



**Policy name:** Management of Internal Security Procedures (Open Prisons) Policy Framework

**Reference:** N/A

**Re-issue Date:** 9<sup>th</sup> August 2024

**Implementation Date:** 10<sup>th</sup> January 2025\*

\*Prisons can choose to implement the policy ahead of this date

Upon publication of this policy the following PSIs will be cancelled. By the implementation date, Governors<sup>1</sup> of public sector prisons and contracted prisons must ensure that their local procedures do not contain references to the following PSIs or service specifications:

Management and security of gate services	14/2011
Management and security of communication/control rooms and internal movement	13/2011
Management and security of keys and locks	55/2011
Management and security of nights	24/2011
Management and security of tools and equipment	57/2011
NOMS service specification for the provision of secure operating environment: communication and control rooms	
NOMS service specification for nights	
NOMS service specification for the provision of a secure operating environment: gate services	
NOMS service specification for the provision of a secure operating environment: internal prisoner movement	

**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		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.**

<sup>1</sup> In this document the term Governor also applies to Directors of contracted prisons.

## OFFICIAL

Governors must ensure that any new local policies developed as a result of this Policy Framework are compliant with relevant legislation, including the Public Sector Equality Duty (Equality Act 2010).

Section 6 of the Policy Framework contains guidance to assist implementation of the requirements set out in Section 4. Any questions concerning departure from the guidance can be sent to the contact details below.

### **How this policy framework will be audited/monitored:**

In public sector prisons, Prison Group Directors (PGDs) will monitor compliance with requirements set out within the Policy Framework in their prisons using the auditing and monitoring tools described in this framework.

For areas in line with the Health and Safety Governance Strategy, Health and Safety assurance and monitoring for the public sector prisons is undertaken through H&S monitoring and assurance within the H&S function, using the H&S audit and reporting tool compliance checklist.

Quality assurance for public sector prisons and contracted prisons is provided by HMPPS Performance Assurance and Risk (PAR) Group through the security audit.

Mandatory elements of instructions should be subject to management checks (and may be subject to self or peer audit by operational line management), as judged to be appropriate by the managers with responsibility for delivery.

### **Resource Impact:**

The identified resource impact for this Policy Framework is staffing within the Security Department. The initial impact will be in terms of the time taken to update the Local Security Strategy (LSS). Prisons will also have to conduct a whole prison approach, evidence-based risk assessment to identify their risks of abscond and update their LSS to reflect these. Following the rewrite of the LSS in alignment with this Policy Framework, resource implication is not expected to be any different to current requirements.

It is expected that this Policy Framework will assist open prisons in reducing the risk of abscond. This in turn is expected to reduce financial costs to HMPPS and other partner agencies, as well as any reputational damage that results from absconds.

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**Approved by OPS for publication:** Helen Judge, Joint Chair, Operational Policy Sub-board, July 2024

### **Revisions**

<b>Date</b>	<b>Changes</b>
09 August 2024	Para 4.179 amended

**Contents**

<b>Section</b>	<b>Title</b>	<b>Page</b>
<b>1</b>	<b>Purpose</b>	4
<b>2</b>	<b>Evidence</b>	4
<b>3</b>	<b>Outcomes</b>	4
<b>4</b>	<b>Requirements</b>	4
	General	4
	Gate Procedures	4
	Internal Movement Procedures	12
	Keys, Locks, Tools and Equipment	13
	Night Procedures	23
<b>5</b>	<b>Constraints</b>	29
<b>6</b>	<b>Guidance</b>	29
	Support for Prisoners	29
	Gate Procedures	29
	Perimeter	31
	Communications Room	31
	Roll Checks	31
	Members of the Public Filming	33
	Gates, Doors, Keys and Locks	33
	Tools and Equipment	37
<b>7</b>	<b>Annexes and Supporting Tools</b>	38

OFFICIAL

## OFFICIAL

### **1. Purpose**

- 1.1 Open prisons are a valuable resource providing key resettlement functions that directly support HM Prison and Probation Service (HMPPS) objectives to rehabilitate people in our care, support reintegration and reduce reoffending.
- 1.2 This Policy Framework provides open prisons with the information and guidance needed to manage the risk of abscond through internal security processes and procedures; ultimately contributing towards HMPPS outcomes to reduce reoffending and protect the public.

### **2. Evidence**

- 2.1 The [HMPPS Annual Digest](#) provides year on year data regarding absconds.

### **3. Outcomes**

- 3.1 Use of this Policy Framework and supporting documents will ensure that internal security procedures in open prisons are conducted in a manner that reduces the risk of abscond and supports the successful maintenance of security and order.
- 3.2 By following the requirements and guidance in this Policy Framework, staff will be able to:
  - Ensure gate procedures are secure.
  - Ensure internal movement, communications and radios are managed effectively.
  - Maintain security during nights.
  - Securely manage tools and equipment.
  - Securely use and maintain keys and locks.

### **4. Requirements (see Guidance for further information)**

#### **General**

- 4.1 Prisons must manage, update and assure their Local Security Strategy (LSS) in line with the [Local Security Strategy Policy Framework](#).
- 4.2 This Policy Framework must be used alongside the [Prevention of Abscond Policy Framework](#).
- 4.3 Governors must ensure they have local contingency plans as per [Incident Management Policy Framework \(Restricted\)](#) detailing the actions to take in the event of any (attempted or actual) abscond.
- 4.4 Governors must ensure that all security documentation including assurance records are retained in line with [Records, Information Management and Retention Policy](#).

#### **Gate procedures**

- 4.5 Governors must undertake an evidence-based assessment to identify the risk of abscond and set out within the LSS agreed processes to be carried out on individuals, vehicles, and material through the main gate.
- 4.6 The LSS must reflect the individual circumstances of the prison. Prisons must ensure that searching requirements within the LSS are also reflected in their Local Searching Policy for prisoners, staff, and visitors upon entry/exit of the gate (see the [Searching Policy Framework](#) for information and guidance).

## OFFICIAL

- 4.7 Where a prison 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 considered in the LSS.
- 4.8 Procedures within the LSS for the secure entry and exit of every person, vehicle and item through the main gate must be effectively communicated to gate staff.
- 4.9 Many Prison Rules and Young Offender Institution (YOI) Rules have a bearing on gate functions. Prison Rules ([The Prison Rules 1999](#)) specific to the gate in relation to abscond are:
- Prison Rule 41/YOI Rule 46 - Search (of prisoners).
  - Prison Rule 71/YOI Rule 75 - Control of persons and vehicles; (1) power to stop, examine or search people or vehicles; (2) power of removal from a prison.
  - Prison Act 1952 Section 39 (Prison Act 1952).
- 4.10 The duties of gate staff must 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 in line with the [Searching Policy Framework](#).
  - Preventing key loss by controlling the storage, issue, and receipt of security keys particularly for those prisons without TRAKA electronic key storage systems.
  - Ensuring staff are professional, consistent and contribute to a secure environment.

### Staff/Visitors

#### Vetting

- 4.11 The level of security clearance varies according to the security category of the prison and the role of the person entering the prison. Governors must ensure that before being granted access to the prison to work, all Directly Employed (DE) and non-Directly Employed (NDE) staff have acquired the appropriate security clearance for the prison and their specific role. Professional or Official Visitors who do not work for us in either capacity, and do not go through our security vetting must be deemed as appropriate by the Governor to enter.

#### Staff (directly and non-directly employed)

- 4.12 All staff should carry a valid form of identification (ID), specific to their role and employer. Some staff members may have locally made temporary ID whilst they are waiting for their ID to arrive.
- 4.13 On both arrival and exit of the prison, staff should show this ID to gate staff upon request. If they do not have ID on request and the gate staff do not recognise them as an employee, then they should not be allowed either entry or exit of the prison until their identification can be verified. This verification process should be conducted by a member of staff who is not with them at the time as this could be an abscond attempt with staff members under duress.
- 4.14 All staff directly and non-directly employed who are given access to the prison must receive a comprehensive security induction, covering:
- Security key talk.
  - Ways to raise the alarm.
  - Actions to take in the event of an emergency/incident.
  - Submission of Intelligence Reports.

## OFFICIAL

- Corruption prevention.
- LSS.
- Radio etiquette/procedures.

### Visitors for staff/contractors

- 4.15 Visitors for staff/contractors to the prison should provide in date photographic ID. A number of these visitors/contractors will visit regularly or be from trusted organisations such as Ministry of Justice, Facilities Management Provider (works department sub-contractors), police etc. Prisons must decide on a case-by-case basis if they need an escort when entering.
- 4.16 The gate should have been informed of these arrangements in advance by the staff member they are visiting (see Official Visitors Booking Form Template Annex C). It is further recommended that they are provided with a visitor's ID card and lanyard to always display.
- 4.17 Upon exit of the prison, their identification must be verified prior to exiting the final door/gate/barrier. Where possible they should visit the gate upon exit, rather than using an intercom system to exit the premises.

### **Vehicles**

#### Vehicles entering

- 4.18 Requirements around vehicle entry and escort (in both regular and emergency situations) must be read in conjunction with [Health and Safety Arrangements: Management of Workplace Transport Policy Framework](#).
- 4.19 Governors must ensure that staff working in the gate and those escorting vehicles have access to a copy of the published prison procedures (core day).
- 4.20 Those operating powered vehicle gates must be suitably trained to operate gates in both regular and emergency situations.
- 4.21 Gate staff must be made aware of relevant centrally issued authorisations and any local authorisations that allow List A, B or C items into the prison. See [Conveyance Policy Framework \(open prisons\)](#) for further information.
- 4.22 Any surplus equipment in the vehicle (such as tools) that is not required in the prison must be secured at the gate and only returned to the vehicle when it is leaving.
- 4.23 Vehicles that contain built in cameras are authorised to enter the prison via a central authorisation. See [Conveyance Policy Framework \(open prisons\)](#) for further information.

#### Vehicle exiting

- 4.24 When the vehicle has completed the delivery and is ready to leave, the vehicle must be searched on exit in accordance with the [Searching Policy Framework](#). Any searching to be conducted on the driver and passengers is to be determined locally following a risk assessment. Details should be checked against the information provided on entry.

## OFFICIAL

### Vehicle searching and supervision

- 4.25 Governors must undertake an evidence-based risk assessment (to include abscond and conveyance) to set out in their LSS the process for searching vehicles (including any content where applicable) on entry and exit, and the level of searching to be conducted on the driver and any passengers. In open prisons, this can be intelligence-led searching only. Procedures set out in the [Searching Policy Framework](#) must be applied when searching.
- 4.26 Staff must be provided with adequate searching equipment for the search of vehicles (see [Searching Policy Framework](#) for details).
- 4.27 See the [Conveyance Policy Framework \(open prisons\)](#) for information on delivery items being decanted at the gate and escorted through the prison.

### Vehicle movement/escorting

- 4.28 Prisons must ensure that the movement of all vehicles in the prison is only done with prior knowledge and/or authorisation of the communication/ control room. The LSS must set out how movements into and around the prison will be managed by the communications/control room and the gate.
- 4.29 Governors must ensure that any circumstances in which a vehicle has been identified as requiring an escort is documented in the LSS. An evidence-based assessment must be used to determine the risks posed by vehicles. This must be completed in conjunction with the Transport Risk Assessment as described in [Health and Safety Arrangements: Management of Workplace Transport Policy Framework \(Annex A\)](#).
- 4.30 Vehicles identified as requiring an escort within the prison must not be allowed to enter until suitability trained escorting staff are available. It is the responsibility of the vehicle escort to always remain with the vehicle and never leave it unattended. Whilst escorting the vehicle to its location, staff must ensure the vehicle remains in sight. Local safe systems of work and PPE which comply with the requirements of [Health and Safety Arrangements: Management of Workplace Transport Policy Framework](#) must be available to identified staff involved in supervising the movements of vehicles.
- 4.31 The responsibility to control and monitor the vehicles of visitors / contractors extends to the prison's own vehicles.
- 4.32 All staff undertaking vehicle escorts must be trained to a competent level and be aware of the location and appropriate use of personal safety equipment clothing and methods of communication with the driver during the escort. A training programme for vehicle escorts and trainers is provided through Learning and Development. See [Health and Safety Arrangements: Management of Workplace Transport Policy Framework](#) for further information.

### Emergency vehicles

- 4.33 In an emergency, such as a life-threatening situation, it may be necessary for an emergency vehicle to pass straight through the vehicle lock/ gate without stopping. This may be on both entry and exit. An ambulance exiting with a prisoner onboard will have staff members in attendance and a gate pass to aid with roll reconciliation will be brought to the gate shortly after. This decision will be directed by the manager on the scene of the incident (Duty Governor/Orderly Officer) and communicated to the gate via the radio net.



## OFFICIAL

- 4.34 Relevant staff must be aware of the process to follow in emergency circumstances ensuring that no delays are caused. This must include the procedures for:
- Authority needed and process to open vehicle gates.
  - Escort / Accompanied Special Purpose Licence (SPL) departure with no escort assessment / release on temporary licence (ROTL) risk assessment or Person Escort Record (PER).
  - Escort / Accompanied SPL departure with no gate pass.
  - Returning of keys, radio, and personal protective equipment (PPE) for escorting staff.
- 4.35 Governors must ensure there are clear instructions within the LSS about the admission of emergency vehicles and that internal escorts for emergency vehicles are available. The instructions must be in accordance with the [Health and Safety Arrangements: Management of Workplace Transport Policy Framework](#) and the [Searching Policy Framework](#) and include:
- Clearing the gate area of any vehicles.
  - Procedures for gate staff in respect of any searching requirements.
  - Procedures for gate staff in respect of any central or local authorisations.
  - Process for identifying a vehicle escort and any additional gate staff to assist with opening of gates on route to the incident area.
  - Process for escorting emergency vehicles during movement.
- 4.36 The preservation of life must always take precedence over local procedures in any life threatening situation. Arrangements must be in place for the processing and holding of delivery vehicles that have entered unsearched where otherwise the LSS outlines for that vehicle to be searched. A member of staff must remain with the vehicle if it can't be held in a secure area until it is searched. Delivery vehicles must not restrict access through the gate.
- 4.37 For more information on entry and exit of emergency vehicles, see the [Conveyance Policy Framework \(open prisons\), Emergency Vehicles \(Annex G\)](#).

### Prisoners

- 4.38 All prisoner movement through the gate area must be recorded and a running roll maintained, ensuring only authorised exit and entry.
- 4.39 The entry and exit of prisoners by vehicle must be in line with the individual risk assessment for those prisoners who are undergoing local escort (by designated prisoners or staff) or in line with other service provider agreements for the police, escort contractor services or immigration removal services.
- 4.40 Gate passes (gate pass books available via Branston National Distribution Centre (NDC)) must accompany all prisoners exiting the gate under escort.
- 4.41 All prisoners exiting the gate not under escort must have their identity confirmed. This may be via biometrics, a discharge checklist or photographic ID; this will be dependent on the prison and available technology at point of exit.
- 4.42 All staff working in the gate must know that unlawfully at large (UAL) prisoners who are surrendering into custody must not be processed into the prison until identification is confirmed, and it is confirmed that they were UAL either by the police or the prison that they escaped or absconded from. Until this is confirmed, the prisoner must be held securely in

## OFFICIAL

reception. Once this is confirmed, normal reception procedures for the receiving prison must take place. For more information, see [PSI 07/2015 Early Days in Custody](#).

### Discharge of prisoners

4.43 Several checks must be made prior to the discharge of a prisoner at the necessary stages, this includes:

- Final discharge: Sentence calculations (14 and 2-day checks).
- Identification confirmed.
- No outstanding cases.
- Licences/restrictions issued confirmed and explained to prisoner.

The staff conducting these checks must have received the appropriate training relevant to their role in the discharge process.

For ROTL:

- Licence in place and conditions understood by prisoner.
- Identification confirmed.

4.44 Prisoners attending the gate for discharge must confirm their identity and provide a copy of their licence/discharge papers as evidence for the gate staff. Gate staff must confirm the movement via NOMIS diary entries and release the prisoner for the duration of their licence or final discharge.

4.45 For more information, see [PSI 72/2011 Prison Discharge](#) and the [Release on Temporary License \(ROTL\) Policy Framework](#).

### **Visits**

4.46 The LSS must set out the security procedures to ensure prisoners are prevented from absconding during or after a visit.

4.47 There must be systems in place to ensure the identification of visitors leaving following a visit is verified.

4.48 Governors have the discretion to require prisoners to wear distinctive clothing to aid staff. This may include bibs, sashes, or armbands. However, it should be recognised that this may have a detrimental impact upon the quality and atmosphere of visits, and such should only be used where necessary to maintain effective security. If prisoners are required to wear distinctive clothing, this must be explained in the LSS.

4.49 For more information, see the [Management and Security of Visits \(Open Prisons\) Policy Framework](#).

### **Perimeter**

4.50 Perimeter features in open prisons vary from boundary fencing to nothing at all, therefore any threats often come from the type of activity at or around the perimeter, rather than to the perimeter itself. Any perceived threat must be reported to the Orderly Officer/Duty Governor immediately and a dynamic assessment of the risk undertaken. Actions taken must be appropriate and proportionate to the risk/threat.

4.51 It is an offence under Section 40cb of the Prison Act 1952 for a person who, without authorisation, throws any article or substance into a prison. "Any article" does not include a

## OFFICIAL

reference to List A, B or C articles and therefore relates to all articles. "Throwing" an article or substance into a prison includes a reference to doing anything from outside the prison that results in the article or substance being projected or conveyed over or through a boundary of the prison so as to land inside the prison.

- 4.52 Internal and external perimeter checks/patrols must take place daily, however the times and quantities of these will differ between prisons. Utilising the local risk assessment process will aid prisons in identifying their specific need. See also [Conveyance Policy Framework \(Open Prisons\)](#).
- 4.53 Local contingency plans must be in place and outline the actions to take following the positive indication of a threat to the perimeter or a failure of any fitted security equipment.
- 4.54 If an officer, in the course of their duties, finds someone who they have reasonable belief has, or is about to throw an article into a prison (physically or via other means) or assist with an abscond from a prison, then they may use the powers of a constable granted under the Prison Act 1952 and effect an arrest on prison grounds or around the perimeter of the prison.
- 4.55 Prior to using [Police and Criminal Evidence Act 1984](#) (PACE) powers, an officer should consider personal and public safety as a priority and where they deem it unsafe to utilise PACE powers to stop the attempt, priority should be given to the following:
- Raising the alarm within the prison.
  - Recording information to assist police such as descriptions or perpetrators, types of vehicles or registrations, including any potential direction of travel to aid further intelligence development, post event or incident.
  - Contacting police.
  - Following local contingency plans.
- 4.56 If an Operational Support Grade (OSG), in the course of their duties, finds someone who they have reasonable belief has, or is about to throw an article into a prison (physically or via other means) or assist with an abscond from a prison then they must maintain their own safety and:
- Raise the alarm within the prison.
  - Record information to assist police such as descriptions or perpetrators, types of vehicles or registrations, including any potential direction of travel to aid further intelligence development, post event or incident.
  - Contact police.
  - Follow any local contingencies available.

### **Communications room and Radios**

#### Communications room

- 4.57 For prisons with a communications room, the LSS must clearly identify the roles and responsibilities of the communications room and those staff grades working within.
- 4.58 The communications room must have responsibility for the following as a minimum:
- Control of the radio net, maintaining secure practices and operating procedures.
  - Management of initial responses to incidents and emergencies.
  - Understanding and control of contingency plans.
  - Maintaining records of all occurrences.

## OFFICIAL

- 4.59 Governors must ensure that staff managing radio communications (or control room) have the required competence to handle, report and record information received via the radio, alarms, monitoring equipment, or any other source, as well as being familiar to the appropriate degree with the prison's intelligence system.
- 4.60 It is recommended that all staff who work in the control room complete: CRFE: Control Room for Future Operatives eLearning ([mydevelopment.org.uk](http://mydevelopment.org.uk)) and the face-to-face Prison Radio Control Room Procedure course, particularly if working in the comms room alone.
- 4.61 The facilities management team must maintain all security related equipment in line with contractual agreements.
- 4.62 The LSS must include details of maintenance contracts company details and emergency contact numbers for all technologies used for security purposes and for all essential security equipment.

### Radios

- 4.63 All staff must be made aware of the risks of transmissions being illegally scanned from outside the prison and the procedures taken to maintain radio discipline, which include:
- All staff are trained in the use of radios if in charge of individual or parties of prisoners or carry radios (directly and non-directly employed).
  - Only nationally approved call signs are used (see Radio Call Signs Annex D).
  - At least two net test calls are conducted per day (one day/one night) and faults investigated/reported.
  - A record of the identities of all outstations is maintained.
  - All night staff must draw a radio and log onto the net.
  - Radio etiquette and professionalism are always used by staff.
- 4.64 Radio handsets must always be retained securely in the possession of staff or returned to the dedicated secure storage point (this also includes all other tactical aid issued to staff including PAVA/ body worn video camera (BWVC)/Batons/Rigid Cuffs/Fish Knives where issued or available).
- 4.65 When drawing a radio staff must ensure that it is in full working order with sufficient battery.
- 4.66 Governors must determine where radios must be drawn and utilised, and by whom. This must be detailed in the LSS. All operational staff supervising prisoners outside of residential units who draw a radio must join the network using dedicated call signs.
- 4.67 All staff supervising prisoners (for example, education and substance misuse workers) without a radio or in an area out of range of the radio network must have means of raising the alarm in an emergency and know what actions to take.
- 4.68 It is important that staff are aware of 'blackspots' of the radio network which provide limited/nil reception. These areas when identified must be listed within the LSS and staff given instructions on other steps to take in these areas including the use of whistles, emergency landlines etc. This is also applicable for those staff who are non-operational and do not carry a radio such as education, substance misuse workers etc.
- 4.69 All radios must be accounted for as soon as is practicable after final lock up.

## OFFICIAL

- 4.70 Radios must be securely stored and issued. The system used for this will be individual to each prison but must include a method of identifying the member of staff who drew the radio (outside of signing on the net).
- 4.71 Radios should never be left unattended and should always be retained securely in the possession of staff or returned to the dedicated storage point. If a radio is unaccounted for then the radio must be 'stunned' immediately by the communications room and 'tool loss' procedures followed. Please see section on tools and equipment for more information.

### **Internal Movement Procedures**

#### **Prisoners**

##### Roll checks

- 4.72 There must be at least 4 routine roll checks per day, one of these being at the beginning and one at the end of the day. Open prisons must risk assess the best time to do this, taking into consideration prisoners attending/returning from ROTL. The LSS must describe the times of these roll checks and the actions to take in the event of an incorrect roll.
- 4.73 Further roll checks must take place at the following times:
- Routine practice full prison standfast roll checks must take place at least once every month.
  - Standfast roll check in line with local contingency plans (see Guidance for procedure).
- 4.74 The gate and reception (where operating) should always maintain a 'running roll'.
- 4.75 A Roll Check Template Form and instructions on roll check procedures can be found at Roll Check Template Form and Procedures (Annex A).

##### Internal movement

- 4.76 Prisoners will not be escorted around the prison unless in specific circumstances (returning to closed conditions or similar) and they will have the freedom to move around the prison. Prisoners will be expected to adopt pro-social behaviours and move around the site responsibly.
- 4.77 The LSS must specify at what times prisoners must cease moving around the prison and by what times they need to be in their own rooms, for example:
- Be on their own residential units between 2030hrs and 0730hrs.
  - Be in their own rooms between 2330hrs and 0600hrs.
  - Exceptions to this would be when individuals are attending/returning from workplaces.

#### **Social and official visitors**

- 4.78 Following a local risk assessment, the LSS must describe the control and supervision measures for internal movement of social and official visitors, these measures must be prison specific, taking into consideration:
- Numbers of visitors moved at a time.
  - Time of visits.
  - Other internal movement in the area.
  - Positioning of visits hall.

## OFFICIAL

- Safety of visitors.
- Route to be taken.
- Person escorting (as this may be a suitable prisoner for official visitors).

### Keys and Locks, Tools and Equipment

#### Gates, doors, keys and locks

4.79 All staff must ensure gates and doors are secured where appropriate.

4.80 All staff must be aware of the actions to take in relation to the actual or possible compromise of any key or lock. This process must be reflected in local contingency plans and must include:

- Broken key/broken lock – individual to always stay with the lock/broken key, asking for assistance over the radio net or waiting until another staff member passes by.
- Loss or suspected loss of key/keys – report to the orderly office/duty manager immediately, orderly officer /duty manager to consider freezing the gate, using chains to secure areas and to consider carrying out a stand fast roll check, area search and checking CCTV; and
- Keys exiting the prison – last key holder to be contacted immediately, either by telephone or in person, if necessary, keys to be returned to the prison once located and sealed in an evidence bag whilst a decision is made on the need for forensic testing and further investigations.

For more information see Reporting a Key Lock Incident (ST13).

4.53 Any key/lock incident either actual or suspected must be reported via local reporting procedures, as well as to the single incident line, National Locking Section ([Lockingorders@justice.gov.uk](mailto:Lockingorders@justice.gov.uk)) and PGD.

4.81 Incidents turning out to be false alarms must be re-submitted as a minor incident on the reporting system.

4.82 The decision to re-lock a prison in the event of a key or lock incident may only be made by the relevant PGD.

4.83 Any Class II and III security keys (and bunches of such, except handcuff keys) for use by staff must be given a number and stored in a key safe/electronic key management cabinet in a secure location. Each prison will have specific processes which must be described in the LSS and include:

- Procedures for the secure storage, allocation, issue, return and safe keeping of keys.
- Arrangements for the storage of spare security keys including access rights.
- Storage and issue procedures for all keys including works, handcuff, and body belt keys.
- Procedures for the secure use of key safes including access for auditors and senior managers.

4.84 If any member of staff arrives for duty with no key chain they must not be issued or draw keys, instead they must follow the specific instructions detailed in the LSS for reporting for duty with no key chain and replacement/loan of a key chain (if the key chain has been lost or stolen, this must also be reported via an intelligence report).

4.85 Staff must not procure their own key chain and must use prison-issued key chains only.

## OFFICIAL

- 4.86 If operating a manual key safe, the safe must be locked overnight/when not in use.
- 4.87 If operating a manual key safe the numbered positions in the key safe must never be empty (a one for one tally system must be used).
- 4.88 Arrangements must be in place to prevent key holders leaving the prison with their keys. This will vary in each prison due to installed technology. It is advised that all staff show their empty key chain to the gate staff on exit.
- 4.89 The LSS must set out:
- The agreed frequency and type of daily key check to be made and by whom (a minimum of one key check for the main key safe/electronic management key safe must take place each day after lock up).
  - Procedures for the use of keys in night state.
- 4.90 A full key audit must take place at least once every six months, and:
- Within one month of a new Governing Governor taking up post.
  - Within one month of a new Head of Security taking up post.
  - Within one month of a new Security Key Manager (usually a Band 5) taking up post.
- 4.91 Spare security keys must be kept and stored securely. These arrangements must be set out in the LSS. As a minimum these must be stored in a secure locked safe and recorded on the key ledger, with access only being given to the Security Key Manager, Head of Security and Deputy Governor.
- 4.92 A record of daily key checks must be made in the Gate Occurrence Book or equivalent.
- 4.93 No security keys must be taken out of the prison, unless agreed by the Governor and the circumstances set out within the LSS (generally only court keys and a small selection of class III keys used for visitor's centres etc).
- 4.94 The LSS must set out the operational procedures for fully automated electronic key safes where they are installed.
- 4.95 Prisoners must not be allowed to handle or examine any key or lock.
- 4.96 Once drawn, keys must always be attached to the person by a chain. Prisons must also have systems in place for secure key storage when staff are using the gym/showers. Keys must not be taken into shower areas due to damage to the keys caused by rusting, options may include for prisons to have secure lockers, with individual keys issued to staff whilst showering (like that of public swimming pools) or a smaller electronic key management system located in the gymnasium.
- 4.97 Prisons must have systems in place for the storage of keys during times such as control and restraint (C&R) incidents in full PPE ensuring staff have somewhere safe and secure to store their keys, this could be a secure safe in the C&R kit room or similar. At no time should one member of staff take control of numerous key bunches on their key chain.
- 4.98 Keys must be kept in pockets or key pouches when not in use, ensuring the key flag/bit is not visible.
- 4.99 Only issued Prison Service key chains should be used by staff and only one key chain used at a time to prevent entanglement. At times it may be necessary to have two clips on the key chain to assist with maintaining security of Orderly Officer key bunches or similar.

## OFFICIAL

- 4.100 Keys must not be able to touch the floor when the key chain is fully extended (vertically down from belt), this prevents damage to the keys if dropped.
- 4.101 Key rings must be sealed with tamper evident seals to prevent unauthorised removal or adding of keys to a bunch.
- 4.102 Excessive force must not be used to open any lock. Any difficulty in opening any lock must be reported immediately to the Facilities Management (FM) Services site manager and the Security Department/Orderly Officer.
- 4.103 The LSS must set out clear guidelines as to whom keys can be issued, types of keys and management of gates, doors and electronic key management systems. This must include:
- Access to keys and training for the Fire Service in case of emergency.
  - Identifying who can draw keys and the type of keys they can hold.
  - Procedures and training that anyone issued with keys must complete to ensure that they are competent in the secure use of keys and locks.
  - Being clear that Class II locks must be locked back securely if left open.
  - Being clear staff must not leave Class II locks (including wooden outer doors) unlocked or unattended; to prevent prisoners from tampering with the lock.
  - Assurance by Governors (to prevent any data breach) that any person's details (biometrics, PIN number, name etc) that are stored on the electronic key management system are deleted from the system at the earliest opportunity, when they are no longer an authorised visitor, or a directly/non-directly employed member of staff.
- 4.104 Each prison must keep a ledger/record of all keys, including all types of handcuff and restraint keys (see Key Ledger Annex E).
- 4.105 The ledger/record of keys will include the following information:
- The running total for each type of key in stock including those not in use and stored securely in a safe.
  - The numbers of each type received from the National Locking Section and the date received.
  - The number of each type of key in use.
  - Information about individual keys not on main locking suites.
  - Information about when keys are returned to National Locking Section for destruction.
  - Gross total for each type of keys held.
- 4.106 There must be a complete and up to date set of locking schedules and floor plans for the prison held by the facilities manager.
- 4.107 No locks or alternative suiting may be installed, including padlocks and rim mounted locks, except those specified on the schedule.
- 4.108 Requests for changes to locking schedules must be made to the CAD (Computer Assisted Design) Manager via [PropertyComplianceTeam@justice.gov.uk](mailto:PropertyComplianceTeam@justice.gov.uk). Requests must be accompanied by a draft revised plan and schedule showing details of the changes requested.
- 4.109 Spare or replacement keys and locks must be ordered from the National Locking Section. Security keys must not be obtained from local sources or cut on key cutting machines.



## OFFICIAL

- 4.110 Obsolete or damaged keys and levers must be returned to the National Locking Section for safe disposal. They must be returned with the appropriate documentation that gives the quantity, type, code and suiting information and a Condemnation Form A40 completed (Key and Locking Condemnation Form A40, Annex F).
- 4.111 Local arrangements must be in place for the acceptance of new keys from the National Locking Section. Keys must be counted immediately, and the total recorded in both the key ledger and the delivery documentation (which must be returned to the National Locking Section).
- 4.112 Deliveries and collections to/from National Locking Section must be made by two security cleared members of staff when collecting suited products.

### Padlocks

- 4.113 Only padlocks supplied by the National Locking Section must be used and identified where in use on the locking schedule. Where padlocks are in use, key staff including the Head of Security and Orderly Officer are to be made aware of where the keys are held.

### Disclosure

- 4.114 Disclosure of a lock or key occurs when it is considered beyond reasonable doubt that an individual (or individuals) has had enough opportunity to copy, manufacture or otherwise effect the means for operation of a lock or key.
- 4.115 Not all compromises result in disclosure. Minor incidents will be dealt with locally and may result in the replacement of a lock or the condemnation of a key.
- 4.116 More serious security, complex breaches or intelligence threats/risks which would have an immediate effect on the physical security of the prison must be referred immediately by the prison to the National Locking Section by telephone and email.
- 4.117 Disclosure procedures and guidelines for the above circumstances are set out in Disclosure or Compromise Risk Assessment and Decision Tool (Annex G1) and Key and Lock Requisition and Disclosure Form (Annex G2). In all cases the Head of National Locking must be informed as soon as possible

### **Tools and equipment**

- 4.118 Tools and equipment must be managed and stored securely to prevent the use of these items being used inappropriately. This includes items in healthcare emergency response kits/grab bags or similar.
- 4.119 All staff must be aware of the actions to take in relation to identifying a missing tool/s or equipment and this process must be reflected in the LSS and local contingency plans in line with the Incident Management Policy Framework. The initial actions to take are:
- Requesting remaining prisoners not to leave the area of the missing tool and supporting staff in finding the tool.
  - Asking prisoners if they know the whereabouts of the missing tool.
  - Reporting missing tool to the Orderly Officer/Duty Manager immediately with full details of when the tool was last seen, and who it was last issued to.
  - Awaiting further instruction from the Orderly Officer/Duty Manager.
  - The Orderly Officer/Duty Manager initiating contingency plans and instructing all areas of necessary actions to take.

## OFFICIAL

4.120 If the tool cannot be located on initial investigation, then the prisoners can return to their regime activities and local investigations will take place dependant on the tool missing, intelligence received and perceived threat/risk.

### Tools risk assessment

4.121 Tools in open prisons will generally be assessed as low risk. Due to the prisoners being held in open conditions, there are no restrictions to issue of tools and allocated workplaces.

4.122 The Security Department will conduct a risk assessment (see Tool Risk Assessment Template Annex H) of all tools including those held by outside FM Departments and plant machinery taking into consideration tool type, location, and who will have access/use of it to determine which items must be marked. The completed risk assessments must consider:

- The security category of the prison, age and profile of the population.
- The potential danger each tool, tool type/item of equipment would pose to the security of the prison if it were lost.
- The likelihood of the item being taken for unauthorised use (i.e., if it is a tool not issued or accessible to prisoners, or if it is used in an area to which prisoners may have access).
- Equipment (including cutlery or servery tools) located in staff rest areas/kitchens which are adjacent to either prisoner accommodation or prisoner recreational areas.

4.123 Tools and equipment used by healthcare staff/dentists/doctors and other visiting healthcare professionals must never be issued/used by prisoners.

4.124 There are no set timescales for tools to be re-risk assessed, however this must be done if a change of prison category, profile of the population takes place or if intelligence is received regarding certain tools being used as weapons/abscond aids.

4.125 A central inventory and local inventories of all tools within the prison must be maintained and kept up to date. Local inventories should not obscure the view of the shadow boards when in place. The inventory must identify both the name of the tool and the unique code for that tool. A tool inventory template can be found at Annex L.

4.126 Tools must not be added or removed (physically or on the inventory), by anybody but the Security Department.

### Prisoner and workplace risk assessments

4.127 Workplaces and prisoners in open prisons will generally be assessed as low risk and as such there are no restrictions to issue of tools and allocated workplaces. Therefore, prisoner and workplace risk assessments are not required, and prisoners will be allocated work via local Labour Boards.

### Unique marking

4.128 Each prison will have a unique coding system for tools which will identify the prison, the area the tool is from, and the tool number. For example: FDI-WKSH6-1 relates to Ford (FDI) Workshop 6 (wkshp6) tool number 1 (1). This allows for each tool to be accounted for in the correct place and helps easily identify a tool of which there may be multiple of in different locations within a prison.

4.129 The LSS will identify which tools and equipment will be identified in this way and they must be marked in a non-erasable way such as etching. Small tools such as dentistry tools may

## OFFICIAL

be photographed and displayed alongside the relevant storage area. Other tools that cannot be etched should be colour coded. For example:

- Workshop 1 could be orange and workshop 2 could be blue, so tools could easily be identified as to where they originated from.
- All 6" screwdriver handles could be blue and all 4" screwdriver handles could be green.

### Storage

- 4.130 Any tools that have been identified as posing a high risk to security and are used regularly must be stored in either a secure shadow board or secure cupboard, dependant on the size of the item. Items such as domestic irons do not always fit into a shadow board and would then be stored in a secure cupboard but accounted for in the same way as if in a shadow board.
- 4.131 Mops and brooms are vital for prisoners and staff to maintain standards of cleanliness and decency and therefore there will be times when prisoners have these in their cells. All staff and prisoners must be aware and remain vigilant to the risk these could cause if fashioned into/used as a weapon, barricade or abscond aid. Staff must remove and dispose of safely any adapted or broken mops and brooms or handles with no head attached.
- 4.132 Small tools, such as dentistry tools can be stored together as a kit, the kit should have a clear inventory attached to it to identify the tools in the kit. Items such as these should be secured when not in use (photographs of such tools rather than etching may be appropriate for accounting purposes).
- 4.133 Stock control systems along with disposal records must also be in place for disposal of medical equipment such as needles, syringes, suture kits etc.
- 4.134 Stores, gate and Security Departments should have a system in place to identify the delivery of any new tools, this will enable the security department to take control of these prior to issue to any area, ensuring they have been risk assessed and etched/marked in the correct manner.
- 4.135 In all areas of the prison, dependent on where prisoners work, they will routinely have access to several materials including cleaning materials, solvents, adhesives, chemicals, petrol or other products used in workplaces. The LSS must specify the procedure for securely storing these items in line with [Control of Substances Hazardous to Health \(COSHH\) Guidelines](#) and COSHH risk assessment, and regular checks to ensure they have not been misused or taken.
- 4.136 Due to the variety of different materials across prisons there is no set procedure for secure storage of these materials. Locally, consideration should be made to:
- Chaining of containers.
  - Locking in appropriate storage cupboards.
  - Materials only being issued to prisoners by staff.

### Issue/Receipt

- 4.137 Tools which are assessed as suitable for prisoner use, must be secured appropriately and the LSS must include a system for the secure issue/receipt of all tools and equipment given to prisoners. This system must include locations of tools within the prison, when and to which prisoner they were issued (please see Tool Issue and Receipt ST2).

## OFFICIAL

- 4.138 Prisoners should never be given direct access to shadow boards/tool cupboards, and they should never be left unlocked.
- 4.139 A replica system for issue of tools to staff must also be in place.
- 4.140 All tools/equipment must be accounted for at the end of each work, association or activity session. If a tool is identified as missing this must be reported immediately. Staff should not spend time looking for the tool prior to reporting as missing.
- 4.141 Fully plastic servery tools do not need to be etched or accounted for in the same way as other tools at the end of a session, however it is advised that an accountability system is put in place to ensure the smooth running of the servery each session.
- 4.142 Tools and equipment used by healthcare staff/doctors/dentists or other visiting healthcare professionals must always be stored securely.
- 4.143 Staff must not bring their own tools or equipment into the prison without first gaining authority from prison management as per the [Conveyance Policy Framework \(open prisons\)](#).
- 4.144 Any tool or item of equipment that is brought into the prison must be listed and controlled so that it cannot be taken or misused by prisoners.
- 4.145 Staff must always be aware of the potential security threats from any large and/or moveable item(s) in use around the prison which can be placed near or against a perimeter boundary.

### Disposal

- 4.146 Any broken tools including items such as hacksaw blades, must be disposed of promptly and securely, with records to show disposal point and date of disposal. Systems should be in place to identify missing tools (due to breakage) from shadow boards and tool inventories. (Please see Tool Disposal ST3).

### High risk items

- 4.147 These items do not pose the same risks to open prisons due to the structure and regime of the prison. Any items identified by the Security Department as high risk in open prisons must be risk assessed locally and follow the control steps below if deemed necessary.
- 4.148 It is recognised that in open prisons, a number of these items may be used by prisoners without supervision were deemed appropriate, this may include the use of ladders, driving/control of plant machinery.

### Skips (if identified as high risk)

- 4.149 All skips and their locations must be thoroughly risk assessed and the risk assessments reviewed regularly as set out within the LSS. Skips should only be placed in locations approved by the Security Manager and adequate security measures put in place to manage any risks identified.
- 4.150 All skips must be in a good sound condition. Access points to the interior of the skip must be lockable using a padlock and chain, or any other approved method. The keys used to secure the skip must always be in control of the member of staff who oversees the skip. The member of staff must always open and secure the skip, controlling prisoner access.

## OFFICIAL

- 4.151 Prisoners must not have access to the security keys for skips under any circumstances.
- 4.152 Procedures for delivery/removal of any skips must be documented within the LSS taking into consideration restrictions for prisoner movement whilst skips are being collected/removed.
- 4.153 See Management of Skips (ST4) for more information.

### Climbing aids (if identified as high-risk)

- 1.122 Climbing aids are items of equipment that are commonly found, and often operated by or in the vicinity of prisoners in open prisons. Examples of possible climbing aids are step ladders, extendable ladders and scaffold towers/ platforms. Although these items present a lower risk in open prisons, the level of risk for climbing aids must still be assessed locally. These items should not be left unattended unless local risk assessment allows for the equipment to be securely left in a way to restrict unauthorised access.
- 4.154 The management, supervision and storage of these items must then be documented and justified in the LSS.

### Climbing aids used for prisoner tuition (if identified as high-risk)

- 4.155 Several prisons operate educational/vocational courses for prisoners which may include the use of ladders, scaffolding and other such items. These items must only be used under the supervision of instructors, always secured when not in use and only ever used in a controlled manner.

### Plant machinery (if identified as high-risk)

- 4.156 Security Departments must risk assess all internal and external vehicles and plant to establish the level of risk they pose to security. If the plant machinery is part of the prison's assets, then this must be risk assessed under the tools and equipment risk assessment process, ensuring procedures are in place for immobilisation and secure storage. This risk assessment must be undertaken before approval is given for its entry into the prison.
- 4.157 Before any commencement of movement with a high-risk vehicle/plant the communications room must be informed to which location it will be going to, its route and that the route is suitable (if the route is wide enough, high enough etc). Movement of plant machinery should be done in line with the Health and Safety Arrangements: Management of Workplace Transport Policy Framework and risk assessment.
- 4.158 Relevant staff must know the actions to take on completion of any work which required the use of a high-risk vehicle or plant. The vehicle must be immobilised and made secure as a minimum.

### Other available climbing aids (if identified as high risk)

- 4.159 Use of the following equipment will need to be managed in line with the LSS (this list is not exhaustive, and all equipment must be risk assessed locally):
- Storage of cabling.
  - Wheelie bins.
  - Storage of bed frames.
  - Storage of wooden pallets.
  - Storage of metal cages.

## OFFICIAL

- Use of sports equipment.

### Sports equipment/Gyms (if identified as high risk)

4.160 All gym equipment must be accounted for at the end of every session, this must include items such as ropes, wall bars, badminton nets, agility ladders and similar.

### Staff Uniform

4.161 Prisoners having access to staff uniforms can be a significant risk. Prisons must ensure that all staff uniforms are stored securely and when no longer required are returned in line with the [Staff Appearance, Uniform and Work Clothing Policy Framework](#) (internal use only).

### Facilities management

4.162 A full and auditable inventory of all works tools must always be maintained by the facilities management team manager. They must have systems in place for disposal and replenishment of tools in the same way as all other tools in the prison. All tools should be stored in shadow boards/cupboards when not in use and the tally system used when taken out (see Tool Issue and Receipt ST2).

4.163 Facilities management tools may be used by prisoners where assessed as appropriate.

4.164 It will be necessary for facilities management teams to use their tools around the prison. They should always have an up-to-date inventory of tools they are carrying with them on their person which includes all items such as drill bits, saw blades, screwdriver heads and so on. Tools must be checked against this inventory when moving between workplaces, upon leaving and arriving at new destinations (see Tool Inventory Template Annex L).

### Contractor's tools

4.165 Procedures must be in place for controlling tools that contractors use, taking into consideration the joint use of these on occasion by prisoners. As per facilities management tools, this must be decided via a risk assessment process.

4.166 On occasion it may be necessary, dependent on the job, for stricter procedures to be in place for the control of contractor's tools. This must be decided by the Security Department.

4.167 Prior to visiting, a list of tools required must be provided to the Security Department. This may be via a 420 meeting for bigger/longer term projects (see 420 Meeting Example Template, Annex B).

4.168 Upon arrival the escorting member of staff must make an inventory of all tools/equipment entering the prison. The use of an authorised polaroid camera or similar may be useful for this, and will provide a means of checking tools without items being wrongly named/identified.

4.169 All tools equipment must be checked against the inventory by the escorting member of staff when moving between workplaces (upon leaving and arriving at new destinations) and on exit of the prison.

### Stores

## OFFICIAL

- 4.170 All staff working within the stores must be sufficiently trained to search the accommodation, items within the stores, and the prisoners with access to the stores area. Staff must also be able to demonstrate that they are competent in the use of handheld metal detectors.
- 4.171 Searching of prisoners with access to stores must only take place if there is intelligence or a reasonable suspicion that the prisoner is removing items from stores.
- 4.172 The stores and its contents must be searched at unpredictable times. Searching of stores in open prisons will be on an intelligence led basis.
- 4.173 To assist with maintaining the security of stores, staff working in stores must:
- Make thorough daily checks on all tools, items of equipment, or stored materials.
  - Maintain a stores log/register.
  - Be fully aware of everything held in stores and its exact location.
  - Take appropriate measures to prevent the compromise of security or good order of the prison and theft by prisoners.
  - The stores manager must undertake a physical security check of all doors, windows and, where appropriate, machinery. This must be carried out simultaneously with the fire check daily and signed for in the stores/log register.
- 4.174 A nominated manager is required to check and sign the stores log/register daily. Staff working within stores areas within prisons are contractor employed. Alongside a daily check and signature of the store's log/register by the nominated stores manager, the contractors site manager must also check and sign the stores log/register at least once every three months, identifying and reporting appropriately any discrepancies.

Staff tactical aid (not all the below items will be personally issued to staff in open prisons)

- 4.175 Personal issue cut-down tools (big fish) and other tactical aids which may be issued to named individuals on a permanent basis must be marked/etched.
- 4.176 Batons:
- Must be stored in secure storage inside the prison (not outside locker rooms); they can be taken out of the prison for escorts/bedwatches and detached duty.
  - If they are to be carried in a personal vehicle (on-route to detached duty), then the Governor must provide a covering letter to the member of staff to produce to the police if stopped (see Detached Duty Authorisation Template Annex K).
  - If the staff member is carrying out bedwatch duties for another prison, then that prison should provide a baton for the staff member when reporting for duty.
- 4.177 Rigid bar handcuffs:
- Will be issued to identified key staff only, usually Orderly Officer/Assist Orderly Officer and C&R instructors.
  - Must be stored in secure storage inside the prison (not outside locker rooms), they can be taken out of the prison for escorts/bedwatches (they should not be used as the primary restraints) and detached duty.
  - If they are to be carried in a personal vehicle (on-route to detached duty), then the Governor must provide a covering letter to the member of staff to produce to the police if stopped (see Detached Duty Authorisation Template Annex K).
  - If the staff member is carrying out bedwatch duties for another prison, then that prison should provide a rigid bar cuff for the staff member when reporting for duty if deemed as necessary to take on the bedwatch.

- 4.178 Cut down tools (big fish):

## OFFICIAL

- Must be individually marked/etched with a unique identification number and these should either be issued individually to members of staff and a central log maintained or stored in a central secure area for staff to access in case of emergency (for example: 1 per residential unit).
- Personal issue cut down tools must be stored in secure storage inside the prison (not outside locker rooms), they can be taken out of the prison for escorts/bedwatches and detached duty.
- If they are to be carried in a personal vehicle (on-route to detached duty), then the governor must provide a covering letter to the member of staff to produce to the police if stopped (see Detached Duty Authorisation Template Annex K).
- If the staff member is carrying out bedwatch duties for another prison, then that prison should provide a cut down tool for the staff member when reporting for duty if deemed as necessary to take on the bedwatch.

### 4.179 PAVA:

- Each have a unique identification number, and these must be held in a central location and issued to staff using a sign in/sign out system when they arrive/leave for night duty.
- Must be stored in secure storage inside the prison (not outside locker rooms).
- Must never exit the gate of the as per the [Use of Force Policy Framework](#).
- If attending a prison on detached duty, PAVA must be provided by that prison.

4.177 For further information please see the [Use of Force Policy Framework](#).

### Night Procedures

- 4.180 Nights can be a difficult, lonely time for staff members and therefore staying alert and aware of surroundings is vitally important. Prisoners may use the night state as a period to attempt abscond, due to reduced staffing levels. Staff are often alone on nights and may be the subject of attempted conditioning and manipulation.
- 4.181 All OSGs should have a period of 'shadowing' and complete the two-week OSG training course, which covers all things related to 'Nights' as well as typical duties and suicide and self-harm procedures and Assessment, Care in Custody Teamwork (ACCT) procedures, prior to being alone on night duty.
- 4.182 Officers must have completed the Prison Officer training course prior to any night duty and Officers and Night Orderly Officers (NOO) must be given the opportunity to shadow a set of nights prior to carrying out nights or NOO duties.
- 4.183 All staff on nights must complete In Cell Fire (RPE) training prior to conducting night duty and must be refreshed annually. Staff can book through [POELT-osgcourse@gov.sscl.com](mailto:POELT-osgcourse@gov.sscl.com), or alternatively complete their local training return for OSG training need.
- 4.184 Every prison operates differently and therefore needs an individual set of night operating procedures. It is recommended that these procedures are not written in silo and take into consideration all factors.
- 4.185 Night operating procedures must include the following details:
- All night staff are aware of information necessary to maintain the safety and security of the prison.
  - Times that prisoners should be in their own residential units/rooms.
  - Access to communal areas (toilets/showers).
  - Movement at night escorted.



## OFFICIAL

- Movement at night unescorted (outworkers leaving/returning from employment).
- 4.186 Night staffing and procedures must be agreed locally, subject to the requirements of the prison. These must be set out in the LSS and approved by the PGD.
- 4.187 Night staff must be aware of the local requirements to maintain the safety and security of the prison. This will include locking procedures, patrols, ACCT observations and the secure movement of prisoners during night state.
- 4.188 A Duty Governor must always be on call throughout the night. They must be informed immediately of serious events to include:
- Death in custody.
  - Serious fire.
  - Abscond /attempted abscond.
  - Emergency discharge to hospital.

### Commencement of duty – day to night handover

- 4.189 A full roll check must take place every 24 hours. The prison must decide locally when to reconcile their roll at the time that is best placed to manage the risk. This must be documented and justified in the LSS. The night lock up roll must be collated by the orderly office once all prisoners are secured in their relevant cells or rooms. This must be recorded on the 'night lock up sheet' and handed to the NOO.
- 4.190 Staff must be allocated specific sets of keys for nights and/or pouches which must be attached to key chains. All staff must be in possession of a radio and a cut down tool (fish knife) where available and in line with the prison's local policy.
- 4.191 The NOO must conduct a full key and radio check and sign for it once complete on the night lock up sheet. Any missing keys or radios must be reported as per key / radio compromise procedures.
- 4.192 The NOO must receive a full briefing from the day Orderly Officer. The NOO must then brief all night staff.
- 4.193 There must be a night procedures sheet to document key information as part of the handover. Handovers should include the following key elements:
- Prisoners on ACCT documents, frequency of observation, conversations required and any key risk information highlighted/ action taken.
  - Newly arrived prisoners subject to first night checks, including documenting any key risk information/ action taken and the expectation of the level of checks.
  - Key incidents that have occurred during the day that staff will need to be aware of (missed medications, individuals that have received bad news, prisoners who have been involved in serious incidents for example).
  - Any prisoners on escort or bedwatch.

### Night staff requirements

- 4.194 All night staff must be briefed at the start of the week by the NOO and made aware of the actions to take in an incident situation. This will include how to summon assistance and containment of the incident (where possible). The following incidents must be covered:
- Abscond.
  - Death in custody.
  - Fire.

## OFFICIAL

- Serious self-harm.

4.195 Other situations may arise during night state such as a loss of electricity or water and staff must be able to locate the local contingency plans that set out how to manage various types of incidents. The NOO must be competent in carrying out the actions within the contingency plans.

4.196 The Duty Governor must be informed immediately if an incident occurs.

### Prisoners conduct and behaviour during the night

4.197 Night staff must be fully aware of the procedures for managing inappropriate prisoner behaviour during the night state including the procedures for challenging these, adjudications, and appropriate recording on NOMIS.

4.198 If a prisoner's behaviour needs addressing further, the NOO should be contacted to make any assessment and further decision. This may include moving a highly disruptive prisoner for the safety of themselves/ others or other appropriate action. All actions must be recorded and justified on NOMIS and in the unit observation book.

### Night patrols

4.199 Regular patrols and visits of all residential accommodation must take place between 2200hrs and 0600hrs and may include undertaking any ACCT observations. A record of all visits must be maintained.

4.200 Patrols must be irregular, for example not taking place at the same time every hour.

4.201 Patrols must also include the completion of fire safety checks during night state.

### Entering accommodation at night in an emergency

4.202 The LSS must clearly state how many staff must normally be present before prisoner accommodation can be entered as well as the local procedures that staff should follow if faced with a potentially life-threatening situation when there are no other staff in the immediate vicinity.

4.203 Staff must have access to the LSS and be made aware of the implications of this for their role in maintaining security during the night.

4.204 There are many incidents that may occur at night, and it is difficult to be prescriptive about what actions to take in each particular case. The following is a guide to the minimum mandatory actions that are required before opening accommodation doors at night.

4.205 Under normal circumstances, authority to enter a cell at night must be given by the NOO and no accommodation door will be opened unless a minimum of two/three (subject to local risk assessment procedures) members of staff are present, one of whom should be the NOO.

4.206 Staff have a duty of care to prisoners, to themselves and to other staff. The preservation of life must take precedence over the directions above. Where there is, or appears to be, immediate danger to life, then doors may be opened and/or entered without the authority of the NOO (but subject to the conditions set out below) and an individual member of staff may enter on their own. However, night staff should not take action that they feel would put themselves or others in unnecessary danger.

## OFFICIAL

4.207 Before entering accommodation:

- Every effort should be made to gain a verbal response from the prisoner;
- This, together with what the member of staff can observe through the door if open or through the panel if closed and any knowledge of the occupant(s), should inform a rapid dynamic risk assessment of the situation and decision on whether to enter immediately or wait for assistance; and
- The communications/control room must be informed before entering the accommodation stating the location of the room and describing the circumstances that require intervention.

4.208 Although it is not possible to include a check list of every potential risk in a live situation, some things that may be considered as part of a rapid dynamic risk assessment could include:

- the presentation of the prisoner who appears to be in danger.
- whether or not it is a single or shared room.
- the occupant's security category.
- the occupant's history of self-harm and/or violence if known. Are they likely to act erratically?
- how vulnerable does entering the accommodation make the member of staff?
- the level of visibility into the room, can a clear assessment be made of what the prisoner may have in their hands?
- is there anything that could be used as a weapon?
- is there anyone else who is at risk?
- how can staff exit the situation if needed?
- how confident does the member of staff feel? How close are other colleagues to assist?

4.209 If a decision is taken to enter the accommodation, staff must tell their colleagues what they are doing. If it is not possible to inform a colleague, staff should summon assistance using a personal or general alarm.

4.210 Staff should contact the communications/control room or Orderly Officer before entering the accommodation and provide the location and describe the circumstances that require intervention.

4.211 If applicable, staff should use the emergency response codes 'red' or 'blue' over the radio which will call for an immediate local healthcare response where this service is available, as well as emergency services. Staff must also state whether the person is conscious and breathing so that this information can be given promptly to the ambulance operator.

4.212 The communication/control room must then contact the NOO and inform them of the situation. Staff will be deployed immediately.

4.213 Where doors are closed and observation panels are covered, the NOO should be informed immediately, and staff deployed to the accommodation. In these circumstances a decision by a member of staff to enter immediately on their own will be more difficult as there is less evidence to inform an immediate risk assessment.

### Prisoner movement during night state

4.214 Prisoners may self-release and move through the prison at night if they have a ROTL license that necessitates them doing so.

## OFFICIAL

4.215 If staff do not recognise a prisoner or are unsure of their reasoning for moving through the prison at night, they must check the prisoner to ascertain that they have a legitimate reason for moving in the grounds at night.

### Breaking night state to permit visitors

4.216 The LSS will set out the circumstances under which the night state may be justifiably broken, and the secure perimeter of the prison breached. Prisons must take into account the potential risk that arises when the gate is unlocked and whether any person wishing to enter may be under coercion.

### Duty Governor night visits

4.217 At least one night visit must take place per month by a Duty Governor. To ensure the security of this visit and that the Duty Governor is not under coercion, prisons must have specific local procedures set out to manage this visit. This may include the Duty Governor contacting the prison prior to arrival and supplying a password to the NOO. The password must be confirmed by the NOO before entry to the prison is permitted. The password should be changed regularly.

4.218 If the password is incorrect the police must be informed and entry to the prison must be refused.

### Statutory right of entry

4.219 The NOO must be aware of who has a statutory right of entry. Prior to the entry of the individual, ID must be confirmed, and the NOO must be content that the visitor is not under coercion. Any concerns must be reported to the Duty Governor and the police immediately.

4.220 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 and 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 and 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.

4.221 If the NOO does not feel comfortable in allowing access, (for example reduced staffing levels as a result of an emergency escort would mean the visit can't be conducted securely) then access must be denied, and immediate contact made with the Duty Governor. The situation must be clearly explained to the visitor(s).

4.222 All night visits must be recorded.

### Emergency services and emergency escorts

4.223 Night state will need to be broken in the event of a medical emergency. There must be clear instructions in the LSS about the unhindered admission of any emergency services vehicles and personnel during night state.

## OFFICIAL

- 4.224 Immediate and safe access must be provided to the emergency services when entering the prison. The NOO will need to ensure that escorting staff are available to permit entry via the gate and that they are aware of the quickest route to different parts of the prison.
- 4.225 If an emergency escort is dispatched without a full risk assessment due to a life-threatening situation, then an Emergency ROTL Risk Assessment must be completed, and the PER must be annotated with 'no restraints to be used' if that is the decision made at time of dispatch by the Duty Governor/Orderly Officer (night state). The full risk assessment must be taken to the escorting staff at the earliest opportunity (no longer than 18 hours)." For more information, see the [External Escorts Policy Framework](#).
- 4.226 On most occasions an emergency escort will consist of two escorting officers but in some circumstances, three officers may be required. The minimum requirement is two officers.
- 4.227 The NOO will remain in charge of the prison and will need to assess what work can continue to be safely carried out, or whether there is a need to attempt to call more staff in (this would be done in consultation with the Duty Governor). Any reduction in work duties during night state will need to be recorded, outlining the circumstances.

### Exiting night state

- 4.228 A full handover must be given to the daytime Orderly Officer to include:
- The night's events.
  - Any security concerns.
  - Prisoners subject to open ACCT documents.
  - Any concerns raised about those recently arrived prisoners.
  - Any hospital escorts/bedwatches.

### **Covert testing**

- 4.229 It is important that open prisons use covert testing to assess internal security procedures, in line with the [Covert Testing Policy Framework \(to be published\)](#).

## **5. Constraints**

- 5.1 There are dependencies between this Policy Framework and the following policy documents:
- [Searching Policy Framework](#).
  - [Management and Handling of Evidence Policy Framework](#).
  - [Management of the LSS Policy Framework](#).
  - [Conveyance Policy Framework \(open prisons\)](#).

### **Data Protection**

- 5.2 Any information relating to an identified or identifiable living individual recorded as a consequence of this framework will be processed in accordance with the Data Protection Act 2018, UK General Data Protection Regulation and PSI 04/2018 Records Information Management Policy.

### **Freedom of Information Act**

- 5.3 This document has been assessed as OFFICIAL and therefore suitable for public release. Some annexes and supporting tools have been marked as OFFICIAL-SENSITIVE and will not be available for public release.

**Diversity and Inclusion**

- 5.4 When communicating to staff, prisoners or visitors, prisons are expected to ensure that briefing documents and information is available in a variety of formats including easy read, braille, voice, and other languages.
- 5.6 A full Equality Impact Assessment has been completed in support of this Policy Framework.

**6. Guidance**

**Support for Prisoners**

- 6.1 There are several policies, processes and key areas that can help support prisoners. Some of these are listed below and should be always considered throughout a prisoner’s time in custody, to aid with the avoidance of prisoners feeling like they have no choice but to escape / abscond from custody or carry out other actions due to frustrations.

PRISONER SUPPORT	<ul style="list-style-type: none"> <li>• Keyworkers</li> <li>• Family support</li> <li>• Substance Misuse Services</li> <li>• Mental Health Services</li> <li>• Pastoral Support</li> <li>• Individual Case Management</li> <li>• PSI 64/2011 Managing Prisoner Safety</li> <li>• <a href="#">CSIP (Challenge, Support &amp; Intervention Plan)</a></li> <li>• <a href="#">PSI 07/2015 Early Days in Custody Prison service instructions (PSIs) - GOV.UK (www.gov.uk)</a></li> <li>• <a href="#">Serious and Organised Crime Policy Framework Prison &amp; Probation Policy Frameworks - GOV.UK (www.gov.uk)</a></li> <li>• <a href="#">Debt Materials and Learning for prisoners</a></li> <li>• <a href="#">Listener Scheme &amp; Samaritans - Safety in prisons (sharepoint.com)</a></li> </ul>
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**Gate Procedures**

- 6.2 The gate area is the part of the prison through which people, vehicles and materials are allowed into and out of the prison. The gate may be a risk area in terms of abscond if not managed correctly and confidently. Staff working in the gate carry out a vital role in maintaining security.
- 6.3 Maintaining a professional ‘front of house’ customer service approach is one of the first steps contributing to maintaining a secure environment, supported further by following procedures set out in the [Searching Policy Framework](#) and [Conveyance Policy Framework \(open prisons\)](#).
- 6.4 Gate staff play a key part in the smooth operation of the prison and maintaining the regime. It is important that gate staff have a copy of the published/current prison regime, allowing them to liaise with delivery drivers etc and be able to provide understanding and explanation as to why a vehicle may not be allowed access immediately.
- 6.5 Gate staff should be able to operate gates where there is a loss of power to electric gates and hand cranking is required. Staffing in the gate should consider this.

## OFFICIAL

### Entry and exit

- 6.6 The [Searching Policy Framework](#) and [Conveyance Policy Framework \(open prisons\)](#) should be referred to for searching and ID requirements.

### Staff

- 6.7 Prisoners may blatantly exit the prison via the gate in a bid to abscond, to identify these prisoners at the earliest opportunity staff should show their ID before exiting the prison.

### Vehicles

- 6.8 If a vehicle is only to enter the prison under escort, then it should wait in a position that will not impede entry or exit of emergency vehicles. As good practice 'no parking/no waiting' signage in these areas is recommended (both internal and external of the prison). Signage is available from HMP Coldingley.
- 6.9 When escorting vehicles, staff should wear the appropriate Protective Equipment (PPE) such as prison issue footwear and a high visibility tabard.
- 6.10 It can be good practice to issue drivers with driver instruction cards to ensure they are aware of prison processes such as escorting arrangements, 5mph speed limit, searching and ID requirements and keeping safe whilst within the prison.

### Prisoners

- 6.11 Prisoners will move through the gate either on entry or exit on most days for different reasons:
- As part of outside work parties.
  - Final discharge.
  - Release on Temporary license (ROTL).
  - Escorts HMPPS and contactor.
- 6.12 It is therefore vital that gate staff understand their role in preventing the unauthorised exit and entry of prisoners and are confident in doing so.
- 6.13 All prisoners attending the gate for any form of discharge should have a copy of their discharge papers with them, whether this be for final discharge or ROTL which will inform the gate staff the reason for discharge and the prisoner's identity.
- 6.14 Several checks should have been conducted prior to the prisoner arriving at the gate in the case of final discharge, it is advised for sentence calculations to be carried out by trained staff and in line with the [Sentence Calculations Policy Framework](#).
- 6.15 As part of the final discharge process carried out by the discharging officer in Reception (Band 4 or above), the prisoner's identity should be confirmed using a selection of different questions (see Prisoner Discharge Checklist Annex N).

For more information please see the [Prisoner Discharge Policy](#).

### **Perimeter**

- 6.16 Open prisons have varying types of perimeter security, ranging from hedges, fences, barriers and perimeter patrols.

## OFFICIAL

- 6.17 Where perimeter security includes a physical patrol, this should be co-ordinated by the communication room and a record of the check should be made with the Security Department.
- 6.18 Consideration should always be given to staff safety. Staff should also be aware of their limitations in relation to apprehension/challenge of persons outside of the prison.
- 6.19 Officers and above can use [PACE](#) powers of arrest, but if doing so should consider other factors especially around their own safety. If they are to use their powers of arrest then the following caution must be issued to the person being arrested:

*I am ..... (state name)*

*I must inform you that you are under arrest on suspicion of .....*

*You do not have to say anything, but it may harm your defence if you do not mention when questioned something which you later rely on in court. Anything you do say may be given in evidence.*

- 6.20 The arresting officer should detain the person under arrest and call the police. Do not question the individual but document anything stated by the person under arrest to use as evidence.

### Communications Room

- 6.21 The communications room will be the 'hub' of the prison in most prisons, controlling emergency situations, staff and prisoner safety (general/fire alarms for example).
- 6.22 Incident managers should ensure communications room staff are kept informed of relevant information about incidents throughout.
- 6.23 Security and/or Orderly Officers should ensure that the comms/control rooms are kept informed about specific prisoners as issues arise.
- 6.24 Staff working in the communications room should complete [CRFE: Control Room for Future Operatives eLearning \(mydevelopment.org.uk\)](#) and the face-to-face Prison Radio Control Room Procedures course. The eLearning is a pre-requisite for the face-to-face course.

### Roll Checks (see Roll Check Procedure Poster ST6.1 and Roll Checks Guide ST6.2)

- 6.25 The 'roll' is the number of prisoners held in a prison, at any one time. This is any prisoner who is on the inside of the prison perimeter, including those lodging on a van whilst other prisoners are dropped off. Accounting for all prisoners, always, is important to identify any missing prisoners.
- 6.26 To aid with maintaining a prison roll, the gate and reception (where operating) should always maintain a prison roll, recording the:
- Unlock roll.
  - Discharge.
  - Receptions.
  - Current roll.
- 6.27 It is recommended that this be clearly displayed in the gate lodge area and must also be recorded in the gate book.

### Stand fast roll check



## OFFICIAL

- 6.28 A stand fast roll check is an ad hoc (when necessary or needed) roll check.
- 6.29 A stand fast roll check may be called if it is suspected a prisoner is missing/absconded.
- 6.30 The procedures to follow will be the same in each circumstance and may operate alongside abscond contingency plans.
- 6.31 Any member of staff being alerted to a missing prisoner must immediately raise the alarm in the appropriate manner at which point a stand fast roll check may be called.

### Stand fast roll check procedure

- 6.32 A stand fast roll check will be managed by the communications room/Orderly Officer, but the procedure may vary between prisons due to layout etc.
- 6.33 The following is an example standfast roll check procedure for open prisons:
- The Orderly Officer will instruct the communications room to announce 'standfast roll check' by the radio, it is advised to use the alarm warble at this stage to gain staff attention.
  - Acknowledgements should be obtained via the radio to all relevant areas/call signs.
  - At the announcement, the following will take place:

#### Residential accommodation:

- Complete roll check of all prisoners confirming ID.
- Report the roll to the communications room when completed.
- Report any missing prisoners to the orderly officer.

#### Healthcare:

- Freeze movement of all prisoners in healthcare and report their roll to the communications room.

#### Other Areas:

- Freeze movement and report their roll to the communications room.
- Prisoners working in remote areas of the prison to be roll checked by the supervising member of staff and their roll reported to the communications room.

#### Prisoners on ROTL:

- The gate lodge are to confirm prisoners working/visiting outside the prison with the communications room.
  - The comms room will then collate the roll.
  - If the roll is correct the comms room will announce by the radio and the prison can return to its normal regime.
  - If the roll is found to be incorrect then a second count will take place.
  - If following the second roll check the roll remains incorrect, the orderly officer and duty governor will be contacted by landline and a decision made whether to return all prisoners to their residential accommodation for a full roll check.
  - If the roll cannot be reconciled the abscond procedure will be implemented.

- 6.34 Consideration to freezing the gate should be made at each stage, freezing the gate will result in no persons or vehicles exiting the gate without permission from the Duty Governor. Consideration should be given to whom can enter the prison, this may include staff but not contractors, and may include Prisoner Escort Contractor Services (PECS) with prisoners onboard to ensure decency.

## OFFICIAL

6.35 Emergency service vehicles must be allowed to both access and leave the prison.

### **Members of the public filming**

6.36 It is an offence under 40D of the Prison Act 1952 for a person who, without authorisation takes a photograph, or makes a sound-recording, inside a prison. This includes images taken by drones. For more information and guidance on drones please see the [Conveyance Policy Framework \(open prisons\)](#).

6.37 Where an officer in the course of their duties has reason to believe that a person is making an unauthorised recording, or video of the inside of a prison then they should carry out the following actions:

- Ask the person if they have authorisation to take photographs/videos.
- Where insufficient proof of authorised filming is given, inform the person that they are in breach of section 40D of the Prison Act and that this is a criminal offence.
- Direct the person to stop their recording/capturing of images.
- If the person is on prison property, they should be directed to leave.
- Raise the alarm and request assistance.
- Request police attendance at the earliest opportunities.
- If CCTV is in action, staff may inform them that they are being filmed and this may be sent on to the police.
- Do not engage if they are trying to do something. If they request you to say something, reply "No Comment".
- Do not react. Whilst this can be difficult, remember that footage of staff reacting is more likely to get likes, shares and views. By not reacting, you take away their power.
- The First on Scene should remain in the vicinity of the person until relieved. The staff member should not engage with the person other than replying "no comment" to questions, or to remind them they are breaching section 40d of the Prisons Act, or to request they leave HMPPS property.

6.38 There is no definition of a prison boundary in the Prison Act or Prison Rules 1999. As such, the most likely interpretation is that a prison boundary is the physical boundary which marks and/or effects the segregation of the prisoners from those outside the prison. This is most likely to be considered beyond obvious barriers such as a vehicle barrier for open prisons.

6.39 It is not an offence for individuals to film outside a prison, as long as any images captured are not images of the inside of a prison. Areas accessible by the public, such as pedestrian footpaths and prison car parks would be considered outside the prison boundary and therefore are not private property. Furthermore, examples such as filming of officers queuing to enter a prison building would not be deemed to be an offence.

6.40 See Members of the Public Filming - Guidance for Staff (ST7.1) and Being Filmed by the Public Information Poster (ST7.2) for more guidance in relation to members of the public filming.

### **Gates, doors, keys and locks**

#### **Gates and doors**

## OFFICIAL



- 6.41 It is recognised that not locking gates and doors in closed prisons provides a different risk to that in open prisons, however there will still be various areas that must remain locked.
- 6.42 Securing and locking of necessary doors and gates is a critical security task. Gates and doors are fundamental parts of our physical security. Safety and security are compromised when gates and doors are left unattended or unlocked. Unsecured gates and doors may increase the risk of violence and disorder.
- 6.43 It is the member of staff's responsibility to ensure that the gate or door is closed correctly and secured in the frame when they have passed through it. Staff should prove they have locked a gate or door before moving away (See Lock and Secure Briefing (ST9.1), Prove Before You Move Poster (ST9.2) and Prove Before You Move Stickers ST9.3).
- 6.44 Leaving a gate unlocked for someone else to follow provides opportunity for prisoners to access unauthorised areas. A member of staff could be distracted or be required to change direction resulting in the gate or door being left unsecured.
- 6.45 Open Class II gates and doors can allow prisoners into unauthorised areas leading to several possible security breaches.
- 6.46 Incidents and compromises may require additional roll checks. This impedes regime delivery and can impact the prison's security and stability. The following should be highlighted to all staff:
- Be responsible and follow correct locking procedures and processes for all class types.
  - Be mindful of who is around you when moving across the site. It may be appropriate to check ID, if you are asked to leave a gate open or allow someone through.
  - Be aware of your surroundings, other members of staff and their movements. They may not be passing through the same gates and doors as you.
  - Be vigilant, help spot potential incidents before they occur and report faulty or difficult locks so that they can be fixed.
  - Report key and lock incidents and compromises correctly.
  - If you come across a gate which has been left unsecured incorrectly, secure it and report it.

### Keys and Locks

- 6.47 Security keys are a fundamental part of day-to-day life in a prison and can carry a high risk. It is important that all key holders understand fully their responsibilities regarding key control/discipline.
- 6.48 In open prisons, there are no Class I locks. However, some open prisons may have a small number of Class II locks if they have standard build areas such as kitchens that routinely came with Class II locking. Only those prisons that have a small number of secure cells will have Class III cell locks.
- 6.49 Class II locks can be mechanical or magnetic. They are used in locations where a lower level of security and control is required, and they may be fitted to:

## OFFICIAL

- Internal control doors and gates within the secured perimeter of a building.
- Doors and gates of other buildings within the secure perimeter of the prison, such as workshops, education facilities, and gymnasias.

6.50 Other than where authorised during the night state, no Class II locks (including wooden outer doors) are to be left unlocked or unattended. This is to prevent prisoners from tampering with the lock. Lock backs may be used.

6.51 Class III locks (Identification lettering and numbering on 'bow' of key - EX, AX, EN etc). Examples of where these will normally be used are:

- Internal doors such as offices, locker rooms, and staff toilets.
- Buildings outside of the secure perimeter of the prison such as the visitor centre, staff locker rooms and the officer's mess.
- The LSS should set a target for the total number of different suited locks, and this should not exceed 25 different suited locks on class 3 keys per prison.

6.52 Each prison will have different procedures for the storage of keys, dependant on factors individual to that prison. The prison LSS should describe the procedures specific to that prison to enable all staff to understand their roles and responsibilities.

### Electronic Key Management Systems (TRAKA)

6.53 Electronic key management systems are operated by individual users, utilising biometric fingerprint readers or individually assigned PIN numbers.

6.54 When enrolling new users (see TRAKA Enrolment Guide ST10) the security department will ensure only the necessary keys are allocated to the new user, for example:

- Only Band 3 and above operational staff (or equivalent in contracted prisons) are given access to cell keys.
- Specialist keys are only allocated to those staff working in those areas.

6.55 On accessing the cabinet 'green' lights will identify the keys that have been allocated to an individual with 'red' lights identifying those keys not allocated. To aid those staff with colour vision deficiency, security departments should turn off the red lights on the main server for the individual user. This will enable those users to be able to identify keys allocated to them (TRAKA Colour Deficiency Guide ST11).

6.56 Electronic management systems are at risk of failure due to power cuts and generator failures. All cabinets are backed up with internal power supplies and manual override functions embedded, allowing manual key issue, and reset options (TRAKA Override Guide ST12).

### Daily key checks

6.57 Carrying out key checks provides assurance that all security keys have been accounted for and not taken out of the prison or lost, whilst also ensuring that all staff are safe and not missing. Both scenarios should be taken into consideration when completing a key check.

#### Scenario:

- 1900hrs key check.
- Keys 'blue 35' not in key safe/electronic key management system.
- Keys were issued to Mr R Sterling of the education department at 1330hrs.

#### To consider:

- Has Mr R Sterling left the prison with the keys?

## OFFICIAL

- Is Mr R Sterling working late and not informed anybody?
- Has Mr R Sterling been taken hostage?

It is therefore important to carry out all appropriate actions to locate the missing keys as quickly as possible in line with local contingency plans.

### Full key checks (audit)

- 6.58 It is good practice to use the six-monthly full key check as a time to check for not only any missing keys but also damage to keys and an opportunity to remove any keys out of circulation which are no longer in use (this includes those keys in works departments).
- 6.59 For efficiency it is advised that key audits take place overnight when most keys have been returned to storage.
- 6.60 Any discrepancies are a potential key compromise, in which case the discrepancy need to be reported to the National Incident Management Unit (NIMU), on IRS, IR, PGD, and local investigations commenced.

### Keys allowed outside the prison

- 6.61 There are a small number of Class III keys which may need to exit the prison for areas such as visitors' centres, works access, staff locker rooms and alike. These keys are not to be stored on a bunch and instead on an individual ring to prevent other security keys being taken out of the prison.
- 6.62 These keys could be stored in electronic key management systems were possible, ensuring only appropriate enrolled users have access, or alternatively stored securely in the main gate area and signed in/out when issued. The procedures for these keys and location of storage should be described in the LSS.
- 6.63 Cuff keys may also be taken outside of the prison for the purposes of an external escort and should remain attached to the escorting officer's (not the officer cuffed to the prisoner) key chain.

### Reading/photography

- 6.64 It is important for all staff members to keep keys concealed to prevent 'reading' of keys or unlawful photography of keys by prisoners (mobile phones). Key pouches are available for issue to staff via NDC Branston.
- 6.65 On occasion in prisons, filming and photography does take place for many varied reasons including TV documentaries, training videos, journalist articles and so on. Any filming/photography if not controlled appropriately could result in security keys being recorded, allowing copies to be made by anybody viewing the filming/photography. To stop this, all camera operatives are to be briefed fully by the security department in advance of the restrictions in regard to recording keys and locks and all key holders should be informed in advance of the filming/photography taking place.
- 6.66 For any footage or photographs where the detail of a key or lock can be seen (for example, via CCTV/ BWVC), the detail of the key must be pixilated. If the image of the key or lock is not clear or taken from a distance and the detail of the key or lock cannot be seen, the Governor can determine whether the pixilation is required.

### Keys testing

## OFFICIAL

- 6.67 On occasion following a key compromise, it may be necessary to have the keys forensically tested, this is a local decision to be made dependant on the circumstances of the compromise. Details and procedures can be obtained from the National Locking Section.

### Key maintenance

- 6.68 Key rings will be sealed with tamper evident seals (Key Tamper Evident Seals ST14) to prevent unauthorised removal or adding of keys to a bunch and to prevent keys 'falling off' a bunch. No other keys should be added to a security bunch, such as locker keys, filing cabinet keys etc.
- 6.69 Keys can become worn and damaged over time affecting their functionality, if this is the case then the security manager should be informed of the key type and bunch number to arrange replacement. This is the responsibility of all staff to prevent key/lock incidents of broken keys, keys stuck in locks etc. Keys must only be ordered by the security department and from National Locking Section. Keys can take up to 8-9 calendar weeks from the order being accepted.
- 6.70 In the same way as keys are and need to be accounted for to maintain security, locks also need to be. However, locks and locking schedules will be managed by the facilities management team.
- 6.71 Spare or replacement locks are to be ordered from the National Locking Section. Locks can take up to 12 -13 weeks and padlocks up to 8-10 weeks from the order being accepted.
- 6.72 Keys and Locks for projects will need to be provided with a Budget code and approver.

### Padlocks

- 6.73 There are times in prisons when the use of padlocks will be necessary, this may be on a permanent basis for securing items which will not fit in shadow boards, cupboards etc or on a temporary basis for short term security solution. Examples of padlock use may include securing of climbing aids/ladders, wheelie bins, skips, vehicles, and gates with chains (during activation of contingency plans).
- 6.74 The only padlocks to be used are detailed in Authorised Padlocks ST15.

### **Tools and Equipment**

- 6.75 Tools and equipment if not controlled properly can assist prisoners with abscond, acts of violence within prison and a range of other criminal activities. Remaining vigilant to risk is key. Staff should always be aware of the potential security threats from item(s) in use around the prison.
- 6.76 Within a prison environment tools and equipment incorporate a wide variety of items, ranging from as simple as an iron on a residential unit, computers in education, to heavy plant machinery such as a cherry picker in the facilities management department.
- 6.77 Due to the potential risks of identified tools, it is important staff always know the whereabouts of such items and that all staff receive an induction in tool control relevant to the area they work.

## **7. Annexes and Supporting Tools (STs)**

OFFICIAL

7.1 Official Sensitive annexes and supporting tools can be accessed here [National Security Framework \(NSF\)](#).

Annex A	OFFICIAL-SENSITIVE - Roll Check Template Form and Procedures
Annex B	OFFICIAL-SENSITIVE - 420 Meeting Example Template
Annex C	Official Visitors Booking Form Template
Annex D	OFFICIAL-SENSITIVE - Radio Call Signs
Annex E	OFFICIAL-SENSITIVE - Key Ledger
Annex F	OFFICIAL-SENSITIVE - Key and Locking Condemnation Form A40
Annex G1	OFFICIAL-SENSITIVE - Disclosure or Compromise Risk Assessment and Decision Tool
Annex G2	OFFICIAL-SENSITIVE - Key and Lock Requisition and Disclosure Form
Annex H	OFFICIAL-SENSITIVE - Tool Risk Assessment Template
Annex I	OFFICIAL SENSITIVE - Prisoner Workplace and Activity Allocation Risk Assessment Template
Annex J	OFFICIAL SENSITIVE - Workplace and Activity Area Risk Assessment Template
Annex K	OFFICIAL-SENSITIVE - Detached Duty Authorisation Template
Annex L	OFFICIAL-SENSITIVE - Tool Inventory Template
Annex M	OFFICIAL SENSITIVE - Physical Security Audit Template
Annex N	OFFICIAL SENSITIVE - Prisoner Discharge Checklist
ST1	OFFICIAL SENSITIVE - Night Operating Procedures Infographic
ST2	OFFICIAL SENSITIVE - Tool Issue and Receipt
ST3	OFFICIAL SENSITIVE - Tool Disposal
ST4	OFFICIAL-SENSITIVE - Management of Skips
ST5	OFFICIAL SENSITIVE - Serviceability and Replacement Standard Handcuffs
ST6.1	OFFICIAL-SENSITIVE - Roll Check Procedure Poster
ST6.2	OFFICIAL-SENSITIVE - Roll Checks Guide
ST7.1	OFFICIAL-SENSITIVE - Members of the Public Filming - Guidance for Staff
ST7.2	OFFICIAL SENSITIVE - Being Filmed by the Public Information Poster
ST8	OFFICIAL SENSITIVE - Staying Safe Outside the Walls – Guidance for Staff
ST9.1	OFFICIAL SENSITIVE – Lock and Secure Briefing
ST9.2	OFFICIAL SENSITIVE - Prove Before You Move Poster
ST9.3	OFFICIAL SENSITIVE - Prove Before You Move Stickers
ST10	OFFICIAL SENSITIVE - TRAKA Enrolment Guide
ST11	OFFICIAL SENSITIVE - TRAKA Colour Deficiency Guide
ST12	OFFICIAL SENSITIVE - TRAKA Override Guide
ST13	OFFICIAL-SENSITIVE - Reporting A Key Lock Incident
ST14	OFFICIAL SENSITIVE - Key Tamper Evident Seals
ST15	OFFICIAL SENSITIVE - Authorised Padlocks