



Deployment and Operation of X-Ray Body Scanners

Version 1.0 - February 2023

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1. PURPOSE AND AIMS

1.1 This Policy provides instruction and guidance on the deployment and operation of X-Ray Body Scanners on adult male prisoners (male students at Hydebank Wood) if there are concerns that prisoners are concealing prohibited and unauthorised articles through internal concealment. The mandatory requirements in this document set out the minimum required for each establishment to be compliant with legislation and NIPS Requirements for Practice.

2. CONSTRAINTS

2.1 This policy does not replace or change any requirements as set out by the NIPS Security Manual (Chapter 19 & 20) and an x-ray body scan must not be used as an alternative to a rub down or full search. Governors must therefore ensure that the use of all x-ray body scanners are consistent with this policy and existing NIPS search procedures and included in Local Search Strategies.

3. EVIDENCE

3.1 There is considerable evidence that prisoners who are entering or re-entering custody use internal secretion as a method of trafficking to convey articles into prison. This can include very significant quantities of drugs which, as well as being potentially extremely harmful to the individuals, have an injurious impact upon safe, decent and secure custody for people in custody and for staff, and impact upon rehabilitation and resettlement.

Technical testing of x-ray body scanners by HMPPS has shown that this technology is an effective means of identifying if a prisoner is concealing prohibited or unauthorised items internally. If used as part of the local search strategy and with appropriately trained staff the x-ray body scanning technology can prove effective in validating intelligence or reasonable suspicion that a prisoner is internally concealing prohibited or unauthorised articles.

4. LEGISLATIVE AND POLICY COMPLIANCE

4.1 The key legislation relevant to the use of x-ray body scanners are:

- Justification of Practices Involving Ionising Radiation Regulations 2004 (as amended) (JOPIIRR)
- Ionising Radiations Regulations (Northern Ireland) 2017
- Health and Safety at Work (Northern Ireland) Order 1978
- Prison Act (Northern Ireland) 1953
- Prisons and Young Offenders Centre (Northern Ireland) Rules 1995
- Human Rights Act 1998
- Data Protection Act 2018
- The Data Protection (Processing of Sensitive Personal Data) Order 2000
- General Data Protection Regulations 2018

4.2 The Justification of Practices Involving Ionising Radiation Regulations 2004 (as amended) requires that any use of x-ray technology is approved by a Justifying Authority. For NIPS 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 are complied with. The mandatory requirements within this policy and associated local SOP's translate the actions that are necessary for compliance with NIPS Requirements for Practice.

4.3 The key NIPS policies and guidance relevant to the use of x-ray body scanners are:

- Local Search Strategies
- Local Governors Orders
- NIPS Security Manual
- Managing Internal Secretion – Suspected or Confirmed.
- The Application of Rule 32 Policy and Guidance to Governors and Dept. of Justice Representatives
- Instruction to Governors 04/17

5. OUTCOMES

5.1 The overarching objective is to establish a mechanism to confidently detect when individuals are attempting to use internal concealment as a method of trafficking. By following this policy and the associated local standard operating procedures it is expected to deliver the following outcomes;

- Effectively identify individuals trafficking prohibited and unauthorised articles by internal concealment.
- Avoid unnecessary action when trafficking is suspected but not confirmed.
- Manage individuals who have items concealed within their bodies, to keep them safe and encourage surrender of these items.
- Prevent prohibited and unauthorised articles being distributed within the general population.
- Secure evidence to support adjudication or prosecution.

6. REQUIREMENTS

6.1 Observance of this policy and the associated local SOPs will ensure that the use of x-ray body scanners in NIPS establishments is compliant with the relevant legislation. Unlawful use of x-ray body scanners may result in enforcement actions against NIPS by the Justifying Authority. It is therefore mandatory that all establishments comply with the requirements set out in this document.

6.2 The Home Office is responsible for ensuring there is an inspection regime in place for NIPS' use of X-ray body scanners. If it is found that an establishment(s) are breaching the Requirements for Practice or are non-compliant with The Justification of Practices Involving Ionising Radiation Regulations 2004 (as amended), 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 NIPS' X-ray body scanners can be used.

6.3 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 NIPS' approval to use X-ray body scanners if a warning notice is not complied with in the specified time frame.

6.4 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 facilitates NIPS in managing these health risks.

6.5 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 contraband; where there is no other means of detecting the suspected contraband (for example full or rub down search); and evidence that conducting a scan will not cause that individual to exceed NIPS' maximum annual dose constraint per individual of 300 microsieverts (μSv) per calendar year.

6.6 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 50.) Adherence to this Policy 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.

6.7 The following persons must not be scanned;

- Staff
- Visitors

- Any individual with female reproductive organs
- Any prisoner with a “do not x-ray body scan” alert on PRISM

Radiation Protection Advisory Services (RPA)

6.8 NIPS has a contract with a radiological service provider to deliver the Radiation Protection Advisory (RPA) services, including for the Radiation Safety Survey inspections, Radiation Protection Supervisor (RPS) training and Local Radiation Advice. These services are a legal requirement for NIPS to operate X-ray equipment.

Staff working with radiation

6.9 No staff working with radiation are regarded as **classified persons** as defined in the Ionising Radiation Regulations (Northern Ireland) 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 exclusion area whilst the machine is in operation; and
- the Ionising Radiation Regulations (NI) 2017 recommends a dose investigation level (DIL) is established. The employer (NIPS), in consultation with the RPA has recommended a DIL of 0.5 mSv. However, considering the assessment of doses carried out in the Ionising Radiation Risk Assessment and provided the Local Rules (which are detailed later in this Policy Framework) are complied with, the DIL is unlikely to be exceeded.

6.10 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 (NI) 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.

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

Prior to Installation

6.12 NIPS must ensure that a registration certificate is held by NIPS, issued by the HSENI, prior to the use of any ionising radiation equipment. Registrations are not site-specific – they apply to the overall employer and the registration held by NIPS will apply to all fixed sites under the direct control of NIPS.

6.13 Prior to installation, a site survey will be co-ordinated for the RPA to assess a suitable location in each establishment for the X-ray body scanner. The RPA will assess any adjustments to the fabric of the area to accommodate the equipment and make appropriate recommendations.

Installation

Supplier Installation and Critical Examination

6.14 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.

6.15 The supplier of the X-ray body scanner, in consultation with the RPA, must agree the maximum individual dosage (up to maximum set level of 6 μ Sv (microsieverts) per scan for each machine, annual dose constraints (300 μ Sv) and the maximum number of scans (50) permissible within the annual dose constraint.

6.16 The installer will 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 Radiation Protection Supervisor (RPS) must ensure this report is kept in the Radiation Protection Book and that any recommended requirements are undertaken during the daily operator and weekly checks (the RPS role and the Radiation Protection Book are described below).

RPA Radiation Safety Survey Inspection

6.17 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.

6.18 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.

6.19 A 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, the establishment may commence X-ray body scan operations.

6.20 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 and Servicing

6.21 The Governor of each establishment must ensure the satisfactory operation of suitable maintenance contracts for all X-ray body scanner equipment are in place.

6.22 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.

[To provide assurance in respect of 6.21 and 6.22 above a central contract and maintenance arrangements have been agreed by NIPS HQ.]

6.23 A written maintenance report will be provided on all maintenance / services undertaken. The RPS must ensure these reports are kept in the Radiation Protection Book (the RPS role and the Radiation Protection Book are described below).

NIPS Assessments and Auditing

6.24 In addition to the 'Critical Examination' 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 (supported by NIPS HQ);

- Health and safety risk assessment (supported by the NIPS H&S Advisor); and
- Daily and Weekly Checks.

Ionising Radiation Risk Assessment

6.25 In accordance with NIPS' Requirements for Practice and Regulation 8 of the Ionising Radiation Regulations (NI) 2017 (IRR(NI)17), before equipment is put into use every establishment 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 contraband 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.

6.26 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 must consult the RPA and may wish to involve the establishment's Health and Safety Advisor(s), the RPS and operators of the equipment. The risk assessment template will be provided when the X-ray body scanner is installed.

6.27 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

6.28 In addition, the Governor must conduct a Health and Safety risk assessment of:

- the risks staff may be exposed to at work; and

- the risks prisoners and other people who come to the establishment 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 for health and safety 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

6.29 The X-ray body scan operator must undertake a daily safety check before the X-ray body scanner machine is used.

6.30 The RPS must undertake a weekly safety check. These checks are listed in a checklist form provided in the Radiation Protection Book. The weekly checks must be recorded on the form and stored in the Radiation Protection Book (the checks are summarised below).

6.31 The daily and weekly check must include:

- ensuring the warning light and emergency stop button are working correctly
- safety signs and notices are visible and in good condition; and
- checking any other recommended manufacturer or engineer requirements.

Local Rules

6.32 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 B**.

6.33 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 Radiation Protection Book

6.34 The RPS must ensure each X-ray body scanner machine has a Radiation Protection Book. This is to be kept in a secure location near the machine and be easily accessible for review by the RPA and inspection by the enforcing authorities. Details of what must be included in this are contained at **Annex C**.

The Role of the Radiation Protection Supervisor (RPS) during and after Installation

6.35 The 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 must be someone with sufficient authority (minimum Senior Officer (SO) grade) to supervise this task and who regularly works in the area of the X-ray body scanner. 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 D**.

6.36 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.

6.37 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.

6.38 The RPS must ensure that the 'Local Rules' (**Annex B**) 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.

6.39 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 that should not be entered by staff during scanning exposures. 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 exclusion area.
- That a Controlled Area warning sign with radiation symbol (Trefoil) is displayed on the entrance/s of the room where the X-ray body scanner is installed, which demarcates the boundary of the Controlled Area. The signs should warn that the Controlled Area has been designated and indicate the nature of the radiation sources and the risks arising from such sources.
- Access to the Controlled Area must be strictly controlled. Only the prisoner undergoing scanning and staff essential to the operation of the scanner and prisoner management are in the Controlled Area during scanning.

6.40 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 Radiation Protection Book.

6.41 The RPS will need to ensure the prison fully complies with the NIPS Requirements for Practice and must highlight any deviations from this Policy immediately to the Governor in Charge of the Establishment.

6.42 The Governor must ensure that the Prisoner Information & Instruction 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. It is important that this information is also made available in a suitable language for those who do not speak English and that sufficient support is provided to those who may have difficulty reading it due to physical or learning disabilities.

6.43 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 Radiation Protection Book for audit purposes;
- ensure the 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 requirements for data recording, outlined in 'DATA PROTECTION AND RECORDING' below.

Accidents and Overexposure

6.44 If it is suspected that any person (staff or other) may have received a radiation dose above the dose investigation level (0.5 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 the Head of Function with responsibility for the x-ray body scanner, the Governor in Charge and NIPS Security and Operations as soon as possible.

Training

6.45 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 NIPS' 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 NIPS training database at the Prison Service College (PSC).

6.46 The Governor must ensure that staff operating the X-ray body scanner equipment complete mandatory training in machine operation 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. The record of this training needs to be held at each prison establishment and on the NIPS training database at PSC.

6.47 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 (Local)

6.48 The Deputy Governor of each establishment has responsibility for maintaining local auditing and assurance processes on a monthly basis for the deployment and operation of X-ray body scanners. The authority for the implementation of the auditing process is delegated from the Deputy Governor to the Security Manager within the establishment. Below are the key focus points of the local auditing process;

- PRISM entries (dip sample)
- Validating daily and weekly checks by operators and RPS's
- Ensuring that RPS's are performing duties effectively
- That only trained operators are conducting scans
- Appropriate authorisation has been given

Any failure identified during the internal audits will be reported to the Governor. The Governor may also inform the Deputy Director of Operations for further action. Non-compliance can result in NIPS being reported to the Justifying Authority (Secretary of State for the Home Office) which could result in the suspension or withdrawal of NIPS' authorisation to use X-ray body scanners in all prisons. Compliance with the requirements is therefore vital.

Further guidance and documentation in relation to the local auditing and assurance process is detailed in the NIPS X- Ray Body Scanner Local Auditing and Assurance documentation.

Health and Safety Audit

6.49 Health and Safety Assurance and monitoring for establishments will be undertaken through Health and Safety monitoring and assurance within the local Health and Safety function. This audit will be used to monitor compliance with the Ionising Radiation Regulations (NI) 2017. Compliance with health and safety auditing requirements will be monitored through the local Health and Safety meeting at each establishment.

Corporate Auditing and Assurance (HQ)

6.50 The corporate auditing and assurance process will be conducted by the Operations Directorate. On installation of a new X-ray body scanner in an establishment the first assurance visit will be conducted within the first month of deployment and operation. The time period for subsequent visits will be dependent on continued compliance with legislative and policy requirements and will be carried out on a regular basis. Corporate auditing results will be disseminated at the Strategic Security Group. Further guidance and documentation in relation to the auditing and assurance process is detailed in the NIPS X- Ray Body Scanner Corporate Auditing and Assurance documentation.

Equality Assurance Auditing

6.51 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 in relation to the use of X-ray body scanners and groups with protected characteristics will be monitored in the monthly Equality and Diversity meetings at local establishments.

Data Protection and Record Keeping

6.52 The Governor must ensure there is a local data retention policy that reflects the data retention requirements below.

6.53 The date, dosage and justification (either intelligence or reasonable suspicion) for each scan must be recorded on PRISM (Prisoner Records Information System Management). **Annex F** details how these details are to be recorded on PRISM. Justification decisions for the use of the X-ray body scanner on an individual must be recorded as an Security Information Report (SIR) 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.

6.54 The X-ray body scan image and associated data recorded on the X-ray body scanner machine must be deleted within 12 months after the scan has been undertaken unless there is an on-going investigation, 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.

6.56 If a hard copy of an X-ray body scan image is necessary/requested for the purpose of adjudication, restriction of association decisions, or ongoing complaint or litigation, the X-ray body scan can be printed., the hard copy of the image must be kept and kept with the associated paperwork (restriction of association paperwork / adjudication paperwork / complaint or any other relevant paperwork relating specifically to the X-body body scan or process). If a prisoner requests a copy of the scan they must submit this request through the appropriate channels (DPA request).

6.57 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.

6.58 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

6.59 Prisons can X-ray body scan a prisoner without obtaining the prisoners consent.

6.60 Prisoners **must not** be selected for X-ray body scanning on a **random basis**.

6.61 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.

6.62 To demonstrate that a scan is justified **all five points below must be met:**

- intelligence or reasonable suspicion suggests that the prisoner is internally concealing contraband;
- there are no other means of detecting the suspected contraband (for example, a full or rub down search);
- it is necessary to reduce the risks posed by prohibited and unauthorised articles being smuggled 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 300 µSv per individual in the current calendar year. The X-ray body scan operator must check the prisoner's PRISM record to ensure the dosage constraints have not been exceeded. If records are missing, the prisoner must not be scanned until it is confirmed that they have not exceeded the dosage constraint.

6.63 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 action at the monthly security meeting;
- direct communications from Police, Courts or other law enforcement agencies that the individual is likely to be internally concealing contraband;
- reasonable suspicion during or following a visit that the individual is likely to be internally concealing contraband; or
- reasonable suspicion that the individual is likely to be internally concealing an item which could be based on information from PECC's and/or committal interview.
- Observed behavioural indicators and presentation which raises concerns that the individual is internally concealing prohibited or unauthorised articles.

6.64 Any scan of an individual on the basis of reasonable suspicion or intelligence as the result of a spontaneous incident within the prison must only occur after the express authorisation of the Duty Governor and where the Duty Governor is unavailable authorisation must be sought from a Governor.

6.65 Any decisions relating to the use of the X-ray body scanner on individuals or groups must be recorded as an Security Information Report or in the instance of cohorts at the monthly security meeting; 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. Monthly security meeting minutes or direct written communications

from the Security Department or other agencies are a sufficient record of the justification used. Where intelligence is used as the justification, the format and route for sharing intelligence is by an intelligence assessment provided by the Security Department unit via secure email, as per local processes.

6.66 In some circumstances a prisoner may be part of a group of prisoners where there is intelligence or reasonable suspicion for that group to be X-ray body scanned. However, the prison must still be satisfied that each individual scan is justified and proportionate. The specific approach to searching including for cohorts will be described in local search strategies which will be kept under review in monthly security meetings. Oversight of local search strategies will be provided by the Strategic Security Group at its meetings. Where it is necessary to conduct a scan because of intelligence or reasonable suspicion that a prisoner may be internally concealing an item local search strategies will appropriately consider the proportionality and necessity of also applying other search techniques.

6.67 If a prisoner attends to be scanned and there appears to be a reason or information available which suggests that they should not be scanned then this should be brought to the attention of the Duty Governor. The Duty Governor should consider this information or the reason and make a determination about whether or not the scan should proceed i.e. medical grounds, mobility issues etc. The outcome of this determination should be fully explained and recorded. (This does not apply to prisoners where a 'Do not X-ray body scan' PRISM alert is active, for whom a scan cannot be undertaken in any event.)

6.68 Established search methods such as a full body search may be used where a prisoner is unable to be scanned for the following reasons;

- Has reached maximum annual dosage;
- Has an active "Do not X-ray body scan" alert on PRISM;
- Cannot stand unaided;
- A determination has been made by the Duty Governor.
- Equipment malfunction.

In such circumstances the necessity and proportionality of the application of established search methods should be appropriately considered in accordance with the Local Search Strategy and context of the situation.

6.69 There are no health reasons why a prisoner should not be scanned, except as provided as information under prisoners with protected characteristics. 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).

6.70 If the prisoner reaches the 300 microsieverts yearly annual maximum dosage, the member of staff who is first made aware of this, must ensure a 'Do not X-ray body scan' PRISM Alert is active on PRISM (for the remainder of the calendar year). This PRISM Alert can then be removed at the start of a new calendar year (1st January).

Prisoners with Protected Characteristics

6.71 In line with other government agencies (such as Border Force, HMPPS 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. As only adult male prisoners will be scanned and that there is a requirement for a rub down search (completed by staff of the same sex) prior to any scan, the primary scan operator will be a male member of staff. This does not prevent female staff from assisting with the x-ray body scan process and interpretation of a scan image or viewing the image for the purpose of adjudication or Prison Rule 32 (this is at the discretion of the prison). Any objections or concerns should be considered on an individual basis based on the specific circumstances.

6.72 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 PRISM. The staff member who becomes aware of this is responsible for ensuring a PRISM alert is active on the system.

6.73 Transgender women and post-operative transgender men who no longer have female reproductive organs can be scanned.

6.74 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 PRISM (at the earliest point) for all pre-operative transgender men. The staff member who becomes aware of this is then responsible for ensuring the PRISM alert is active on the system. All staff should provide the prisoner with sight of **Annex E** 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.

6.75 Staff should refer to Transgender guidance for further information. 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.

6.76 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.

Preparing for a Scan

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

You must have assessed that a scan is justified and proportionate.

- 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 PRISM.

- **You must check the prisoner can be scanned by checking PRISM 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, PRISM must be checked.
- **You must check the prisoner record on PRISM to ensure that a further scan would not exceed the cumulative dosage limit of 300 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 PRISM. 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 F**.
- 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 contraband.** 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 hand over any items they may be in possession of.
- **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

6.78 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.

6.79 With the exception of the prisoner being scanned, all other persons must remain outside of the yellow and black demarked exclusion area around the X-ray body scanner. The exclusion 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.

6.80 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.

6.81 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.

6.82 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.

6.83 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. All subsequent scans must be individually recorded on PRISM.

Refusing or Sabotaging a Scan

6.84 In circumstances when a prisoner refuses to be scanned, or intentionally moves to distort the image, it is a material consideration contributing to reasonable suspicion that they may be attempting to convey prohibited or unauthorised articles into prison. On that basis established search methods including a full body search may be required to support the conclusions of a rub down search in respect of items that may be on the person.

6.85 If on conclusion of the deployment of traditional search methods concerns remain that the prisoner may be internally concealing prohibited or unauthorised articles, a Duty Governor/ Governor needs to ensure that a defensible decision is made on any actions taken/not taken and recorded on PRISM. They should consider whether it is necessary to manage the prisoner in terms of risk to self, this could include location of the prisoner and requirements for observations and frequency. The Duty Governor/Governor will determine whether the individual is to be placed on Rule 32 in the Care and Supervision Unit and the applicable safeguards required to manage the risk as outline in the Managing Secreted Items – Suspected or Confirmed Guidance.

6.86 Where a prisoner refuses to be scanned, or intentionally moves to distort the image, it may also be appropriate to charge the prisoner with an offence against prison discipline under Rule 38(22) Prison and Young Offenders Centre Rule (Northern Ireland) 1995 or have their regime level downgraded and in accordance with the PREP's Scheme.

6.87 Prisoners may be subject to multiple scans, provided that each scan is justified and proportionate.

6.88 Prisoners must not be restrained in order to be X-ray body scanned.

Recording of the Scan

6.89 The date, dosage and justification (either intelligence or reasonable suspicion) of each scan must be recorded on PRISM. This must be recorded as soon as

practical after the scan is conducted. The PRISM record must also record whether or not any suspected contraband was detected by the scan. **Annex F** details how these details are to be recorded on PRISM.

6.90 Any scan that indicates a positive detection of internally concealed items and there is a 'find', must be recorded on the PRISM screen. This record must include details of what the item/s is/are (if known).

Image Interpretation - Outcomes

Image shows no contraband being internally concealed

6.91 If the operator concludes that the scan image indicates that the prisoner is not internally concealing contraband, this information must be recorded on PRISM and the prisoner should be processed in line with the local operating procedures.

6.92 If an X-ray body scan of a prisoner shows a negative scan image (no internal concealed contraband 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 contraband being internally concealed

6.93 If the operator concludes that the scan image indicates that the prisoner is internally concealing contraband, 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), to assist healthcare to manage the health risks to the prisoner.

6.94 The prisoner must be informed that the image taken by the X-ray body scanner indicates that they are internally concealing contraband. If the item is accessible the prisoner must be asked to hand over the contraband. A private area should be made available for this purpose and it is likely that the Care and Supervision Unit will be the most suitable environment.

6.95 Staff who handle items that the prisoner has removed from the anal, genital or oral area must use appropriate PPE. 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 and stored within Security Departments.

6.96 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.

6.97 If a prisoner surrenders internally concealed contraband, for adjudication purposes the items can be accepted as evidence. For such cases, it may be appropriate to lay a charge under Prison Rule 38 paragraph 12. The prison must also consider whether the case should be referred to the PSNI for prosecution or dealt with solely through adjudication.

6.98 If the prisoner refuses or is unable to 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 Rule 32 and management on the Managing Internal Secretion – Suspected or Confirmed Policy, if applicable, or in some instances sending the prisoner for outside medical intervention. This decision should be made in conjunction with the advice from healthcare.

6.99 If the prisoner has an unknown internally concealed item, a Duty Governor/Governor needs to ensure that a defensible decision is made on any actions taken/not taken and recorded on PRISM. This could include location of the prisoner and requirements for observations (and frequency). The Duty Governor/Governor will determine whether the individual is to be placed on Rule 32 in the Care and Supervision Unit and the applicable safeguards required to manage the risk as outline in the Managing Internal Secretion – Suspected or Confirmed Policy.

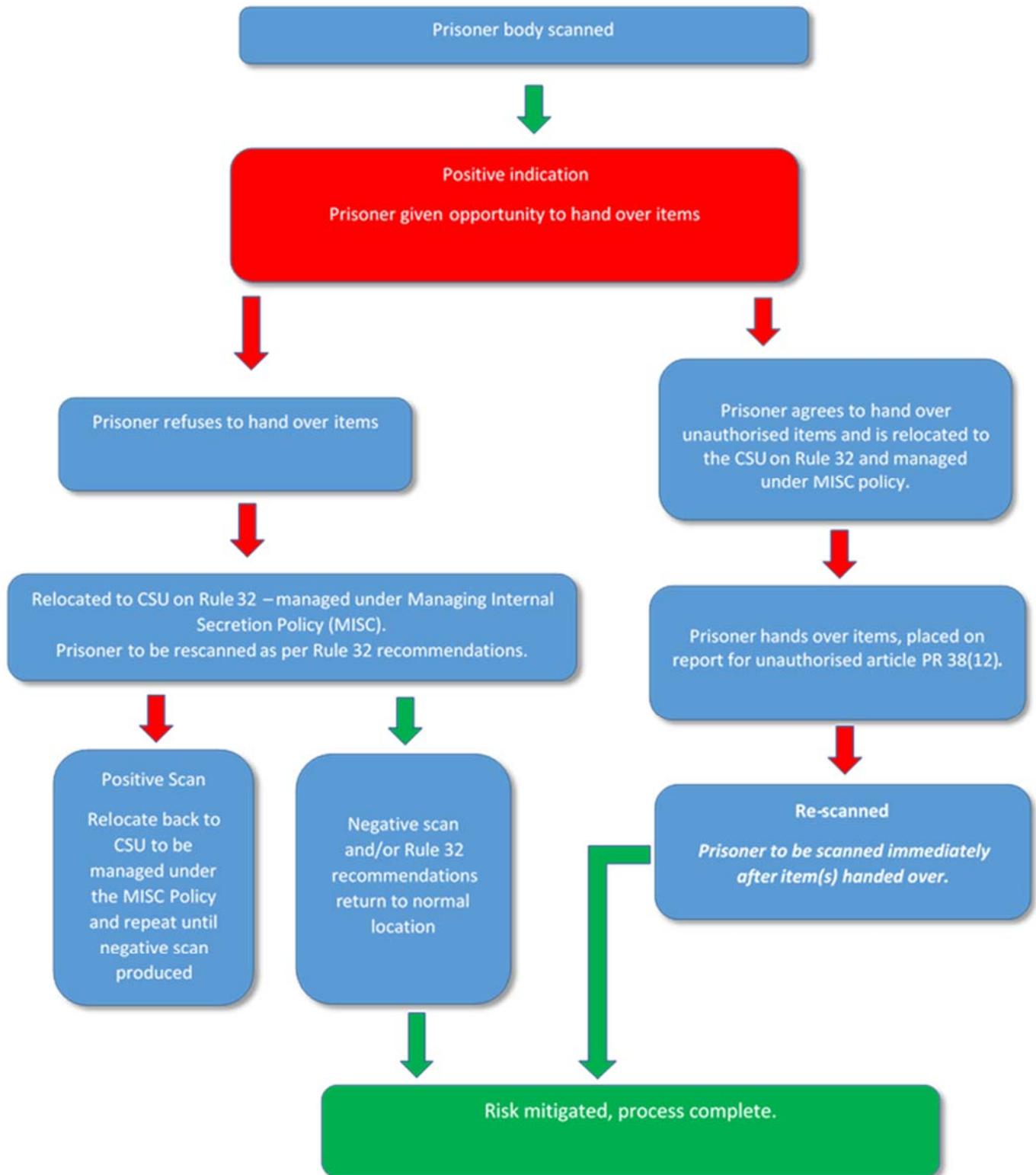
6.100 Any continued use of Rule 32 must be consistent with the Rule 32 Guidance and is only likely to be justified and proportionate for as long as the risk remains that the prisoner has internally concealed contraband.

6.101 If the prisoner states they are no longer concealing contraband and has passed it or removed it, recommendations by a Governor within the management of Rule 32 may then consider whether a further scan is justified and proportionate in accordance with this Policy. In the instance that items are recovered the prison must consider whether the case should be referred to the PSNI for prosecution or dealt with solely through adjudication.

6.102 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 Governor should ensure that a dynamic risk assessment is undertaken and consider what measures can be applied to mitigate the risk.

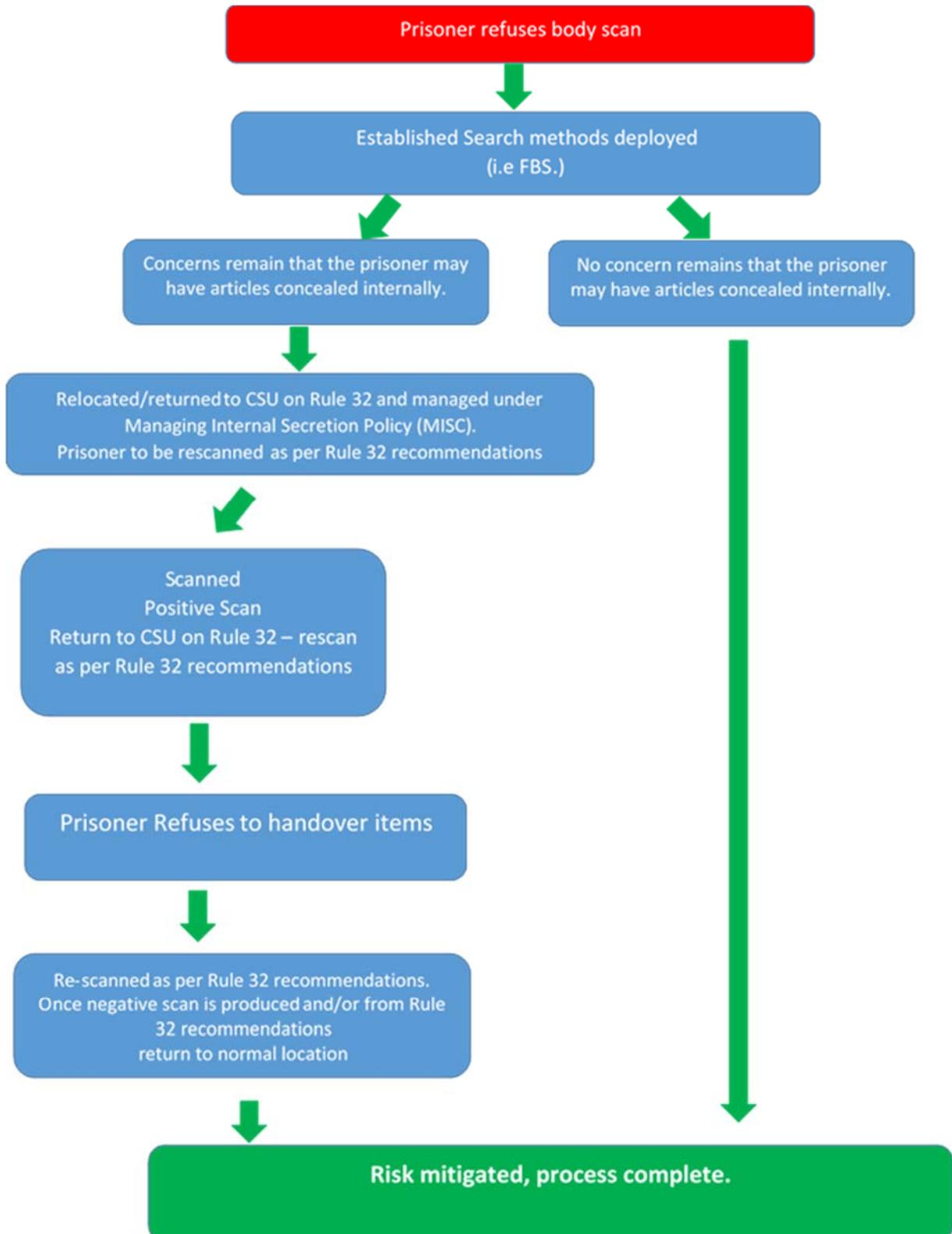
Body Scanner Flow chart

Prisoner showing positive indication



Body Scanner Flow chart

Prisoner refusing a body scan



Local Rules Template



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 security X-ray imaging equipment. The Radiation Employer is the Northern Ireland Prison 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 Supervisors for this area are:

--

3 RADIATION PROTECTION ADVISER (RPA)

Radiation protection services are provided by:

--

4 DESIGNATION OF STAFF, PERSONAL MONITORING AND DOSE INVESTIGATION LEVEL

All staff working with radiation are regarded as **non-classified**. There is no requirement for staff to wear personal dose monitors as the radiation risk assessment has identified that doses are as low as reasonably practicable and the risk is low for normal work and all reasonably foreseeable radiation accidents. Dose levels around the equipment are checked regularly. A dose investigation level (DIL) of 0.7mSv 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 working with radiation. Pregnant staff should inform their line manager of their pregnancy.

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 equipment is connected to the mains supply at the console.**

5.1 CONTROLLED AREAS

The area demarked by the yellow and black tape and the barriers are designated as a Controlled Area.

5.2 ACCESS TO CONTROLLED AREAS

- i) Only the prisoner undergoing scanning should be in the Controlled Area when the x-rays are produced.
- ii) Staff may stand at the operator console during scanning and at entrances to prevent access / escape from the room.
- iii) 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.
- iv) The X-ray equipment mains must be switched off when it is not in use.

6 OPERATING PROCEDURES

All employees, contractors and visitors must comply with these Local Rules.

6.1 RADIATION PROTECTION SUPERVISORS

The Radiation Protection Supervisors must:

- i) Oversee the use of the x-ray equipment to ensure it is in accordance with these Local Rules
- ii) Ensure the records in the Radiation Protection Record Book are kept up to date
- iii) Report any concerns about radiation safety to their line manager and RPA
- iv) Check the following safety systems at intervals of no more than one month and record the results in the Radiation protection book:
 - Malfunction of warning lights
 - General condition of machine
 - Emergency switches are in good working order
 - Safety signs and notices are visible and in good condition

6.2 EMPLOYEES OPERATING RADIATION EQUIPMENT

- i) Only authorised, trained employees or contractors may operate the bodyscanner equipment. These people must be listed in the local Radiation Protection Record Book.
- ii) Employees and contractors **must** receive appropriate training before operating x-ray equipment.
- iii) Unsupervised equipment **must** be isolated from the mains supply at the console.
- iv) Where equipment is key operated, the key shall be kept in a secure location when the equipment is not in use.
- v) The login and password to start the equipment must not be left near the unit.

- vi) Any damage to any x-ray equipment safety features or radiation safety concerns **must** be reported immediately to the Radiation Protection Supervisor.
- vii) Persons **must not** interfere with any safety devices or attempt to repair any part of the body scanner equipment unless authorised to do so.

6.3 CLEANING PERSONNEL

- i) Cleaning personnel may only clean around x-ray equipment when isolated and at times previously arranged by local management or the Radiation Protection Supervisor.

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) All works/maintenance must be completed by authorised contracted service engineers only.
- iii) Any maintenance personnel or visiting service engineer shall take responsibility for radiation protection. The equipment shall be formally handed over to the engineer via a written procedure. Once work is completed the equipment shall be formally handed back to the operator and a written record made. The engineer taking responsibility shall provide copies of any local rules that shall be followed **before** starting any work.
- iv) Any service engineer or physicist who carries out a temporary modification to an x-ray 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 inspection needs to be aborted for any reason, i.e. 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/or line manager
- ii) If the emergency action was due to an equipment fault, the RPS must ensure that the equipment is not used until the necessary repair work has been successfully completed.
- iii) Any service engineer who making repairs under these Contingency Plans must be provided with a written permit to work. This must give 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.

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, and extension 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.

Template RPS Appointment Letter



Xxxxx Prison

Date xxxxx

Radiological Protection Supervisor

[Name of RPS],

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

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

- To ensure that HMP XXXXX activities are compliant with The Ionising Radiations Regulations (NI) 2017 (IRR(NI)17);
- 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 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: Governor-in-Charge	Position:
Signature.....	I accept the appointment as RPS for XXXXX Prison
Date:	Signature.....
	Date:

X-Ray Body Scanner Instruction & Information Sheet

- If you have female reproductive organs you **must not** be scanned (the prison will be aware of this).
- **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 38 for disobeying a lawful order and/or restriction of association under Rule 32.
- 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 38 for disobeying a lawful order and/or restriction of association under Rule 32.
- 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 contraband is believed to be internally concealed. This may include disciplinary action under Prison Rule 38 for having an unauthorised article/s in your possession or relocation to the Care and Supervision Unit.
- **If you have any concerns about your health because you are internally concealing contraband 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 images may be used for training and research purposes.

If you have any questions please ask a member of staff.

PRISM Instructions

[REMOVED FOR PUBLICATION]

A full version of the Guidance is available to prison staff.