



# Ministry of JUSTICE

National Offender Management Service

National Security Framework		Ref: NSF 6.2
SECURITY MANAGEMENT FUNCTION		
Management and Security of Keys and Locks		
This instruction applies to :-		Reference :-
NOMS Agency staff (Headquarters) Prisons		<b>PSI 55/2011</b>
Issue Date	Effective Date	Expiry Date
26 September 2011	1 October 2011	30 September 2015
Issued on the authority of	NOMS Agency Board	
For action by	All staff responsible for the development and publication of policy and instructions.  Deputy Directors of Custody, Governors/Directors of Contracted Prisons, Heads of Groups. In this document, the term Governor also applies to Directors of Contracted Prisons.	
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Associated documents	Related Service Specification Related Operating Models Related Direct Service Costs and Assumptions paper Related Cost Spreadsheets See: <a href="#">NOMS directory of service specifications</a>	
Audit/monitoring :		
Compliance with this instruction will be monitored by Audit and Corporate Assurance and through internal self-audit.		
Introduces amendments to the following documents : -		
National Security Framework Function 2 (Accounting and Control)		

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[NOMS directory of service specifications](#)

## 1. Executive Summary

### Background

- 1.1 This instruction is one of a number of Prison Service Instructions (PSIs) which forms part of the Security Management function of the National Security Framework NSF). All Security Management instructions can be accessed via the National Security Framework website. This PSI supports the Security Management specification.

### Desired Outcomes

- 1.2 Escapes and absconds are prevented.
- 1.3 Threats to the security, safety, order and control of the establishment are detected and deterred.
- 1.4 Crime and suspected criminal activity is detected, reported and deterred.
- 1.5 There is effective and lawful information exchange with establishment staff.
- 1.6 There is effective and lawful information exchange and working arrangements with other agencies.
- 1.7 Security measures are applied lawfully, safely, fairly, proportionately and decently.

### Application

- 1.8 The National Security Framework (NSF) incorporates mandatory requirements derived from the specifications relevant to its specific policy areas. This PSI incorporates mandatory requirements derived from the Security Management specifications, which are highlighted in the shaded boxes.

### Mandatory Action

- 1.9 *Governors and Directors of contracted prisons must ensure that all staff are familiar with their LSS which sets out the local instructions that comply with the requirements set out within this PSI and the security management specification.*

### Resource Impact

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

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(signed)

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## OPERATIONAL INSTRUCTIONS

Text within shaded boxes indicates requirements from the "Provision of a Secure Operating Environment – Security Management" specification document.

### 2. STORAGE & ISSUE OF KEYS

Security Keys and security/personal safety equipment is stored, carried and used correctly.

#### General - All staff

- 2.1 *All Class I, II and III security keys (and bunches of such except handcuff keys) for use by staff must be given a number and stored in a key safe in a secure location. (See Annex D for the definition of each type of security key).*
- 2.2 *Instructions must be in place to manage any member of staff arriving at the prison without a key chain.*
- 2.3 *The key safe must be locked overnight / when not in use and only accessed by authorised staff.*
- 2.4 *The numbered positions in the key safe must never be empty. Keys should only be issued in exchange for a key tally or other individual identification. This must be placed on the vacant numbered position when the keys have been issued.*
- 2.5 *Arrangements must be in place to prevent key holders leaving the establishment with their keys.*

#### Night State

- 2.6 Detailed policy on the management of Keys and locks during the night state are set out **within** (NSF 8.1 Management and Security of Nights (PSI 24/2011))

#### Staff Responsible for Maintaining the LSS

- 2.7 *The Local Security Strategy (LSS) must set out the procedures for the secure storage, allocation, issue, return and safe keeping of keys. Gate Staff are usually responsible for controlling and managing keys. NSF 5.1 - Management and Security of Gate Services (PSI 14/2011)*
- 2.8 *The Local Security Strategy (LSS) must set out the procedures for the secure storage, allocation, issue, return and safe keeping of personal issue security and safety equipment (for example batons, whistles and cut-down tools).*
- 2.9 *Spare security keys must be kept and stored under the arrangements set out in the LSS.*
- 2.10 *All Class I, II and III security keys (and bunches of such except handcuff keys) for use by staff must be given a number and stored in a key safe in a secure location. (See Annex D for the definition of each type of security key).*

- 2.11 *The storage and issue of all other keys including works, handcuff and body belt keys (NSF 7.1 External Prisoner Movement PSI XX/2011 (To be published) must be set out in the LSS.*
- 2.12 *The LSS must set out the procedures for the location and use of Class I doubles keys and Class III master keys. The number of keys in these suites must be limited in number and controlled carefully.*
- 2.13 *The LSS must set out the arrangements for the secure issue, retrieval and storage of keys.*
- 2.14 *The LSS must set out the procedures for the secure use of Key safes including access for auditors and Senior Managers. Key safes must not be unlocked in the presence of prisoners or visitors.*

Allocated security keys are recorded and accounted for and key ledgers are maintained.

- 2.15 *The LSS must set out the agreed frequency and type of key checks to be made and which member of staff must do each check. The minimum check for every establishment is once daily after lock up each night (NSF 8.1 Management and Security of Nights (PSI 24/2011)). A record of each check must be made in the Gate Occurrence Book or equivalent.*
- 2.16 *The LSS must set out the procedures for the restricted use of keys during the night state. (NSF 8.1 Management and Security of Nights (PSI 24/2011))*
- 2.17 *No security keys must be taken out of the prison, unless agreed by the Governor/Director and the circumstances set out within the LSS.*

#### Electronic Key Management Systems

- 2.18 *The LSS should set out the operational procedures for fully automated electronic key safes where they are installed. This should include details of basic training, any security measures such as finger biometrics, and contingency plans in case of failure (auxiliary power, manual operation etc).*

### **3. BEHAVIOUR TO MAINTAIN KEY AND LOCK SECURITY**

#### General – All Staff

- 3.1 *Keys must not be exposed during filming or close-up photography.*
- 3.2 *No prisoner must be allowed to handle or examine any key or lock.*
- 3.3 *Keys must be kept concealed when about the person.*
- 3.4 *Once drawn, keys must be attached to the person by a chain at all times. The LSS must set out clearly any local arrangements for the secure management and storage of keys should staff need to remove their keys or key chain for any reason (such as control and restraint or using the gym).*
- 3.5 *Key rings must be sealed with tamper evident seals to prevent unauthorised removal or adding of keys to a bunch. Key holders must not alter their allocated key bunch without the authority of the Governor/Director or their nominated manager.*
- 3.6 *Excessive force must not be used to open any lock. Any difficulty in opening any lock must be reported immediately to the Facilities Management Services Site Manager and the*

Security Department in case a key/lock compromise has occurred. All key/lock compromises are reportable incidents to the single incident line 0207 147 4071 and on P-Nomis/IRS (see Annex C).

#### Staff Responsible for Maintaining the LSS

#### 3.7 The Local Security Strategy must:

- identify who can draw keys and the type of keys they can hold;
- sets out the procedures and training that anyone issued with keys must complete to ensure that they are competent in the secure use of keys and locks;
- be clear that Class I and II locks must be locked back securely if left open;
- be clear staff must not leave Class I locks (including wooden outer doors) unlocked or unattended. This is to prevent prisoners from tampering with the lock;
- be clear that Class I works locks must be double locked at all times when the lock is not in use;
- be clear that Class I locks must be double locked at night unless the Deputy Director of Custody (or the Director of High Security Prisons) has exceptionally agreed otherwise;
- be clear that Class I locks must only be locked back in accordance with the procedures set out within the LSS.

#### 4. **INVENTORY OF KEYS HELD**

New, unissued and withdrawn security keys (including restraint keys) are securely stored, recorded and accounted for.

#### General – All Staff

#### 4.1 Each prison must keep a ledger /record of all keys, including all types of handcuff/restraint keys showing the following information:

- The running total for each type of key in stock including those not in use and stored securely in a safe;
- The numbers of each type received from FM Operations Secure Lock Store and the date received;
- The number of each type of key in use;
- Information about individual keys not on main locking suites;
- Information about when keys are returned to Security Locking Section for destruction;
- Gross total for each type of keys held;
- Crown Court keys (where appropriate).

- 4.2 *Every six months an audit of all keys in the establishment must be made against the prison's own key ledger. The result must be recorded in the ledger and any discrepancies reported immediately to the Governor/Director and the Deputy Director of Custody and further investigations initiated.*

## **5. LOCKING SCHEDULES**

### General – All Staff

- 5.1 *There must be a complete and up to date set of locking schedules and floor plans for the establishment held by the facilities manager.*
- 5.2 *No locks or alternative suiting may be installed, including padlocks and rim mounted locks, except those specified on the schedule.*
- 5.3 *Requests for changes to locking schedules must be made to the Security Locking Section of FM Operations. Requests must be accompanied by a draft revised plan and schedule showing full details of the changes requested.*
- 5.4 *Spare or replacement keys and locks must be ordered from FM Operations Secure Lock Store. Keys must not be obtained from local sources, or cut on key cutting machines.*
- 5.5 *Obsolete or damaged keys and levers must be returned to FM Operations Secure Lock Store for safe disposal. They must be returned with the appropriate documentation that gives the quantity, type, code and suiting information and a Condemnation form A40 completed (See Annex E).*
- 5.6 *Local arrangements must be drawn up for the acceptance of new keys from FM Operations Secure Lock Store. Keys must be counted immediately, and the total recorded in both the key ledger and the delivery documentation (which must be returned to FM Operations Secure Lock Store).*

### Locking the Healthcare centre

- 5.7 *The head of healthcare with the agreement of the heads of operations and security, must set out in the LSS a policy on access to the pharmacy to cover normal hours, out-of-hours and emergency situations. These arrangements must include provision for the control of keys, dispensing of medication and updating the drugs registry.*
- 5.8 *The LSS must set out a secure method of conveying drugs to units and wings which includes the method of dispensing them safely. These procedures must have been agreed with The Governor/Director, Deputy Director of Custody, Senior Healthcare professional and the prison pharmacist.*
- 5.9 *Controlled drugs must always be kept in a locked cabinet in a secure room and any drugs to be disposed of must to be dealt with in accordance with legally required standards.*
- 5.10 *The prison pharmacist has to comply with the requirements of Health Services for Prisoners Standard.*

## 6. CROWN COURT LOCKING

- 6.1 The current policy of nominated governors having responsibility for the locking of their local Crown Court custody suite will continue. Funding for this work must be profiled into the prisons individual financial plans where such a responsibility exists.
- 6.2 FM Operations Secure Lock Store at Lindholme will supply and issue the locks for Crown Court custody suites as required. Cell locks will be provided in suites with a single master key. Separate suites will be provided for male and female cells where they exist.
- 6.3 *Existing Crown Court cells using gates in place of cell doors must have physical protection to the lock to prevent defendants reaching or, tampering with the lock or keyhole from within the cell.*
- 6.4 *Keys must be kept secure at all times to maintain key and lock security and kept in a locked key safe when not in use.*
- 6.5 Suites of control locks will be provided in the following locations:
- Doors on the perimeter of the secure area giving access to it;
  - Female defendants area;
  - All other areas excluding stores rooms, offices, rest rooms and interview rooms.
- 6.6 To ensure security, the method of keying "Control Locks" will follow current NOMS' policy for keying within prisons. All doors that permit access to the Custody Area from other parts of the court and the external entry points will be fitted with keyholes on the secure side only.
- 6.7 *Key bunches must not be taken by individual members of staff/contractor's staff outside of the Crown Court Secure Area which is bounded by the prisoner entrance, the dock entrance and the door between the visits waiting area and the secure area. Staff/contractors working within the visits area will require a single suited key.*
- 6.8 *All security locks in the custody area must be left in the unlocked and open condition when the secure area is not in use thereby obviating the necessity to leave keys with the court administration.*
- 6.9 The LSS must set out *local agreements for those Crown Courts attached directly to a police station to allow the police to use the secure cells when the Court is not sitting (i.e. normally weekends and bank holidays). The control of any security keys designated for police use must be arranged so that signed receipts are obtained from any police officers issued with the keys to provide a complete audit trail of their use. When not in use the key bunch must be securely stored in a key safe which is under the control of the Senior Police Officer on duty.*
- 6.10 FM Operations Secure Lock Store will undertake locking layouts for new or refurbished Crown Courts upon submission of a complete set of floor plans and door schedules for all levels of the court, in accordance with Section 13, paragraph 4.13 of the **Crown Courts Standards and Design Guide**.
- 6.11 It is the duty of the nominated manager to ensure that key security and control are maintained in all parts of the custody area through regular visual and physical inspections of those parts of the Crown Court for which the escort contractors are responsible.



- 6.12 *The security custody suite keys, where they exist, must be checked and counted at the beginning of each working day. The LSS should state clearly the frequency with which a full key check must be conducted.*
- 6.13 *The nominated manager must report immediately by telephone and in writing, any potential security deficiencies to the authority responsible for the maintenance of the fabric of the court building and/or FM Operations Secure Lock Store.*

## **7. PADLOCKS**

7.1 *Padlocks supplied by FM Operations Secure Lock Store may be used, where specified on the locking schedule. Where padlocks are in use staff must be aware of where the keys are held. Examples of padlock use:*

- *Climbing aids/ladders;*
- *Dustbins;*
- *Skips;*
- *Vehicles;*
- *Activation of local contingency plans.*

## **8. MANAGING A KEY/LOCK INCIDENT**

8.1 *The local security strategy must include procedures for staff to report any of the following immediately:*

- *The loss, or suspected loss of any key;*
- *The actual or possible compromise of any key;*
- *The actual or possible compromise of any lock;*
- *Damage to any key or lock.*

8.2 *Thee LSS should have procedures and contingency plans in place to comply with PSO 1400 – “The Contingency Planning Manual” for enquiring immediately and thoroughly into any suspected incident compromise (See Annex C). Any actual or apparent loss of a key, or any suspected or actual key or lock incident, must be reported to the following:*

- *On the single incident line 0207 147 4021;*
- *FM Operations locking store;*
- *The Deputy Director of Custody (DDC), or where appropriate the Director of High Security Prisons.*

8.3 *Incidents turning out to be false alarms must be re-submitted as a minor incident on P-Nomis/IRS.*

8.4 *The decision to re-lock an establishment in the event of a key or lock incident may only be made by the relevant Deputy Director of Custody for the establishment concerned.*



**GOVERNOR'S KEY LEDGER TEMPLATE - GUIDE**

<b>GOVERNOR'S KEY LEDGER</b>								
<b>HMP/YOI:</b>		Romney		<b>Folio No</b>		1		
<b>Key No</b>		RMA/A1		<b>Description</b>		General Office Pass		
<b>Bin Slot No</b>		25		<b>Sheet No</b>		1		
Date	Description of Transaction	Initials	Receipts	Issues	Stock			Total Holding
					Sound	Worn	In Use	
1 10.1.1	Received from Locking Section (first allocation)		250		250			250
1 15.1.1	Issued to Gate key safe			240	10		24	250
1 15.2.1	Issued to Gate key safe (additional staff)			8	2		8 24	250
1 25.2.1	Received from Locking Section (additional stock)		20		22		8 24	270
4.3.11	Exchange with Gate safe (Worn/Broken)		4	4	18	4	8 24	270
5.3.11	Issued to Gate key safe (audit team keys)			10	8	4	8 25	270
1 12.3.1	Returned to Locking Section for disposal			4	8	-	8 25	266
1 25.3.1	Exchange with Gate safe (worn/broken)		2	2	6	2	8 25	266
1 30.3.1	Returned from Gate safe (ex Audit team)		10		16	2	8 24	266
1 31.3.1	Quarterly Key Audit				16	2	8 24	266

**Reporting A Key Lock Incident**

If a key or locking system is endangered or exposed, the scale of the incident should be subject to a risk assessment.

This risk should be scaled depending on the degree of severity e.g. if a key is taken from an establishment and returned immediately and has not left the possession of the member of staff and this can be verified, then the level of risk is low. If a key is lost and found to be in the possession of a prisoner then this would pose a significant risk and the level of risk is high. This process of assessment could be described in levels.

- Level 1 – **High risk** of disclosure, investigations taking place, situation being monitored. **Relock essential.**
- Level 2 – **Medium risk** of disclosure, situation being monitored to establish if a relock is necessary. **Relock possible.**
- Level 3 – **Low risk** of disclosure, minor incident that may have disclosed the key/lock systems. **Small chance of relock.**
- Level 4 – **Very low risk** of disclosure, but a notifiable minor incident that may have compromised the key/lock systems but has not led to a disclosure. **No relock.**
- Level 5 - **No Risk** of disclosure. **No relock**

***There must not be any delay in the completion of the key inventory check, a systematic search and, if necessary, work to change some or all of the locks.***

Authority to relock must be sought from the Deputy Director of Custody (DDC).

All incidents relating to locks and keys should be reported as 'key / lock incidents' not miscellaneous' incidents e.g. Deliberate jamming of locks with foreign objects, unique keys lost or unaccounted for doors (including cell doors) and gates found to be unlocked and insecure etc.

**Text according to circumstances. May have multiple linked offender/prisoner involvement ensuring correct role is selected.**

**LOCKING (definitions and alternatives)**

**Class I locks**

Class I locks can be mechanical magnetic or electronic. Their purpose is to form a secure perimeter and they may be found on:

- Cell doors (including gated cells);
- Gates on the perimeter of all buildings containing prisoner accommodation;
- The main entrance to the prison;
- Control and restraint staircases: external ground floor gates, control and restraint doors, and the staircase side of bolt holes (keyhole on the secure side only);
- Access to perimeter sterile areas;
- The perimeter security of Close Supervision Centres (CSCs);
- Control and restraint staircases, “weather” doors, escape doors from landings to a bolt-hole (key hole on both sides), plus a bolt on the sterile side;

**Class II locks**

Class II locks can be mechanical or magnetic. They are used in locations where a lower level of security and control is required, and they may be fitted to:

- The prisoners’ side of doors next to building perimeter gates which themselves are fitted with a Class I lock;
- Internal control doors and gates within the secured perimeter of a building;
- Doors and gates of other buildings within the secure perimeter of the prison, such as workshops, education facilities, and gymnasias;
- Gates in zone control fences;
- Control and restraint staircases, “weather” doors, escape doors from landings to a bolt-hole (key hole on both sides), plus a bolt on the sterile side;
- Other than where authorised during the night state, staff must not leave any Class II lock unlocked or unattended. This is to prevent prisoners from tampering with the lock. Lock backs may be used;
- Staff must not leave Class II locks (including wooden outer doors) unlocked or unattended. This is to prevent prisoners from tampering with the lock.

### **Class III locks (EX, AX, EN etc)**

Examples of where these will normally be used are:

- Internal doors such as offices, locker rooms, and staff toilets;
- The LSS must set a target for the number of different keys in use which must not exceed 25 on any Class 3 suite. Annex E
- Accountable suites of locks fitted internally and externally to prisoner areas, which are additional to the Class II lock and are locked when the facility is not in use;
- Buildings outside of the secure perimeter of the prison such as the visitor centre, staff locker rooms and the officer's mess;

**Locking Condemnation Form – A40**



**SCHEDULE OF LOCKS AND KEYS FOR CONDEMNATION**

**A40**

**FACILITIES MANAGEMENT (LOCKING)**

ESTABLISHMENT:

SIGNED:

LSR REFERENCE \*:

NAME:  Originator  Governor

Office Use Only:

DATE:

Box Number	Lock Type (or other part reference)	CLASS 1 & 2					CLASS 3 Locks or Lever Packs	OTHER Other Items	TOTAL LOCKS	SuiteCode (Identify whether current or disclosed)		KEYS
		With Short Fore- Ends (Gates)	With Long Fore- Ends (Doors)	Rebated	Inner Locking Units (Cell & Electric locks only)					Master Ref.	Servant Ref.	
					LH	RH	Nr	Nr				
Ref.	Eg 3G112Mk3, 3G110	Nr	Nr	Nr	Nr	Nr	Nr	Nr	Ref.	Ref.	Nr	

\* Insert relevant Locks And Spares Requisition form reference if new locks &/or keys are to be ordered to replace those condemned.

Received by FM(L)  Signed  Date

# HQ policy

## *Equality Impact Assessment*

<b>Policy</b>	The Management and Security of Keys and Locks
<b>Policy lead</b>	Guy Woollven
<b>Group</b>	Security Policy Unit
<b>Directorate</b>	National Operational Services Directorate.

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## **What is an Equality Impact Assessment (EIA)?**

An EIA is a systematic appraisal of the (actual or potential) effects of a function or policy on different groups of people. It is conducted to ensure compliance with public duties on equality issues (which in some areas go beyond a requirement to eliminate discrimination and encompass a duty to promote equality), but more importantly to ensure effective policy making that meets the needs of all groups.

Like all other public bodies, the National Offender Management Service is required by law to conduct impact assessments of all functions and policies that are considered relevant to the public duties and to publish the results.

**An Equality Impact Assessment must be completed when developing a new function, policy or practice, or when revising an existing one.**

*In this context a **function** is any activity of the Prison Service, a **policy** is any prescription about how such a function is carried out, for instance an order, instruction or manual, and a **practice** is the way in which something is done, including key decisions and common practice in areas not covered by formal policy.*

**If you are completing this document as part of the OPG process, you must complete and return it together with the final Business case for OPG approval and publication alongside the relevant PSI.**

## **Your Equalities team**

It is important that all policies are informed by the knowledge of the impact of equalities issues accumulated across the organisation. Early in the policy development process, and before commencing the EIA, please contact the relevant equalities team to discuss the issues arising in your policy area.

- HR issues – Staff Diversity and Equality Team – 020 7217 6090 or [frank.colyer@noms.gsi.gov.uk](mailto:frank.colyer@noms.gsi.gov.uk)
- Service delivery issues relating to gender and younger offenders – Women and Young People’s Group – 020 7217 5048 or [matthew.armer@noms.gsi.gov.uk](mailto:matthew.armer@noms.gsi.gov.uk)
- All other service delivery issues – Race and Equalities Action Group – 020 7217 2521 or [REAG@noms.gsi.gov.uk](mailto:REAG@noms.gsi.gov.uk)

## **The EIA process**

The EIA has been constructed as a two-stage process in order to reduce the amount of work involved where a policy proves not to be relevant to any of the equalities issues.

The initial screening tool should be completed in all cases, but duplication of material between it and the full EIA should be avoided. For instance, where relevance to an equalities issue is self-evident or quickly identified this can be briefly noted on the initial screening and detailed consideration of that issue reserved for the full EIA.

Further guidance on this will be given by the relevant equalities team.

### **Stage 1 – initial screening**

The first stage of conducting an EIA is to screen the policy to determine its relevance to the various equalities issues. This will indicate whether or not a full impact assessment is required and which issues should be considered in it. The equalities issues that you should consider in completing this screening are:

- Race
- Gender
- Gender identity
- Disability
- Religion or belief
- Sexual orientation
- Age (including younger and older offenders).

## **Aims**

### **What are the aims of the policy?**

To update and replace the current Keys and locking policy contained within Function 2 of the National Security Framework (Accounting and Control) with a discreet “Keys and Locking” security function. It also supports the new “Security Management” Specification.

## **Effects**

### **What effects will the policy have on staff, offenders or other stakeholders?**

The new policy is more detailed. It takes into account operational and practical issues that have come to light through key and lock compromises in the recent past and also “future proofs” policy to allow for the development and innovation of electronic key and lock management systems.

## **Evidence**

### **Is there any existing evidence of this policy area being relevant to any equalities issue?**

*Identify existing sources of information about the operation and outcomes of the policy, such as operational feedback (including local monitoring and impact assessments)/Inspectorate and other relevant reports/complaints and litigation/relevant research publications etc. Does any of this evidence point towards relevance to any of the equalities issues?*

No. The policy should be applied equally and across the board to all staff with access to, or responsible for, the storage, issue and management of security keys and locks for use both within and outside a prison regardless of racial background or gender.

## **Stakeholders and feedback**

### **Describe the target group for the policy and list any other interested parties. What contact have you had with these groups?**

The following have been consulted twice on the draft of this PSI.

FM Security Locking, ACA, OSRR, The Chaplaincy, Service Delivery Group (women and young persons), HSPG, Security Group (other sections), NOMS Custodial property, OHSPS (health and safety), Employee Relations, NOG, DDC offices, PECS, POA, PGA, MOJ-TUS, MOJ Legal advisors, Offender Health, HMCIP, PPO, CPS, Private Sector prisons. SBC programme.

### **Do you have any feedback from stakeholders, particularly from groups representative of the various issues, that this policy is relevant to them?**

Nothing of any concern. In general the new policy has been welcomed as being clearer and easier to follow.

## Impact

Could the policy have a differential impact on staff, prisoners, visitors or other stakeholders on the basis of any of the equalities issues?

No. It will be introduced, applied and managed in line with national and local equality policies.

## Local discretion

Does the policy allow local discretion in the way in which it is implemented? If so, what safeguards are there to prevent inconsistent outcomes and/or differential treatment of different groups of people?

Yes. It is down to each individual establishment to implement the process through their Local Security Strategy which makes allowance for local issues (including the physical layout of the prison) but ensures that the mandatory elements are complied with at all time.

## Summary of relevance to equalities issues

Strand	Yes/No	Rationale
Race	NO	
Gender (including gender identity)	NO	
Disability	NO	
Religion or belief	NO	
Sexual orientation	NO	
Age (younger offenders)	NO	
Age (older offenders)	NO	

If you have answered 'Yes' to any of the equalities issues, a full impact assessment must be completed. Please proceed to STAGE 2 of the document.

If you have answered 'No' to all of the equalities issues, a full impact assessment will not be required, and this assessment can be signed off at this stage. You will, however, need to put in place monitoring arrangements to ensure that any future impact on any of the equalities issues is identified.

## Monitoring and review arrangements

Describe the systems that you are putting in place to manage the policy and to monitor its operation and outcomes in terms of the various equalities issues.

To be reviewed again upon the expiry and/or review of the PSI.

**State when a review will take place and how it will be conducted.**

The review will be conducted as outlined above and involve a further full consultation.

	<b>Name and signature</b>	<b>Date</b>
<b>Policy lead</b>	Guy Woollven	
<b>Head of group</b>	George Houghton	