

SERVICE IMPROVEMENT PLAN - UNANNOUNCED INSPECTION OF BROOK HOUSE IRC

Recommendation No	Recommendation Addressed to	Primary Theme	Secondary Theme	HMIP Recommendation	Accepted / Partially Accepted / Not Accepted	Progress Complete / Partially Complete / Not Complete	Action taken / proposed	Expected completion within [6/12 months]
S42 – Key Recommendation	Centre Manager	Safety	Arrival and early days in detention	<p>Key concern: Detainee interviews were not conducted in private and did not cover enough areas of possible vulnerability and risk. There was not enough use of professional interpreting by reception staff.</p> <p>Recommendation: Reception interviews for new arrivals should be held in private using telephone interpreting wherever detainees are not fluent in English, and should consider a broad range of potential risks and vulnerabilities.</p>	Accepted	Partially Complete	<p>A private interview room is available within the Detainee Reception area. G4S will ensure that all new arrivals are offered a private interview during the Admissions process. This will be recorded on the local supplier IT system. The Head of Safeguarding will oversee this with a view to complete by end of October 2019. Arrangements for staff to use professional telephone interpretation are already in place for all confidential interactions with detainees.</p> <p>Staff will be reminded to use the interpretation service wherever necessary to ensure that the content of any message being conveyed is understood, and to record this action appropriately. If a detainee prefers to utilise peer interpretation or a member of staff, then this then this will be facilitated where considered appropriate. However, in all other cases telephone interpretation is utilised.</p> <p>Detainees are screened by both healthcare and supplier reception staff during the admission process for a number of risks and vulnerabilities, including formal room sharing risk assessments, health and wellbeing. In addition, the Home Office induction process will continue to take place in a private room, with professional telephone interpretation. Engagement Officers, who have received Home Office training on the Adults at Risk policy, will look for indicators of vulnerability, risk and any safeguarding concerns as part of that induction.</p> <p>Further, the Engagement Officer will check that the initial healthcare screening has taken place and whether there is anything further that the individual wishes to explain about their physical or mental health and that a Rule 34 appointment with a GP has been offered.</p> <p>To implement a recommendation in the Shaw Review (2018) of immigration detention, the Home Office recently completed a 5-month review of interpretation services in IRCs. Analysis of the findings is expected to be completed by October 2020. This will support and drive improvements in the provision of professional interpretation services, including installation of new equipment and usage of these services.</p>	6 months

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S43 - Key Recommendation	Centre Manager	Safety	Safeguarding (Self Harm and suicide prevention)	<p>Key concern: During the previous six months, the centre doctors had not submitted any rule 35 reports notifying the Home Office that a detainee may be suffering suicidal ideation. Yet, in our survey 40% of detainees said they had felt suicidal at some time while in the centre. In the previous year almost 100 detainees had been on constant watch to prevent self-harm or suicide.</p> <p>Recommendation: Doctors should submit a rule 35 report to the Home Office on any detainee they suspect of having suicidal ideation.</p>	Accepted	Partially Complete	<p>Home Office published guidance, Detention Services Order (DSO) 02/2016, provides advice on the preparation and consideration of reports submitted in accordance with rule 35 of the Detention Centre Rules 2001, as amended by the Detention Centre (Amendment) Rules 2018 (SI 411/2018). This guidance sets out who may prepare a report, how a report should be prepared and what steps the Home Office should take in considering the report and a timescale for providing a reply.</p> <p>In accordance with the Detention Centre Rules 2001, only a medical practitioner can determine when it is appropriate to make a report under Rule 35.</p> <p>Rule 35 of the Detention Centre Rules 2001 already states that: "The medical practitioner shall report to the manager on the case of any detained person he suspects of having suicidal intentions, and the detained person shall be placed under special observation for so long as those suspicions remain"</p> <p>To further support this the Home Office will liaise with the Healthcare supplier and centre supplier regarding individuals who are on constant watch regarding submission of DC Rule 35s.</p>	6 months

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S44 - Key Recommendation	Centre Manager	Safety	Legal Rights	<p>Key concern: The quality of ACDT documentation was not good enough. Assessments and reviews were timely but care maps frequently lacked detail, case reviews were not sufficiently multidisciplinary and some post-closure reviews were not completed. ACDT observations were regular but did not always demonstrate enough meaningful engagement.</p> <p>Recommendation: Care maps should always be completed in detail and regularly updated. Case reviews, including those for post closure, should demonstrate multidisciplinary input and daily observations should be in depth and demonstrate engagement with detainees.</p>	Accepted	Partially Complete	<p>In July 2019 G4S introduced an electronic diary management system to enhance attendance at both ACDT reviews and post closure reviews. ACDT Case reviews now have time slots booked in advance and healthcare, Home Office and other stakeholders are invited. Initial indications show that attendance has improved. This process will be reviewed going forward and attendance will be audited from October 2019.</p> <p>Aide memoires, learning bulletins and an effective audit process will be introduced by G4S in October 2019 to monitor quality of Care maps and meaningful engagement. In addition, more emphasis will be placed upon the completion of ACDT documentation during both initial training courses and yearly staff refreshers.</p> <p>Home Office and Healthcare staff will attend case reviews wherever possible - where requested and where considered beneficial.</p> <p>HMPPS has been reforming ACCT/ACDT in conjunction with the Home Office over the last three years, as part of a package of work to reduce self-harm and suicide. In 2020, HMPPS anticipate rolling out this revised version nationally – including to all IRCs. One IRC, Morton Hall, has piloted the revised version of ACDT.</p> <p>The revised version of ACDT simplifies processes and takes a more person/conversation-centred approach, which is aimed at improving the quality of human interactions and the subsequent documentation and should encourage:</p> <ul style="list-style-type: none"> • Better identification and assessment of risk • Closer multi-disciplinary working and information sharing • Better provision for person-centred care (with a focus on outcomes for the individual) <p>The Home Office is currently reviewing staff training in this area which should further improve the quality of the documentation.</p>	6 months

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S45 - Key Recommendation	Home Office	Safety	Daily Life (Residential Services)	<p>Key concern: Despite the reduction in the average length of detention, some detainees were held for prolonged periods. There was evidence that lengthy and indefinite detention affected feelings of safety and wellbeing. At the start of our inspection, 13 detainees had been held for more than six months, two of them for more than a year. The longest detention was for one year and eight months. Sluggish casework and delays in obtaining suitable accommodation and travel documents prolonged detention.</p> <p>Recommendation: There should be a strict time limit on the length of detention and caseworkers should act with diligence and expedition throughout detention.</p>	Partially Accepted	Partially Complete	<p>There has been much debate about the introduction of a 28-day time limit. But the evidence on all sides of the debate is somewhat limited. Stephen Shaw, in his most recent review of detainee welfare, said that he had yet to see a coherent account of how a proposal for 28 days had been arrived at and that the case for such a limit has been articulated more as a slogan than as a fully developed policy proposal.</p> <p>The former Home Secretary commissioned an internal review of how time limits work in other countries. Few other countries adopt very short time limits. The Government is looking closely at these matters, to understand how it can have a detention system that is fair to those who may be detained, upholds our immigration policies, and acts as a deterrent to those who might seek to frustrate those policies. This part of the recommendation is therefore not accepted.</p> <p>It is accepted that case-owners should act with diligence and expedition and Case Progression Panels review all cases where a detainee has been in detention for 3 months (and every 3 months thereafter), ensuring an independent assessment of all cases. Panels review the appropriateness of all detained cases to ensure consistency of decision making and case handling, adherence to the Adult at Risk policy, review case progression actions and provide transparent recommendations.</p> <p>The Case Progression Panels provide an opportunity for sharing of best practices and continuous improvement. Case progression actions are audited to ensure implementation.</p>	6 months
S46 - Key Recommendation (Repeat Recommendation)	Centre Manager	Safety	Security and Freedom of Movement	<p>Key concern: Detainees were locked in their cells from 9pm to 8am and, during the day, for two half-hour periods for roll count. This was a disproportionate restriction for a detainee population.</p> <p>Recommendation: Detainees should not be locked in cells and should be allowed free movement around the centre until later in the evening</p>	Partially Accepted	Not Complete	<p>Published Home Office guidance, DSO 4/2018 Management and Security of Night State, outlines the standards and general principles of how the night state should be operated across the estate to ensure a consistent approach is taken. The implementation of night state will be dependent on the physical layout of each centre.</p> <p>Current local arrangements at Brook House have been agreed by the Home Office and have been assessed as balancing the need to maintain safety and security with the dignity and welfare of detainees.</p> <p>Within the service provision for the new contract, which takes effect from May 2020, it is required that detainees should not be locked in their rooms for any longer than nine hours.</p>	12 months

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S47 - Key Recommendation	Centre Manager	Respect	Daily Life (residential services)	<p>Key concern: There was a reasonable range of food choices, but we received many complaints about the food not meeting the diverse needs of the population, both in our detainee interviews and survey, where 68% of detainees said the food was quite or very bad. The centre was aware that some groups of detainees were dissatisfied with the food but had not succeeded in addressing these concerns.</p> <p>Recommendation: Effective measures should be taken to ensure that a majority of detainees find the food to be of sufficient quality.</p>	Accepted	Not Complete	<p>The centre's menu is designed in consultation with detainees and is reviewed regularly through Food Forums with detainees. Food forums will now be attended by the Head of Residence in addition to the Catering manager. Minutes of these meetings will be circulated to the G4S SMT to ensure actions are completed.</p> <p>G4S Head of Residential and Resettlement will undertake a review of menus including the use of visual displays. This review will be conducted by November 19.</p> <p>Greater flexibility will be built into the menu choices to allow for changes in the cultural diversity of the population and a new detainee Paid Activities role will be created to support food preparation (including tasting).</p> <p>Additionally, regular food surveys will be completed to gauge baselines and improvements and the detainee catering comments books will be audited weekly. The Head of Residential and Resettlement will oversee this process.</p> <p>Where detainee requests or complaints in relation to food issues are not sufficiently responded to, G4S will escalate at the quarterly contractual review meetings held with the catering supplier.</p> <p>In addition, within the new contract from May 2020, the centre supplier will develop a system of consultation with detainees and relevant stakeholders about catering arrangements.</p>	6 months
S48 - Key Recommendation	Centre Manager	Respect	Daily Life (Detainee Consultation, Applications and redress)	<p>Key concern: The complaints system had several layers of quality checking. However, while courteous, replies often took an unhelpfully defensive and legalistic approach. Almost no complaints were upheld, and in some cases, that had clearly been the wrong decision. In both our survey and interviews, nearly half the detainees suggested that they did not have confidence in the complaints system.</p> <p>Recommendation: Managers should investigate and address the reasons for detainees' low confidence in the complaints system.</p>	Accepted	Partially Complete	<p>The complaints process will be overseen by a supplier Senior Manager / Deputy Director to quality assure and sign off.</p> <p>Complaints are allocated for investigation to the most relevant manager with knowledge of the area of complaint and with sufficient availability to conclude the matter swiftly</p> <p>A satisfaction survey will be included with every complaint response sent.</p> <p>Detainee understanding and satisfaction with the complaints system will be included as part of regular surveys and consultation forums to gauge understanding.</p> <p>The Home Office regularly monitors supplier performance in responding to complaints in terms of timeliness and quality through a range of measures and will continue to do so.</p> <p>As part of these measures an internal Home Office review took place in the Summer of 2019 and an action plan developed to seek improvements in processes across the immigration detention estate.</p>	6 months

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S49 - Key Recommendation	Centre Manager	Respect	Equality, Diversity and faith (Protected Characteristics)	<p>Key concern: There was no systematic approach to the identification of individuals' protected characteristics.</p> <p>Recommendation: Information about the protected characteristics of all detainees should be systematically collected on arrival, with support offered where necessary.</p>	Accepted	Partially Complete	<p>Where detainees make their protected characteristics known, referrals will be made to staff who lead on equality, diversity and inclusion. Where necessary care plans will be initiated including personal emergency evacuation plans (PEEP).</p> <p>The centre has three disabled rooms that allows in- room showering facilities and has adapted hand rails. Hearing loops are strategically located in the Centre and individual equality impact assessments are conducted for detainees that can include utilisation of lifts, support during meal times as well as a buddy system. The centre can provide audio books and large text books to assist visually impaired detainees. The induction is now available through I-pod technology.</p> <p>A review of Reception and Induction processes will be conducted between the Head of Safeguarding and Head of Residential and Resettlement by the end of October 2019 to ensure that detainees with protected characteristics are identified as early as possible after arriving at the centre and that this information is recorded and disseminated effectively</p> <p>Individual consultations currently occur with detainees with protected characteristics. These are conducted discreetly with the Diversity Manager.</p> <p>Monitoring of protected characteristics will also be conducted monthly by the Diversity Manager, who will work closely with the Healthcare provider in this area –with trends identified and analysed and appropriate action taken where required.</p> <p>From May 2020 the centre supplier will carry out an Equalities Assessment to assess the impact of delivering the services as defined in the new contract on those with protected characteristics as set out in Section 4 of the Equality Act 2010.</p> <p>Also, the supplier will record details of detainees engaging in both recreational activities and education, monitoring protected characteristics and those who are vulnerable, to examine and identify any problems of access to activities, implementing improvements to increase usage.</p>	12 months

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S50 - Key Recommendation	Centre Manager	Activities	Education and Work	<p>Key concern: The centre did not give detainees enough encouragement to participate in education and improve their skills. Managers had not developed policies to incentivise consistent attendance. The centre induction did not include advice or guidance to help and encourage detainees to choose a course.</p> <p>Recommendation: Managers should significantly increase the number of detainees who benefit from the education provision, through better promotion, guidance and incentives to improve participation.</p>	Accepted	Partially Complete	<p>A review of Induction and Activities will be undertaken to look at both the promotion of Education and the increased and sustained attendance as well as competitions, by the end of October 2019.</p> <p>Through close supervision from Officers and Orderlies, enhanced monitoring of attendance at education classes, the gym and the library will be introduced and fed into a monthly review of the centre's regime and activities programme. Results will be taken forward to improve arrangements.</p> <p>The introduction of comments books in Activity areas will assist in informing and adapting the provision to meet detainees needs.</p> <p>Within the requirements of the new contract from May 2020 the centre supplier within the centre will ensure that each detainee has their own Individual Learning Plan ensuring that all those that wish to take part in education are assessed for literacy, numeracy and language support needs and the information used to structure learning to meet individual needs.</p> <p>Additionally, the supplier will ensure that detainees receive an induction for education, where the education opportunities and means of accessing them is explained.</p>	12 months
S51 - Key Recommendation	Centre Manager	Activities	Access to Activities	<p>Key concern: Although access to fitness provision was reasonably good, there were not enough activities to promote wellbeing, relaxation or stress relief to help detainees who were often preoccupied by their cases.</p> <p>Recommendation: Managers should introduce relaxation and stress-relief activities into the centre's activities programme.</p>	Accepted	Partially Complete	<p>G4S will undertake a review by the end of October 2019 to consider the introduction of activities that promote wellbeing, relaxation and stress relief i.e. yoga.</p> <p>Fitness instructor training has been arranged and will be completed in November 2019. This will allow for the activities team to ensure that inductions are consistently delivered by appropriately qualified staff and explain all the activities that are available within the centre.</p> <p>The Healthcare supplier provides "Well man" clinics, emotional health support groups and Health promotion in line with the NHS England calendar and are looking at working jointly with the supplier for many of the health promotion days that are held.</p> <p>Within the new contract, there will be a full programme of educational and recreational activities for detainees, throughout the day, 7 days a week.</p>	6 months

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S52 - Key Recommendation	Centre Manager	Preparation for Removal and Release	Communications	<p>Key concern: Detainees had reasonable access to email and internet. However, the blocking of legitimate websites, including some national newspapers, immigration support and humanitarian sites, was a significant problem which could affect detainees' preparations for legal motions and removal or release plans. Systems to unlock sites and provide access were slow. In our survey, only 16% said it was easy to access what they wanted on the internet. There was still no access to social networks or video-calling sites.</p> <p>Recommendation: Detainees should have access to legitimate websites, including those facilitating legal assistance, Skype and social networking. There should be effective and prompt procedures for unblocking such sites.</p>	Partially Accepted	Partially Complete	<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.</p> <p>The Home Office recently undertook a pilot at selected immigration removal centres on the use of Skype and similar platforms. Following this pilot, video calling is being rolled out to immigration removal centres across the detention estate. Access to Skype will be introduced at Brook House in September 2019.</p> <p>It is accepted that there should be prompt procedures re unblocking legitimate sites and G4S will conduct an audit of detainee access to the internet and provide an action plan, via their IT specialists to ensure that websites are unblocked promptly to allow access. This will be completed by January 2020.</p> <p>Records for this will be retained in accordance with Detention Service Order (DSO) – 04/2016 – Detainee Access to the Internet.</p> <p>As part of this DSO the Home Office also undertakes regular monitoring of the unblocking of sites.</p>	6 months

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S53 - Key Recommendation	Centre Manager	Preparation for Removal and Release	Leaving the centre	Key concern: Centre staff did not systematically assess detainees' welfare needs on arrival nor did they assess whether detainees had outstanding welfare needs before leaving the centre. Recommendation: Detainees should be routinely seen on arrival and before discharge to ensure that welfare matters are identified and addressed.	Partially Accepted	Partially complete	<p>Currently it is not possible for all new arrivals to be systematically assessed upon arrival or discharge due to contractual staffing levels, however a review will be undertaken to look at how detainee welfare can feature more prominently within the Reception / Induction process. This review will be undertaken by the Head of Safeguarding by October 2019.</p> <p>Where possible detainees who have been given advance notice of leaving the centre will be offered an appointment to see welfare staff to discuss any needs or concerns.</p> <p>Within the new contract, the welfare team will complete a systematic assessment of welfare needs and provide support for detainees within 48 hours of arrival in the IRC. This will identify practical issues that require resolving prior to removal and together with the detainee, develop an individual plan to resolve issues. Meetings with the detainee will be held monthly thereafter to review progress.</p> <p>The centre supplier will ensure that a detainee has all their personal matters attended to within the timescale agreed with the detainee and detailed in their individual plan. In addition, the supplier will, prior to a detainee transfer to another IRC, capture and record outstanding welfare issues that require resolving prior to removal, that immediately need to be taken account of, on arrival at the receiving IRC. This record will be sent to the IRC the detainee is transferring to, at the time of Discharge.</p> <p>Additionally, Detainee Engagement Team staff, who conduct the initial Home Office induction, and are responsible for ongoing casework engagement whilst in the IRC, will work closely with supplier staff to ensure that welfare needs are known and shared.</p>	12 months
1.12 – General Recommendation (Repeat Recommendation)	Home Office and Escort Contractor	Safety	Arrival and Early Days in Detention	Detainees should not be subjected to exhausting overnight transfers when this could be avoided through more timely escorts.	Not Accepted		The Home Office and escorting contractor seek to avoid routine night time transfers. Mitie Care and Custody 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 between centres sometimes have to be conducted during the night if they are time-specific priority moves i.e. taking detainees to flight.	

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1.32 - General Recommendation	Centre Manager	Safety	Self-harm and Suicide Prevention	Key departments should be consistently represented at monthly safer community meetings and the minutes should demonstrate discussions and actions based on the data presented.	Accepted	Partially Complete	<p>By the end of September 2019, the safer community meeting Terms of Reference and diary management system will be reviewed to ensure maximum possible attendance at meetings and results will be assessed by the end of 2019 to see what improvements were made. The Home Office will continue to attend and monitor attendance at safer community meetings as part of their assurance and oversight of the supplier.</p> <p>In addition, the data presented at meetings will be reviewed to ensure to ensure appropriate discussions are held and that analysis of finding will take place in subsequent meetings. The Head of Safeguarding ensures relevant attendance at meetings and minutes are accurately recorded.</p>	6 months
1.44 - General Recommendation	Centre Manager	Safety	Personal Safety	Violence reduction processes should focus on identifying, quantifying and addressing the causes of violence.	Accepted	Partially Complete	<p>A violence reduction toolkit will be introduced by the end of September 2019 and there will be a new process to focus on identifying, quantifying and addressing causes of violence.</p> <p>Environmental, situational, cultural, personal and relationships, as well as locations and profiles, will be considered for analysis.</p> <p>The Home Office closely monitors this area and an internal review was conducted earlier this year and an action plan is expected to be in place by November 2019 to take forward appropriate recommendations.</p>	6 months
1.55 - General Recommendation (Repeat recommendation)	Centre Manager	Safety	Security and Freedom of Movement	All security procedures should be proportionate to a detainee population and based on individual risk assessments.	Accepted	Partially Complete	<p>Within the next 6 months a supplier review of the recording of full searching, the use of restraints on escort and the agenda of the security meeting will take place by October 2019. This will be completed by the Head of Security.</p> <p>In addition, a review of security procedures will be conducted including use of banned / closed visits and visiting arrangements, use of restraints, searching strategy and prohibited items. This will be completed by the Head of Security by October 2019.</p> <p>The Home Office conducts independent reviews and assessments of security procedures to ensure that the supplier is fully undertaking their responsibilities.</p> <p>The new contract, due to be introduced in May 2020, will reduce the lock down to no more than nine continuous hours allowing detainees to have longer access to the facilities at the centre than currently available.</p>	6 months

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1.70 - General Recommendation	Centre Manager	Safety	Use of Force and Single Separation	An in-depth review of use of force should be conducted to ensure that such incidents are minimised in line with the level used in other immigration removal centres.	Accepted	Partially complete	<p>When force has been used on a detainee, whether it be spontaneous or planned, the Duty Director on the day of the incident will complete a review using Body Worn Camera /CCTV footage, complete a review form and attached this to the required Home Office DCF-2 paperwork.</p> <p>The locally held Use of Force log in the SMT folder will be then be updated with any actions taken.</p> <p>Minutes will be produced to evidence subsequent meetings with staff in relation to any actions that have occurred with the Home Office able to attend such reviews.</p> <p>Additionally, meetings to discuss incidents involving use of force are held monthly chaired by the Head of Safeguarding. The meetings review the recorded footage and the appropriateness of the use of force to identify any trends. These meetings are attended by various stakeholders – including Home Office.</p> <p>Feedback will also be provided to the Senior Management Team at the monthly SMT meeting.</p> <p>Since August 2019 reports of the Use of Force have considered the demographic, age range, background of detainees and the reasons for occurrence. A further review will be undertaken before the end of 2019.</p> <p>The Home Office plays an integral part in reviewing every Use of Force both in conjunction with and independent of the supplier.</p>	6 months
1.71 - General Recommendation	Centre Manager	Safety	Use of Force and Single Separation	Detainees in the segregation unit should be offered full access to the regime. Subject to individual risk assessments	Partially Accepted	Partially Complete	<p>Detainees that are placed on Rule 40 / 42 for the minimal amount of time possible and are subject to an individual tailored regime according to individual risk assessment.</p> <p>The use of “in-room packs” which contain origami, colouring, puzzles, crosswords, DVD / CD player within Rule 40/24 accommodation will be produced by the end of 2019.</p> <p>Quality assurance of Rule 40 /42 paperwork will be created to evidence delivery of individual targeted regimes and a review and analysis of the introduction of this process will conducted by the end of November 2019.</p> <p>The Home Office is currently reviewing Detention Services Order 02/2017 - Removal from Association (Detention Centre Rule 40) and Temporary Confinement (Detention Centre Rule 42) which will be completed by the end of Autumn 2019.</p>	6 months

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2.14 - General Recommendation	Centre Manager	Respect	Daily Life – Living Conditions	Toilets and basins should be clean and unstained.	Partially accepted	Partially Complete	<p>The toilets currently in place are made from a single fixed unit and are made from a strong resin material.</p> <p>These have previously been refurbished to try to reduce staining however this process has been found to be ineffective. Alternatives using various cleaning materials have also been made to improve the aesthetics but with limited success. They remain part of the long-term maintenance programme for the site.</p> <p>A regular cleaning schedule is in place that includes daily cleanliness checks of rooms, including toilets. Cleaning materials are also freely available to detainees. In the event of a departure, all rooms are cleaned, and quality checked by detainee custody officers.</p>	12 months
2.20 - General Recommendation	Centre Manager	Respect	Daily Life – Detainee Consultation, Applications and Re-dress	Decisions on actions should be made, and their implementation tracked, at detainee consultation meetings.	Accepted	Partially Complete	<p>Detainee Consultation Meetings continue to be held monthly with minutes taken and actions noted and addressed.</p> <p>From 1 October 2019 action points arising from these meetings will be given oversight by a member of the SMT to ensure the action points are progressed.</p> <p>A Communications Orderly has recently been appointed to ensure messages from these meetings are passed to detainees.</p> <p>Updates on actions arising from meetings to be included in the local bulletin (Gazette) which is circulated to staff and detainees on a monthly basis. This will be effective from the October edition.</p>	6 months
2.26	Centre Manager	Respect	Daily Life – Residential Services	All detainees who wish to take part in the cultural kitchen activity should be able to do so regularly and within a reasonable timescale.	Accepted	Partially Complete	<p>Cultural Kitchen opening times have been increased to include weekend opening from the end of September 2019.</p> <p>Regular reviews of usage will be undertaken, and results analysed regarding waiting times.</p> <p>Within the service provision for the new contract, which takes effect from May 2020, it is required that the Cultural Kitchen is open both morning and afternoon seven days a week.</p>	6 months

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2.31 - General Recommendation	Centre Manager	Respect	Equality, Diversity and Faith – Strategic Management	Diversity monitoring should facilitate the identification and investigation of trends in detainee outcomes.	Accepted	Partially Complete	<p>Training for staff will be developed and delivered to raise staff awareness of protected characteristics</p> <p>In addition to the training delivered on the Initial Training Course, all staff will receive a Toolbox Talk / Presentation on identifying and supporting detainees with protected characteristics. This will be overseen by Head of Safeguarding.</p> <p>An agenda item on protected characteristics will be added to the monthly detainee consultative meeting to invite feedback and assess detainees' understanding of the subject and the importance of disclosing this information to ensure that their needs can be fully met by the centre.</p> <p>A trend analysis will be undertaken quarterly to identify trends and monitor outcomes.</p> <p>Centre Director to chair Equality Diversity and Inclusion board from October 2019.</p>	12 months
2.36 - General Recommendation	Centre Manager	Respect	Equality, Diversity and Faith – Protected Characteristics	Detainee support forums should be provided for detainees with protected characteristics and different nationality groups.	Accepted	Partially Complete	<p>A timetable of support forums will be implemented by November 19 - with analysis undertaken by the Head of Safeguarding taking place in early 2020 which will determine how effective the forums have been.</p> <p>G4S currently offer and conduct individual consultations with individuals that declare protected characteristics this is in addition to monthly care officer reviews.</p> <p>In addition, contact with community support groups will be arranged by 30 October 2019 to discuss and explore the most effective way to support detainees who declare that they have a protected characteristic.</p>	12 months
2.41 - General Recommendation	Centre Manager	Respect	Equality, Diversity and Faith – Faith and Religion	Chaplains should be available for the drop-in service at specified times each day.	Accepted	Partially Complete	<p>The appointment of a new Religious Affairs Manager in July 2019 has allowed for drop in services to be available to the population at specified times.</p> <p>Duty Chaplains are now scheduled daily and will be available in the religious affairs office for drop in sessions by end of September 19. These sessions will be advertised via posters and detainee forums.</p>	12 months
2.57 - General Recommendation	Centre Manager	Respect	Health Services – Governance Arrangements	The health care complaints system should be well advertised and ensure that medical confidentiality is maintained.	Accepted	Partially Complete	<p>There are posters in English available on each wing advising detainees on how to complain or compliment healthcare and these supplement leaflets provided on admission which are in a number of languages.</p> <p>Individual "post boxes" for each wing have been ordered to supplement the current post box in health care.</p> <p>Medical information is only shared if consent is given by patient.</p>	6 months

SERVICE IMPROVEMENT PLAN - UNANNOUNCED INSPECTION OF BROOK HOUSE IRC

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2.58 - General Recommendation	Centre Manager	Respect	Health Services – Governance Arrangements	All health staff should receive regular, recorded managerial and clinical supervision.	Accepted	Partially Complete	<p>Clinical and managerial supervision review of policies is already being undertaken.</p> <p>All healthcare staff are subject to Managerial supervision and all clinical staff will receive clinical supervision.</p> <p>Supervision details will be recorded on a register and be conducted in line with G4S clinical and managerial policy.</p>	12 months
2.59 - General Recommendation	Centre Manager	Respect	Health Services – Governance Arrangements	The centre should promote the emergency protocols to ensure that all custody staff are familiar with them and are confident to use them when needed to prevent confusion and potential risk.	Accepted	Partially Complete	<p>Healthcare have developed an emergency response Standard Operating Practice - in line with the Code Red and Code Blue guidance contained within Detention Service Order 09/2014 – Emergency Response Codes.</p> <p>Healthcare staff are aware of these codes and regular refreshers will take place regarding knowledge of this.</p> <p>Joint working Including practice exercises – this includes first on Scene and Radio etiquette during ITC training and live contingency exercises between the centre and healthcare staff will ensure better implementation.</p> <p>The centre manager will ensure that emergency codes are called correctly to ensure that the correct response code is used and will introduce regular training to ensure that the correct response code is used.</p> <p>Emergency protocols will be taught on the officer initial training course and thereafter, G4S will introduce regular training including Notices to Colleagues and visual aides to increase knowledge of this.</p>	6 months
2.60 - General Recommendation	Centre Manager	Respect	Health Services – Governance Arrangements	A wide range of translated health information, including self-help guidance, should be easily accessible and clearly promoted.	Accepted	Partially Complete	<p>A selection of varied Health promotion leaflets are available however better explanation of these leaflets and posters is required.</p> <p>Healthcare will seek further resources on self-help and guidance, specifically in Mental Health and Psychiatry, in multiple languages to better inform individuals.</p> <p>Information that requires translation will be translated via Bigword translation services, if not available in a patient's specific language.</p>	6 months
2.69 - General Recommendation	Centre Manager	Respect	Health Services – Primary Care and Inpatient Services	Formal monitoring should be introduced to ensure that all detainees leave the centre with their prescribed medication.	Accepted	Partially Complete	<p>Healthcare will develop and implement a formal discharge assessment, due to commence by November 2019. New templates will be devised, and training given to staff prior to implementation</p> <p>This will include ensuring medical notes, hospital appointments and medication is provided to the patient on discharge and recorded on the patient record.</p>	6 months

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3.18 - General Recommendation	Centre Manager	Activities	Education and Work	Managers should implement the quality assurance framework to support teachers more effectively in improving the provision.	Accepted	Partially Complete	Regular observations and analysis of the delivery of lessons will be introduced to ensure that teaching standards are appropriate. These will be completed on a quarterly basis and coordinated by the Head of Residential and Resettlement. Lesson plans will be routinely reviewed by peers and line managers to ensure that they meet the needs of the centre's population.	12 months
3.22 - General Recommendation	Centre Manager	Activities	Library Provision	Managers should monitor use of the library to identify areas where the service can be improved, and use increased.	Accepted	Partially Complete	An effective system for borrowing books will be explored through cross sharing with Tinsley House. Review of library to be conducted / included in Activities review. This will be overseen by the Head of Residence and Resettlement and completed by the end of October 2019. Library use will be one of the questions of the regular detainee surveys with results taken forward. Enhanced monitoring of attendance will be undertaken to understand current usage and inclusion for all. This will involve a Detainee Comment Book and the Supervising Library Officer monitoring the purpose of the detainees visit to ensure resources are meeting their needs. A quarterly stock check will be carried out and additional books ordered as appropriate to maintain sufficient stock.	12 months
4.12 - General Recommendation	Centre Manager	Preparation for Removal and Release	Visits and Family Contact	Visitors should be able to book visits easily by telephone.	Accepted	Partially Complete	G4S recognises the importance to maintain contact with friends and family. Phone answering will be a priority 24 hour a day. Visits can currently be booked through email or phone staffed by operators that manage this process. G4S will look to ensure phones are diverted during busy periods or night state to a staffed phone or answerphone to cover phone booking requests. This will include night state cover. The Head of Safeguarding will arrange this by October 2019.	6 months

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4.18 - General Recommendation	Centre Manager	Preparation for Removal and Release	Communications	Detainees should have access to video-calling and social networking sites unless an individual risk assessment determines that this is inappropriate.	Partially Accepted	Partially Complete	<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.</p> <p>The Home Office recently undertook a pilot at selected immigration removal centres on the use of Skype and similar platforms. Following this pilot, video calling is being rolled out to immigration removal centres across the detention estate with Brook House introducing Skype access during September 2019.</p>	6 months
4.23 - General Recommendation	Home Office	Preparation for Removal and Release	Leaving the Centre	The Home Office should keep records of the numbers of detainees being released homeless.	Accepted	Complete	A spreadsheet will be put in place in each IRC to record the reference and date (of release) of every person released without an address.	6 months