

Policy name: Use of X-Ray Body Scanners (Adult Male Prisons).

Re-Issue Date: 16 October 2025

Implementation Date: 18 May 2020

Replaces the following documents (e.g. PSIs, PSOs, and Custodial Service Specs) which are hereby cancelled: None

Introduces amendments to the following documents: None

Action required by:

☒	HMPPS HQ	☒	Governors
☒	Public Sector Prisons	☒	Heads of Group
☒	Contracted Prisons	☐	Contract Managers in Probation Trusts
☐	National Probation Service	☐	Community Rehabilitation Companies (CRCs)
☐	HMPPS Rehabilitation Contract Services Team	☐	HMPPS-run Immigration Removal Centres (IRCs)
☐	Other providers of Probation and Community Services	☐	Under 18 Young Offender Institutions

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

For Information: This Policy Framework details the minimum mandatory requirements which are needed for prisons to purchase, install and operate a legal and effective regime of X-ray body scanning prisoners who are believed to be engaged in concealing items internally.

This Policy Framework relates to Adult Male Prisoners only (all prisoners 18 and over).

Governors¹ of Public Sector Prisons and Directors of Contracted Prisons must ensure that any new local policies that they develop because of this Policy Framework are compliant with relevant legislation, including the Public Sector Equality Duty (Equality Act, 2010) and all relevant legislation outlined in this policy. All actions are mandatory for both Public Sector Prisons and Contracted Prisons unless specifically detailed otherwise.

Throughout this Policy Framework, the general term prison(s) will refer to describe Public Sector Prisons and Contracted Prisons, unless there is a specific need to distinguish between the two.

The definition of the term 'intelligence', used within this Policy Framework, is the same as the definition within the [Intelligence Collection and Analysis Policy Framework](#).

The use of the word 'unauthorised' in this policy in relation to items means items which the person is not authorised by the Governor to have in possession and could lead to disciplinary action.

The use of the word 'illicit' in this policy in relation to items means items for which it is a criminal offence to have in possession and could lead to prosecution.

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

Audit/monitoring: 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.

In Contracted Prisons monitoring of compliance will be through the standard contract management processes.

Health and Safety Assurance and monitoring for Public Sector Prisons is undertaken through Health and Safety monitoring and assurance within the Health and Safety function, using the health and safety audit and reporting tool compliance checklist. The Health and Safety processes may be different for Contracted Prisons and therefore, Contracted Prisons must have their own Health and Safety arrangements which ensure, so far as is reasonably practicable, the health, safety and welfare at work of all employees using the X-ray body scanners.

The prison service maintenance group for Public Sector Prisons will undertake statutory mandatory compliance audits (SMC) to ensure both Public Sector Prisons and Contracted Prisons meet legislative duties in relation to the maintenance of the X-ray body scanner equipment.

Quality Assurance for Public Sector Prisons and Contracted Prisons is provided by HMPPS Performance, Assurance and Risk Group (PAR) through the Security Audit.

HMPPS Directorate of Security (DoS) will provide assurance for Public Sector Prisons and Contracted Prisons of monitoring the recording of the X-ray body scan data on NOMIS.

External inspections can be conducted by the Health and Safety Executive (HSE), the Home Office and/or the Border Force. [Annex A](#) sets out the legal basis for inspections and the enforcement actions that could be taken.

Resource Impact: There will be a resource impact due to the additional task of scanning a prisoner and manually entering the scan information on NOMIS (to ensure a record is kept of the scan, justification and dosage). The prison will also need to appoint trained Radiation Protection Supervisor(s) at Custodial Manager (CM) grade or above in Public Sector Prisons if they do not already have them. Directors of Contracted Prisons must appoint a competent and trained RPS. However, we recognise that this additional capability has resource implications and must be balanced against the potential, if used effectively, to reduce the risk of illicit/unauthorised items being conveyed by prisoners and the consequent effect on security and good order, which we know has a significantly negative impact on staff time.

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Approved by OPS for publication: Helen Judge, Chair, Operational Policy Sub-board, September 2025

Revisions

Date	Changes
October 2022	• Para 5.100 – 5.102 and 5.107: to reflect legislation around intimate searching and change to Prison Rule used for adjudication process. • References to smuggling/smuggled have been changed to conveying/conveyed to bring the wording in line with other NSF policies. • References to contraband have been changed to illicit and/or unauthorised items to bring the wording in line with other NSF policies. • Annex F, Bullet point 7 to reflect legislation around intimate searching and changes to Prison Rule used for adjudication process. • 5.19 removed as no longer relevant. • Para 5.8, 5.26, 5.33, 5.49, 5.73, 5.91 amended in line with correct wording/processes. • Para 5.107 added to include process to take when an image is inconclusive to support establishments in reducing illicit conveyance of items.
October 2025	• Paras 5.74 – 5.78 amended to include further information on cohort scanning. • Addition of Annex H on Cohort Scanning – Security Meetings and Minutes

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1. Purpose

- 1.1 This Policy Framework provides end-to-end instruction and guidance on the procurement, installation and use of X-ray body scanners in adult male prisons to detect if prisoners are attempting to conceal items internally. The mandatory requirements in this document set out the minimum required for a prison to be compliant with legislation and HMPPS's Requirements for Practice for Prisons.

2. Constraints

- 2.1 This Policy Framework does not replace or change any of the requirements set out in [Searching Policy Framework](#) and a X-ray body scan must not be used as an alternative to a full or rub down search. Governors must therefore ensure that the use of all X-ray body scanners are consistent with both this Policy Framework and the policy on the use of technical search aids more generally, as set out in [Searching Policy Framework](#) ensuring that processes and arrangements for their use are reflected in the Local Searching Strategy.

3. Evidence

- 3.1 Some prisoners attempt to intentionally undermine HMPPS's security search methodologies by hiding items inside their bodies. HMPPS has a duty to protect prisoners, those working in or visiting prisons, as well as the public, by taking steps to prevent the importation and supply of drugs and other illicit items into prisons.
- 3.2 HMPPS's Directorate of Security (DoS) has, with prisons, conducted technical tests of the X-ray body scanner equipment for its effectiveness in confirming whether a prisoner suspected of internally concealing illicit items is doing so or not. If used as part of a searching strategy and with a trained, professional staff group, X-ray body scanning technology can provide an effective means of confirming the intelligence or reasonable suspicion that a prisoner is attempting to conceal items internally.
- 3.3 The principal pieces of legislation relevant to the use of X-ray body scanners are the [Justification of Practices Involving Ionising Radiation Regulations 2004 \(as amended\) \(JOPIIRR\)](#), the [Ionising Radiation Regulations 2017](#) and [Health and Safety Work At Work Act 1974](#).
- 3.4 The [Justification of Practices Involving Ionising Radiation Regulations 2004 \(as amended\)](#) require that any use of X-ray technology is approved by the "Justifying Authority". For HMPPS, the Justifying Authority is the Secretary of State for the Home Office. Approval from the Justifying Authority has been issued on the condition that a set of Requirements for Practice for Prisons are complied with. The mandatory requirements set out in this Policy Framework translate the actions that are necessary to comply with the Requirements for Practice (which can be viewed in full at [Annex B](#)).

4. Outcomes

- 4.1 By following the mandatory actions within this Policy Framework, it is expected that prisons can:
- Improve the capability to detect illicit and unauthorised items conveyed by way of internal concealment.
 - Contribute to a reduction of drugs and other illicit and unauthorised items being conveyed into or out of a prison.

- Contribute to a reduction in the risks posed by illicit and unauthorised items being conveyed into or out of a prison.
- Reduce the risk that concealed items may cause harm to the prisoner.
- Deter exploitation of vulnerable prisoners to convey concealed items.
- Provide the basis for legal compliance to manage the safety and other health risks associated with the use of ionising radiation (X-ray).

5. Requirements

- 5.1 Adherence to this Policy Framework will ensure that scanning regimes are compliant with the relevant pieces of legislation. Unlawful use at an individual prison may result in enforcement action against HMPPS by the Justifying Authority. It is therefore imperative that all prisons comply with the requirements set out in this Policy Framework.
- 5.2 The Home Office is responsible for ensuring there is an inspection regime in place for HMPPS' use of X-ray body scanners. If it is found that a prison(s) is breaching the Requirements for Practice or are non-compliant with The Justification of Practices Involving Ionising Radiation Regulations 2004, the Home Office can withdraw the Approval or serve a contravention notice. Failure to comply with a contravention notice is a criminal offence on the part of the individual failing to comply. If the Approval is withdrawn, none of HMPPS' X-ray body scanners can be used.
- 5.3 If the Requirements for Practice are not complied with, there is a possibility of warning notices being served by the Justifying Authority under regulation 21E(5). The Governor must respond to these warning notices by complying with the specified steps within the specified time frame. If not, the Justifying Authority may withdraw HMPPS' approval to use X-ray body scanners if a warning notice is not complied with in the specified time frame.
- 5.4 Exposure to ionising radiation (above and beyond exposure that occurs naturally in day to day life) carries a risk to health. Ionising radiation (such as X-ray) can pass through, and potentially change, the structure of cells. This is why all cases of exposure to ionising radiation through the use of an X-ray body scanner must be fully justified (the benefit to the individual or society from exposing a prisoner to radiation must outweigh the health risks to that individual) and be proportionate. Full compliance with the mandatory actions in this policy framework allows HMPPS to manage these health risks.
- 5.5 Only prisoners can be X-ray body scanned, and they must only be scanned: where there is intelligence or reasonable suspicion that they are internally concealing items; where there is no other means of detecting the suspected items (for example full or rub down search); and evidence that conducting a scan will not cause that individual to exceed HMPPS' maximum annual dose constraint per individual of 700 microsieverts (μSv) per calendar year. This calculation must include any doses received at other establishments. (For reference, if every X-ray body scan was 6 μSv , the total maximum number of scans a prisoner could have in the calendar year would be 116.) Adherence to this Policy Framework will ensure that all mandatory steps are taken to ensure that every X-ray body scan can be justified and proportionate in line with the Requirements for Practice.
- 5.6 The following persons must not be X-ray body scanned:
- Visitors
 - Staff
 - Prisoners with female reproductive organs
 - Any prisoner with a 'Do not X-ray Body Scan' Alert

Radiation Protection Advisory (RPA) services

- 5.7 HMPPS has a contract with a national radiological service provider to deliver the Radiation Protection Advisory (RPA) services for the Radiation Safety Survey inspections, Radiation Protection Supervisor (RPS) training and Local Radiation Advice. These services are a legal requirement for HMPPS to operate X-ray equipment.
- 5.8 Radiation Safety Survey inspections, RPS training and radiation advice are paid for centrally and then re-charged to local prison business units upon completion. There is a national programme of work scheduled for each prison on an annual basis and local RPS's shall be responsible for ensuring this work is carried out as part of their role. Further information about the role of the RPA is detailed at [Annex C](#).

Staff working with radiation

- 5.9 No staff working with radiation are regarded as **classified persons** as defined in the [Ionising Radiation Regulations 2017](#). There is no requirement for staff to wear personal dose monitors because:
- doses likely to be received under normal working, and in the event of an accident, have been assessed as part of the Ionising Radiation Risk Assessment and are considered to be low with a minimal risk;
 - the dose levels around the equipment are checked annually by the RPA during the Radiation Safety Survey inspection and are also checked by the service engineer as part of a planned preventative maintenance programme;
 - staff, visitors and other prisoners must remain outside the Controlled Area whilst the machine is in operation; and
 - the [Ionising Radiation Regulations 2017](#) recommends a dose investigation level (DIL) is established. The employer (HMPPS), in consultation with the RPA has recommended a DIL of 1mSv. However, considering the assessment of doses carried out in the Ionising Radiation Risk Assessment and provided the Local Rules (which are detailed at paras 5.35 and 5.36) are complied with, the DIL is unlikely to be exceeded.
- 5.10 Measurements of environmental dose rates will be performed during maintenance servicing and annually by the RPA Radiation Safety Survey inspection to verify that the DIL remains appropriate. Governors must ensure these measurements are retained for 2 years in accordance with Regulation 19(8) and Regulation 20(5)(c) of the [Ionising Radiation Regulations 2017](#). The records must include:
- (a) in relation to areas designated on the basis of external radiation, an indication of the nature and quality of the radiation in question;
 - (b) in relation to areas designated on the basis of internal radiation, an indication, where appropriate, of the nature, physical and chemical states of the radioactive contamination.
- 5.11 There is no requirement for any change in working conditions for pregnant staff due to radiation dose. Contracted Prisons should clarify their own arrangements for their staff.
- 5.12 However, staff members, if they have a doctor's certificate, do not have to be X-ray body scanner operators or work where there is X-ray body scanner equipment.

Procurement

- 5.13 **Public Sector Prisons** must not purchase X-ray body scanner equipment without the agreement of DoS and outside of the current MOJ contract. Therefore, the prison Governor must ensure that the acquisition and installation of an X-ray body scanner is conducted in

cooperation with Commercial Contract Management Directorate and DoS. This is to ensure that the equipment is effective and represents value for money and that prisons are offered appropriate support to plan for its use. In many cases, DoS will be in contact with prisons at the beginning of the process and a collective decision will have been made as to the need to procure the equipment. Where this is not the case, prisons must inform DoS via the mailbox on the front of this Policy Framework that they seek to acquire an X-ray body scanner and appropriate support and advice will be provided.

- 5.14 **Contracted Prisons**, in the absence of an agreed arrangement, are responsible for the purchasing and funding of their own X-ray body scanners. However, it is strongly recommended that they look at the specifications of equipment used in Public Sector Prisons to ensure that they source effective equipment which complies with legislative requirements and HMPPS' Requirements for Practice.

Prior to Installation

- 5.15 Contracted Prisons must ensure that the HSE are notified of any ionising radiation equipment and its use. If in doubt as to the HSE registration status, Contracted Prisons should seek the advice of their appointed RPA regarding the requirements for HSE registration. Individual notification for Public Sector Prisons is not required as this is undertaken centrally by the Ministry of Justice.
- 5.16 Prior to installation, the X-ray Body Scanner Advisor in DoS will co-ordinate a site survey for the supplier to assess a suitable location in the prison for the X-ray body scanner and will normally be present at the survey to confirm suitability of its location. The Governor must ensure the manager of the area where the X-ray body scanner is being installed (most likely reception), and relevant facilities management staff, are also in attendance for the survey to seek the agreement of all key parties. Further information about the site survey is detailed at [Annex C](#).
- 5.17 Prior to the installation of an X-ray body scanner, and/or any adjustments to the fabric of the building to accommodate the equipment, a qualified RPA must be consulted to advise on the suitability of the proposed location for the X-ray body scanner. Furthermore, Governors must ensure compliance with the manufacturers' instructions on safe use, including ensuring that the machines are positioned and operated in accordance with the manufacturers' guidelines.

Installation

Supplier Installation and Critical Examination

- 5.18 The supplier – after installation but before initial use, or if the equipment is re-located, or following replacement of any component that directly affects radiation exposure – will undertake a 'Critical Examination' to ensure that:
- the safety features and warning systems operate correctly;
 - the equipment provides sufficient protection for all persons against exposure to radiation;
 - potential doses received by operators and others in the vicinity of the equipment are as low as reasonably practicable; and
 - those being scanned do not receive a dose in excess of the equipment specification or Requirements for Practice as agreed with the Justifying Authority.
- 5.19 The installer shall provide a written report on the outcome of the Critical Examination together with adequate information about the proper use, testing and maintenance of the X-ray body scanner. The RPS must ensure this report is kept in the RPA book and that any

recommended requirements are undertaken during the daily operator and weekly checks (the RPS role and the RPA book are described below).

RPA Radiation Safety Survey Inspection

- 5.20 The RPA must carry out a Radiation Safety Survey inspection(s) of the X-ray body scanner to ensure that the machine is not operating outside of the authorised parameters and the equipment specification. These Radiation Safety Survey Inspection(s) will be undertaken:
- when first installed and prior to use;
 - annually;
 - if the equipment is re-located; or
 - following the replacement of any component that directly affects radiation exposure.
- 5.21 The Radiation Safety Survey inspections by the RPA will form part of the review process and ensure the X-ray body scanner is calibrated correctly.
- 5.22 An RPA Radiation Safety Survey Report will arrive shortly after the inspection. However, the RPA on the day of the safety inspection will give a verbal confirmation that the machine is safe to operate or otherwise. If the RPA is satisfied on the day that the machine is operating safely, and the prison meets the requirements of this Policy Framework, the prison may commence X-ray body scan operations.
- 5.23 The Radiation Safety Survey inspection will include the radiation dosage check, which must be carried out by the RPA, which, as a minimum, must be conducted annually.

Maintenance / Servicing

- 5.24 The Governor must ensure the satisfactory operation of suitable maintenance contracts for all X-ray body scanner equipment are in place.
- 5.25 The Governor must ensure the X-ray body scanner equipment is maintained in line with the manufacturers recommended maintenance schedule of two preventative maintenance visits per year.
- 5.26 A written maintenance report will be provided on all maintenance / services undertaken. The RPS must ensure these reports are kept in the RPA radiation protection book (the RPS role and the RPA radiation protection book are described below).

Prison owned assessment/s and checks

- 5.27 In addition to the 'Critical Assessment' undertaken by the X-ray body scanner installer and the Radiation Safety Survey Inspection(s) undertaken by the RPA, the Governor needs to ensure the following assessments are undertaken by the prison:
- Initial Ionising Radiation Risk Assessment;
 - Health and safety risk assessment; and
 - Daily and Weekly Checks.

Ionising Radiation Risk Assessment

- 5.28 In accordance with HMPPS' Requirements for Practice and Regulation 8 of the [Ionising Radiation Regulations 2017](#) (IRR17), before equipment is put into use every prison must undergo an initial Ionising Radiation Risk Assessment of the potential risk of exposure to radiation for staff operating the machines and any bystanders, as well as prisoners suspected of concealing items internally. The purpose of the assessment is to identify the measures

required to restrict exposure during normal operations and in the event of an accident. In particular all hazards with the potential to cause a radiation accident must be identified. Measures must be implemented to prevent any such accident or limit the consequence should such an accident occur.

- 5.29 The Head of Function responsible for the X-ray body scanner in the establishment must ensure the Ionising Radiation risk assessment is undertaken, before the X-ray body scanner machine is first used, and updated whenever there is a change in practice, following relocation or an accident. The Head of Function will ensure that a suitable and sufficient risk assessment is completed, maintained and reviewed. When completing the risk assessment, the Head of Function may wish to involve the establishment's Health and Safety Advisor(s) and HMPPS X-ray Body Scanner Advisor for specialist advice and support, the RPS, operators of the equipment and where necessary the RPA. The risk assessment template will be provided when the X-ray body scanner is installed (if procured through DoS); or it can be requested via the email address on the front of this Policy Framework.
- 5.30 The Governor must ensure that any measures identified by the Ionising Radiation Risk Assessment, as being required to restrict exposure, must be implemented.

Health and safety risk assessment

- 5.31 The Governor must conduct a Health and Safety risk assessment of:

- the risks employees may be exposed to at work; and
- the risks prisoners and other people who come to prison may be exposed to,

as a result of the use of the X-ray body scanner for the purposes of identifying the preventative and protective measures to comply with the requirements and prohibitions imposed upon him/her by or under the relevant statutory provisions described in [Health and Safety Risk Assessments PSI 37/2015](#), and implement any measures identified and record all significant findings. This risk assessment must be undertaken in respect of each site where the X-ray body scanner is deployed in conjunction with/supported by the RPA. The risk assessment must be undertaken before the X-ray body scanner is used (for the first time). Once the X-ray body scanner is in operation, the recording and the maintenance of the risk assessment must be kept up to date when there is a significant change in the matters to which it relates.

Daily and Weekly Checks

- 5.32 The X-ray body scan operator must undertake a daily safety check before the X-ray body scanner machine is used.
- 5.33 The RPS must undertake a weekly safety check. This check sheet must be recorded in the Radiation Protection Book (described below).
- 5.34 The daily and weekly check must include:
- ensuring the warning light and emergency stop button are working correctly; and
 - checking any other recommended manufacturer or engineer requirements.

Local Rules

- 5.35 The Governor must ensure a copy of the Local Rules are displayed in a clearly visible location near the machine. The template is set out at [Annex D](#) and the prison must fill in section 2 and 3.
- 5.36 In accordance with sections 18 and 19 of the [Ionising Radiation Regulations 2017](#) the Local Rules must also:
- set out the names of the Radiation Protection Supervisor(s) (RPS);
 - describe the Controlled Area; and
 - set out the arrangements to ensure:
 - an employee or a non-classified outside worker aged 18 years or over does not receive in any calendar year a cumulative dose of ionising radiation which would require that person to be designated as a classified person; and
 - any other person does not receive in any calendar year a dose of ionising radiation exceeding the relevant dose limit.

Further details of these requirements are described in more detail below.

The RPA Radiation Protection Book

- 5.37 The RPS must ensure each X-ray body scanner machine has an RPA Radiation Protection Book. This is to be kept in a secure location near the machine and be easily accessible for inspection by the RPA. Details of what must be included in this are contained at [Annex C](#).

The Role of the Radiation Protection Supervisor during and after Installation

- 5.38 The prison Governor must appoint, in writing, a sufficient number of trained members of staff as the RPS(s) for the X-ray body scanner operations. The RPS therefore must be someone with sufficient authority (minimum Custodial Manager (CM) grade) in Public Sector Prisons to supervise this task and who regularly works in the area of the X-ray body scanner. In Contracted Prisons, the Director must appoint sufficient competent staff. An individually named RPS must be appointed for each area where X-ray body scanner equipment is used. A template appointment letter is provided at [Annex E](#).
- 5.39 The number of staff appointed as an RPS must take into consideration any periods of absence (annual leave, sickness, detached duty), although there must always be one identified person who holds the overall responsibility for the RPS role for each X-ray body scanner machine. A fully trained RPS must be appointed before the machine is operated.
- 5.40 It is the responsibility of the RPS to ensure that the X-ray body scanner operation is compliant with the requirements of the [Ionising Radiation Regulations 2017](#), the Requirements for Practice and the Local Rules for the operation of the X-ray body scanner machine.
- 5.41 The RPS must ensure that the 'Local Rules' ([Annex D](#)) clearly describe the operating procedures, to restrict any exposure of people in the Controlled Area around the X-ray body scanner and are appropriate to the radiation risk and the nature of the operations undertaken in that area.
- 5.42 In relation to the Controlled Area, the RPS must ensure:
- There is a yellow and black taped demarcation area around the X-ray body scanner equipment which identifies the space as a Controlled Area so that there is a physically demarcated area or, where this is not reasonably practicable, delineated by some other suitable means. The positioning of this tape will be undertaken by the machine installers and then later confirmed as correct by the RPA as part of the Radiation

Safety Survey inspection. The RPS must ensure yellow and black tape is replaced appropriately to ensure it always clearly demarks the Controlled Area.

- That a radiation symbol (Trefoil) is displayed on the entrance/s of the area where the X-ray body scanner is installed, and that there are suitable and sufficient signs displayed in suitable positions warning that the Controlled Area has been designated and indicating the nature of the radiation sources and the risks arising from such sources.
- The Controlled Area must be strictly controlled so that no staff, visitors or other prisoners enter this area when the machine is in operation and therefore would be exposed to radiation.

5.43 The RPS must take all reasonable steps to ensure that the Local Rules are observed and are brought to the attention of those staff and other persons who may be affected by them. The RPS must also ensure all X-ray body scan operators sign a register to evidence their understanding and compliance. This register must be kept in the RPA book.

5.44 The RPS will need to ensure the prison fully complies with the central Requirements for Practice and must highlight any deviations from this Policy Framework by email, within 24 hours, to HMPPS HQ policy holders of this Policy Framework via the email contact on page one of this document.

5.45 The Governor must ensure that the Staff and Prisoner Information sheet provided at [Annex E](#) is displayed on the wall near the X-ray body scanner and be accessible to prisoners being scanned, and any staff and visitors in the area. This information sheet must also be provided to prisoners in induction packs. The suitably appointed person must ensure as detailed in [Advancing Equality for Offenders and Children in Custody Policy Framework](#) that information is appropriately conveyed to prisoners with protected characteristics, including those with physical or learning disabilities and those who do not speak English. This Policy Framework must also be made available to prisoners should they wish to read it.

5.46 The RPS must also:

- ensure that the installer's Critical Examination and the RPA's Radiation Safety Survey(s) are undertaken;
- ensure operator daily and weekly checks are carried out and the findings recorded and maintained in the RPA Radiation Protection Book for audit purposes;
- ensure the RPA Radiation Protection Book is kept up to date, in a secure location near the machine and be easily accessible for inspection by the RPA;
- ensure arrangements are made for the appropriate operational training of all staff who work with the equipment;
- ensure that arrangements have been made for the supervision of contractors, visitors and other persons who may come into contact with the X-ray body scanner equipment;
- be the principal point of contact for liaison with the RPA;
- on behalf of the Governor, ensure that any remedial action is taken to address any concerns or recommendations made by the RPA during a Radiation Safety Survey inspection and recorded in good time according to the recommendation in the RPA report;
- liaise with maintenance personnel for any defaults, faulty equipment and maintenance visits and hold copies of all maintenance/service reports; and
- ensure an internal monitoring process is in place to ensure that X-ray body scan data is recorded in accordance with the Policy Framework requirements for data recording, outlined in 5.60 -5.64.

Accidents and Overexposure

- 5.47 If it is suspected that any person (employee or other) may have received a radiation dose above the dose investigation level (1 miliseivert), the RPA must be contacted, by the RPS, for further advice. The RPA will decide whether further investigation is required. The RPA will advise on the matters to be considered as part of the investigation and on the conduct and outcome of that investigation. The RPS must also inform DoS via the email address on the front of this Policy Framework within 24 hours of the incident occurring.

Training

- 5.48 The Governor must ensure that staff who undertake the RPS role complete the RPS training before the RPS appointment confirmation. To receive a certificate evidencing completion of the training the staff member will have had to demonstrate sufficient knowledge and competency in radiation matters and have completed the full training course. RPS training (including refresher training) must be sourced from HMPPS' contracted RPA. RPS refresher training must take place within a 5-year period or when there is a change in practice or technology, and a training record must be held at each prison establishment and on the national database via SOP.
- 5.49 The Governor must ensure that staff operating the X-ray body scanner equipment complete mandatory operator training and basic radiation awareness before they operate the X-ray body scanner equipment. This training will include how to operate the machine and the health and safety risks to both the operator, other members of staff and the prisoner. Additionally, staff should undertake image interpretation training provided by HMPPS Learning and Development Group. The record of this training needs to be held at each prison establishment and on the national database via SOP.
- 5.50 Post installation of the X-ray body scanner, the Governor must ensure that a minimum of two members of staff are identified to attend a Workshop for Trainers which will enable the prison to deliver the local operator radiation awareness training and image interpretation training. Workshop for Trainers is available through HMPPS Learning & Development. Contracted Prisons will be able to purchase this training from HMPPS Learning & Development.
- 5.51 The RPS must ensure that only staff trained in machine operation and basic radiation awareness use the X-ray body scanner machine and there must be a sufficient number of trained staff to ensure the equipment can be operated when required.

Internal Audits and Assurance

- 5.52 Any failure identified during the internal audits will either be reported to the PGD or HMPPS HQ policy holders (depending on the audit); the HMPPS DoS Senior Business Owner (Head of Security Counter Measures) may also be informed for further action. Non-compliance may also be reported to the Justifying Authority (Secretary of State for the Home Office) which could result in the withdrawal of HMPPS' authorisation to use X-ray body scanners in all prisons. Compliance with the requirements is therefore vital.

Health and Safety Audit

- 5.53 Health and Safety Assurance and monitoring for Public Sector Prisons will be undertaken through Health and Safety monitoring and assurance within the Health and Safety function, using the health and safety audit and reporting tool compliance checklist. This audit will be used to monitor compliance with the [Ionising Radiation Regulations 2017](#).

- 5.54 The Health and Safety processes may be different for Contracted Prisons and therefore, Contracted Prisons must have their own Health and Safety arrangements which ensure, so far as is reasonably practicable, the health, safety and welfare at work of all employees using the X-ray body scanners.

Prison Service Maintenance Group Audit

- 5.55 The prison service maintenance group will undertake statutory mandatory compliance audits (SMC) to ensure both Public Sector Prisons and Contracted Prisons meet the [Ionising Radiation Regulations 2017](#) legislative duties in relation to the maintenance of equipment.

HMPPS Performance, Risk & Assurance Group (PAR)

- 5.56 For both Public Sector Prisons and Contracted Prisons, the Quality Assurance audit will be undertaken by PAR as part of the prison's Security Audit. This audit will ensure that systems of control and mandatory actions, in line with this Policy Framework, are in place, including the monitoring of individual radiation dosage, justification for X-ray body scanner use and good record keeping.

HMPPS (DoS) Data Monitoring Assurance

- 5.57 HMPPS (DoS) will provide monitoring assurance on the recording of the X-ray body scan data on NOMIS. The prison Governor must ensure that the prison complies with all management information and performance data requests for data around the use of the X-ray body scanner.

Equalities Assurance Monitoring

- 5.58 The Governor must ensure that the use of the X-ray body scanner on any particular prisoner group with a protected characteristic is regularly monitored and addressed where identified.

Data Protection and Record Keeping

- 5.59 The Governor must ensure there is a local data retention policy that reflects the data retention requirements below.
- 5.60 The date, dosage and justification (either intelligence or reasonable suspicion) for each scan must be recorded on HMPPS' case management system NOMIS. [Annex G](#) details how these details are to be recorded on NOMIS. Justification decisions for the use of the X-ray body scanner on an individual must be recorded as an Intelligence Report or on the monthly security minutes (described in paras 5.66-5.67); and will form part of the history for the justification of why a particular prisoner was selected to be X-ray body scanned in that instance.
- 5.61 The X-ray body scan image and associated data recorded on the X-ray body scanner machine must be deleted within 24 - 36 months after the scan has been undertaken unless there is an on-going complaint or litigation from the relevant prisoner. This timeframe is based on the potential need for the image, data, auditing purposes and enables the prison to undertake a 12-month data deletion once per year.
- 5.62 If a hard copy of an X-ray body scan image is necessary/requested for the purpose of adjudication, segregation decisions, or ongoing complaint or litigation, the X-ray body scan can be printed, but must be destroyed after a decision has been made, or no longer needed

for a complaint or litigation. Before it is destroyed, the hard copy of the image must be kept in a sealed envelope and kept with the appropriate paperwork (e.g. segregation or adjudication paperwork / complaint or any other relevant paperwork relating specifically to the X-ray body scan or process)

- 5.63 X-ray body scan images may be retained for training purposes. Any image that is used for training purposes must be anonymised. If it is possible to identify an individual from the image, it must not be used for training purposes.
- 5.64 The Governor must ensure an internal monitoring process is in place to ensure that X-ray body scan data is recorded in accordance with the requirements above.

Identifying prisoners who may be scanned

- 5.65 Prisons can X-ray body scan a prisoner without obtaining the prisoners consent².
- 5.66 Prisoners must not be selected for X-ray body scanning on a random basis.
- 5.67 All cases of exposure to ionising radiation through the use of an X-ray body scanner must be:
- fully justified in accordance with The Justification of Practices Involving Ionising Radiation Regulations 2004. This means that the exposure may only occur when the benefit to the individual or society outweighs the health detriment that may be caused to the individual;
 - necessary for the prevention and detection of crime or disorder and/or connected to: prison security, prison order or prison discipline, or protecting the safety of prisoners, visitors or prison staff; and
 - proportionate.
- 5.68 To demonstrate that a scan is justified **all five points below must be met:**
- intelligence or reasonable suspicion suggests that a prisoner is internally concealing items, which may be linked to specific prisoners or cohorts;
 - there are no other means of detecting the suspected item (for example, a full or rub down search);
 - it is necessary to reduce the risks posed by illicit and unauthorised items being conveyed into or out of a prison and that these risks outweigh the health detriment caused by exposure to radiation;
 - there are no other circumstances of the prisoner, the intelligence or the reasonable suspicion, which would make the exposure disproportionate; and
 - there is evidence that the scan will not cause that individual to exceed the maximum annual dosage constraint of 700 µSv per individual in the current calendar year. The X-ray body scan operator must check the prisoner's NOMIS record to ensure the dosage constraints have not been met. If records are missing, the prisoner must not be scanned until it is confirmed that they have not exceeded the dosage constraint.
- 5.69 Use of the X-ray body scanner must be led by intelligence or reasonable suspicion. For example, the action for an X-ray body scan could have come from:
- direct communications from the Security Department that the individual is likely to be internally concealing an item;
 - agreed at the monthly security meeting, including agreement to any cohort scanning;

² See Regulation 21G of The Justification of Practices Involving Ionising Radiation 2004

- direct communications from Police, Courts or other law enforcement agencies that the individual is likely to be internally concealing illicit and unauthorised items;
- reasonable suspicion during or following a visit that the individual is likely to be internally concealing items; or
- reasonable suspicion that the individual is likely to be internally concealing an item which could be based on information on the prisoner's Person Escort Record (PER) or pre-sentence interview, report or behavioural indicators.

- 5.70 Any decisions relating to the use of the X-ray body scanner must be recorded as an Intelligence Report and will form part of the history for the justification of why a particular prisoner was selected to be X-ray body scanned in that instance. Any decisions around cohort scanning must be recorded in the monthly security meeting minutes. Where intelligence is used as the justification, the format and route for sharing intelligence is by an intelligence assessment provided by the prison intelligence unit via secure email, as per local process. It should not include the evaluation code.
- 5.71 In some circumstances a prisoner may be part of a cohort of prisoners where there is intelligence or reasonable suspicion that individuals within the cohort are internally concealing items (see paragraphs 5.74 – 5.78 below). The prison must still be satisfied that each individual scan within the cohort is justified and proportionate as described in paragraphs 5.67-5.68.
- 5.72 There are no health reasons why a prisoner should not be scanned, except as provided in paragraph 5.76. A prisoner can still have an X-ray body scan if they have had or are undergoing medical procedures (this includes any form of medical X-ray / radiotherapy).
- 5.73 If the prisoner reaches the 700 microserverts yearly annual maximum dosage, the member of staff who is first made aware of this, must ensure a 'Do not X-ray body scan' NOMIS Alert is added to NOMIS (ensuring that an end date is entered). This NOMIS Alert can then be removed at the start of a new calendar year (1st January).

Cohort Scanning

- 5.74 Cohort scanning is where a prison opts to scan a cohort of prisoners where there is intelligence or reasonable suspicion that prisoners in the cohort are conveying illicit items internally via a particular route into or within a prison, but it has no other means of determining which specific prisoners are doing so. Each individual scan of a member of the cohort must still comply with the requirements of paragraph 5.67 and be justified in accordance with paragraph 5.68, including ensuring they are suitable to be scanned and would not exceed the maximum annual dosage. The reason for the scan must be recorded in accordance with paragraph 5.70.
- 5.75 The scenarios where a cohort scan could be used include, but are not limited to, new receptions, transfers from another prison, recalls, court returns, release on temporary licence (ROTL). It could also apply if there is intelligence or reasonable suspicion that prisoners in a particular area of a prison, such as a place or work, or a wing are conveying items within the prison.
- 5.76 The use of cohort scanning must be discussed monthly, this will often be done at the Security Meeting (sometimes referred to as Security Committee). Any decision on cohort scanning must be reviewed and documented at each meeting, with clear supporting evidence provided for any continued cohort scanning or new circumstances for cohort scanning.

- 5.77 Cohort scanning must not be routinely extended without justification, and any information or data used to justify its use should remain live and relevant. Where it is no longer justified, cohort scanning must cease. Please see Annex H for further information.
- 5.78 Under no circumstances should prisons conduct random scanning on cohorts of prisoners.

Prisoners with Protected Characteristics

- 5.79 In line with other government agencies (such as Border Force and the NHS) there is no requirement for the X-ray body scan operator to be the same sex as the prisoner being scanned and this is because images are only X-ray quality. Privacy concerns are mitigated by the fact that the prisoner is not naked. However, the X-ray body scan image could reveal some physical detail of the prisoner being scanned. If the prisoner objects to a female staff member undertaking and interpreting the scan, the prison should, where possible, facilitate a male member of staff to interpret the scan (depending on the prison's operational capability). This is at the discretion of the prison. Any objections or concerns should be considered on an individual basis based on the specific circumstances.
- 5.80 A pragmatic and considerate approach should be applied to scanning prisoners with disabilities as it may not always be possible to conduct a scan. If a prisoner is unable to stand unaided they should not be scanned. If the prisoner is unable to stand unaided, a 'Do not X-ray body scan' alert should be added to NOMIS. The staff member who becomes aware of this is responsible for putting the NOMIS alert on the system.
- 5.81 Transgender women and post-operative transgender men who no longer have female reproductive organs can be scanned.
- 5.82 Due to the potential harm to a foetus, a prisoner may not be scanned if they have female reproductive organs; this risk may arise in relation to pre-operative transgender men who consequently must not be scanned. However, staff must be careful not to reveal that the prisoner is transgender. A 'Do not X-ray body scan' alert must be put on NOMIS (at the earliest point) for all pre-operative transgender men. The staff member who becomes aware of this is then responsible for putting the NOMIS alert on the system. All staff should provide the prisoner with sight of [Annex F](#) before scanning, so that a prisoner understands they should not be scanned if they have female reproductive organs and has the opportunity to make the prison aware.
- 5.83 Staff should refer to the [Transgender Policy Framework](#) for further information. A Local Transgender Case Board should be held at establishment level within 14 days of someone identifying as transgender. This should include the creation of a voluntary agreement, which should cover agreements with regard to searching. It is appropriate that a sensitive discussion would take place alongside a wider conversation concerning the prisoner's particular needs before a scan is undertaken.
- 5.84 The Governor must ensure that information is communicated (verbally and in writing) to prisoners before they are scanned on the purpose of the scan and associated health and safety implications. That information must be appropriately conveyed to prisoners with protected characteristics, including those with physical or learning disabilities and those who do not speak English ([Advancing Equality for Offenders and Children in Custody Policy Framework](#)). An example of a Staff and Prisoner information sheet is provided at [Annex F](#).

Preparing for a Scan

- 5.85 Before conducting a scan, the following steps must have been taken:

- **You must have assessed that a scan is justified and proportionate (para 5.69).**

- All cases of exposure to ionising radiation through the use of an X-ray body scanner must be fully justified, proportionate and the individual or societal benefit of the exposure must outweigh any potential health risks. The justification for any scan must be recorded, in all cases, on NOMIS.
- **You must check the prisoner can be scanned by checking NOMIS alerts. If there is a 'Do not X-ray body scan' the prisoner cannot be scanned.**
 - Some prisoners cannot be X-ray body scanned and therefore, NOMIS must be checked.
- **You must check the prisoner record on NOMIS to ensure that a further scan would not exceed the cumulative dosage limit of 700 µSv per individual per calendar year.**
 - Every instance of exposure from an X-ray body scanner in the current calendar year must be calculated using the information available on NOMIS. If records are missing, the prisoner must not be scanned until it is confirmed that they have not exceeded the dosage constraint.
- **You must explain the process for X-ray body scanning to the prisoner.**
 - If the justification for a scan remains, the prisoner must be provided with a reasonable level of information about the use of X-ray body scanners and the proposed radiation exposure. Template information sheets are provided at [Annex E](#).
 - The information must be appropriately conveyed to prisoners with protected characteristics, including those with physical or learning disabilities and those who do not speak English.
- **You must have provided the prisoner with an opportunity to hand over any illicit or unauthorised items.**
 - Before conducting a scan, the prisoner must be asked if they are in possession of an unauthorised item. In doing so, they must be offered the opportunity to privately hand over any internally concealed items, in line with [Searching Policy Framework](#) and relevant hygiene procedures. If the prisoner hands over items, the justification and proportionality of the scan must be reassessed.
- **You must ensure the prisoner is able to physically undertake a scan (for example the prisoner is able to stand for the duration of the scan).**

Conducting a Scan

- 5.86 Staff working with radiation are not regarded as **classified persons**. There is no requirement for staff to wear personal dose monitors as the dose levels around the equipment are checked regularly as described in paras 5.9 – 5.10.
- 5.87 With the exception of the prisoner being scanned, all other persons must remain outside of the yellow and black demarked Controlled Area around the X-ray body scanner. The Controlled Area must be strictly controlled so that no staff, visitors or other prisoners enter this area when the machine is in operation and therefore would be exposed to radiation.
- 5.88 Trained X-ray body scan operators must be familiar with the operating instructions for the specific X-ray body scanner in use at the prison and must explain to the prisoner the process so they know what is going to happen and how the scan will be conducted.
- 5.89 The prisoner must be provided with a clear verbal instruction of how they must stand for the operator to take an image. To ensure the operator can take a good image, it is important that

the prisoner remains still during the scan. The prisoner should put one hand on the rail and the other by their side to improve the imaging.

- 5.90 Following the scan and subsequent interpretation of the image, local operating procedures must provide clear instruction as to where and how the prisoner will be safely located during this period.
- 5.91 In the event that the image is unclear, the operator may want to seek assistance from another trained member of staff. If the operator concludes that the image is unclear, another scan could be considered if it continues to be justified.

Refusing a Scan / Sabotaging a Scan

- 5.92 If a prisoner refuses to be scanned, or intentionally moves to distort the image, it may be appropriate to charge the prisoner with an offence against prison discipline under Rule 51(22) Prison Rules 1999/Rule 55(25) Young Offender Institution Rules 2000 (see [Prisoner Discipline Procedures \(Adjudications\) Policy Framework](#) for further detail), or have their incentive level downgraded and in accordance with the Prison's Incentive Scheme.
- 5.93 If staff believe that this is the case, they should consider whether it is necessary to manage the prisoner, in terms of risk to self, as if they do have an internally concealed item (as below).
- 5.94 Prisoners may be subject to more than one scan per day, provided that each scan is justified and proportionate.
- 5.95 Prisoners must not be restrained in order to be X-ray body scanned.

Recording of the Scan

- 5.96 For every scan undertaken an individual entry of the date and dosage justification (either intelligence or reasonable suspicion) must be recorded on NOMIS. This must be recorded as soon as practical after the scan is conducted. The NOMIS record must also record whether or not any suspected illicit or unauthorised item was detected by the scan. [Annex G](#) details how these details are to be recorded on NOMIS.
- 5.97 Any scan that indicates a positive detection of an illicit or unauthorised item and there is a 'find', must be recorded on the Incident Reporting System (IRS) as a find. All reports must include details of what the item is (if known) and must record the method of detection.

Image Interpretation – Outcomes

Image shows no item being internally concealed

- 5.98 If the operator concludes that the scan image indicates that the prisoner is not internally concealing an illicit or unauthorised item, this information must be recorded on NOMIS and the prisoner should be processed in line with the local operating procedures.
- 5.99 If an X-ray body scan of a prisoner shows a negative scan image (no internal concealed item identified), but the prisoner has been seen by staff or another person to internally conceal an item, then the X-ray body scan operator must be mindful that the image could have been misinterpreted, or not have shown on the X-ray scan. Therefore, the prison, using the information and reasonable suspicion, may decide to manage the prisoner in terms of risk to self, as if they do have an internally concealed item (as below).

Image shows an item being internally concealed

- 5.100 If the operator concludes that the scan image indicates that the prisoner is internally concealing an item, this information must be relayed to healthcare as soon as possible in case the internally concealed item may cause a risk to the prisoner. Information must include what the item could be (for example, drugs / mobile phone / weapon), enabling healthcare to manage the health risks to the prisoner (please refer to [Searching Policy Framework](#)).
- 5.101 The prisoner must be informed that the image taken by the X-ray body scanner indicates that they are internally concealing an item. If the item is accessible the prisoner can be asked to hand over the item when considered safe to do so by the prisoner. A private area should be made available for this purpose as is set out in [Searching Policy Framework](#).
- 5.102 Staff who handle items that the prisoner has removed from the anal, genital or oral area must comply with [Searching Policy Framework](#). They must take appropriate hygiene and health precautions and clinical waste procedures should be followed. Staff must wear single use disposable gloves (which are disposed of through clinical waste) with access to hand washing facilities. Any items found or handed over must be retained in evidence and appropriately marked, transported, stored and dealt with in line with [Managing and Handling of Evidence Policy Framework](#).
- 5.103 Similarly, where prisoners are asked to remove, or do remove, items from their anal, genital or oral areas, they must be provided with single use disposable gloves (which are disposed of through clinical waste) and have access to hand washing facilities.
- 5.104 If the prisoner agrees the item is safe to remove, a member of healthcare should be asked to observe the physical condition of the prisoner both before and after removal of the item. A private area should be made available for this purpose.
- 5.105 In the event that the prisoner cannot safely remove or refuses to hand over the item, staff must consider whether it is appropriate to place the prisoner on report for conveyance/secretion of the item by applying R51(23) / YOI R55 (26) disobeys any rule or regulation applying to him. The evidence for this charge is the members of staff's visual observation of a protruding item or a body scan image of a secreted item. In order for this adjudication charge to be applied, establishments will need to amend their local rules to include prohibiting the secretion of any item within the body. This must be undertaken before establishments can bring to discipline prisoners under R51(23) / YOI R55 (26).
- 5.106 If the prisoner refuses or is unable to safely remove or pass a suspected item the prison must consider the risks presented by that prisoner to themselves and/or others. In all cases the prison must consider the location and observation requirements of the prisoner. This could include use of segregation and/or ACCT, if applicable, locating the prisoner in healthcare, or sending the prisoner for outside medical intervention. This decision should be made in conjunction with the advice from healthcare.
- 5.107 If the prisoner has an unknown internally concealed item, a competent operational manager / Duty Director needs to ensure that a defensible decision is made on any actions taken/not taken and recorded on NOMIS. This could include location of the prisoner and requirements for observations (and frequency). If the prisoner is to be segregated, authority to do so must first be sought from a competent operational manager / Duty Director. Segregation must be consistent with PSO 1700 Segregation under Rule 45 (YOI Rule 49) Good Order or Discipline (GOoD) and should be for the shortest period of time consistent with the reason for segregation in the first place.

- 5.108 Any continued use of segregation must be in line with [PSO 1700 Segregation](#) and is only likely to be justified and proportionate for as long as the risk remains that the prisoner has internally concealed items.
- 5.109 If the prisoner states they are no longer concealing items and has passed it or removed it, staff may then consider whether a further scan is justified and proportionate in accordance with this Policy Framework.
- 5.110 The prison must consider whether the case should be referred to the police in accordance with the Crime in Prison Referral Agreement and/or for adjudication.
- 5.111 If an internally concealed item is detected, for adjudication purposes a photograph (in this case an X-ray body scan image) can be accepted as evidence. For such cases, it may be appropriate to lay a charge under Prison Rule 51(23) / YOI Rule 55(26) please refer to [Prisoner Discipline Procedures \(Adjudications\) Policy Framework](#) for more information.
- 5.112 If an image is inconclusive and the operator is unable to interpret due to movement or an obstruction (belts, buttons for example), a re-scan needs to be taken to allow the operator to make an informed and accurate interpretation of the image. If an operator cannot conclusively determine an image is negative or positive, further scan(s) may be required.
- 5.113 Prisoners will still be required to be transferred between establishments, or to attend court or medical appointments. The knowledge that the prisoner has an internally concealed item does not automatically mean the prisoner cannot be transferred. The competent operational manager / Duty Director should ensure that an individual risk assessment is undertaken and consider what measures can be applied to mitigate the risk. Options for additional security measures on escort include, but are not limited to: use of prison or specialised contractor vehicles, additional number of prison escort staff, application of restraints (which must be separately risk assessed on an individual basis), notification of details of the escort to police and, if justified and proportionate, a request for police escort.

Enforcement Regime under Part 7A and Part 8 of The Justification of Practices Involving Ionising Radiation Regulations 2004 (as amended)

Regulation 21E and Requirements for the Practice for HMPPS – it is a specific requirement for prison staff to comply with the Requirements for Practice in carrying out the X-ray body scanning practice in prisons under rule 21E(3).

Warning Notices – if the Requirements for Practice are not complied with, there is a possibility of warning notices being served by the Justifying Authority under regulation 21E(5). It is essential you respond to these notices by complying with the specified steps within the specified time frame the Justifying Authority may withdraw HMPPS' approval to use x-ray body scanners if a warning notice is not complied with in the specified time frame.

Consent – under regulation 21G, the requirement to obtain prior consent before conducting a scan does not apply to scans conducted by law enforcement officials. This term is defined to include:

- (a) A governor of a prison
- (b) An officer of a prison
- (c) A person working at a prison who is authorised by the governor of the prison to exercise powers of search
- (d) A director of a contracted out prison
- (e) A prisoner custody officer of a contracted out prison
- (f) A worker at a contracted out prison who is authorised by the director of the contracted out prison to carry out restricted activities.

Contravention Notices in Regulation 22 – the Justifying Authority (Home Office) may serve a contravention notice if it appears that a prison has breached the Requirements for Practice, that dose constraints have been exceeded, that prisons have failed to provide a reasonable level of information to prisoners before scanning them). The contravention notice would specify the steps that must be taken within a specified period. It is the prisons responsibility to comply with the steps set out in the contravention notice within the specified time period.

Inspection – Regulation 23A. The Justifying Authority must establish an inspection regime to monitor whether prisons have breached the Regulations or failed to comply with the Requirements for Practice. The findings from each inspection would be communicated to the prison. Prisons are obliged to cooperate with inspections in any way that is required of them by officials of the Justifying Authority.

Enforcement Powers – Regulation 23 and Schedule 1. The Justifying Authority's enforcement powers include the following: power to enter the prison, investigate, examine items, take photos, measurements and recordings and take samples. The Justifying Authority may require that the scanner and any part of the prison is left undisturbed or require the X-ray body scanner to be dismantled and taken away for testing. The powers also includes the powers to require staff with relevant information to answer questions, to require the production of records of scans, to inspect records, to take copies of records, and to require staff to provide assistance with their investigation.

Offences – Regulation 24. It is a criminal offence to fail to comply with a requirement in a contravention notice, without reasonable excuse or to provide false, misleading or reckless information, statements or materials. It is also a criminal offence to obstruct the justifying authority when it is exercising its enforcement powers, which would include obstructing officials of the Justifying Authority when they were carrying out their inspection via their powers of entry, refusing

or failing to provide them with facilities, assistance or information or preventing someone from answering their questions. The offence is triable either way. A person found guilty on summary conviction can be liable to a fine or to imprisonment for up to three months or both. A person found guilty on conviction on indictment can be liable to a fine or to imprisonment for up to two years or both.

Application to the crown of the criminal offences – Regulation 25A. The crown is not criminally liable for contravention of the provisions in the Regulations. However, individual crown servants can be liable for the criminal offences, as can private prison staff. In practice, this means that whilst HMPPS cannot be prosecuted, private prison providers and individual prison staff in private or public prisons can be. In relation to HMPPS, the High Court could also declare unlawful any act or omission by a public sector prison which would have constituted a criminal offence were it not for the crown immunity provision.

HMPPS and Privately Contracted Prisons Requirements for Practices for Deploying and Operating X-Ray Body Scanners that utilise Ionising Radiation for Non-Medical Purposes in Prisons.

- HMPPS and Privately Contracted prisons using non-medical X-ray machines³ must consider the potential radiation risk to staff and other persons as well as prisoners suspected of conveying items internally. A risk assessment, in accordance with the requirements of the Ionising Radiations Regulations 2017 (IRR17), must be undertaken in respect of each site where scanners are deployed. Additional risk assessments under regulation 3 of the Management of Health and Safety at Work Regulations 1999 may also be required.
- If there is a change to agreed practices or new prisons adopting non-medical X-ray machines, HMPPS and Contracted Prison Providers must review the local risk assessment or set one in place if none exists.
- The use of non-medical X-ray machines by HMPPS and Contracted Prison Providers is subject to the requirements of the IRR17. As such, expert advice on compliance from a Radiation Protection Adviser is required.
- Before initial use after installation or following relocation, non-medical X-ray machines must have their radiation performance measured by the equipment installer to ensure:
 - potential doses received by operators and others in the vicinity of the equipment of the equipment are as low as reasonably practicable;
 - those being scanned do not receive a dose in excess of the equipment specification or the Requirement for Practice as agreed with the Justifying Authority.
- HMPPS and Contracted Prison Providers must comply with manufacturers' instructions on safe use of the non-medical X-ray machines and must ensure that the machines are positioned and operated in accordance with manufacturers' guidelines. HMPPS or Contracted Prison Providers must consult their RPA when installing this type of equipment for the first time, or when moving it within the establishment.
- HMPPS and Contracted Prison Providers must undertake risk-assessments in consultation with a Radiation Protection Adviser and carry out routine image quality testing to ensure the dose per scan remains within the limits of the equipment specification and the Requirements for Practice as agreed with the Justifying Authority. This may also be undertaken by the equipment supplier under a service management contract.
- HMPPS and Contracted Prison Providers must comply with HMPPS instructions on the use of the non-medical X-ray equipment, must comply fully with any mandatory requirements/control measures and undertake any remedial action needed as directed by the Justifying Authority.
- HMPPS and Contracted Prison Providers must provide Local Rules, specific to each site, as required by IRR17.
- Governors/Directors must appoint a competent and trained member of staff as the Radiation Protection Supervisor (RPS) for each area of the prison where a non-medical X-ray scanner is used. The RPS must ensure that the radiation operation is controlled in accordance with

³ "Non-medical" is a term generally accepted in the radiation protection community to differentiate the type of units used by HMPPS and Contracted Prison Providers from standard medical X-ray units, e.g. a hospital chest X-ray.

Local Rules and compliant with legislative requirements identified by the Radiation Protection Adviser.

- Only staff trained in the operation of non-medical X-ray body scanners may operate these machines as part of their designated duties. Training will include operating the machine and the health and safety risks to both the operator and the subject. Staff may only operate the equipment as part of their designated duties and in line with instructions provided. In the case of any change in practice and/or technology, Governors/Directors must ensure operators are appropriately trained to use the equipment.
- Any prisoner who may be subject to a scan using ionising radiation must be provided with appropriate and relevant guidance to ensure that they are aware of the purpose of the scan and associated health and safety implications. As a minimum, information notices must be displayed in the location of the scanner and provided verbally before each scan. Information should also be included in prisoner induction packs, provided on entry to the prison.
- HMPPS and Contracted Prison Providers must undertake an annual review with each prison, in consultation with their RPA, to agree the maximum individual dosage (up to maximum set level of 6 μ Sv (microsieverts) per scan for each machine, annual dose constraints and the maximum number of scans permissible within the annual dose constraint. This will be informed by the technical specifications of the machine, as well as an assessment of local intelligence and operational requirements at each prison.
- The manufacturers and installers of X-ray scanners, in consultation with their RPA, must ensure that the machine does not exceed a maximum individual dosage of 6 μ Sv (microsieverts) when operating at maximum power.
- HMPPS and Contracted Prison Providers must, in consultation with their RPA, ensure that regular performance checks are undertaken on X-ray body scanners to ensure that the equipment continues to operate within the specified limits.
- Each scan must only be conducted where there is intelligence or reasonable grounds to suspect that an item is being concealed by a person internally. The intelligence can be HMPPS owned intelligence and/or intelligence received from external agencies, either linked to specific prisoners or cohorts. A person must not be scanned routinely or on a random basis.
- HMPPS and Contracted Prison Providers must ensure non-medical X-ray machines are used only when it is necessary and proportionate to do so for the prevention and detection of crime or disorder and / or connected to: prison security, prison order or prison discipline, or protecting the safety of prisoners, visitors or prison staff.
- Each individual scan / exposure to ionising radiation must be justified and appropriate records must be kept for each scan in accordance with HMPPS national guidance. As part of these records, establishments must demonstrate that the operational / security and societal benefits of exposure outweigh the anticipated health risks to the individual. A scan should only be conducted when the balancing exercise has resulted in this conclusion.
- All non-medical scans must be conducted in accordance with the procedural instructions set out in national HMPPS guidance.
- No person must exceed the maximum number of scans. This includes any scans conducted at another prison.
- HMPPS and Contracted Prison Providers must ensure that records are kept of each non-medical scan and are able to share these records with other prisons to ensure that no

individual exceeds the agreed annual dosage constraint. This requirement is in addition to any system inherent in individual scanners which raises an alert if an individual is approaching annual exposure limits.

- HMPPS and Contracted Prison Providers must consult with their RPA with regards to staff exposure (operating positions and similar) and must comply with their advice.
- Any action undertaken as a result of a non-medical scan must be appropriate and proportionate, taking into account national HMPPS guidance, the Prison Act 1952, Prison Rules 1999, the Offender Management Act 2007 and the potential threat identified as a result of the scan.

Overview of Site Survey and Location of the X-ray Body Scanner, Radiation Protection Adviser (RPA) and RPA Radiation Protection Book

Site Survey and Location of the X-ray Body Scanner

A site survey by the supplier should be completed to capture the following:

- Assess the working environment for the health and safety of both staff and prisoners.
- Assess the security of the equipment in the proposed location and the potential for prisoner indiscipline or damage.
- Assess the radiation protection impact Controlled Area

In doing so, it should capture the below information:

- Access / route for delivery of equipment and manual handling requirements.
- Risks to the equipment or staff installing equipment at time of installation.
- Description of area of deployment.
- Diagram and photographs of area.
- Diagram / description of radiation protection impact Controlled Area.
- Detailed measurements of location of equipment in relation to surrounding areas.
- Security of the equipment and potential for prisoner indiscipline or damage.
- Where and what signage is required.

The X-ray body scanner is a large piece of equipment and will need a suitable and safe area to be installed with space around it for a Controlled Area to be cordoned off. Any windows in the selected area should also be considered as the radiation can affect people walking outside the window if they are within the vicinity. Although the location must be operationally effective for the prison, safety must take priority and the location must comply with the [Ionising Radiation Regulations 2017](#). Trefoil signage must be displayed in and around the Controlled Area at points of entry to this area.

Radiation Protection Adviser (RPA)

HMPPS has appointed a Radiation Protection Advisor under contract. Details of the current provider are available from Commercial Contracts Management Directorate (CCMD). The RPA is responsible for:

- Delivering the Radiation Protection Advisory (RPA) services for the Radiation Safety Survey inspections, Radiation Protection Supervisor (RPS) training and Local Radiation Advice.
- Providing HMPPS with general advice on radiation protection for staff and others who may be affected, including advice on compliance with relevant statutory requirements and new developments in radiation safety.
- Giving specific advice on radiation protection of staff and others to each prison where security X-ray equipment is used.
- Advising on the completion of the assessments of the risks to staff from ionising radiation and on the control measures that must be implemented to eliminate or reduce the risk.

- Visiting each prison where security X-ray equipment is used at a frequency determined by the RPA as appropriate for type and use of equipment. These visits will include an inspection and survey of X-ray body scanner equipment and reviews of radiation safety.
- Compiling a report following each visit identifying any problems, the remedial work that needs to be done to rectify any identified problems and a time scale for completing the work.
- Providing information for the RPA Radiation Protection Book for each establishment
- Undertaking of Radiation Safety Survey of new equipment. Giving advice when requested on new equipment and facilities.
- Providing training for RPS(s) as required.
- Advise on Local Rules.
- Providing advice on remedial action and undertaking investigations and dose assessments as appropriate, in the event of any accident or potential exposure involving radiation of staff or others.
- Providing HMPPS with regular reports describing the work carried out within the scope of the RPA contract and identifying any trends or concerns.

Radiation Protection Book

The RPS will compile and maintain the Radiation Protection Book. The book will include:

- A description of each item of equipment and its location.
- Names, addresses and contact numbers for all persons having a radiation protection role in the use of X-ray body scanner equipment.
- The training schedule for all persons involved in the work with the equipment.
- RPS appointment letters from the Governor
- Signed log of all operators who have signed to state they have read and understood the local rules.
- Risk assessments.
- A description of the designated Controlled Area.
- The Local Rules for radiation safety, including contingency plans.
- Copies of the RPA's reports and any other relevant correspondence.
- Results of the daily and weekly checks.
- Critical Examination reports provided by the Supplier
- Maintenance and service reports provided by the service engineer.
- Fault log.
- Operator daily checks
- RPS weekly checks
- Register of X-ray body scan operators' signatures to confirm they have read, undertook and will adhere to the Local Rules.

Ionising Radiations Regulations 2017**Low dose X-ray body scanner systems****1 INTRODUCTION**

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

Equipment, Serial Number and Location

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2 RADIATION PROTECTION SUPERVISOR (RPS)

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

The Radiation Protection Supervisor (s) for this area is/are:

3 RADIATION PROTECTION ADVISOR (RPA)

Radiation protection services are provided by:

The Radiation Protection Advisor is:

4 DESIGNATION OF STAFF, PERSONAL MONITORING AND DOSE INVESTIGATION LEVEL

Staff working with radiation are not regarded as **classified persons**. There is no requirement for staff to wear personal dose monitors as the dose levels around the equipment are checked regularly. A dose investigation level (DIL) of 1mSv is recommended. However, provided these Local Rules are complied with the DIL is unlikely to be exceeded. Measurements of environmental dose rates will be performed during servicing and annually by the radiation protection service to verify that the DIL remains appropriate.

There is no requirement for any change in working conditions for pregnant staff due to radiation dose.

5 DESIGNATION OF CONTROLLED AND SUPERVISED AREAS

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

5.1 Controlled Areas

A Controlled Area shall exist whenever the x-ray body scanner is connected to the mains electricity supply and switched on. The extent of the Controlled Area is demarcated by the yellow and black tape and the fixed barriers (walls, doors etc...).

A Controlled Area shall cease to exist when the x-ray body scanner is disconnected from the mains electricity supply.

5.2 Access to Controlled Areas

- i) Only the prisoner undergoing scanning should be in the Controlled Area when X-ray body scans are produced.
- ii) Engineers and physicists may access the Controlled Area during scanning for test purposes only, but must not stand on the scanning platform when the X-ray beam is on. In these circumstances control of the x-ray equipment and responsibility for radiation protection shall be handed over to the engineer or physicist. Handing over control and responsibility of the area shall be by a formal written procedure the reciprocal of which shall be followed when the control and responsibility is handed back to the prison.

6 OPERATING PROCEDURES

All employees, contractors and visitors must comply with these Local Rules and co-operate in their implementation.

The X-ray body scanner equipment mains must be switched off when it is not in use.

6.1 Radiation Protection Supervisors

The Radiation Protection Supervisors must:

- i) Oversee the use of the X-ray body scanner equipment to ensure it is in accordance with these Local Rules.
- ii) Ensure the records in the Radiation Protection Book are kept up to date.
- iii) Report any concerns about radiation safety and/or safety features to the RPA and the Head of Function responsible for the X-ray body scanner equipment.
- iv) RPS to call out maintenance supplier for any damage to any X-ray body scanner equipment safety features.

6.2 Employees Operating Radiation Equipment

- i) Only authorised, trained employees or contractors may operate the X-ray body scanner equipment. These people must be listed in the local Radiological Protection Book.
- ii) Employees and contractors **must** receive appropriate training before operating X-ray body scanner equipment
- iii) Unsupervised equipment **must** be isolated from the mains supply at the console.

- iv) The login and password to start the equipment must not be left near the unit.
- v) Employees, contractors or members of the public, with the exception of the person being scanned, **must not** access the Controlled Area when the system is producing X-ray body scans. Access must be prevented with the use of a barrier (exception for dose-rate checks during testing).
- vi) Any damage to any X-ray body scanner equipment safety features or radiation safety concerns **must** be reported immediately to the RPS. .
- vii) Persons **must not** interfere with any safety devices or attempt to repair any part of the X-ray equipment unless authorised to do so.

6.3 Cleaning Personnel

- i) Cleaning personnel may only clean around X-ray body scanner equipment at times previously arranged by local management or the RPS.

6.4 Visitors / Service Engineers / Physicists

- i) All visitors must comply with verbal and/or written instructions issued by the authorised operator of the equipment.
- ii) The RPS (or nominated deputy) shall formally handover the control of the x-ray equipment and hence responsibility for radiation protection to the visiting service engineer or physicist using a handover form either provided by the prison or provided by the service engineer/physicist.
- iii) Any maintenance personnel who are employees of the prison shall work to these local rules. Any visiting service engineer or physicist to whom the equipment and controlled area are handed over shall work to their employer's local rules and risk assessment. They must make the RPS aware of the Local Rules and radiation risk assessment that will be in operation **before** starting any work. Once the work is finished the x-ray equipment and controlled area shall be formally handed back to the RPS (or nominated deputy).
- iv) Any service engineer or physicist who carries out a temporary modification to an X-ray body scanning unit which affects its output or quality **must**:
 - a) Attach to the equipment an appropriate warning notice.
 - b) Inform the RPS in writing if the modification is of a permanent nature.

7 CONTINGENCY PLANS

- i) If an X-ray body scanner inspection needs to be aborted for any reason, for example non-termination of X-rays, the operator must terminate the inspection as follows:
 - a) Depress the **EMERGENCY STOP** button to close the machine down completely and switch off.
 - b) Report the incident to the RPS and the Head of Function responsible for the X-ray body scanner equipment, or if not available the Duty Governor.
- ii) If the emergency action was due to an equipment fault, the RPS, or equivalent grade must ensure that the equipment is not used until the necessary repair work has been successfully completed. Should the RPS not be available then notification shall be made to the next senior

member of staff with managerial responsibility (e.g. head of function or local governor for the area) who shall initiate the process for having the equipment repaired.

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



HMP xxxxx

Date xxxxxx

Radiological Protection Supervisor

[Name of RPS],

I hereby appoint you Radiation Protection Supervisor (RPS) for HMP XXXXXX.

The RPS is responsible for helping HMP XXXXXX to ensure the radiological safety of all personnel within the workplace. In addition, your duties as RPS are as follows:

- To ensure that HMP XXXXXX activities are compliant with The Ionising Radiations Regulations 2017 (IRR17);
- To maintain an inventory of x-ray equipment on the premises and to update the RPA of any changes in the equipment inventory.
- To liaise with maintenance personal for any defaults, faulty equipment and maintenance visits and hold copies of all maintenance/service reports.
- Ensuring that Local Rules are available and are being complied with.
- Ensure arrangements are made for the appropriate operational training of all staff who work with the equipment.
- Ensuring that arrangements have been made for the supervision of contractors, visitors and other persons who may come into contact with the X-ray body scanning equipment.
- Ensure daily operator checks are made before use and recorded in the Radiation Protection Book for audit purposes.
- Ensuring that the weekly checks on the correct operation of the safety features (warning lights, emergency stop buttons) are carried out and the findings recorded in the Radiation Protection Book for audit purposes.
- Maintaining the RPA Radiation Protection Book.
- Maintain the signed register of X-ray body scan operators confirming they have read, undertook and will adhere to the Local Rules.
- Ensuring that remedial action required as the result of an RPA safety inspection is completed and recorded in good time.
- On behalf of the prison Governor to ensure that action is taken to address any concerns or recommendations made by the RPA during a safety inspection.

Name: (Person issuing the letter)	Name.....(RPS)
Position: Governing Governor	Position: I accept the appointment as RPS for HMP XXXXX
Signature.....	Signature.....
Date:	Date:

What is an X-ray body scanner?

An X-ray body scanner machine uses ionising radiation to provide high resolution and real time body view images.

Is it safe?

The X-ray body scanner does omit, during a scan, a low dose amount of radiation which could impact health. However, HMPPS' full compliance with the mandatory actions in the Policy Framework ensures compliance with The [Ionising Radiation Regulations 2017](#). Therefore, no person being scanned will be exposed to a radiation level which exceeds the legal limits.

When is it used?

Scans are only undertaken when it is assessed as necessary and proportionate in order to prevent, detect or investigate crime, to maintain prison security, good order and discipline and there is intelligence or reasonable suspicion that the person is internally concealing an item.

What is it used for?

It is used to detect items ingested or internally concealed within body cavities that may cause harm or threats to the person being scanned or other people within the prison.

Some of the items that it can identify are:

- metallic and non-metallic weapons
- explosives
- drugs
- mobile phones, USB's and SIM cards
- jewellery, gems and precious metals.

What is the justification for its use & the prison's responsibilities?

Prisons are authorised to conduct these scans under the Justification of Practices Involving Ionising Radiation 2004 (as amended 2018) and the approval for use held by HMPPS.

The X-ray body scanner will be used in addition to other searching procedures in accordance with [PSI 07/2016 Searching of the Person](#).

Prisons must consider the requirement for a scan, weighing up the societal benefit, against any potential health risks caused by the X-ray machine. Every scan must be justified and proportionate, which means:

- There must be intelligence or reasonable suspicion that a prisoner is concealing items inside themselves;
- There is evidence that the scan will not cause that individual to exceed the maximum annual dosage constraint of 700 µSv per individual in the current calendar year.
- There are no other means of detecting the suspected item (for example full or rub down search).

Prisons are required to operate under strict guidelines and safeguards to ensure that the risks to health are minimal for the person being scanned and others operating and in the vicinity of the scanner.

Instructions and Information for prisoners being scanned:

- If you have female reproductive organs you must not be scanned. You should make the prison aware at this point before scanning if you do have female reproductive organs.
- Comply with the instructions / orders given by the officer (refusing a scan may be considered as a failure to comply with a lawful order which may constitute an offence against prison discipline).
- Answer the officer's questions in a truthful and honest manner. Before a scan, you will be asked if you are in possession of an unauthorised item and given the opportunity to hand over any internally concealed items in privacy.
- There is no legal requirement for prison staff to obtain consent from those being scanned before conducting a scan. If you refuse to be scanned, you may be subject to disciplinary action under Prison Rule 51/YOI Prison Rule 55 for disobeying a lawful order.
- It is important that you stay still and do not twist or turn during the scan. If you move you may be subject to another scan and/or disciplinary action under Prison Rule 51/YOI Prison Rule 55 for disobeying a lawful order may be taken.
- The machine produces an internal image (it is not a graphic image). You should talk to staff if you have any concerns.
- Action may be taken if items is believed to be internally concealed. This may include disciplinary action under Prison Rule 51 (23)/ YOI Prison Rule 55 (26) disobeys any rule or regulation applying to him, located in segregation, or healthcare, or sent outside for medical intervention.
- If you have any concerns about your health because you are internally concealing illicit or unauthorised items please ask to see healthcare.
- The internal complaints process should be used if you wish to raise any concerns about the way in which the scan was conducted.
- Please note female staff work in this establishment and the X-ray body scan image may be taken and/or subsequently viewed by female members of staff. If you have any concerns please talk to staff before the scan is undertaken.
- Anonymised scan images may be used for training and/or research purposes.

For more information regarding the X-Ray Body Scanners please refer to the Use of X-Ray Body Scanners (Adult Male Prisons). The Policy Framework which should be made available in the prison Library.

The current approach set out in this Annex is an interim solution until the new NOMIS method of recording can be put in place, when this Annex will then be updated.

Step 1:

Select 'Offender Personal Details' and 'Personal Care Needs' as per the arrow below

The screenshot shows the BLI software interface. On the left, a tree view under 'Offender Management' has 'Personal Care Needs' selected, indicated by a red arrow. The main window displays the 'Personal Care Needs' form with a table of existing entries.

Care Type*	Sub Type*	Description	From Date*	Inactive Date	Status*	Source
Disability	No Disability Reco	N	13/12/2018		Ongoing	I
Disability	No Disability Reco	EXI	20/07/2018		Ongoing	I

Step 2:

In 'Care type' tab select 'Prisoner X-Ray Body Scan' as per the arrow below, press OK.

The screenshot shows the 'Personal Care Needs' form with a dropdown menu open for 'Care Type'. The dropdown list shows 'Prisoner X-Ray Body Scan' selected, indicated by a red arrow. The table below shows the updated entry.

Care Type*	Sub Type*	Description	From Date*	Inactive Date	Status*	Source
Disability	No Disability Reco	N	13/12/2018		Ongoing	I
Disability	No Disability Reco	EXI	20/07/2018		Ongoing	I
			14/11/2019			

Step 3:

Under 'Sub Type' select the dosage of 'Body Scan' that was used, in this example it was 5.5µSv as per the arrow below, press OK.

The screenshot shows the 'Personal Care Needs' form. The 'Care Type' is 'Disability' and the 'Sub Type' is 'No Disability Record'. The 'Description' is 'EXI'. The 'From Date' is '13/12/2018', 'Inactive Date' is '20/07/2018', and 'Status' is 'Ongoing'. The 'Source' is 'I'. A dropdown menu is open for 'Sub Types (Domain = 'HEALTH_PBLM')', showing options: 'Body Scan (4.0 µSv)' (BSC4.0), 'Body Scan (4.5 µSv)' (BSC4.5), 'Body Scan (5.0 µSv)' (BSC5.0), 'Body Scan (5.5 µSv)' (BSC5.5), and 'Body Scan (6.0 µSv)' (BSC6.0). The 'Body Scan (5.5 µSv)' option is selected.

Step 4:

In the Description tab, type in the reason for the scan, examples of this could be:

- Intelligence
- Reasonable Suspicion

The date will automatically come up, if this needs to change to a past date, manually change.

The screenshot shows the 'Personal Care Needs' form. The 'Care Type' is 'Disability' and the 'Sub Type' is 'No Disability Record'. The 'Description' is 'Intelligence concealing drugs'. The 'From Date' is '14/11/2019', 'Inactive Date' is empty, and 'Status' is 'Ongoing'. The 'Source' is 'I'. The 'Body Scan (5.5 µSv)' option is selected in the 'Sub Types' dropdown.

Step 5:

Under the 'Status' tab select 'Ongoing' as per the arrow below, press OK.

The screenshot shows the 'Personal Care Needs' form. The 'Care Type' is 'Disability' and the 'Sub Type' is 'No Disability Record'. The 'Description' is 'Intelligence concealing drugs'. The 'From Date' is '14/11/2019', 'Inactive Date' is empty, and 'Status' is 'Ongoing'. The 'Source' is 'I'. The 'Body Scan (5.5 µSv)' option is selected in the 'Sub Types' dropdown. A dropdown menu is open for 'Status (Domain = 'HEALTH_STS')', showing options: 'Recovered' (I), 'Ongoing' (ON), and 'Expired Body Scan Entry' (EBS). The 'Ongoing' option is selected.

That entry is now complete.

If another scan is undertaken, add in another entry, as the example below.

Legal Information

Reception

Property

Offender Personal Details

Personal Summary

Physical Identifier

Offender Address

Contact Addresses

Aliases and Identifiers

Personal Care Needs

Personal Care Needs

Care Type*	Sub Type*	Description	From Date*	Inactive Date	Status*	Source
Disability	No Disability Reco		13/12/2018		Ongoing	
Disability	No Disability Reco	EXI	20/07/2018		Ongoing	
Prisoner X-Ray Bo	Body Scan (5.5 µS	Intelligence concealing drugs	14/11/2019		Ongoing	
Prisoner X-Ray Bo	Body Scan (5.5 µS	Confirmation re-scan after drugs har	14/11/2019		Ongoing	

Cohort scanning must not be routinely extended without justification, and any information or data used to justify its use should remain live and relevant. Where there is no longer justification, cohort scanning must cease.

Any decision relating to the use of the X-ray body scanner must be recorded as an Intelligence Report or on the monthly security minutes in all cases and will form part of the history for the justification of why a particular prisoner/cohort was selected to be X-ray body scanned in that instance.

Monthly Security Meetings

The use of X-ray body scanning must be discussed monthly at the Security Meeting (sometimes referred to as Security Committee), with justification for decisions on any cohort scanning reviewed at each meeting. Cohort scanning should not be routinely extended, and any information or data used to justify its use should remain live and relevant.

Things for the Security Meeting to consider

The Security Meeting can consider a range of data and intelligence to inform their decisions as to whether use of the body scanner is justified for the following month. This could include, but is not limited to:

- Finds data.
- Local Tactical Assessment information and data.
- Local threats and risks identified by the mandatory evidence-informed risk assessment.
- Local or national intelligence⁴.
- Intelligence from external agencies, such as police.
- Number and rates of positive scans.

It will need to be determined locally as to what constitutes a high number or rate of positive scans, considering the number of scans completed, intelligence and size of cohort, amongst any other relevant factors.

A smaller number of positive scans doesn't necessarily mean cohort scanning cannot be justified if it is coupled with intelligence that a certain route is a key conveyance risk to the prison, and this can be justified and documented in the Security Meeting.

A prison must take special care when considering whether to continue cohort scanning if there were few or no positive scans in the previous month. This decision must be thoroughly justified and documented monthly for any cohort in the security minutes.

Minutes of the Security Meeting

Attendees at the Security Meeting should be fully briefed on any supporting information and justification to make the decision for the scanning arrangements for the next month. Then, any decisions must be explained and recorded in the minutes, with supporting information, data and evidence placed on the minutes.

⁴ Intelligence is defined by the [Intelligence Collection, Analysis and Dissemination Policy Framework](#)

The minutes must set out clearly the cohorts and circumstances in which scanning will take place. This will form part of the justification of why a particular prisoner was selected to be X-ray body scanned as part of a cohort in that instance.

The minutes should specify the attendees of the meeting, any views and opinions of the cohort scans, including any objections and clearly detail the justification. They should be signed by the chair and state when the next Security Meeting and review will take place. These minutes are auditable documents and as such could be reviewed as part of the Security Audit, they may also be subject to disclosure, for example as part of legal proceedings.