



Policy name: HMPPS National Health and Safety Arrangements for First and Emergency Aid

Reference: N/A

Re-issue Date: 22 February 2024 **Implementation Date:** 04 August 2023

Certain elements of bespoke training relevant to the particular first aid situations likely to arise in HMPPS require development and inclusion into commissioned contract first aid training **(to be in place by January 2025)**.

Replaces the following documents (e.g. PSIs, PSOs, Custodial Service Specs) which are hereby cancelled: PSI 2015-29 and PI 21/2015 First Aid

Introduces amendments to the following documents: N/A

Action required by:

X	HMPPS HQ	X	Governors
X	Public Sector Prisons	X	Heads of Group
X	Contracted Prisons	X	The Probation Service
X	Under 18 Young Offender Institutions		Other providers of Probation and Community Services
	HMPPS Rehabilitation Contract Services Team		

Mandatory Actions: All groups referenced above must adhere to the Requirements section of this Policy Framework, which contains all mandatory actions.

For Information: The aim of this Policy Framework is to produce clear guidance for HMPPS sites on managing first aid across all prison and probation sites in England and Wales.

By the implementation date Governors¹ of public sector prisons, Directors of contracted prisons and Regional Probation Directors² (RPD) of probation sites must ensure that any local guidance and procedures that they develop because of this Policy Framework are compliant with relevant legislation, including the public sector equality duty (Equality Act, 2010).

In this document any reference to 'Prison Group Director' (PGD) means the Deputy Director of contracted custodial services in the case of any contract managed prison. Any reference to RPD means Probation Director for community accommodation services in the case of approved premises (AP's).

The HMPPS national health and safety arrangements for first aid and emergency aid manual provides guidance to implement the mandatory requirements set out in section [4] of this Policy Framework. Whilst it will not be mandatory to follow what is otherwise set out in this guidance, clear

¹ In this document the term Governor also applies to Directors of Contracted Prisons.

² In this document the term Regional Probation Director also applies to Probation Director for Community Accommodation Services.

reasons to depart from the guidance should be documented locally. Any questions concerning departure from the guidance can be sent to the contact details below.

How will this Policy Framework be audited or monitored: Mandatory elements of this policy framework will be subject to audit and monitoring via;

- The National Health Safety Fire and Governance Strategy (HSFGS) defines the national regional and local audit and assurance processes. A copy can be requested via the contact details below.
- Local monitoring arrangements of first aid equipment and first aider provision
- Local senior health, safety and fire advisors (prison) and regional senior health and safety advisors (probation) will monitor policy compliance and management arrangements and report to duty holders.
- PGD's/RPD's and Governors/ Heads of Probation Delivery Units (HPDU's)/ Approved Premises Area Manager (APAM) will monitor compliance with requirements set out within this policy framework at their sites.
- In contracted custodial settings, policy monitoring, audit and assurance will be via standard custodial contract management arrangements.
- Health, safety, and fire function will provide assurance to HMPPS at executive, group and site level via reports presented at local, regional, and national health and safety committees.

Resource Impact: Requirements for sites to have a first aid needs assessment, first aid co-ordinator (FAC) and competent first aiders are in place and accommodated in existing programmes in accordance with PSI 29/2015 and PI 21/2015 First Aid.

The role of emergency and first aiders within prisons is a voluntary task which requires requalification on a cyclic basis and be considered as part of the site training needs assessment. All officer apprentices receive emergency first aid at work (EFAW) training as part of the initial training course. Should volunteer first aid at work (FAW) trained staffing change there may be a need to train further FAW staff to ensure the first aid needs assessment is met and fill any gaps, this will have a very small resource requirement. The training resource impact in respect of EFAW could be considered to be low due to ongoing delivery of EFAW in prison officer foundation training.

Any local decision which identifies a need to train further inhouse FAW/EFAW trainers to support local delivery of first aid training has a negligible resource impact. The use of inhouse certified trainers where available can be used to assist limit the need for offsite training and could therefore reduce the impact on resource/time spent away for site. Cyclic requalification of trainers will need to be considered as part of the site training needs analysis.

In probation settings EFAW forms part of the job description for all operational members of staff and is subject to requalification.

Contact: For enquiries related to this policy, please contact Health-Safety.national@justice.gov.uk

Deputy/Group Director sign-off: Yaser El-Borgi, Deputy Director

Approved by OPS for publication: Sarah Coccia and Ian Barrow, Joint Chairs, Operational Policy Sub-Board, July 2023

Revisions:

Date	Changes
22 February 2024	Date for bespoke training to be in place changed (now Jan 2025)

CONTENTS

Section	Title	Page
1	Purpose	4
2	Evidence	4
3	Outcomes	4
4	Requirements	4
	Glossary of Terms	9
	Annexes	10

1. Purpose

- 1.1 HMPPS has a statutory duty under the Health and Safety (First Aid) Regulations 1981(HSFAR81) to make arrangements to ensure that its employees receive immediate attention if they are injured or taken ill whilst at work. HMPPS also has legal duty through common law, the Prison Rules 1999, and the European Convention on Human Rights to look after the health and wellbeing of prisoners and people on probation which extends to ensuring they receive immediate attention in an emergency.
- 1.2 This policy is based on the HSFAR81, and the Approved Code of Practice guidance (ACOP L74) published alongside them, about first aid at work for employees. It additionally adopts a pragmatic, risk-based approach to the assessment of first aid needs provision for prisoners/people on probation and third parties in all HMPPS sites and contracted prisons.
- 1.3 The policy contains minimum standards to be achieved in ensuring suitable provision at local level and guidance on the steps which should be taken to allow these standards to be met.

2. Evidence

- 2.1 By providing emergency first aid response, this enables the provision of any immediate treatment for the purpose of preserving life and minimising the consequences of any injury or illness until further professional medical assistance arrives where required.

3. Outcomes

- 3.1 Implementing this policy framework will;
 - ensure compliance with the legislative and common law duty and care requirements thereby protecting HMPPS from enforcement and legal actions.
 - ensure staff, prisoners, and people on probation, third parties and contractors are provided with first aid treatment if required.

4. Requirements

- 4.1 The HMPPS emergency first aid roles and responsibilities Annex B (prison) and Annex C (probation) and the HMPPS national health and safety arrangements for first aid and emergency manual should be read in conjunction with the below.
- 4.2 Contracted prisons must put in place appropriate measures to meet policy requirements and compliance with legislation.
- 4.3 RPDs, PGDs, Governors, and other managers of site based services are required to;
 - implement this policy in accordance with the Equality Act 2010
 - identify and direct the necessary actions to ensure that their needs assessments meet the standards required, to ensure the implementation of the findings and to ensure the effective monitoring of the standards achieved and to review as required in line with the below requirements.
 - consider the following groups for engagement in the implementation of the policy: Governors, health and safety sponsors, health, and safety teams, first aid coordinators, first aiders, people hub managers, custodial managers, safer custody,

detail office managers, HRBPs and training managers, HPDU in probation, APAM, Approved Premises Managers (APMs), heads of business strategy & change (BSC), business managers (BM), recognised trade union health and safety representatives.

- 4.4 Governors must ensure that the roles and responsibilities as provided within Annex B are implemented.
- 4.5 In probation sites heads of HPDU's and APAM must ensure that the roles and responsibilities as provided within Annex C are implemented.

First Aid Needs Assessment

- 4.6 All sites must have in place suitable numbers of adequately trained staff and suitable equipment and facilities to adequately meet the needs for first aid provision as identified in their first aid needs assessment where staff are injured at or become ill whilst at work.
- 4.7 Annex A provides the minimum standards which must be met in all cases. Individuals identified within the roles and responsibilities Annex B (prison) and Annex C (probation) completing the agreed HMPPS first aid needs assessment are advised to refer to the HMPPS national health and safety arrangements for first aid and emergency aid manual for further guidance which also provides details of the first aid needs assessment template which must be completed.
- 4.8 The First Aid needs assessment must;
- cover the needs of employees
 - consider third parties (including prisoners and people on probation, visitors, and contractors) where immediate response is required in the interim of further assistance arriving i.e., Healthcare (prisoner), on site third party provider response and emergency service response
 - consider a number of factors including the use of HMPPS contracted healthcare provision (where in place). Health staff are not to be counted directly within HMPPS 1st aid provision however should be considered as the primary response for prisoner first aid
 - identify needs based on local risk and demand
 - be recorded to demonstrate how the level of first aid provision was decided
 - be consulted on through the local health and safety committee
 - be agreed and accepted by the duty holder or their representative
- 4.9 The first aid needs assessment process must actively engage staff and their recognised trade union representative so that "on-the-ground" issues can be understood, considered, and addressed.
- 4.10 Staff based at a site must be informed of the arrangements by which they can access or call for first aid equipment or treatment. This information must be included in their induction and all staff should be informed of changes to first aid personnel, equipment, or arrangements.
- 4.11 Staff and people on probation working on community payback project sites must be briefed on the standing first aid arrangements for such work and any site specific first aid considerations.
- 4.12 Monitoring and review of the arrangements and assessment must be undertaken at least annually or earlier

Contingency planning for night responses in prisons and approved premises

- 4.13 Senior managers of services which incorporate overnight sleeping accommodation must take particular care to ensure that, night contingency plans offer the optimal capability to co-ordinate a casualty response.
- 4.14 Plans must ensure first aider or healthcare access to the casualty to enable treatment to reach the casualty at the earliest opportunity bearing in mind security risks. In addition, consideration must be given to enabling emergency services and personnel access to the casualty.

Designating a First aid Co-ordinator and a Deputy (FAC)

- 4.15 Governors/HPDU/BSC's and APM's must ensure that a first aid coordinator is designated;
- In prisons, the role of FAC has been assigned to the people hub but can be subject to local determination based on available resource.
 - In the probation service the allocation of the role will be subject to local determination
- 4.16 The role must be supported, facilitated, and monitored by management as it ensures that first aiders who leave or transfer can be replaced and is therefore critical to having a legally suitable and adequate provision in place.
- 4.17 This is an important role in ensuring the service maintains adequate provision, duties are described within Annex B (prisons) and Annex C (probation).

First aid allocations in prisons and probation settings

- 4.18 Invision (or another suitable detailing system) must be used for ensuring adequate first aid cover in line with the findings of the needs assessment.
- 4.19 Within prison settings, the detail office staff must be consulted about the needs assessment and how it is intended to work and given the opportunity to consider how the identified provision can be best integrated with the detailing system;
- Detailing adequate numbers of suitably trained first aiders in operational environments
 - Being in a position to provide records of first aider allocation provision when required
- 4.20 Within prison settings, first aiders **must be** staff volunteers who have achieved a level of competence through formal training to undertake the role.
- 4.21 Within AP's, all operational staff must undertake and refresh EFAW as part of their job description. Agency/contracted staff must also be first aid trained. Local arrangements must be in place to manage training needs to ensure as a minimum there is one trained first aider as a minimum at all times.
- 4.22 Within contact centres first aid provision must be in place during opening hours to meet the local needs assessment.
- 4.23 Within community payback, placement co-ordinators and supervisors must undertake and refresh EFAW training as part of their role.

Training

- 4.24 Governors/HPDU's, BSC, APM's must ensure that designated staff;
- Have access to training in line with point 4.21 - 4.26
 - Are allocated time to train and re-train as first aiders as required
 - Are trained to the relevant levels identified in the needs assessment and training is recorded on MyLearning.
- 4.25 Contract commissioning by HMPPS Learning and Development must ensure that all first aid training available includes elements of bespoke training relevant to the particular first aid situations likely to arise in HMPPS for example self-harm, cut down/ligature, catastrophic bleeding, cell fire significant burns, scolds as a result of serious assault and substance misuse and overdose.
- 4.26 Where mother and baby units are in place within prison settings, bespoke training in paediatric first aid/child resuscitation must be delivered to identified staff to meet the first aid needs assessment.
- 4.27 First Aid training must be accessed via;
- Nationally commissioned FAW and EFAW contracts available through Civil Service Learning (CSL)
 - HMPPS "in-house" first aid trainers who must have completed "*train the trainer*" training delivered via the nationally commissioned train the trainer course providers as triaged by the CSL Gateway.
- 4.28 Alternative provision will be recognised only by exception and approval of the national health and safety team.
- 4.29 Emergency first aid and skills to deal with self-harm, cut down/ligature, catastrophic bleeding, cell fire significant burns, scolds as a result of serious assault, substance abuse symptom and overdose responses must be delivered in prison officer foundation.
- 4.30 Within AP's, new operational staff must shadow until such time as they have completed their first aid training, ligature training and substance abuse symptom response delivered via nationally commissioned contracts and refreshed at suitable intervals.
- 4.31 Trained first aiders must;
- hold a current, valid certificate of competence in either FAW or EFAW
 - attend refresher training and requalification
- 4.32 In house first aid trainers must;
- be trained and currently certified as a competent first aid trainer
 - attend refresher training and requalification training as required by recognised UK standards and delivered via the nationally commissioned train the trainer course providers as triaged by the CSL Gateway.
 - To teach the first aid, there is a requirement for these individuals to obtain a teaching qualification to teach.

First aid equipment and facilities

- 4.33 At all sites first aid kits, facilities and equipment provided (this includes those provided for vehicles and supervisor led community payback projects) must be checked in line with the roles and responsibilities Annex B (prison) and Annex C (probation), with any shortfalls reported to the person or team responsible for purchasing and procurement. Records must be kept for audit purposes.
- 4.34 Where provided, first aid rooms must be adequate and meet the standards, these are outlined in the HMPPS national health and safety arrangements for first aid and emergency aid manual.
- 4.35 All First Aid kits must contain resuscitation face shield(s) for emergency use. All trained EFAW and FAW staff must be issued with a personal resuscitation face shield. Measures must be in place locally to replenish when used.
- 4.36 If there is specialist equipment such as defibrillators or oxygen equipment, maintenance and inspection must be in line with the supplier's instructions and recorded.
- 4.37 Concerns about missing, damaged or obsolete first aid equipment must be raised through the following hierarchy at the earliest opportunity;
- Manager responsible for the area
 - FAC (prison) /BM (probation)
 - Senior health, safety, and fire advisors (prison) and regional health, safety, and fire advisors (probation)
 - If significant and persistent to the duty holder and Health and Safety Committee.
- 4.38 Signage as to emergency and first aid injury arrangements and location of equipment must be provided proportionately in such a way as to be useful and informative and to avoid confusion or duplication.
- 4.39 General workplace inspections must be undertaken by local managers or health and safety advisors in line with workplace monitoring policies and must include checks on first aid equipment including defibrillators where in place. Trade Union Health and Safety Representatives are also able to ask for information and undertake workplace inspections.

Medical emergencies and legal action risk

- 4.40 Any staff attending the scene of a critical incident must render any reasonable assistance as is required by the first aider, regardless of their training status. Where emergency service response is required, site must have in place appropriate measures to ensure emergency services personnel have prompt access to the casualty.

Post incident

- 4.41 Serious Incidents which have required first aid must be reviewed to consider if the need was met in terms of time, skill, and treatment.

- 4.42 Where first aid treatment is given, the aider must make a written record of incidents they attend and submit to the identified FAC/BM/APM for local collation to be kept in accordance with the requirements of the Data Protection Act 2018 for audit purposes.
- 4.43 Complaints and concerns regarding first aid treatment availability must be properly considered and responded to locally or nationally as required.

Community work and off site first aid provision

- 4.44 Where clear risks arise from the community-based work e.g. community payback work, a first aid needs assessment as to training and provision must be undertaken. The assessment must consider any remote or lone working and the potential for more serious injuries arising from work equipment etc and its findings implemented.
- 4.45 All HMPPS vehicles must be provided with a suitable travel first aid kit which is clearly identifiable signage. Within Supervisor project packs information related to nearest defibrillator must be provided.
- 4.46 Where staff are operating in the community standard procedures must be in place to enable these staff to contact their base or emergency services should a problem arise e.g. mobile phone or lone working device.

Service providers operating on HMPPS premises

- 4.47 It is not the direct legal responsibility of HMPPS to provide first aid provision to staff of third-party employers who operate on HMPPS' behalf. However there is always a common law duty of care to people on site, reasonable levels of mutual co-operation and support are expected through the health and safety operating protocols required by HMPPS national policy, organisation, and summary arrangements for the management of health and safety.
- 4.48 HMPPS should satisfy itself that contractors have made adequate provision for their own staff, and for prisoners or people on probation where they provide a service to same and should seek mutual co-operation to deal with injuries and emergencies. See Annex D for further information.

Glossary of Terms

AP's	Approved Premises
APM	Approved Premises Manager
APAM	Area Approved Premises Manager
BM	Business Manager
BSC	Business Strategy Change
CSL	Civil Service Learning
EFAW	Emergency First Aid at Work
FAC	First Aid Co-ordinator
FAW	First Aid at Work
HPDU	Head Probation Delivery Unit
HSF	Health, Safety Fire
HSFAR81	Health and Safety (First-Aid) Regulations 1981
HSFGS	National Health Safety and Fire Governance Strategy
PGD	Prison Group Director
RPD	Regional Probation Director

Annexes

Annex A	Minimum standards of response to be achieved
Annex B	Prison - Emergency First Aider Roles and Responsibilities
Annex C	Probation - Emergency First Aider Roles and Responsibilities
Annex D	First Aid and Contractors and On-Site Service Providers
Annex 1	First aid needs assessment minimum standard flowchart
Annex 2	Template First Aid Needs Assessment
Annex 3	Competencies and functions of first aiders