Lockdown Policy

CPRCCG CP14

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Name of Director Sponsor:	Chief Finance Officer
Name of originator/author:	Local Security Management Specialist
Name of responsible committee/individual:	Audit Committee
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Contents

1.0 Introduction

The purpose of this document is to outline the procedures in response to a request for lockdown of the premises across Castle Point and Rochford Clinical Commissioning Group. A lockdown should be used to ensure the safety and security of all CCG, personnel, property and assets in the event of a major incident and by doing so will protect the integrity of the CCG.

2.0 Purpose and Scope

This document follows guidance produced by the NHS Protect with regard to assessing key locations, determining their ability to Lockdown their sites and outlining these arrangements. In the event of a terrorist incident/emergency, the response by Castle Point and Rochford CCG will be of paramount importance in protecting its staff and visitors and its properties and assets

NHS premises are potential prime targets therefore locking down a NHS premises may be a proportionate response from a variety of threats and hazards
.
The Policy will be communicated to all staff within the Castle Point and Rochford CCG during their Induction phase and a copy will be available at all other times via designated policy points.

This policy and guidance is applicable without exception to all staff working within the CCG whether directly or indirectly employed

3.0 Definitions

NHS Protect
The CCG should aim to adhere to guidance previously set by NHS Protect, (***NHS Security Management Standards)*** pending the publication of new Guidance and as a guide to good practice only. NHS Protect was a division of the NHS Business Services Authority abolished with effect from 1 November 2017. The CCG is free to decide and include any guidance from any regulatory or supervisory body either within or outside of the NHS.

Lockdown
This is the process of controlling the movement and access – both entry and exit – of people (NHS Staff and visitors) around a CCG site or other specific CCG building/area in response to an identified risk, threat or hazard that might impact upon the security of staff and assets or, indeed, the capacity of that facility to continue to operate. A lockdown is achieved through a combination of physical measures and the deployment of personnel".

There are three key elements to "lockdown"
- Entry
- Exit
- Movement

In preventing the entry, exit or movement of people, or a mixture of the three, the overarching aim of implementing lockdown is to either exclude or contain staff and visitors.

Supporting the overarching objective of excluding or containing staff and visitors, a lockdown may be characterised as a partial (static or portable), progressive or full lockdown.

Partial lockdown
This is the locking down of a specific part of a CCG site or building, also when entry restrictions are in place to control the flow of people into it i.e. restricting access into a department during investigation of an incident.

Progressive lockdown
This is the step by step (incremental) lockdown of a CCG site or building in response to an escalating scenario.

Full lockdown
This is the process of preventing freedom of entry to an exit from either an entire NHS site or from a specific building.

The objective of lockdown is to ensure the safety and security of all staff and visitors, property and assets in the event of a major incident and thus protecting the integrity of the NHS.

Incident
An event or circumstance which could have resulted, or did result in unnecessary damage, loss or harm to staff members, visitors or members of the public

4.0 Legal and statutory responsibilities

Major Incident Plan

When a lockdown is instigated roles and responsibilities are broken down into four stages:-
- Lockdown Activation: where staff have to report to and what resources they need to facilitate their role.
- Lockdown Deployment: staff designated specific roles during lockdown.
- Lockdown Maintenance: staff consider some of the features that should be taken into account to maintain a lockdown, and how this can be achieved.
- Lockdown Stand-Down: focuses on how staff will facilitate the end of a lockdown.

During a lockdown the CCG may have to make the decision to move essential business activity and support services to alternative temporary locations.

Business Continuity during Lockdown
Business Continuity is the maintaining of essential business of the CCG in the event of a disruption or a major incident.
The Business Continuity Plan will be shaped by both the cause and duration of a lockdown

Activation of a Lockdown
A decision to initiate a Lockdown should be guided by the following four factors:
- The protection of staff, visitors or assets
- The isolation of a threat or hazard
- Establishing a safe distance between /staff/assets and a threat/hazard
- Neutralising the threat or hazard

Once a Lockdown has been initiated, its time and duration will depend on the individual circumstances. Staff will take every effort to minimise the duration as much as possible.

Full Lockdown
If a full Lockdown is needed then staff should contact the emergency services immediately for their assistance (if necessary). Cordons can only be officially enforced by the Police. If the senior manager or on call manager believes that a situation may warrant such measures they must contact the emergency services. The Police (and Fire Service) may also be able to assist in the management of on/offsite traffic, crowd control and any evacuation.

Partial and Progressive Lockdown
If only a partial or progressive Lockdown is needed, the senior manager with staff support should make every effort to manage/contain the situation with a view to contacting the emergency services if the circumstances begin to escalate.
As soon as a lockdown has been called, staff should report to an agreed location. At this point, they will need to identify key resources, all of which should be maintained at a central location:
- Map – of the premises, contained in the Fire Evacuation Procedures
- Keys – to secure doors and window
- Radios or mobile phones – where available as part of the Fire Evacuation Procedures
- Tabards – to identify key staff, where used by Fire Marshals/Wardens
- Signage / barriers – where available to highlight no access routes.

Staff Deployment
The CCG does not employ Security Guards or other full time security personnel. Arrangements for securing an area will therefore depend on the availability of staff that are present in the building at the time.

Once staff have been issued with the items above they will need to go as quickly as possible to fulfil their roles. Action must be taken quickly to secure the building. Any access controls should be utilised to speed up the process. A manual Lockdown should be undertaken as quickly and safely as possible.

To speed up a manual lockdown, careful consideration needs to be given to the order in which doors and windows will be locked. Senior staff should decide this based on the high risk areas within their premises, their use and accessibility to the public.

Department staff will be responsible for controlling the movement of visitors within their department areas. Where possible, staff will be positioned at the main entrances/fire exits to explain the situation to people and request their co-operation. It is important that some staff are positioned by the main external fire exit doors as fire legislation may prevent these from being locked.

Staff should remain calm and professional during the deployment in order to keep visitors calm. Maintaining a Lockdown

Once staff are in control of their areas they should communicate this to the Senior Manager. Communication links should be maintained at all times so that staff can be updated on the progress of the Lockdown.

The CCG have the right to refuse access. If someone enters the premises having been advised not to, or is already in the premises but refuses to leave; they may be considered a trespasser and reasonable force may be used to prevent access or remove them. If an individual enters a locked down premises or refuses to leave, they could be prosecuted.

In the absence of the police, who are able to enforce a containment cordon, it will only be lawful for CCG staff to prevent the exit of a significant number of people from its premises by utilising specific legislative provision (e.g. emergency regulations under the Civil Contingencies Act and/or Public Health (Control of Disease) Act 1984) which provides for the protection of the public from notifiable diseases.

Even when these specific regulations can be used, specific articles of the Human Rights Act 1998 must also be considered – for example, a person's right to liberty (Article 5) and an individual's right to a family (Article 12). Without these regulations, it is likely that exit could only be prevented in relation to specific individuals in certain circumstances, which are likely to be limited to the following situations:

- The individual is committing an offence or causing injury or damage to property which may lead to them being arrested.
- They are detained under the Mental Health Act or otherwise lawfully detained.

It is important to remember that staff can only appeal to people to stay inside a locked down area. If people still choose to leave, a safe route must be available for them to do so.

Stand Down
Once the decision has been given to stand down, staff should open key doors first. Any signage or barriers should be removed in order of risk/priority to allow access again. Staff should reassure visitors during the stand down in order to keep them calm. Senior staff or the On Call Manager will need to contact the Communications Team to inform them of the Lockdown outcome and any resolved situations.

5.0 Duties and Responsibilities

Chief Finance Officer
Chief Finance Officer has overall responsible for the health, safety and welfare of all staff and visitors who resort to the NHS premises and delegates the day to day management of risk management to the Head of Performance and Corporate Services. Also has responsibility for security and will coordinate the development of the lockdown.

Head of Performance and Corporate Services
Will advise on identifying critical assets, assessing risk and will liaise with police and ambulance.

Local Security Management Specialist (LSMS)
To provide assistance and guidance on lockdown and the capability and functionality of security arrangements both during and after the event. The LSMS will be responsible for the carrying out of a lockdown exercise on designated areas of the CCG to test the robustness of the plans and support inter-agency collaboration.

Your LSMS contacts are published on the CCG's website and on notice boards within the CCG's headquarters.

Head of System Resilience

Will oversee the preparation, planning and response to a major incidents including lockdown, ensuring on-going business continuity, whilst lead on issues relating to the functionality of buildings and building resilience, will also liaise with Local Authority.

Fire Safety Adviser

To provide advice on the operation and functionality of the buildings fire legislation / procedures and will liaise with fire authority.

Communications Lead

To help develop communication channels with staff and visitors and will liaise with external media.

All Staff

Staff are expected, at all times to fully co-operate with management and should be aware of their responsibility in protecting the assets of the CCG and colleagues etc. Where specific security procedures are in operation, staff must abide by them at all times. All staff have a responsibility to take reasonable care of their own safety and security, and to participate as required in the event of the implementation of a lockdown. In order to support a lockdown, staff are likely to have to carry out activities that are outside of their normal job description.

6.0 Implementation

This policy will be available to all staff, for use in the circumstances described on the title page. All directors and managers are responsible for ensuring that relevant staff within their own directorates and departments have read and understood this document and are competent to carry out their duties in accordance with the procedures described.

7.0 Training implications

Staff should be made aware of their sites lockdown plans as part of their local induction. They will also be expected to participate in any major incident training exercise or staged Lockdown, whether this is co-ordinated as a real-time on site session, or as a desk-top exercise.

8.0 Monitoring, Review and Archiving

8.1 Monitoring

All aspects of this policy and procedure will provide a detailed picture of the CCG lockdown capability for the premise and will determine what can be locked down in a major incident.

The Associate Director of Assurance, Associate Director of Operations and LSMS will review annually or when circumstances dictate.

The Associate Director of Assurance will ensure that the processes outlined in this policy

and any associated policies and guidance are followed.

The Associate Director of Assurance will ensure that a copy of this policy is freely available to all CCG staff (electronically and/or Hard copy). A hard copy will be held with the Business Continuity Policy and Plans.

8.2 Review

A review date will be set at two years, with the agreement of the Audit Committee. However, it is the Policy Owner's responsibility to review their policy if there are changes before the review date is met.

8.3 Archiving

The Associate Director of Assurance will ensure that archived copies of superseded policy documents are retained in accordance with Records Management: NHS Code of Practice 2009.

9.0 Equality Impact Assessment Statement

NHS Castle Point and Rochford CCG is committed to carrying out a systematic review of all its existing and proposed policies to determine whether there are any equality implications.
This policy has been assessed using the CCG's Equality framework on Appendix 4

10.0 References

- NHS Protect Lockdown Guidance
- NHS Protect Standards for Commissioners 16/17
- Health Building Note (HBN) 07 Chapter 4
- Civil Contingencies Act 2004
- Human Rights Act 1998
- Health and Safety at Work Act 1974
- Care Quality Commission

11.0 Version Control

Version	Date issue/review	Author Name and title	Comment
1.0	5th October 2006	LSMS, Mazars	New Policy
2.0	April 2018	LSMS, Mazars	Refresh
3.0	November 2019	West Midlands Ambulance Service University NHS Foundation Trust	Refresh

12.0 Stakeholder involvement

Name	Designation
Local Security Management Specialist	West Midlands Ambulance Service University NHS Foundation Trust

Appendix 1 – Lockdown Procedure

Lockdown Procedure
This procedure makes reference to the Castle Point and Rochford CCG Policy for the Lockdown of the Building at Pearl House, 12 Castle Road, Rayleigh, Essex, SS6 7QF for Castle Point and Rochford CCG staff only, which should be viewed as the main point of reference in relation to Lockdown. Nothing within this document should be read as overriding the Lockdown Policy.

This document is intended to assist CCG Staff including Executives, Managers, Facilities Officers and Corporate Services, deal with a Lockdown should it be instigated.

General

The Chief Finance Officer is responsible for ensuring that a Lockdown, if called, is carried out and maintained in accordance with the overriding policy.

Other regular building staff should also be identified and their assistance utilised as necessary. It is acknowledged should a Lockdown of this site be instigated, the main access and egress doors would need to be locked

The LSMS is available to offer site specific advice and guidance.

Lockdown Action Cards

The Chief Finance Officer
On instruction from the Chief Finance Officer, Managers will instruct nominated staff to carry out a full Lockdown of the CCG work area and building they are located in. The staff involved will not be pulled away from this task until the Lockdown is complete or staff are instructed to do so by any of those above.

Management
Managers and pre nominated staff are to deputise a staff member to act on their behalf in the event of absence during a CCG building Lockdown.

Managers are to additionally identify deputed staff members that may be called upon in the event of a Lockdown being activated. They are to be made aware of the Lockdown Procedure and their responsibilities.

The following Action Cards are to be brought to the attention of relevant staff and issued in the event of a Lockdown being activated.

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Review Date: November 2021

Appendix 2 - Lockdown Action Cards

Lockdown Instructions

Action Card 1

Executive/Management

- **You will deputise a staff member to maintain communication with the Chief Finance Officer.**
- **You will ensure that deputised staff are made aware of the Lockdown and that they comply with their respective responsibilities.**
- **You will ensure that all access points are locked (doors and windows).**
- **You will ensure that, where safe to do so, a deputised staff member remains at each of the access points.**
- **You will ensure that fire escape doors are secured but remain ready for use in case of evacuation.**
- **You are to comply with all directions received from the Associate Director of Assurance.**
- **You will ensure that the Chief Finance Officer is regularly updated with a situation report.**

Lockdown Instructions

Action Card 2

Deputised Nominee/ Receptionist/Governance Lead/Executive Assistant - Facilities

- **You will maintain in communication with the Chief Finance Officer**
- **You will relay all updates from the Chief Finance Officer to the Associate Director of Assurance, Head of Resilience or their Nominee.**
- **You will relay all updates from the Associate Director of Assurance, Associate Director of Operations or their Nominee**

Appendix 3 – Lockdown Action Card

Lockdown Instructions

Action Card 3

Deputised Staff Member

- **Deputised Staff Members will obtain relevant keys from the Executive Assistant - Facilities or their Nominee.**
- **You will secure the main building access point/s (Front entrance/Rear or staff entrance).**
- **Where safe to do so, you will remain at the locked door.**
- **You will follow the directions of the Associate Director of Assurance, Associate Director of Operations or their Nominee.**
- **Your task is to prevent anyone from entering the site unless they are staff with their ID card or other instructions are received from the Associate Director of Assurance, Associate Director of Operations or their Nominee.**

Appendix 4 – Equality & Equity Impact Assessment Checklist 1

This is a checklist to ensure relevant equality and equity aspects of proposals have been addressed either in the main body of the document or in a separate equality & equity impact assessment (EEIA)/ equality analysis. It is not a substitute for an EEIA which is required unless it can be shown that a proposal has no capacity to influence equality. The checklist is to enable the policy lead and the relevant committee to see whether an EEIA is required and to give assurance that the proposals will be legal, fair and equitable.

	Challenge questions	Yes/No	What positive or negative impact do you assess there may be?
1.	**Does the proposal affect one group more or less favourably than another on the basis of:**		
	• **Race**	**No**	
	• **Pregnancy and Maternity**	**No**	
	• **Sex**	**No**	
	• **Gender and Gender Re-Assignment**	**No**	
	• **Marriage or Civil Partnership**	**No**	
	• **Religion or belief**	**No**	
	• **Sexual orientation (including lesbian, gay bisexual and transgender people)**	**No**	
	• **Age**	**No**	
	• **Disability (including learning disabilities, physical disability, sensory impairment and mental health problems)**	**No**	
2.	**Will the proposal have an impact on lifestyle?** **(e.g. diet and nutrition, exercise, physical activity, substance use, risk taking behaviour, education and learning)**	**No**	

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3.	Will the proposal have an impact on social environment? (e.g. social status, employment (whether paid or not), social/family support, stress, income)	No	
4.	Will the proposal have an impact on physical environment? (e.g. living conditions, working conditions, pollution or climate change, accidental injury, public safety, transmission of infectious disease)	No	
5.	Will the proposal affect access to or experience of services? (e.g. Health Care, Transport, Social Services, Housing Services, Education)	No	

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Appendix 5 – Equality & Equity Impact Assessment Checklist 2

By using evidence and insight to assess and grade our equality performance, NHS Castle Point and Rochford can generate much of the information we will require to demonstrate compliance with the PSED. The checklist is to enable the policy lead and the relevant committee to see if a particular policy or project will provide the relevant evidence to assist NHS Castle Point and Rochford CCG meet the set out EDS goals to achieve better outcomes for patients and staff. Please assess your policy, project or service against the following:

The goals and outcomes of EDS2			
		Description of outcome	**Yes/No**
Better health outcomes	1.1	Services are commissioned, procured, designed and delivered to meet the health needs of local communities	
	1.2	Individual people's health needs are assessed and met in appropriate and effective ways	
	1.3	Transitions from one service to another, for people on care pathways, are made smoothly with everyone well-informed	
	1.4	When people use NHS services their safety is prioritised and they are free from mistakes, mistreatment and abuse	
	1.5	Screening, vaccination and other health promotion services reach and benefit all local communities	
Improved patient access and experience	2.1	People, carers and communities can readily access hospital, community health or primary care services and should not be denied access on unreasonable grounds	
	2.2	People are informed and supported to be as involved as they wish to be in decisions about their care	
	2.3	People report positive experiences of the NHS	
	2.4	People's complaints about services are handled respectfully and efficiently	
A representative and supported workforce	3.1	Fair NHS recruitment and selection processes lead to a more representative workforce at all levels	
	3.2	The NHS is committed to equal pay for work of equal value and expects employers to use equal pay audits to help fulfil their legal obligations	
	3.3	Training and development opportunities are taken up and positively evaluated by all staff	
	3.4	When at work, staff are free from abuse, harassment, bullying and violence from any source	
	3.5	Flexible working options are available to all staff consistent with the needs of the service and the way people lead their lives	
	3.6	Staff report positive experiences of their membership of the workforce	
Inclusive	4.1	Boards and senior leaders routinely demonstrate their	

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leadership		commitment to promoting equality within and beyond their organisations	
	4.2	**Papers that come before the Board and other major Committees identify equality-related impacts including risks, and say how these risks are to be managed**	
	4.3	**Middle managers and other line managers support their staff to work in culturally competent ways within a work environment free from discrimination**	
Policy Author		Signature:	Date:	
Equalities Lead		Signature:	Date:	