**IMB health and safety guidance for direct monitoring during the COVID-19 outbreak**

*Items marked \* have been updated since the version issued on 17 June*

**Introduction and context**

1. The majority of IMBs moved to remote monitoring when COVID-19 was first recorded in prisons/the IDE and the UK entered lockdown. Guidance was provided for the few members or boards who decided it was safe to continue with some form of direct contact with the establishment. As the government starts to ease the national lockdown, and more boards are considering carrying out direct visits, we have revised the guidance and provided more detail on risks and how to assess them. The Management Board will review this guidance on a monthly basis to reflect any changes in national or HMPPS/Home Office risks and circumstances.
2. This guidance is designed to support boards and members wishing to return to direct monitoring, but only when it is safe to do so. It is acknowledged that many members will still be unable to visit prisons or IRCs at present, due to their own or others’ vulnerability or age. There is no requirement for members to return to monitoring directly.
3. At all times members who choose to visit establishments should adhere to public health advice and to the ‘do no harm’ principle and should comply with any infection control measures in place in the establishment. This guidance sets out key processes that should be followed and actions that should be taken when visiting the establishment, in order to reduce risks to themselves, their household, prison/IRC staff and prisoners/detainees.
4. The main issues to consider before returning to direct monitoring include:

* health and wellbeing of members
* current infection rates in the establishment and in the community
* method of transport to the establishment
* areas to be visited within the establishment
* whether alternative methods of monitoring are available

**Rationale for considering resuming direct monitoring**

1. The World Health Organisation is explicit about the [importance of oversight and independent scrutiny](https://www.euro.who.int/__data/assets/pdf_file/0019/434026/Preparedness-prevention-and-control-of-COVID-19-in-prisons.pdf?dm_i=21A8,6SM73,FLWT3F,R7PLZ,1) during the pandemic:

*“The COVID-19 outbreak must not be used as a justification for objecting to external inspection of prisons and other places of detention by independent international or national bodies whose mandate is to prevent torture and other cruel, inhuman or degrading treatment or punishment; such bodies include national preventive mechanisms under the Optional Protocol to the Convention against torture”.*

1. However, as stated above, no member should feel obliged to monitor directly. Members are unpaid public appointees and their welfare and wellbeing, and that of their families, should always be a key consideration. The decision about whether to visit the establishment remains with the individual member, who should also consider how their visit feeds into the overall monitoring priorities and activities of the board.
2. Visits to the establishment may take a number of forms: from going into a Board office which is outside the prison gate to accessing wings or living units. The risks will therefore be different, depending on the extent of contact with prisoners/detainees and staff.
3. Boards may have new members, who have not yet been into the establishment, and/or who will still require to be accompanied on a visit. This will be possible if another board member is directly monitoring, but only if social distancing, and the other elements of this guidance, can be ensured
4. If a member is considering visiting the establishment, or any part of it:

* they must read this guidance first and ensure that they follow it, as well as any infection control measures in the establishment
* they should notify the Chair that they are intending to resume direct monitoring, including whether this is to visit the administrative block or also any residential units/wings.

1. **Essential workers:** The Ministry of Justice has designated IMB members as essential workers, and members can request documentation from the Secretariat to confirm this to any authorities seeking to understand the reason for travel. Members should make requests via [imb@justice.gov.uk](mailto:imb@justice.gov.uk) in the first instance.
2. **Exclusions:** it is strongly recommended that members who are classified as more vulnerable to severe illness as a result of COVID-19 and/or who have [recognised medical conditions](https://www.gov.uk/government/publications/staying-alert-and-safe-social-distancing/staying-alert-and-safe-social-distancing) should not make visits to the establishment. This recommendation also applies if members have vulnerable family or household members. Some members may also need to prioritise caring or childcare responsibilities, or to support COVID responses in the community, and may have limited time for monitoring. There will still be many opportunities for remote monitoring, including telephoning in to key meetings and, where available, participating in call handling on the 0800 number. Please [contact the Secretariat](mailto:imb@justice.gov.uk) if additional support or guidance would be helpful.
3. **Frequency of visiting:** Members should continue to aim to minimise risks of spreading the virus by examining whether the information can be obtained remotely, eg by telephone or Zoom or through documentation. Board meetings should still be held remotely either by telephone or video conferencing. Boards are no longer advised to limit visits to once a week but should undertake the minimum number of visits required to supplement the information provided remotely and to undertake other essential monitoring functions that cannot be done remotely. This will also be dependent on Board capacity and member availability.
4. **Members with symptoms:** members may contract the virus in the community. All members must report any clinical signs of infection to the chair of the Board immediately, and must undergo an appropriate length of self-isolation prior to returning to monitoring in line with government and NHS advice.[[1]](#footnote-1) Members must also self-isolate is anyone in their household experiences symptoms or if they believe they have been exposed to anyone else who has. Members who have symptoms qualify for priority testing and can [make a self-referral](#arrange-a-test-if-youre-an-essential-worker).
5. **Feeling unwell**: if members begin to feel unwell while on site or believe that they are developing symptoms of COVID-19, they should be vigilant in maintaining a social distance and arrange to leave the establishment as soon as possible. They should inform the chair prior to leaving, and the chair should inform the establishment as soon as possible. Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) will apply and remote contact with the health and safety lead in the establishment should be made as soon as possible.
6. **\*Contact Tracing:** if a member who has been visiting and prison/IDE receives a laboratory confirmed positive COVID-19 test result, they should immediately notify the Governor/Director of the establishment and the chair of the Board. Contact Tracing will then be initiated via the establishment. The Governor/Director will notify the local Health Protection Team (HPT) and will need to provide contact details (name, address, telephone number and date of birth) where possible. COVID-19 Leads in the prison will also contact the member to establish their contacts within the prison (staff and prisoners). The establishment will then follow the HMPPS Contact and Tracing guidance. This means that members do not need to supply NHS Track and Trace with the names of members of staff or prisoners, as the establishment will do that on their behalf. Members may be traced by the national Trace and Test programme if they have been in touch with someone with COVID-19. In this case, if the member has visited the establishment in the last 14 days, they must notify the Governor/Director and Chair and should not visit the establishment for 14 days. It should be noted that HMPPS is clear that the details must not be passed to anyone other than the SMT and HPT.
7. **\*Antibody Testing:** These tests, which establish whether someone has previously had COVID-19, are being piloted in 28 prisons and, currently, members are not eligible to take part. If the position changes, new guidance will be issued.

**Recording the decision to directly monitor**

1. If any member of a Board is considering direct monitoring it should be discussed with the Chair. Chairs should ensure that at monthly Board meetings that the minutes record which board members, if any, are visiting the establishment. It is good practice for the Board, at each meeting, to discuss the guidance and the current situation in relation to direct and remote monitoring, in light of current risks in the prison/IRC and the community.
2. Boards may also wish to consult with the establishment’s health and safety personnel, and must follow their guidance and processes for infection control. However, the decision to enter the establishment remains a matter for each individual member, and members should read the guidance before assessing their own situation.
3. On arrival at an establishment, members should ask for an update before entering, to understand whether there are any significant current health risks, such as a COVID outbreak.
4. If there is a confirmed COVID-19 outbreak at the establishment, the presumption should be that visits will cease unless the Board is satisfied there is sufficient isolation of the case(s): eg in a specific area of the establishment clearly separate from the areas that will be visited by the member. Boards should record this decision formally, usually within Board minutes.

**Travelling to and from establishments**

1. **Using your own car:** Using public transport presents additional risk of infection. Members are strongly encouraged to reduce this risk by using their own cars or private transport. Due to the current circumstances, members should not carry passengers, unless in the same household. If sharing cars is unavoidable, a single passenger can be carried for a short journey with appropriate social distancing.
2. **Taxis**: if it is not possible to drive (for example, if there is no available parking or members do not drive/have access to a car) members should use taxis to visit the establishment. Where possible, taxis with screens between driver and passenger should be used to reduce the risk of infection. Please contact the Secretariat for more guidance in the first instance.

**Reducing transmission of the COVID-19 virus**

1. Members should follow the usual Public Health England advice on personal hygiene:

**Washing hands:** members should wash their hands frequently and for at least 20 seconds.They should do this upon arrival at an establishment, immediately upon arrival back at home, and frequently during the visit. Members should be aware that keys, locks, gates, railings and door handles are a high-risk contamination point. Members should avoid touching their face after making contact with these surfaces and follow [this practical guide on hand washing](https://www.nhs.uk/live-well/healthy-body/best-way-to-wash-your-hands/).

**Hand sanitiser:** all members should carry hand sanitiser if at all possible. This is also now available on entry to and within most establishments. Members may also seek permission from the establishment to bring in their own hand sanitiser. The cost of this can be reclaimed through ‘other expenses’.

1. **Bringing items into an establishment:** Members should limit the items they bring into an establishment. Notepads should not be placed on surfaces, and pens should remain in the member’s possession and not placed in the mouth.
2. **\*Face coverings** Since the issuing of guidance on 17 June, the position for visitors to immigration removal centres, STHFS and prisons has developed further. Details for each type of establishment are listed below.

Please note there is a difference between face coverings, which if needed can be made at home, and face masks, which form part of PPE. This guidance relates to face coverings and further government guidance is provided here

<https://www.gov.uk/government/news/public-advised-to-cover-faces-in-enclosed-spaces>

Face coverings are not deemed to be personal protective equipment and should only be seen as a low level method of limiting the transmission of infection. Members can source their own face coverings and reclaim expenses via “other expenses”.

Please can members be aware that face coverings can cause significant difficulties for people who are hard of hearing or rely on lip reading.

Standard face coverings are available through pharmacists and (including ones designed for lipreading) on-line.

**STHFs** Mitie require all members attending a STHFs to wear a face covering, both for travelling and attending the establishment because of the confined space in these particular environments. They will supply these.

**Immigration removal centres** Members may wear face coverings if they choose; this has been agreed with the Home Office.

**Prisons** HMPPS’ preferred position is that IMB members align with staff and prisoners, who will not be wearing face coverings unless the 2m rule cannot be maintained. However, some other organisations, including HMIP, are choosing to wear face coverings in certain situations, and therefore members may wish to consider having a face covering to hand for areas such as narrow corridors, gates or other enclosed places where distancing is not feasible. As above the costs of these can be claimed back on expenses.

Currently, there are very low rates of infection in prisons, and the prisoner cohorting arrangements minimise risks within the establishment. Members should be very vigilant about social distancing, not least because of the risks they may pose to those within the establishment, as well as the other way round.

1. **Keys:** members should familiarise themselves with, and then comply with, the local guidance on hygiene requirements with regard to key handling (eg wiping down keys before and after use).
2. **Food:** members should avoid eating in the establishment and should not taste food as part of monitoring duties. If it is essential to bring in food, members should also provide their own utensils and adhere to the usual guidance about hand-washing and washing of food and utensils both in the establishment and on return home.
3. **Social distancing**: members are expected to maintain **two metres of social distance** from others whilst monitoring. Some landings or corridors are less than two metres in width and members should consider this when moving around the establishment, making every effort to plan a route which enables them to maintain distance from others. When using narrow corridors and going through gates, members should give way to others and avoid these areas during organised movements such as meals and exercise.
4. **Maintaining a clean office:** while some level of cleaning of offices may be undertaken as part of HMPPS/HO cleaning policies, during COVID-19 all boards should work with the establishment to confirm that cleaning has been carried out and to acquire sufficient cleaning materials to allow cleaning by members. It may be possible to bring in antiseptic wipes, and members can reclaim the cost through expenses. If establishments cannot provide the required cleaning materials, members should contact the secretariat for advice.

* All office surfaces including desks, chairs, keyboards, screens, filing cabinet handles and any equipment such as kettles should be cleaned, using disposable cloths or wipes, on entry and each time before leaving. This may mean cleaning several times a day if other individuals can use the office while the member is out elsewhere in the establishment.
* If the office is multi-use, the Board should seek assurances from the prison or IRC that the office will be thoroughly cleaned after each use.
* If the size of the IMB office allows, more than one member may be there at the same time, as long as social distancing of two metres can be maintained. If possible, any windows should be kept open.
* Some offices are small and will not allow social distancing. In these cases, members should coordinate visits so only one member is in the office at one time. Individuals other than IMB members should be discouraged from using the space.
* Members may prefer to complete administrative tasks at home rather than use shared desk space and IT equipment and this is permissible during this period. Information assurance guidance can be found on the [members’ website](https://my.imb.org.uk/the-board/legal-framework/confidentiality-and-information-assurance/) and should be strictly adhered to.

1. **Visiting a wing/unit:** members should be careful when entering areas where air flow is limited, such as small offices and cells. They should talk to staff in open spaces where possible and whilst observing social distance. They should not talk to prisoners/detainees through the gaps in cell doors as air flows can be directed to either person’s face. If they wish to speak to a prisoner/detainee directly, it is advised that this is done with the door open and standing at least two metres apart, even if this means confidentiality is compromised; or alternatively asking for the prisoner or detainee to be moved to a suitable alternative space. Where prisoners or detainees have in-cell phones, it will be possible to communicate in this way with randomly selected individuals.
2. **Visiting a cohorted unit in a prison/IRC:** Establishments are required to designate three separate units: a reverse cohorting unit for the temporary separation of newly received prisoners/detainees; a protective isolation unit for the temporary isolation of symptomatic prisoners/detainees; and a shielding unit for those prisoners/detainees in the NHS England vulnerable persons cohort for 12 weeks. Symptomatic prisoners/detainees may also be isolated in their cells. Members should pay attention to any signage or briefing notes that identify areas where individuals may be isolated due to COVID-19 and exclude themselves from contact to prevent cross infection. It is recognised that there are specific risks and stresses for prisoners and detainees in these environments, and in particular that there has been criticism of the very restrictive regime for isolated prisoners. Members will want to look at ways of monitoring the experience of these prisoners or detainees, and it may be possible to make direct contact by telephone or email. Only in very exceptional circumstances where no other option is identified should members enter any of these three cohorted units or have any face to face contact with symptomatic prisoners or detainees. If it is essential in exceptional circumstances to enter, the Chair must be informed of this and the reason for it, and the appropriate personal protective equipment (PPE) should be used. If PPE is not available a member will not be able to enter.
3. **Personal Protective Equipment (PPE):** There are various kinds of PPE, from simple face coverings, through medical masks, to full protective clothing. As stated above, members should not, unless in very exceptional circumstances, place themselves in a situation where they would require either of the last two, both for their own safety and also so as not to deplete supplies in the establishment. Where this is exceptionally necessary, establishments will provide the necessary equipment and instructions on its use. At present, face coverings are not required or issued either for staff or prisoners, who should rely on social distancing (see para 25).
4. **Visiting healthcare:** it is possible that in-patient units may be used to isolate prisoners/detainees with suspected COVID-19 or who are being isolated for their own protection, therefore visiting those units in these circumstances should only be in exceptional circumstances as above. Alternative methods of communication with prisoners/detainees and staff should be explored.
5. **Visiting segregation/separation and attending reviews:** As above,members should not talk to prisoners or detainees through the gaps in cell or equivalent doors. If a prisoner/detainee requires multiple staff to unlock him/her, alternative methods should be sought to communicate with him/her. Whether to attend a separation or segregation review face to face or remotely will vary according to local circumstances (for example depending on whether social distancing can be maintained, and whether there is the facility to ‘attend’ by telephone) and should be considered by the Board as part of the risk assessment.
6. **Visiting education and workshops:** further guidance will follow once these services have resumed.
7. **Emergency resuscitation:** members must **not** attend any emergency resuscitation incidents as this will require an additional level of PPE due to the aerosol effect of the procedure.
8. **Serious incidents:** Boards can already attend the command suite in order to monitor serious incidents and it is now possible to attend the location of the incident in line with the procedures above, maintaining two metres’ distance. If this is not feasible, Boards can monitor the CCTV or body worn video footage. If a serious incident takes place in a location where there are or may be detainees or prisoners who are symptomatic, members attending should wear PPE if they attend.

**Additional guidance available to members:**

Additional guidance on specific IMB working practices:<https://my.imb.org.uk/covid-information-hub/>

(Any member who cannot access the members website where this guidance is held should email [imbtraining@justice.gov.uk](mailto:imbtraining@justice.gov.uk) to obtain log-in details or password reset.)

Government guidance: https://www.gov.uk/government/collections/coronavirus-covid-19-list-of-guidance

NHS guidance: <https://www.nhs.uk/conditions/coronavirus-covid-19/>

1. [↑](#footnote-ref-1)