

**SERVICE IMPROVEMENT PLAN**

**UNANNOUNCED INSPECTION OF BROOK HOUSE IMMIGRATION REMOVAL CENTRE**

**Inspected 31 OCTOBER – 11 NOVEMBER 2016**

Ref	HMCIP Recommendation	Accepted / Partially Accepted / Accepted Subject to Resources / Rejected	Progress	Action Taken / Proposed	Expected Completion Within [6 / 12 / 18 months]
<b>Main Recommendation – To the Home Office</b>					
5.1	The reasons for the increasing length of detention should be analysed and appropriate remedial action taken. All casework should be progressed promptly and, if that is impossible, the detainee should be released. (S35)	Partially Accepted	Ongoing	<p>There is no fixed time limit on immigration detention in the UK although no one is detained indefinitely. Once a person is detained their continued detention remains under review by the Home Office at least at 28 day intervals, and earlier in response to any change of circumstances that might have a material effect, to ensure that it remains lawful and appropriate. If at any time that ceases to be the case the individual will be released from detention. Caseworkers are required to work with diligence and expedition to ensure individuals are detained for no longer than is reasonable to achieve return.</p> <p>In response to a number of Shaw recommendations relating to detention reviews, the Home Office commissioned the creation of Case Progression Panels where all those detained in immigration detention would be reviewed together on a regular basis, quality assuring detention decisions and suggesting actions to ensure cases are progressed at pace. Case Progression Panels which reviewed cases on a minimum of a three monthly basis, beginning with the week following the third 28 day detention review, were successfully piloted in June and July 2016 and were implemented as business as usual on 01 February 2017.</p>	
<b>Main Recommendation – To the Home Office and Centre manager</b>					
5.2	Concerted action should be taken to soften the prison-like living conditions. Showers and toilets should be adequately screened, and toilets deep cleaned. Units should be well ventilated and detainees should have more control over access to fresh air. (S36)	Partially Accepted	Ongoing	<p>A comprehensive action plan has been implemented and work commenced to clean all detainee rooms and toilet areas, which is being tracked and is part of a continuous programme of cleaning.</p> <p>All showers are individual and are located in communal areas. They are each screened with a curtain and a door. Curtains for all toilets have been ordered and are in the process of being installed.</p> <p>The self-regulating building management system manages the temperature and ventilation throughout the Centre and does not permit detainees to have control over fresh air access in bedrooms.</p> <p>A review of the effectiveness of ventilation system has been commissioned</p>	<p>12 months</p> <p>6 months</p> <p>6 months</p>
<b>Recommendations – To the Home Office</b>					
<b>Safeguarding Children</b>					
5.3	All detainees claiming to be children should have a Merton-compliant age assessment by social services. (1.38)	Accepted	Completed and Ongoing	The Home Office is bound by section 55 of the Borders, Citizenship and Immigration Act 2009 which places the Secretary of State under a statutory duty to make arrangements to safeguard and promote the best interests of children. Our policy is not to detain children or those whose age is disputed. A claim is disputed where there is little or no evidence of age and there is doubt about whether an individual is a child, as claimed. Where new information comes to light which indicates that a person who is being treated as an adult and is being held in detention may be under 18, the Home Office would release the individual to the local authority at the earliest safe opportunity for a Merton and further case law compliant age assessment.	N/A

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<b>Casework</b>					
5.4	The contact management team should conduct comprehensive induction interviews with all detainees within 24 hours of arrival at the centre. (1.78)	Partially Accepted	Completed and Ongoing	All detainees entering the IRC estate for the first time will be inducted as soon as possible and no later than 72 hours. Detainees may request to see the on-site immigration team if they so wish to. Detainees are advised verbally of the voluntary return programme, the reimbursement programme, and re-entry bans. They also have their right to request bail and temporary admission explained, and advised where the forms are located within the centre for them to complete.	N/A
5.5	Monthly progress reports should be served on time and should contain meaningful and relevant information on progress since the last report. (1.79, repeated recommendation 1.98)	Accepted	Completed and Ongoing	There is clear guidance to caseworkers on the timing of monthly detention reviews and the need to ensure that the interval between reviews is 28 days or fewer. The report of a monthly review, which will set out the reasons for continued detention, should be provided to the detainee in question as soon as possible after the review has been conducted.	N/A
5.6	Where a detainee claims they have been tortured, the Rule 35 report should include an assessment of PTSD. Where there is independent evidence of torture, the Home Office should only detain in very exceptional circumstances. Reasons for maintaining detention in such cases should be comprehensive. (1.80)	Partially Accepted	Completed and Ongoing	Guidance published on 12 September 2016 on Rule 35 now specifically asks the doctor to make an assessment of the impact of detention on the detainee, including the likely impact of ongoing detention, which would be likely to refer to any mental and/or physical health problems, including PTSD, arising from the concerns that the detainee may have been a victim of torture. The policy (as set out in EIG 55.10) that a person with independent evidence should normally be detained only in very exceptional circumstances was replaced on 12 September 2016 by the new "adults at risk in immigration detention" policy. That policy strikes the right balance between protecting vulnerable individuals and maintaining effective and proportionate immigration control. Under the terms of the policy, a person who would be vulnerable to particular harm in detention would not normally be detained unless there is compelling evidence that other factors which relate to immigration abuse, the integrity of the immigration system or public protection are of such significance as to outweigh the vulnerability factor.	N/A
<b>Removal and release</b>					
5.7	Home Office staff should speak to all detainees on their day of removal to allow them to ask questions, address concerns and present new paperwork. (4.25, repeated recommendation 4.38)	Partially Accepted	Ongoing	The Home Office Immigration Enforcement (HOIE) contact staff meet with detainees prior to their removal to identify any outstanding issues and ensure everything is in place to effect the removal. Resource constraints prevent a commitment to meeting with all detainees on the day of removal and where detainees are booked onto early flights this is not possible. Any urgent paperwork will be served prior to removal.  An Immigration Enforcement Officer travels on board all charter flights and conducts a surgery during the flight that allows detainees to ask questions and address concerns.	N/A

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5.8	Only detainees who volunteer to do so should be placed on a reserve list. (4.26)	Rejected		<p>The Home Office can receive legal challenges at any point up until the point of removal.</p> <p>We have a responsibility to deliver value for money to the taxpayer, and maximising the use of charter flights is an important part of this.</p> <p>It is therefore necessary to overbook flights to ensure they are fully utilised as cases can be lost to legal attrition, medical or other procedural barriers.</p> <p>We forecast likely attrition rates and cap the number of bookings when required, meaning it is unusual for flights to have “unused reserves”.</p> <p>However in such circumstances we would seek to return such individuals as quickly as possible either on a forthcoming charter or a scheduled flight.</p>	
5.9	Removed detainees should receive assistance with travel from the airport of arrival to their final destination. (4.27)	Partially Accepted	Ongoing	Tascor overseas escorts are in possession of a small amount of funds on each removal to afford a degree of financial assistance when a detainee cites financial hardship in getting back home, once in their own country.	N/A
<b>Recommendation – To the Home Office and Escort contractor</b>					
<b>Escort vehicles and transfers</b>					
5.10	Detainees should not be subjected to exhausting overnight transfers when this could be avoided through more timely escorts. (1.4)	Rejected		The Home Office and escorting contractor seek to avoid routine night time transfers. Tascor operates a 24/7 escorting service that covers a wide range of activity, including moves between centres. All proposed moves consider the impact on the care and welfare of individual detainees, including the time and length of the move. Although overnight moves are avoided where possible, moves from police stations or between centres sometimes have to be conducted during the night if it has not been possible to complete them during the day; e.g. due to a high number of time-specific priority moves such as taking detainees to flights, court appearances, embassy appointments, medical appointments.	
<b>Recommendations – To the Home Office and Centre manager</b>					
<b>Self-harm and suicide prevention</b>					
5.11	The ACDT process should be reserved for detainees assessed as at risk of self-harm, and should not be used to monitor those who do not eat food provided by the centre. ACDT documents should identify specific triggers and daily entries should reflect interactions with detainees in crisis. (1.25)	Accepted	Ongoing	<p>The current Detention Service Order (DSO) regarding food and fluid refusal directs G4S to enter the detainee into the ACDT process.</p> <p>Revised guidance on managing food and/or fluid refusals (FFR) has been developed and is currently subject to consultation. Consideration is being given to replacing the mandatory requirement for an ACDT plan to be opened in all cases, with a discretionary ACDT requirement, alongside a multi-disciplinary meeting to monitor cases that fall within the revised FFR definition. The revised definition will exclude detainees who are eating/drinking from other sources, such as food bought from the centre shop</p> <p>All staff will receive refresher training regarding ACDT documents, identifying triggers and to reflect interactions.</p>	Ongoing

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5.12	A care suite for detainees at risk of self-harm should be established. (1.42)	Rejected		The building design constraints do not allow for a care suite to be established at Brook House. However, a care suite is being built at Tinsley House IRC, located half a mile away, where G4S is also the service provider. This will provide care suite facilities for the Gatwick IRC estate with detainees, those at risk of self-harm and other vulnerable detainees who require such accommodation being moved to Tinsley House subject to any risk assessment.	
<b>Safeguarding (protection of adults at risk)</b>					
5.13	All staff should have effective training in the adults at risk guidance. There should be effective multidisciplinary oversight of detainees in this group. Their vulnerability should be monitored carefully and developments communicated promptly to Home Office case workers. (1.33)	Accepted	Ongoing	All Home Office operational staff and managers received training in September 2016 on the adults at risk policy. This training has also been shared with G4S and Healthcare.  A multi-disciplinary workshop has been held in early 2017 to clarify the process to manage, monitor and review detainees considered under the "adults at risk" policy with the Home Office and Healthcare.  The new multi-disciplinary meeting process for Adults at Risk will involve Healthcare and the Home Office and will ensure the specific needs of adults considered to be at risk are reviewed regularly.	12 months
<b>Safeguarding children</b>					
5.14	There should be a multi-agency case review of detainees found by social services to be children, which should include the chief immigration officer who made the original assessment, to learn safeguarding lessons. (1.39)	Accepted	Completed and Ongoing	Detainees who have been age assessed by Immigration Enforcement as adults, but who are subsequently found by social services to be children, will be discussed in a multi agency lessons learned meeting.	N/A
<b>Legal rights</b>					
5.15	In consultation with the Legal Aid Agency, the centre should ensure adequate prompt access to legal advice. (1.66, repeated recommendation 1.84)	Accepted	Completed and Ongoing	The Legal Aid Agency (LAA) operates legal advice surgeries across the entire immigration removal centre estate in England and Wales, through facilitated services.  Advice Surgeries at Brook House run from Monday through to Thursday and up to 10 detainees each day are able to see a designated duty solicitor. There is no limit to the number of times a detainee accesses this service. The detainee is entitled to receive up to 30 minutes of advice regardless of his financial eligibility or the merits of his case.  The purpose of the advice session is to ascertain the basic facts of the matter and for the solicitor to make a decision as to whether the matter requires further investigation or whether further action can be taken. Advice on Temporary Admission and Bail can also be considered.  On the conclusion of the detainee's 30 minute advice session the solicitor will make a determination as to whether the detainee qualifies for civil legal services in accordance with Legal Aid Legislation to ascertain whether his is able to continue to advise the detainee.  It is at this point that the detainee must qualify financially and the matter must be in scope of legal aid and meet the relevant regulatory merits tests.  Civil legal aid is only available for those areas of law which are covered by Part 1 Schedule 1 of the Legal Aid, Sentencing and Punishment of Offenders Act 2012. Legal aid is not generally available for advice in relation to immigration applications, for example regularisation of stay on the basis of Article 8 ECHR.  The LAA works closely with each IRC to monitor capacity and will increase capacity where and when the need arises.	N/A

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<b>Communications</b>					
5.16	Legitimate websites should be accessible, including those facilitating legal assistance, Skype and social networking. There should be effective procedures for permanently unblocking such sites. (4.18, repeated recommendation 4.26)	Partially Accepted	Completed and Ongoing	<p>A new Detention Services Order (04/2016) on access to the internet was published in May 2016.</p> <p>The provision of internet access is an important means of helping detainees to remain in contact with family, friends and legal representatives and to prepare for removal. There are no plans to enable detainees to access to social media or Skype.</p> <p>During the inspection some sites were found to be erroneously blocked by the filtering software. This has now been resolved and legitimate sites have now been enabled.</p> <p>A daily audit of websites which should be permanently available will be completed to ensure availability.</p>	N/A
<b>Removal and release</b>					
5.17	Extant licence conditions should be explained to all ex-prisoners being released into the community. Systems should be robust enough to ensure that police and offender managers are also informed when a detainee who is a risk to children or others is released from detention. (4.28, repeated recommendation 4.45)	Accepted	Ongoing	<p>A process is in place for Detainee Reception staff to pass any licences to Home Office staff as part of the admission process.</p> <p>Copies of licences are sent to the Immigration Office by Detainee reception staff in line with the Reception DSO. Upon release, conditions are explained by Immigration staff prior to departure from the centre. The Casework Information Database special conditions screen is checked prior to release to ensure offender managers / police are made aware if required.</p> <p>Where a detainee is released into the community and a licence is still current, G4S re-issue the licence to the detainee.</p> <p>The procedures relating to the management of licenses and their conditions were circulated to staff in February 2017.</p>	N/A
<b>Recommendation – To the Escort contractor and Centre Manager</b>					
<b>The use of force and single separation</b>					
5.18	All use of force should be necessary, proportionate and competently applied. (1.58)	Accepted	Completed and Ongoing	<p>All incidents involving use of force are formally reviewed by a qualified use of force instructor, using incident reports, CCTV and body worn camera footage. Lessons learned reviews are conducted where appropriate, and management information is reviewed to identify any trends, which is then used to inform annual staff refresher training.</p> <p>Any use of restraint, including equipment, is only used where it is necessary, reasonable and proportionate having regard to the relevant circumstances.</p> <p>All officers are appropriately trained in the use of force which is refreshed on a regular basis.</p> <p>Where restraint is used, this is kept under regular review and only used for the length of time considered appropriate.</p>	N/A



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<b>Recommendations – To the Centre manager</b>					
<b>Early days in detention</b>					
5.19	All detainees should have a private reception interview and experience robust first night and induction procedures, irrespective of their initial location, to help reduce anxiety and prepare for their time in the centre. (1.11)	Accepted	Ongoing	A comprehensive review of the Reception process will be conducted over the next 4-6 weeks and will take account of the interview process, Healthcare and Induction assessment processes to minimise the repetition and ensure appropriate privacy is afforded.  The review will also consider the consistency of inductions for those not placed on the Induction wing to ensure all detainees receive a consistent induction.	12 months
<b>Bullying and violence reduction</b>					
5.20	The management of perpetrators of violence and bullying should include monitoring and challenge of poor behaviour. (1.18)	Accepted	Ongoing	All staff and managers will receive annual refresher training concerning the anti-bullying policy. There is a clear expectation that all violent, bullying and negative behaviour is appropriately challenged.  G4S will review with the Home Office an appropriate mechanism to promote positive behaviour and disincentivise negative behaviour that is not reliant on removal from association.	12 months
<b>Self harm and suicide prevention</b>					
5.21	The constant supervision cells should be refurbished and cleaned to provide a more suitable environment for detainees in crisis. (1.26)	Accepted	Completed and Ongoing	Both constant supervision rooms have been deep cleaned.  Murals will be painted directly onto the walls in order to create a softer environment which is not vulnerable to vandalism. Consideration will also be given to different types of bedding and additional furniture, including a television.  A monitoring system will be implemented concerning the cleaning of the constant supervision rooms and G4S will carry out a regular audit to ensure cleaning is happening.	6 months
<b>Security</b>					
5.22	All security procedures should be proportionate to a detainee population and based on individual risk assessments. (1.48)	Partially Accepted	Ongoing	The association times between 8am and 9pm mirror those operated at other IRCs. They allow for access to a comprehensive regime, including access to a library, gym, a range of educational classes, cultural kitchen, IT suite and religious facilities. There is free movement around the communal areas during this time, with the exception of lunchtime where detainees return to their residential area.  A drug strategy will be completed by 1 <sup>st</sup> March 2017 and implemented, incorporating input from operational, substance misuse and Home Office representatives.  All Detention Custody Managers (DCMs) have been reminded of the need to fully record the justification for full searching. This will be incorporated into a monthly audited programme.  A reminder has been provided to managers regarding the justification for a full search.	6 months

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5.23	Detainees should not be locked in cells and should be allowed free movement around the centre until later in the evening. (1.49)	Rejected		The purpose of immigration removal centres is to provide secure but humane accommodation for detained persons in a relaxed regime with as much freedom of movement and association as possible, consistent with maintaining a safe and secure environment.  At Brook House open access to the centre's regime is provided for all detainees between 8am and 9pm each day. Detainees are only confined to their rooms overnight.	
<b>Rewards scheme</b>					
5.24	The rewards scheme should not be punitive or based on sanctions. (1.51)	Rejected		Paid work opportunities may be provided under Rule 17 of the Detention Centre Rules. Detention Services Order 1/2013 sets out that the provision of opportunities should be directly linked to a level of compliance with the service provider and Home Office.	
<b>The use of force and single separation</b>					
5.25	Detainees in the separation unit should be held in clean and fully furnished cells, and they should be able to access a full regime. (1.59)	Accepted	Completed and Ongoing	A deep clean has been conducted in all areas of the Care and Separation Unit (CSU). The CSU and all rooms are being redecorated.  A monitoring system will be introduced to record the cleaning of this area.  An audit of the rooms has been carried out to ensure all rooms are fully furnished. This will form part of a weekly audit.  A review of the regime for those detainees in separation will be carried out, taking account of the forthcoming Rule 40/42 DSO once published.	6 months
<b>Legal rights</b>					
5.26	Detainees should have access to up-to-date legal resources, including text books and country of origin information, and be permitted to print legal correspondence in confidence. (1.67)	Accepted	Completed and Ongoing	A full audit of all legal resources has been commenced and will determine which resources require updating. This will be concluded within the next 3 months. In addition to the hard copy resources available, all detainees have access to internet based resources.	6 months
<b>Staff-detainee relationships</b>					
5.27	Each detainee should be asked about their welfare by their allocated care officer at least once a month and more frequently in the early stages, and the conversation should be recorded together with any actions arising from it. (2.8)	Accepted	Ongoing	A full review of the care officer scheme will be conducted to ensure it incorporates a welfare check and any actions are recorded. A robust monitoring system will also be introduced.	6 months

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<b>Equality and diversity</b>					
5.28	The specific needs of gay and bisexual detainees should be identified and addressed through the fostering of a climate of acceptance of different lifestyles, drawing on the resources of community organisations. (2.19)	Accept	Completed and Ongoing	A Detention Services Order (DSO 02/2016), setting out standards for the treatment of LGB detainees in the immigration detention estate, was published in April 2016.  Sexual Orientation is now included in the Induction process and individual referrals are made to the Diversity Manager. The promotion of alternative lifestyles using symbolism and colour relating to LGBTQ will be increased.  Leaflets regarding outside support groups, such as GALOPS and UK LGIG (Lesbian Gay Immigration Group) will be displayed in Welfare, Induction, Healthcare and Diversity notice boards.  A meeting took place with UKLGIG at the end of February to determine what further input they may have in the Centre.	6 months
<b>Health services</b>					
5.29	A health needs assessment should be carried out and a centre health and well-being strategy should be developed. (2.40)	Accepted	Ongoing	A Health Needs Assessment has been arranged by NHS England for 2017 and any actions will be added to health improvement plan.	12 months
5.30	There should be regular clinical audit. (2.41)	Accepted	Completed and Ongoing	An annual clinical audit cycle is completed which is conducted by clinical auditors external to the local on-site team. A range of audits are completed as per yearly plan and ongoing.	12 months
5.31	The health care complaints system should maintain medical confidentiality. (2.42)	Accepted	Ongoing	The current DSO on complaints has been reviewed and reissued on 6 February 2017, with revised guidance on medical complaints.  A post box has been ordered to be positioned outside Healthcare to ensure complaints come direct to Healthcare and are answered promptly.	6 months
5.32	Detainees who do not speak or read English well should have reasonable access to translated information about health services and health and well-being. (2.43)	Accepted	Completed and Ongoing	The number of health promotion posters, in relevant languages, have been increased in communal areas.  Further posters have been placed in the Healthcare waiting room regarding the translation service. All staff are encouraged to use translations service for non-English speaking detainees.	6 months
5.33	A professional pharmacist should be present on site to audit and quality assure services, provide advice to detainees, and advise the medicines and therapeutics committee (2.54)	Accepted	Ongoing	Arrangements are in place to ensure a Pharmacist is on site 4 hours a week and delivers pharmacy clinics.  An advert for a Pharmacy Technician has been issued and will be appointed to increase the support within the pharmacy team.	6 months
5.34	Medicines administration and collection queues should be supervised. The medicines room hatch and controlled drugs cabinet should be made secure. (2.55)	Accepted	Completed and Ongoing	The Medication hatch was reviewed in November 2016 and new Perspex applied to ensure safe administration through hatch.  The controlled drug cupboard has been secured to the floor.	6 months
<b>Substance misuse</b>					
5.35	A drug and alcohol strategy for the centre should be established. (2.65)	Accepted	Ongoing	A substance misuse strategy will be established as part of a multi-disciplinary process with operational, healthcare and Home Office colleagues. This will be completed by 1 <sup>st</sup> March 2017.	6 months



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<b>Services</b>					
5.36	The extended opening hours of the cultural kitchen should be continued after Tinsley House detainees return to that centre. The kitchen should be increased in size. (2.71)	Accepted Subject to Resources	Ongoing	A review will be completed as part of the additional beds work to increase the opening hours of the Cultural Kitchen. One of the additional teachers being recruited currently will deliver Food Technology sessions in the Cultural Kitchen.	6 months
<b>Learning and skills</b>					
5.37	The quantity and range of provision in English and English for speakers of other languages should increase significantly to ensure that all detainees' needs are fully met. (3.10)	Accepted	Ongoing	2 additional teachers are currently being recruited to expand the quantity and range of the curriculum. This will enable greater variety of opportunities for all detainees. A review of the curriculum and education needs will be carried out through an external education manager within the next 12 weeks.	12 months
5.38	Thorough and systematic quality assurance, including regular self-assessment, should be applied to education and other activities. (3.11, repeated recommendation 3.19)	Accepted	Ongoing	The external G4S Education Manager will review the quality assurance and self-assessment framework.	12 months
5.39	A strategy should be developed and implemented to improve punctuality and attendance at learning and skills sessions. (3.12)	Accepted	Ongoing	G4S will revise and publish a timetable incorporating structured classes and short course sessions which are more flexible to ensure the range of educational needs are appropriately catered for.	12 months
<b>Paid work</b>					
5.40	Detainees should not be prevented from taking up jobs because of non-compliance with the Home Office. (3.15, repeated recommendation 3.23)	Rejected		Paid work opportunities may be provided under Rule 17 of the Detention Centre Rules. Detention Services Order 1/2013 sets out that the provision of opportunities should be directly linked to a level of compliance with the service provider and Home Office.	
5.41	A wider range of accredited employment related work should be provided to enhance detainees' skills and employment opportunities. (3.16)	Accepted	Ongoing	A review will be conducted with the Home Office and detainees, to ascertain the priorities for detainees in removal centres and what opportunities can be developed for skills and employment, exploring options with sub-contractors and local organisations.	12 months
<b>Library</b>					
5.42	Language support materials should be available in the library to enable detainees to improve their language skills. (3.19, repeated recommendation 3.27)	Accepted	Completed and Ongoing	Language support materials exist in the form of audio resources. Further resources have been purchased appropriate to the needs of the population. Additional resources will be purchased as dictated by the profile of the population.	12 months
<b>Sport and physical activity</b>					
5.43	Detainees' attendance in the gym should be monitored systematically to ensure fairness and equality of access. (3.23)	Accepted	Completed and Ongoing	A review of the attendance monitoring in the gym has been carried out to ensure accurate information is captured and understood concerning equality of access. The feedback from the data will be fed into the monthly Diversity meeting.	6 months

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<b>Welfare</b>					
5.44	All detainees should be able to access the welfare service when required. Interviews should be confidential and not interrupted by other detainees. (4.5)	Accepted	Ongoing	A review of the welfare provision has been completed. The Welfare office has been moved to avoid regular disruptions. A standardised booking procedure has been introduced with a further review to be undertaken.  Key information sought by detainees will be positioned in various other areas such as library and visits waiting room and appropriate signposting communicated to minimise queues.	6 months
<b>Visits</b>					
5.45	Managers should ensure that detainees can easily book visits. (4.11)	Accepted	Ongoing	A method to enable detainees to book their own visits has been introduced, utilising the current visit booking system.	6 months
5.46	Detainees' contact with visitors should only be restricted on the basis of individual assessments of risk. (4.12)	Accepted	Ongoing	Detention Services Order 04/2012 'Visitors and Visiting Procedures' sets out the visiting procedures in the immigration detention estate. Additionally the guidance sets out the circumstances in which a detainee may be placed on closed visits or when banning a detainee's visitor(s) from the centre and the procedures that must be followed.  Physical contact between a detainee and visitor may be restricted to minimise the risk of prohibited items being passed and entering the Centre and inappropriate behaviour in front of other visitors, including children.  The G4S policy for contact with visitors will be reviewed and communicated to staff and managers to ensure consistency of practice. The policy allows physical contact, including a greeting and goodbye embrace.	6 months