

SERVICE IMPROVEMENT PLAN - UNANNOUNCED INSPECTION OF DUNGAVEL IMMIGRATION REMOVAL CENTRE

Recommendation No	Recommendation Addressed to	Primary Theme	Secondary Theme	Repeated Recommendation	HMIP Recommendation	Accepted / Partially Accepted / Not Accepted	Progress	Action taken / proposed	Expected completion within [6/12/18 months]
5.1	Home Office and Centre Manager	Respect	Daily Life (Living Conditions)	N	Accommodation, including detainees' rooms, showers and shared areas, should be refurbished and maintained to a reasonable standard of decoration, furnishing and cleanliness. (S38)	Accepted	Ongoing	A programme of refurbishment is underway and will be completed over the next 12 months. Decoration will be refreshed as part of the existing re-decoration programme.	12 months
5.2	Centre Manager	Safety	Safeguarding (Vulnerable Adults)	Y	The risks associated with holding women and men should be routinely assessed and discussed at security meetings, and a specific safer custody and safeguarding policy should be developed for women. (S37, repeated main recommendation S28)	Accepted	Ongoing	The existing safeguarding policy developed in August 2015 and approved by the Home Office will be reviewed and updated to provide additional focus on safeguarding issues relating to the detention of women in a mixed gender centre. An initial scoping discussion is planned to encompass all elements raised within the inspection report. The security meeting forum will be used to engage in further discussion associated with these safeguarding issues and discussions / actions will be documented.	6 months
5.3	Home Office	Safety	Safeguarding	N	The Home Office should maintain a comprehensive and accurate record of adults at risk of harm. The record should be regularly updated and shared with the centre contractors and health care department. (1.19)	Accepted	Ongoing	The Home Office provides individual immigration removal centres with a regular update of all recorded adults at risk at their centre. Local Home Office Immigration Enforcement (HOIE) share this list with the centre supplier and work with them to ensure that all Adults at Risk (AaR) are effectively identified. Staff are made aware of individuals who have been identified as an adult at risk through information circulated to all staff on the daily centre briefing. HOIE will deliver a workshop on managing AaR with all parties working at the centre.	6 months

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5.4	Home Office	Safety	Legal Rights	N	Case workers should act with diligence and expedition. Deportation procedures for ex-prisoners should be concluded before the end of their custodial sentences. (1.71)	Accepted	Completed and Ongoing	<p>For every individual who is detained, there must be a realistic prospect of removal within a reasonable timescale. In each case, those making detention decisions must consider the likely duration of detention necessary in order to effect removal of that individual. What is a reasonable timescale will depend on the individual circumstances of each case, taking account of factors such as immigration history, criminality and risk to the public but also vulnerability considerations, in line with the "Adults at Risk" policy.</p> <p>All detention cases are subject to regular review at increasingly senior levels as the detention continues. Detention is currently reviewed after 24 hours, at 7 days, 21 days and 28 days. At the 28 days stage detainees are notified of the reasons for detention in writing and these are explained to them in person in the Immigration Removals Centre (IRC) by a Home Office member of staff. This process is repeated every 28 days for any consecutive period of detention. In relation to Foreign National Offenders (FNOs), Criminal Casework (CC) aim to remove at the earliest opportunity. Where a detainee refuses to cooperate with the removal or deportation</p>	

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5.5	Home Office	Preparation for Removal and Release	Communications	Y	Subject to a risk assessment, detainees should have access to video-calling and social networks. (4.19, repeated recommendation 4.17)	Partially Accepted	Ongoing	<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.</p> <p>Detention Services Order (04/2016) on access to the internet was published in May 2016 and does not currently permit access to social networks or Skype.</p> <p>The Home Office is undertaking a pilot at selected immigration removal centres on the use of Skype for detainee contact with families. The outcome of this pilot will be used to inform future operational policy for the detention estate.</p>	
5.6	Home Office and Escort Contractor	Safety	Arrival and early days in detention	Y	Detainees should not be escorted during the night unless this is required for urgent operational reasons. (1.11, repeated recommendation 1.7)	Partially Accepted	Completed and Ongoing	While every effort is made not to schedule moves at night, such moves may take place to meet time-critical operational demands such as early arrivals and departures for flights, hospital appointments and court hearings. All proposed moves consider the impact on the care and welfare of individual detainees. Where moves do take place during the night as much advance notice as possible is provided to detainees.	
5.7	Home Office, Escort Contractor and Centre Manager	Safety	Use of Force and Single Separation	N	Detainees should not be held in separated conditions for excessive periods because of delays in transfer arrangements. (1.63)	Accepted	Completed and Ongoing	Any separation undertaken is conducted in accordance with Home Office published guidelines (Detention Services Order 2/2017). Every effort is made to ensure that detainees are not held in separated conditions for excessive periods. Use of separation is well documented providing full justification and indicating what alternatives have been considered to manage the situation / behaviour.	6 months

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5.8	Home Office and Centre Manager	Safety	Safeguarding (Vulnerable Adults)	N	There should be a joint local safeguarding policy on the care of adults at risk of harm. The policy should include all providers working in the centre and explain how risk information is shared with Home Office caseworkers. (1.20)	Accepted	Ongoing	The existing safeguarding policy developed in August 2015 and approved by the Home Office will be reviewed and updated to provide additional focus on safeguarding issues on the care of adults at risk. An initial scoping discussion is planned to encompass all elements raised within the inspection report including the effective sharing of information with all parties at the centre. The security meeting forum will be used to engage in further discussion associated with these safeguarding issues and discussions will be documented.	6 months
5.9	Home Office and Centre Manager	Safety	Safeguarding (Self-Harm & Suicide Prevention)	N	Assessment, care in detention and teamwork (ACDT) documents should be completed in full and care plans should be tailored to the individual. Case reviews should include contribution or attendance by Home Office immigration enforcement staff. (1.30)	Accepted	Ongoing	Full and robust checks of Assessment, Care in Detention and Teamwork (ACDT) documents will continue. Planned increases to HOIE staffing should assist with ensuring that all ACDT case reviews can be attended. Supplier managers will be briefed to ensure that invitations are extended to all the relevant parties at the centre. Where attendance by any party is not possible, information will still be obtained and documented.	6 months

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5.10	Centre Manager	Safety	Arrival and early days in detention	N	The reception environment and procedures should be fit for purpose, ensuring that detainees' immediate vulnerabilities, needs and risks are assessed during a private interview with professional interpretation where required. (1.12)	Accepted	Ongoing	All staff have been reminded of the need to consider and use interpreting services during the reception process to ensure that detainees fully understand the process . The use of interpreting services will be logged and reviewed on a monthly basis to assess whether it is being used consistently and appropriately in line with the centres population. The reception environment will be refurbished as part of the ongoing renovation works which will enable receptions to be undertaken in a private environment and a relaxed atmosphere. The detainee waiting area will be updated to create a more welcoming environment.	6 months

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5.11	Centre Manager	Safety	Safeguarding	N	A multidisciplinary committee, including health care staff, should meet frequently to consider the risks to and needs of adults at risk of harm. (1.21)	Accepted	Ongoing	Individual meetings currently take place as part of the ACDT process to maintain the needs of each detainee subject to these monitoring procedures. To build on this, a Multi Disciplinary Committee (MDC) meeting will be introduced to discuss all adults at risk as well as to examine individual cases in detail.	6 months
5.12	Centre Manager	Safety	Safeguarding	N	The safer custody meeting should review all cases involving self-harm, violence or bullying, and discuss quality checks of safer custody documentation to learn lessons. (1.31)	Accepted	Ongoing	All cases of self harm, violence and bullying form part of the current safer detention meeting agenda and are discussed monthly. The meeting agenda will be reviewed to ensure that matters discussed do not overlap with those discussed in the Multi Disciplinary Team meeting (MDT). The MDT meeting is used to review ongoing issues whereas the safer custody meeting looks at historic issues which have been resolved. Minutes taken will be reviewed and revised to ensure that they capture the required detail of the meeting discussion before distribution. The existing quality assurance checks of documentation will be reinvigorated and lessons learned as a result of this will be disseminated to staff to ensure continuous improvement.	6 months
5.13	Centre Manager	Safety	Safeguarding Children	N	There should be an up-to-date safeguarding children policy and all staff should have up-to-date safeguarding children training. (1.36)	Accepted	Ongoing	As part of the update of the existing safeguarding policy, amendments will be made to ensure that the policy is fully aligned with published Home Office guidance (DSO 14/2012 Detention and Escorting Safeguarding Children Policy). The supplier's safeguarding children training package has been reviewed and will shortly be reissued. Home Office staff are required to undertake a range of mandatory training associated with keeping children safe. Training records are maintained to ensure that all staff receive the appropriate training which is refreshed at specified intervals.	6 months

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5.14	Centre Manager	Safety	Personal Safety	N	Allegations of bullying and violent incidents should be fully investigated and actions should be followed up thoroughly. (1.43)	Accepted	Ongoing	A review of the safer detention policy is being undertaken. Additional training will be provided to all managers undertaking investigations to ensure that they are completed robustly and that well evidenced and properly documented conclusions are drawn resulting in the identification of lessons learned. All actions resulting from investigations are already recorded in a central log which is reviewed at regular intervals to ensure that progress is maintained in implementing improvements.	6 months
5.15	Centre Manager	Safety	Security and Freedom of Movement	Y	Detainees should not be subject to routine rub-down and room searches. (1.52, repeated recommendation 1.52)	Accepted	Completed and Ongoing	In accordance with the requirements of Detention Services Order 9/2012 (revised in August 2018) the centre has reduced the frequency of searching of accommodation and detainees. Searches take place where indicated by intelligence.	6 months
5.16	Centre Manager	Safety	Security and Freedom of Movement	N	Detainees should only be placed on closed visits on the basis of specific risks or intelligence. Their cases should be reviewed regularly and the restriction should be removed when no longer supported by the evidence. (1.53)	Accepted	Completed and Ongoing	The centre's policy on closed visits will be reviewed to ensure that it is in accordance with the relevant Home Office guidance. Detainees will not be subject to automatic closed visits and any closed visit arrangements will be discussed as an agenda item at the weekly meetings with the Home Office to ensure that they remain appropriate.	6 months

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5.17	Centre Manager	Safety	Security and Freedom of Movement	N	A centre-wide policy to manage substance misuse, including supply reduction action planning, should be developed. (1.54)	Accepted	Ongoing	A centre wide policy on managing substance use will be developed with all parties working at the centre. The policy will be expanded to include a joint statement (including healthcare) to ensure the safe management of detainees during the reduction programme. The policy will also include the steps taken to minimise substance supply and demand. Quarterly drug and therapeutic meetings are already held to discuss individual cases.	6 months
5.18	Centre Manager	Safety	Use of Force and Single Separation	N	All use of force incidents should be subject to a full recorded review process with lessons learned and disseminated to staff. (1.61)	Accepted	Ongoing	The process of reviewing use of force will be assessed and improved to ensure that lessons are learned. The centre's Head of Operations will hold regular meetings with use of force instructors to discuss issues arising from these reviews. Use of force will be added as a standard agenda item to the monthly security meeting and lessons learned will be disseminated to staff to ensure practices are improved.	6 months
5.19	Centre Manager	Safety	Use of Force and Single Separation	N	Use of force data should be analysed thoroughly to ensure that trends are identified and appropriate action taken. (1.62)	Accepted	Ongoing	The centre's Head of Operations will undertake a regular analysis of use of force data to identify trends. Information gathered from this analysis will be used in a targeted way in an attempt to minimise, as far as possible, future occurrences. Findings and progress in implementing actions will be discussed more widely at the monthly security meeting attended by the Home Office.	6 months

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5.20	Centre Manager	Respect	Daily Life	N	Detainee consultation should involve a wide cross-section of the population and individual updates should be provided for all generated actions. (2.20)	Accepted	Ongoing	Weekly detainee consultation meetings are held and attended by detainee representatives, including women, who canvass the detainee population for their views and suggestions ahead of the meeting. Attendees are sent text message reminders to increase engagement. Meetings are also advertised throughout the centre. Actions from meetings are fully documented and updates on their implementation will be provided through information posted in the information centre, even if meetings are cancelled. In addition to these meetings the centre also holds an open consultation meeting monthly. All meetings are advertised in the information centre and detainees are advised that they take place during their induction on arrival to the centre.	6 months
5.21	Centre Manager	Respect	Daily Life	N	Responses to complaints should be timely. (2.21)	Accepted	Completed and Ongoing	A complaints tracking system is used to co-ordinate complaint responses to ensure that responses are timely. Interim responses will be sent to complainants in the event of a delay. This is in line with requirements of Home Office published guidance.	6 months
5.22	Centre Manager	Respect	Daily Life	N	The cultural kitchen should be deep-cleaned and monitored regularly by the centre to ensure that acceptable standards of hygiene are maintained. (2.27)	Accepted	Completed and Ongoing	Managers review centre facilities daily including cleanliness using a targeted check list. Where managers identify that additional cleaning to the normal schedule is required this will be undertaken. The cultural kitchen is, in addition, deep cleaned every 6 months by an external cleaning company and this has been undertaken since the inspection took place. A new cultural kitchen is being created as part of ongoing improvement work at the centre.	6 months

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5.23	Centre Manager	Respect	Daily Life	N	The cultural kitchen should have longer opening times and be effectively promoted, especially to women detainees. The reasons for the latter not using the facility should be investigated and action taken to encourage participation. (2.28)	Partially Accepted	Ongoing	The cultural cooking class is open three hours per day and provides sessions for women weekly as well as daily access in mixed gender classes. The women only cooking class will be promoted through the agenda of the dedicated monthly meetings which are held for women. These classes will also be advertised within the detainee induction programme and will be promoted within each accommodation area.	6 months
5.24	Centre Manager	Respect	Equality, Diversity and Faith	N	Equality policies, planning, monitoring, consultation and systems of redress should cover all protected groups. (2.32)	Accepted	Ongoing	The Equality Diversity and Inclusion (EDI) policy is reviewed annually. The centre has Protected Group Liaison Officers whose roles will be reviewed to ensure they fulfil the needs of detainees. Where required, roles will be expanded. EDI meetings take place regularly and will document all engagement undertaken with protected groups at the centre. Detainees are able to attend these forums to contribute suggestions for how engagement can be improved.	12 months
5.25	Centre Manager	Respect	Equality, Diversity and Faith	N	Professional telephone interpreting should be used for all interviews requiring accurate or confidential communication. (2.42)	Accepted	Completed and Ongoing	The centre is introducing a revised professional telephone interpreting (PIN) system to allow for better records and easier auditing and analysis of use. A reminder to staff will be issued on the appropriate use of telephone interpreting. A recent audit of the usage of interpreter services was completed and showed that interpreting services were frequently used by both Healthcare and Operational staff.	6 months

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5.26	Centre Manager	Respect	Health Services	N	Health staff should have access to an electronic medical record system to enable better use of data and technology and to enhance the quality and efficiency of the service. (2.62)	Accepted	Ongoing	The Healthcare manager has recently made arrangements to have remote access to the electronic health records system (System 1) used in IRCs in England. This provides "read only" access but is unable to permit staff to enter new notes. Enquiries are on-going into the practicalities and costs associated with accessing the Scottish records system after which a funding request will be submitted to the Home Office.	18 months
5.27	Centre Manager	Respect	Health Services	N	Detainees should be able to complain about health services through a well-advertised separate confidential health complaints system. (2.63)	Not Accepted		Complaints, including those pertaining to healthcare, are handled in accordance with Home Office published guidance DSO 03/2015. It is not considered practical to introduce an alternative process at this juncture until wider consultation can be undertaken.	
5.28	Centre Manager	Respect	Health Services	N	Nurses should have access to additional specialist training to support the delivery of best practice standards for the management of long-term conditions with evidence-based care plans. (2.70)	Partially Accepted	Completed and Ongoing	Training delivered to healthcare staff is up to date and includes enhanced training over and above that which is mandatory. All training is line with best practice and staff training in chronic illnesses is refreshed regularly. A review will be undertaken of the care plan template.	6 months

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5.29	Centre Manager	Respect	Health Services	Y	Detainees on opiate substitution treatment should receive prescribing informed by a local policy, based on current best practice, a comprehensive specialist assessment, and regular documented reviews and documented harm reduction. (2.82, repeated recommendation 2.88)	Not Accepted		The local policy specific to the IRC environment is for a reduction programme in all cases and not a maintenance programme. All detainees on opiate substitution treatment are subject to a comprehensive assessment and are supported by Royal College of General Practitioners (RCGP) trained staff.	
5.30	Centre Manager	Respect	Health Services	N	Detainees should have timely access to dental services based on clinical need and to the full range of NHS equivalent treatment that can reasonably be delivered. This should not be delayed by a lack of escort staff. (2.92)	Accepted	Ongoing	Analysis of escorting information for attendance at dental appointments over the past 4 months has shown that only around 10% of appointments were cancelled due to operational reasons. The costs of updating dental equipment to bring this service back on site is being explored and if viable this will improve access if funding is approved. In the meantime, increased staffing will ensure that there are very few cancellations in the future.	12 months
5.31	Centre Manager	Activities	Fitness Provision	N	Gymnasium staffing levels should ensure that detainees can access scheduled exercise activities throughout the week. (3.19)	Accepted	Completed and Ongoing	A full programme of scheduled exercises for detainees is in place throughout the week. The gymnasium is opened on a daily basis for 12 hours. Two new staff have been allocated to work within the gymnasium which will improve the delivery of these activities.	6 months

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5.32	Centre Manager	Activities	Fitness Provision	N	Broken exercise equipment should be repaired and maintained in good working order. (3.20)	Accepted	Ongoing	A full review of gym equipment will be completed and equipment will be replaced in accordance with available funding. A new provider has been sourced to maintain the current equipment which will improve availability. Upgrading of equipment has commenced and replacement parts are on order for broken machines and orders for new equipment have been placed.	6 months
5.33	Centre Manager	Preparation for Removal and Release	Visits and Family Contact	N	The centre should identify and monitor detainees with friends and family living far from the centre, and take steps to address their potential sense of isolation. (4.12)	Partially Accepted	Ongoing	The centre will develop means of monitoring isolated detainees and will analyse information gathered as part of the Equality Diversity Inclusion (EDI) forum. Individuals will be identified and referred to detainee visitor groups to provide support or introduced to group activities if found that they are not attending. Detainees are already issued with mobile telephones and have access to IT for emails in order to maintain contact with friends, family and legal representatives.	6 months
5.34	Centre Manager	Preparation for Removal and Release	Leaving the Centre	N	Detainees should be informed of their transfer to another centre as soon as is reasonably practicable. (4.26)	Partially Accepted	Completed and Ongoing	The centre will, with immediate effect, amend its policy on the notification provided to detainees about transfers. Each case will be considered on a case by case basis to ensure that any risk factors are taken into account and documented. A notice will be sent to all staff to ensure immediate implementation.	6 months