential risk of exposure to radiation for staff operating the machines (X-ray baggage scanners in the context of EGS) and any bystanders, as well as prisoners suspected of concealing contraband internally. The purpose of the assessment is to identify the measures required to restrict exposure during normal operations and in the event of an accident. This includes restricting access to the equipment so that the operation cannot be undertaken by unauthorised persons. In particular, all hazards with the potential to cause a radiation accident must be identified, e.g. removing or supervising keys, using barriers to prevent access to the inside of the machine via the curtains. Measures must be implemented to prevent any such accident or limit the consequences should such an accident occur.

11.4 The Head of Function, responsible for the X-ray baggage scanner in the establishment, must ensure that the Ionising Radiation risk assessment is undertaken before the X-ray baggage scanner machine is first used and updated whenever there is a change in practice, following relocation or an accident. The risk assessment should be completed in conjunction with the Head of Function responsible for the equipment, the RPS, the onsite Health and Safety advisor, the operators of the equipment and, where necessary, the RPA. A template of the Ionising Radiation Risk Assessment is provided below at Template 1.

11.5 The Governor must ensure that any measures identified by the Ionising Radiation Risk Assessment, as being required to restrict exposure, must be implemented.

All Machinery Checks

11.6 Running performance test pieces through both the metal detection and X-ray equipment is the responsibility of the Security/Operations department and a critical assurance activity that supports us to understand how the kit is performing. It is also the Security/Operations department's responsibility to oversee and review the operator's capability to effectively and efficiently find unauthorised items using these search aids and to offer support and guidance as required. Details of how to procure these test pieces and how to use them will be shared by the implementation team. If you have further questions, please contact EGSPSMqueries@justice.gov.uk.

11.7 X-ray baggage scanners, archway metal detectors and hand-held metal detector wands are covered under the standard Portable Appliance Test (PAT), which must be carried out across all sites for all electrical items. The PAT is carried out by the Facilities Management provider every 12 months. In terms of the hand-held metal detector wand, the wand charger is tested rather than the wand itself as they are battery-operated.

X-ray Baggage Scanner Checks

11.8 The X-ray baggage scanner operator must undertake a daily safety check before the machine is used. This must include ensuring that the warning light and emergency stop are working correctly and any other recommended manufacturer or engineer requirements. The daily check will be carried out by those OSGs who are trained in operating the X-ray baggage scanner. There must be a signed record of these checks kept with the X-ray baggage scanner, and it is good practice to also keep these records in the RPA Radiation Protection book. As per paragraph 8.4, the RPS is responsible for assuring these checks weekly and recording results in the RPA protection book.

11.9 X-ray baggage scanners must also undergo weekly checks by the operator to assess whether the unit is working at optimum performance. This involves running a transmission X-ray test piece through the equipment and recording the performance results on a test sheet. These weekly checks will be made known during the 2.5-day Learning and Development 'X-Ray Baggage Scanner' training course. The weekly check will be carried out by those OSGs who are trained in operating the X-ray baggage scanner.

11.10 X-Ray baggage scanners have the capability to project false images of threats. Threat Image Projection is a software solution to quality assure use of the equipment. If any issues are highlighted during this process, support and additional training will be/can be offered. Further guidance will be provided prior to implementation by EGSPSMqueries@justice.gov.uk.

Archway Metal Detector Checks

11.11 Please refer to the installation and programming manual for the archway metal detector supplier's suggested maintenance schedule, e.g. a series of inspection/tests occurring every four months, and for assistance with troubleshooting. Paragraph 7.3 also discusses the mandatory verification/re-certification of the archway calibration as detailed in the manual.

11.12 Archway metal detectors must undergo weekly checks by the operator. This involves conducting a walk test through the archway using the appropriate performance test piece for the HMPPS programmed setting (small/medium/large object), plus a phone test piece for the ferromagnetic detection. There must be a local record of these checks.

Summary of all equipment checks:

X-ray baggage scanner check	Archway Metal Detector check	Hand-held metal detector wand charger check	Type of test/visit	Frequency
Installation/Re-location of Equipment				
X			Radiation Safety Survey Inspection (6.7-6.8 and 10.4)	- When the equipment is first installed and prior to use; - annually; - if the equipment is re-located; or - following the replacement of any component that directly affects radiation exposure
X			Critical Examination (6.4- 6.6)	When new x-ray equipment is installed or existing equipment is moved to a new location
	X		Relocation assessment (6.1)	When the equipment needs to be moved
Internal Assurance/Management checks				
X	X	X	Portable Appliance Test (11.7)	Every 12 months
X			Operator safety check (11.8)	Daily
X			Operator performance test (11.9)	Weekly
	X		Operator performance test (11.12)	Weekly
X			RPS assurance safety check (8.4 and 11.8)	Weekly
X			Threat Image Projection (11.10)	Further guidance on this will be provided prior to implementation
	X		Supplier's suggested maintenance schedule (11.11)	Varied, but mostly occurring every four months.

External Maintenance				
X			Supplier check (10.3)	Annually
X			Radiation dose rate measurement and check (10.5)	Carried out as part of RPA's regular visits
	X		Planned preventative maintenance (10.1)	Annually
Calibration of Equipment				
	X		Mandatory verification/ re-certification of the calibration (7.3)	Every 12 months

12. Training

General

12.1 OSGs must have completed the mandatory OSG training package delivered by Learning and Development which now incorporates EGS as an additional week. There must be a local record of who has undertaken this training.

12.2 All staff who are deployed to searching at the Gate should receive Searching of the Person local refresher training every two years. Training records should be made available for audit purposes.

12.3 The Security Risk Unit are currently preparing a developmental package for Heads of Security receiving EGS and are working with L&D to pilot a training package for EGS CMs. The Security Risk Unit are also sponsoring a number of functional heads to become members of The Security Institute, a professional body for security personnel. This allows security managers access to a wide range of external skilling opportunities focussed on continuous learning and development. Sponsorship is based on an application process and is approved on a case by case basis.

X-ray Baggage Scanner

12.4 Establishments must ensure that all staff who are deployed to searching tasks involving the X-Ray Baggage Scanner have completed the 45-minute e-learning and have received the mandatory 2.5-day Learning and Development 'X-Ray Baggage Scanner' training. This course is listed live in the Learning Management System of myLearning. Any individual enquiries relating to X-Ray Baggage Scanner training can be referred to learning-development-general-enquiries@justice.gov.uk. A record of trained operators will be kept in the RPA Radiation Protection Book.

Archway Metal Detector

12.5 Staff who are deployed to searching at the Gate and managers with oversight of that functional area must complete local training on the use of the archway metal detector. Establishments should identify (usually two) staff member(s) who will receive this training from the archway metal detector supplier (or the implementation team) at the time of installation. These members of staff will then act as 'local trainers' for other staff using the archway metal detectors. The trainers will also act as SPOCs for the use of the archway metal detectors. There must be a local record of who has undertaken this training.

12.6 All staff deployed to searching tasks at the Gate will be offered the '1 day Back to Basics Foundation Course' locally and delivered by the Learning and Development Group. This course discusses theory and knowledge relating to archway metal detector use only. It does not include operation of the equipment hence the need to have received local operator training delivered by local staff, as described in the previous paragraph, in advance of the '1 day Back to Basics Foundation Course'.

RPS

12.7 The Governor must ensure that staff who undertake the RPS role complete the RPS training before they issue the RPS appointment confirmation. To receive a certificate evidencing completion of the training the staff member will have had to demonstrate sufficient knowledge and competency in radiation matters and have completed the full training course. The certificate must be kept in the RPA Radiation Protection Book along with a copy of the RPS appointment letter (letter template provided below at Template 2).

12.8 RPS training (including refresher training) must be sourced from HMPPS's contracted RPA. All establishments with X-ray baggage scanners will hold the contracted RPA's contact details and can go direct to them to source RPS training. RPS's must attend an RPS refresher training course every three to five years (depending on duties and experience) or when there is a change in practice or technology, and a training record must be held at each prison establishment and on the national database via SOP. The original RPS certificate will need to be replaced with the subsequent training certificate.

13. Preparing to search at the Gate

Unauthorised items list

13.1 Establishments must ensure that they comply with the mandatory requirements contained within PSI 10/2012 – Conveyance and Possession of Prohibited Items and Other Related Offences. This involves displaying a sign which lays out the penalties for the conveyance of unauthorised items in/out of prison as described by the Offender Management Act 2007 and Crime and Security Act 2010. Where possible audio and visual warnings should be in use, and signage must also list the local authorised items in both the Gate and internal areas of the prison. PSI 10/2012 – Conveyance and Possession of Prohibited Items and

Other Related Offences - Annex 1 also details those items that cannot be lawfully conveyed into a prison without prior authorisation under the Prison Act 1952.

13.2 Governors may wish to review their local lists in light of intelligence driven risks/threats. Only the Governor, Deputy Governor or the Head of Security can give exemptions to this list and these must be recorded in writing.

Control Zone

13.3 Establishments must ensure that they create and define a clear demarcation zone for searching at the Gate and record their demarcation zone within their LSS. Establishments may wish to inform all staff as to the local point of demarcation. PSI 18/2015 - NOMS Health and Safety Arrangements for Radiation Safety of X Ray Security Equipment also provides guidance on designated areas for the use of X-ray equipment.

Local Rules

13.4 In accordance with PSI 18/2015 - NOMS Health and Safety Arrangements for Radiation Safety of X Ray Security Equipment, work with ionising radiation must be carried out in accordance with written safety procedures, referred to as Local Rules. Local rules are a set of instructions laying down how the work should be carried out so as to restrict exposure to radiation (and ensure compliance with relevant legislation). A Local Rules template is provided below at Template 3.

13.5 In accordance with PSI 18/2015 - NOMS Health and Safety Arrangements for Radiation Safety of X Ray Security Equipment, the RPA will provide Local Rules based on a standard template. It is the responsibility of the Governing Governor to ensure that local rules adequately reflect local conditions. Local rules should include:

- Details of the RPS(s);
- Description of any designated areas;
- General operational procedures (which are pertinent to radiation safety);
- Actions to be taken in the event of a radiation accident;
- Dose investigation level.

13.6 In accordance with PSI 18/2015 - NOMS Health and Safety Arrangements for Radiation Safety of X Ray Security Equipment, the RPS must ensure that adequate Local Rules are available and are being complied with by all staff and others who may come into contact with the X-ray equipment. The Governor must ensure that a copy of the Local Rules is displayed in a clearly visible location near the machine. Staff trained in operating the X-ray baggage scanner must read the Local Rules annually and then sign a register, which will be held in the RPA Radiation Protection Book, to confirm that they have read, understood and will adhere to the Local Rules.

14. Searching at the Gate

14.1 Staff, social/domestic, official and professional visitors entering the Gate will be searched in line with PSI 07/2016 - Searching of the Person.

14.2 After completing ID verification, all persons entering the prison via the Gate will be asked by a member of the searching staff if they have any unauthorised items on their person and will then commence the mandatory search process.

14.3 Every person will then:

- Collect a tray.
- Empty their pockets, remove all metallic objects, such as jewellery, watches, belts, and outer clothing, e.g. coats/jackets, and place these into the tray. The items retrieved from the pockets will then be searched by Gate staff.
- Have their property searched using the X-ray machine. If a visitor refuses, the Duty Governor will determine the most suitable way forward. If a staff member refuses, the Duty Governor will decide if they are to be refused entry and subjected to a conduct and discipline investigation. However, in some instances, the staff member will be detained and subject to arrest under the Police and Criminal Evidence Act 1984 (PACE).
- Place the tray onto the X-ray conveyor belt when instructed to do so by the operator.
- Walk through the archway metal detector and follow instructions given by the operator.
- Receive a secondary search by the hand-held metal detector wand if the warning light or alarm sounds on the archway metal detector. If the archway metal detector indicates below the knee level, shoes will be removed and X-rayed. Please see PSI 07/2016 - Searching of the Person for the use of hand-held metal detector wands during a search.

14.4 In accordance with PSI 07/2016 - Searching of the Person, all alarms must be explored and the source of the alarm must be identified wherever possible. The metallic object must be removed where possible. The person should be rescanned to ensure no other metal is present. If the metal cannot be removed (for example, due to internal plates/pins etc.) the person should be subjected to a rub-down search to ensure no other metal is present.

14.5 The random percentage of staff to be rub-down searched is set out, or if not already it now must be, in the LSS for each establishment and is not affected by this Annex, and local policy must describe how the process will be truly random. However, all visitors will be subject to a rub-down search on every occasion. PSI 07/2016 - Searching of the Person contains details of the circumstances in which a full search can be conducted on staff and visitors, however staff and visitors will not be full-searched routinely and only in exceptional circumstances.

14.6 PSI 07/2016 - Searching of the Person includes the mandatory requirements for searching people with disabilities, religious or cultural headwear and babies. As the rub-down searching of males by female staff conflicts with some cultures, it is recommended that male officers are provided for the rub-down search when these religious or cultural

considerations are present. However, whether an establishment can accommodate such a request is a local decision that depends on the local capacity of each establishment.

14.7 PSI 07/2016 - Searching of the Person also provides instruction on searching those with pacemakers using the archway metal detector and hand-held metal detector wand.

14.8 PSI 07/2016 - Searching of the Person states that the BOSS chair can be used on pregnant people. This element of the instruction also applies to the archway metal detector and the hand-held metal detector wand as this equipment also uses low radio frequency.

14.9 The expectation is that all visitors and staff entering the prison will be subject to Enhanced Gate search procedures. Where there are insufficient staff available to run 100% searching at all times, the objective should be the highest percentage of searching time possible, managed according to risk. Therefore, searching will not commence until the Gate is staffed for searching. Where the resource needs to be deployed away from the Gate this should be for security tasks only.

14.10 Where a site needs to respond dynamically to threat displacement (e.g. supply via a different conveyance route), sites may deploy staff away from the Gate for a limited period. The objective should be to restore to 100% searching as soon as operationally viable with the permission of the Duty Governor/Duty Manager.

DST/Search Dog Deployment

14.11 The search of visitors and staff by search dogs must be in line with PSI 20/2011 - Prison Dogs. PSI 20/2011 - Prison Dogs provides further instruction on using search dogs and describes what staff must do when a passive search dog provides an indication. PSI 07/2016 - Searching of the Person also instructs on measures that must be taken after an indication on a visitor or member of staff by a passive drug dog.

14.12 Prisons with SIP funded dog handlers must deliver the highest percentage of organic search of staff and visitors at the Gate, managed according to risk and as stipulated in the LSS and regime management plan.

15. Dealing with suspicious items & unauthorised item finds

15.1 The first port of call in the event of someone refusing to open their bag should be the Orderly Officer/Duty Manager. A member of the searching team should have access to a radio to facilitate this contact.

15.2 In accordance with PSI 07/2016 - Searching of the Person, local arrangements must be in place to investigate and deal with suspicious items identified by the X-ray process. This may involve asking the person to open the bag or item themselves in order to explore the source of the suspicion or asking the owner for permission for Gate staff to do so in the presence of the owner. If a person refuses, this should be escalated to the orderly officer and the person may be refused entry to the prison. If the person does leave the prison, it is

good practice to record this on the intelligence system. PSI 07/2016 - Searching of the Person also states that a bag may be forcibly searched where there is reasonable suspicion that it contains drugs, weapons or explosives etc. following an X-ray scan.

15.3 In accordance with PSI 07/2016 - Searching of the Person, all alarms from the archway metal detector must be explored and the source of the alarm must be identified wherever possible. Furthermore, PSI 07/2016 - Searching of the Person states that where this is not possible, a risk assessment must be undertaken to determine what action should be taken. Best practice would involve making a record in the Gate observation book, and management are responsible for identifying any patterns and conveying this to security teams.

15.4 The reporting of unauthorised items found as part of a search must occur in line with PSI 07/2016 - Searching of the Person. The prison must also consider whether the case should be referred to the police in accordance with the Crime in Prison Referral Agreement.

15.5 PSI 08/2016 – Dealing with Evidence provides guidance on how to handle, preserve and label evidence.

15.6 Staff must report suspicions of wrongdoing and corruption at the earliest opportunity through the appropriate channels in accordance with the Counter Corruption and Reporting Wrongdoing Policy Framework.

16. Local Security Strategy

16.1 The requirements of this operational Annex must be included within the LSS and prison's searching policy and will be reviewed as part of the audit process.

17. Evaluation

17.1 Establishments may be asked to provide feedback about the use and impact of EGS and are asked to provide this information in a timely manner.

18. Searching staff and visitors in the absence of an X-ray baggage scanner

18.1 If the establishment does not have an X-ray baggage scanner, the searching of staff must follow the following process:

- Staff must empty their pockets, remove outer clothing and empty food, drink and keys from their bag into the tray provided at the Gate.
- A member of Gate staff will examine the contents emptied into the tray and provide a visual examination of the items remaining in the bag. This visual examination will involve checking all areas of the bag, including pockets, for non-authorised items. To ensure an efficient search process, prisons should mandate bag sizes for bags used by prison staff to carry their belongings into the prison. This should be recorded in the LSS.

- Staff will walk through the archway metal detector. If the warning light or alarm sounds, staff will receive a further search using a hand-held metal detector wand. All alarms must be explored and the source of the alarm must be identified wherever possible.

18.2 A randomised process must be in place for a percentage of staff bags to receive a secondary, physical search by a member of Gate staff. This will be in local policy and will explain how the process is truly random. This thorough searching should be supported by dog support as often as possible.

18.3 Prisons should use existing X-ray baggage scanner equipment to search visitors entering the establishment. If this is not possible, the searching of visitor bags must involve the visual examination as described in 18.1. However, due to the difference between what visitors and staff can bring into the establishment (e.g. staff can bring in food), visitors will only have to empty their pockets and remove outer clothing into the tray provided at the Gate. Additionally, all visitors will have their bags physically searched. The process for visitors bringing bags and specific items into the establishment will already be captured in each establishment's LSS and this must be adhered to. All visitors will also be subject to search using the archway metal detector and a rub-down search in line with 14.5.

19. Best practice ideas

19.1 Prisons can take additional measures to enhance and speed up their searching procedure at the Gate. For example, some establishments use one-sided clear plastic bags for staff entering the establishment to store their belongings or mandate a standardised bag size for staff, which ensures visibility of items and volumetric control. However, establishments should be considerate of staff who may have personal items that they do not want to be made visible. Other examples include placing staff lockers outside or before the entrance to the prison and having a local policy on no cans, tins or opaque food packaging, meaning food can only enter the Gate if it is transported in transparent packaging or a transparent container.

Template 1 – Ionising Radiation Risk Assessment

Prepared by:	**Date:**
X-Ray Baggage Scanner Unit: **Serial Number:**	**Location:**

No.	**Assessment: IONISING RADIATION SOURCES AT HMP xxxxxx**
1.0	**INTRODUCTION** The Ionising Radiations Regulations 2017 (IRR17) require an initial Ionising Radiation Risk Assessment to be carried out for new activities involving work with ionising radiation. The Risk Assessment must identify the steps that a Radiation Employer (HMPPS / the prison establishment) should take to restrict the exposure of employees or other persons to ionising radiations. Work with ionising radiation should not be carried out unless; • all hazards with the potential to cause a radiation accident have been identified, and • the nature and magnitude of the risks have been evaluated as far as reasonably practicable. This is an extension of the general requirement under Regulation 3 of the Management of Health and Safety at Work Regulations, for Risk Assessments to be carried out.
2	**Risk Assessment**
2.1	***What is the nature of the sources of ionising radiation to be used, or likely to be present, including the accumulation of radon in the working environment?*** Ionising radiation source will be X-ray baggage scanner equipment. Make …….. Model …… Serial no. …….. Location …….. ***A radon risk assessment has been carried out and indicates that the Prison is not in a radon affected area. Consequently, no further action is required unless the Prison decide to carry out radon measurements and in this case the RPA should be contacted for further advice*** ***delete if not applicable*
2.2	***What are the estimated radiation dose rates to which anyone can be exposed?***

No.	Assessment: IONISING RADIATION SOURCES AT HMP xxxxxx
	Scatter measurements were made at a number of locations surrounding the scanner. Measurements were performed using a Raysafe Xi Survey detector. Exposure should not occur providing the lead curtains that protect the controlled area are working and intact. www.irs-limited.com advice@irs-limited.com +44 (0) 151 709 6296
2.3	***What is the likelihood of contamination arising and being spread?***
	Not applicable.
2.4	***What are the results of any previous personal dosimetry or area monitoring relevant to the proposed work?***
	Environmental monitoring has been performed by service/installation engineers or radiation protection personnel on this or similar equipment as part of installation assessment or routine annual testing. Results of these measurements have been used to inform this risk assessment .
2.5	***What is the advice from the manufacturer or supplier of equipment about its safe use and maintenance?***
	The manufacturer and supplier of the equipment provide training on how to use the equipment, but also provide operating manuals. This should be provided as part of the installer's critical examination. All Operators must also complete the mandatory X-ray baggage scanner training before using the machine.
	All Maintenance work must be completed by registered maintenance engineers for the equipment.
2.6	***What engineering control measures and design features are already in place or planned?***
	The X-ray baggage scanner unit is key operated and the key is kept safely when not in use, has warning lights to indicate the status of the X-ray set and when X-rays are being generated, and appropriate warning signs incorporating the ionising radiation trefoil (complies with the Health and Safety (safety Signs and Signals) Regulations 1996).
2.7	***Are there any planned systems of work? If so what?***
	The planned systems of work as described in the Local Rules is an extension to run alongside this document in each establishment. During maintenance of the X-ray equipment control of the area around the equipment will be given to the maintenance engineer. Systems of work will be used by the maintenance engineer.
2.8	***What are the estimated levels of airborne and surface contamination likely to be encountered?***
	Not applicable.
2.9	***What is the effectiveness and suitability of PPE to be provided?***

No.	Assessment: IONISING RADIATION SOURCES AT HMP xxxxxx
	PPE is not required.
2.10	***What is the extent of unrestricted access to working areas where dose rates or contamination levels are likely to be significant?***
	There is no unrestricted access to areas within X-ray units of significant dose rate.
2.11	***What are the possible accident situations, likelihood and potential severity?***
	1. Failure of shielding resulting from impact, movement or fire damage 2. Deliberate exposure of a person to the insides of the X-ray unit (controlled area). The likelihood of any identified accident is very low. When an X-ray unit is moved or damage is suspected, the unit is taken out of use until it can be verified as operational and safe by an appropriately qualified engineer. The risk of exposure due to unsuspected damage to the unit is very low, and the severity of the exposure is likely to be relatively low due to the X-rays likely to be emitted being secondary or scattered radiation.
2.12	***What are the consequences of possible failures of control measures – such as electrical interlocks, ventilation systems, and warning devices – or systems of work?***
	If a control measure failed, it is unlikely that a significant exposure would occur directly as a consequence. However, if shielding failed and this was not spotted for a period of time then it is possible that a significant dose may be received.
2.13	***What are the steps to prevent identified accident situations, or limit their consequences?***
	Do not enter any body part into the controlled area/exclusion zone (between the lead curtains) when the X-Ray indication light is on. Faults or irregularities in X-ray equipment performance should be noted in the fault log and reported to the RPS. If there is a suspected problem with the unit it should not be operated until it has been investigated. Such issues include • Damage to warning sign • Warning lights failure When not in use the key required to operate the unit is to be kept in a secure place. This equipment may only be operated by persons trained in its use. The following safety features are to be checked weekly and results are to be recorded. Any issue should be brought to the attention of the RPS immediately. • Warning lights • Condition of Warning signs

- Emergency Off Switch
- Other damage to unit

3.0	**Actions Required as a Result of Risk Assessment**
3.1	***What action is needed to ensure radiation exposure is ALARP?***
	Ensure that all operators and RPSs are aware of their responsibilities for routine operation of the X-ray units. Ensure that all operators and RPSs have been appropriately trained in the radiological hazards associated with the units.
3.2	***What steps are necessary to achieve this control of exposure by use of engineering controls, design features, safety devices, and warning devices and, in addition, by the development of systems of work?***
	No additional systems are required other than as described or referenced elsewhere in this assessment.
3.3	***Is it appropriate to provide PPE and if so what type would be adequate and suitable?***
	PPE is not appropriate.
3.4	***Is it appropriate to establish dose constraints for planning or design purposes and if so what values should be used?***
	Dose constraints are not appropriate.
3.5	***Is there the need to alter the working conditions of any female employee who declares she is pregnant or is breastfeeding? If so what alterations are necessary?***
	Female staff should notify employer of pregnancy at the earliest opportunity post confirmation of pregnancy. There is no necessary change to working conditions for pregnant employees to operate this X-ray baggage scanner.
3.6	***What is an appropriate investigation level to check exposures are being restricted as far as reasonably practicable?***
	An appropriate dose investigation level for use of security X-ray units is 1 mSv. In reality due to the prison service not having dosimetry or radiation dose rate instruments, it is difficult to assess actual exposure to ionising radiation received by prison employees. Typical dose rates from the surface of a unit are approximately 0.5 µSv/h, and assuming the units are used for 200 h per year, this would result in a maximum dose of 0.1 mSv due to standard use of the units assuming the same person stands in contact with the unit for 200 h. Consequently, if it is suspected that something may have occurred with a unit and the shielding may be compromised, the RPA should

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	be contacted for advice.
3.7	***What maintenance and testing schedules are required for the control measures selected?***
	The unit will have a visual function check carried out every day by the X-ray unit operator. The checks are formally recorded weekly. Unit will be tested yearly by the HMPPS contracted Radiation Protection Advisor and is subject to a planned yearly preventative maintenance (PPM) programme.
	A record of maintenance, including any defects found and their repair, will be kept for each item of x-ray equipment.
3.8	***What contingency plans are necessary to address reasonably foreseeable accidents?***
	Contingency plans have been provided in the Local Rules. The X-ray unit shall be switched off immediately and the key removed to the key press. The maintenance engineer is called immediately and if an exposure is suspected to an employee, the RPA shall be called for assistance. The RPS will be notified immediately. In all events, the X-ray unit can be immediately disabled by using an emergency stop button.
3.9	***What are the training needs of classified and non-classified employees?***
	All operators and RPSs shall be non-classified persons. RPS's should attend appropriate RPS training and operators should complete the in house operator training which incorporates basic radiation H&S 'awareness training. The training should be refreshed at a frequency no less than every five years.
3.10	***Is there a need to designate specific areas as controlled or supervised areas and to specify local rules? If so what areas?***
	The inside of the unit shall be designated as a controlled area (In between the lead curtains) This area is defined in the Local Rules.
3.11	***What are the actions needed to ensure restriction of access and other specific measures in controlled or supervised areas?***
	Operators of X-ray units restrict access to all parts of the X-ray units. If access is required by a maintenance engineer, control of the unit and the immediate area around the unit is effectively handed over to the engineer for the duration of the maintenance.
3.12	***Is there the need to designate certain employees as classified persons? If so who?***
	No classification of persons is necessary.
3.13	***What is the content of a suitable programme of dose assessments for employees designated as classified persons and for others who enter controlled areas?***
	Not applicable. No classified persons will be designated, and access to the controlled areas by non-classified persons is forbidden. Local Rules contain written arrangements for general operation of the X-ray units and for arrangements for when maintenance engineers carry out

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	scheduled maintenance.
3.14	***What are the responsibilities of managers for ensuring compliance with the regulations?*** The Prison Health and Safety adviser has responsibility to ensure compliance with IRR17. The RPS has a duty to ensure that all operators follow the Local Rules for the units, but also that IRR17 is complied with in full where appropriate.
3.15	***What is an appropriate programme of monitoring or auditing of arrangements to check the requirements of IRR17 are being met?*** An annual visit by the RPA is sufficient to provide adequate advice to the Prison regarding compliance with IRR17. If further visits are required, or if circumstances change resulting in changes to personnel then compliance audits may be appropriate when the change has occurred. It is expected that RPS will make sure that all daily and weekly checks are being carried out by operators and that a Radiation Safety Management file is being used to keep all relevant documentation.

Template 2 – Radiation Protection Supervisor Appointment Letter

Radiation Protection Supervisor Appointment

I hereby appoint you Radiation Protection Supervisor (RPS). You have attended the RPS training course, passed the end of the course assessment and have completed additional training or been clearly shown the relevant procedures required to carry out this role.
The RPS is responsible for helping to ensure the radiological safety of HMPPS personnel within the workplace. The role of the RPS requires you to:

- Ensure that work with ionising radiation is carried out in accordance with the requirements of the Ionising Radiation Regulations 2017 by taking all reasonable steps to ensure that the safety arrangements (local rules) are adhered to;
- Act as a liaison with local personnel and the RPA to exchange information necessary to enable work with ionising radiation to be carried out in a planned manner so as to minimise the risk of individual exposure;
- Ensure that all persons likely to be affected by radiological safety arrangements have read the relevant documents and are able to refer to them (e.g. local rules, site records and signage);
- Ensure that contingency arrangements are in place and that anyone likely to be affected has read and understood them;
- Ensure that radiation dosimetry, EPDs and TLDs are issues appropriately and used in accordance with the local rules; and
- Attend appropriate refresher training every 5 years.

Authorising Senior Officer:
Signature:
Name:
Date:
Please sign below to indicate that you accept this appointment.

I accept this appoint as an RPS in HMPPS.
Signature:
Name:
Date:

Please keep one copy for your own records and return a signed copy to your line manager.

Template 3 – Local Rules

1 INTRODUCTION

These Local Rules are issued under the Ionising Radiation Regulations 2017 and Approved Code of practice and are the means of complying with these regulations for work with security X-ray baggage scanner imaging equipment. The Radiation Employer is HM Prison and Probation Service.

Equipment, Serial Number and Location

2 RADIATION PROTECTION SUPERVISOR (RPS)

The Radiation Protection Supervisor is responsible for supervising the work with radiation in accordance with these Local Rules.

The Radiation Protection Supervisors for this area are:

3 RADIATION PROTECTION ADVISOR (RPA)

Radiation protection services are provided by: Integrated Radiological Services (IRS) Ltd 0151 709 6296 The Radiation Protection Advisor is IRS Ltd and the named RPA is Paul Connolly. he RPA may be contacted at the above telephone number or via advice@irs-limited.com

4 DESIGNATION OF STAFF, PERSONAL MONITORING AND DOSE INVESTIGATION LEVEL

All staff working with radiation are regarded as **non-classified**. There is no requirement for staff to wear personal dose monitors as the radiation risk assessment has identified that doses are as low as reasonably practicable and the risk is low for normal work and all reasonably foreseeable radiation accidents. Dose levels around the equipment are checked regularly. A dose investigation level (DIL) of 1mSv is recommended. However, provided these local rules are complied with the DIL is unlikely to be exceeded. Measurements of environmental dose rates will be performed during servicing and annually by the radiation protection service to verify that the DIL remains appropriate.

There is no requirement for any change in working conditions for pregnant staff due to working with radiation. Pregnant staff should inform their line manager of their pregnancy.

5 DESIGNATION OF CONTROLLED AND SUPERVISED AREAS

In accordance with IRR17 certain areas are designated as Controlled or Supervised Areas. These areas exist **as long as the X-ray baggage equipment is connected to the mains supply at the console.**

5.1 Controlled Areas

The area inside the scanner and protected by the lead curtains is designated as a Controlled Area when the X-ray light is on. No person is to put any part of the body into this controlled area, or reach into this area (e.g to retrieve baggage) until the system has been switched off at the console.

5.2 Access to Controlled Areas

i) Staff may stand at the operator console, entry and exit to the conveyor belt during scanning to operate the system, load and collect the items after scan.
ii) The X-ray equipment mains must be switched off when it is not in use.

6 OPERATING PROCEDURES

All employees, contractors and visitors must comply with these Local Rules. All staff must have completed the mandatory baggage x-ray training course before operating this machine.

6.1 Radiation Protection Supervisors

The Radiation Protection Supervisors must:

i) Oversee the use of the x-ray equipment to ensure it is in accordance with these Local Rules
ii) Ensure the records in the Radiation Protection Record Book are kept up to date
iii) Report any concerns about radiation safety to their line manager and RPA
iv) Check the following safety systems at intervals of no more than one month and record the results in the Radiation protection book:
    - Malfunction of warning lights
    - Condition of lead curtains
    - General condition of machine
    - Emergency switches are in good working order
    - Safety signs and notices are visible and in good condition

6.2 Employees Operating Radiation Equipment

i) Only authorised, trained employees or contractors may operate the baggage scanner equipment. These people must be listed in the local Radiological Protection Record Book.
ii) Employees and contractors **must** receive appropriate training before operating x-ray equipment.
iii) Unsupervised equipment **must** be isolated from the mains supply at the console.
iv) Where equipment is key operated, the key shall be kept in a secure location when the equipment is not in use.
v) The login and password to start the equipment must not be left near the unit.
vi) Any damage to any x-ray equipment safety features or radiation safety concerns **must** be reported immediately to the Radiation Protection Supervisor.
vii) Persons **must not** interfere with any safety devices or attempt to repair any part of the baggage scanner equipment unless authorised to do so.

6.3 Cleaning Personnel

i) Cleaning personnel may only clean around x-ray equipment at times previously arranged by local management or the Radiation Protection Supervisor.

6.4 Visitors / Service Engineers / Physicists

i) All visitors must comply with verbal and/or written instructions issued by the authorised operator of the equipment.

ii) All works/maintenance must be completed by authorised contracted service engineers only.

iii) Any maintenance personnel or visiting service engineer shall take responsibility for radiation protection. The equipment shall be formally handed over to the engineer via a written procedure. Once work is completed the equipment shall be formally handed back to the operator and a written record made. The engineer taking responsibility shall provide copies of any local rules that shall be followed **before** starting any work.

iv) Any service engineer or physicist who carries out a temporary modification to an x-ray unit which affects its output or quality **must:**

a) Attach to the equipment an appropriate warning notice.

b) Inform the RPS in writing if the modification is of a permanent nature.

7 CONTINGENCY PLANS

i) If an X-ray inspection needs to be aborted for any reason, i.e. non-termination of X-rays, the operator must terminate the inspection as follows:

a) Depress the **EMERGENCY STOP** button to close the machine down completely and switch off

b) Report the incident to the RPS and/or line manager

ii) If the emergency action was due to an equipment fault, the RPS must ensure that the equipment is not used until the necessary repair work has been successfully completed.

iii) Any service engineer who making repairs under this Contingency Plans must be provided with a written permit to work. This must give details of the nature of the fault/problem and any hazards that are thought to exist. Written confirmation that the equipment has been repaired and is safe to use must be provided before the equipment is returned to routine use.