

Rec 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]
6.1	Home Office	Safety	Safeguarding (Safeguarding of vulnerable adults)  Legal Rights	<p><b>Key concern (1.38):</b> Many detainees had been held for lengthy periods with little prospect of being removed within a reasonable time. One man had been held for almost a year, although he had no travel documents and flights to his home country were very restricted. Some long-held detainees had been assessed as level 3 adults at risk (the highest risk level), which meant that the Home Office accepted that ongoing detention was having a negative impact on their health and well-being. Others were held despite the Home Office accepting that they were victims of torture.</p> <p><b>Recommendation: The Home Office should ensure that detention is not unnecessarily prolonged when there is little prospect of removal within a reasonable timeframe, especially for vulnerable detainees whose health and well-being is detrimentally affected by ongoing detention.</b></p>	Accepted	Partially Complete	<p>The Home Office’s detention policies are clear that detention should only be maintained where there is a realistic prospect of removal within a reasonable timeframe. A number of safeguards are in place, including regular detention reviews and Case Progression Panels (CPP), to ensure that detention remains lawful, appropriate and proportionate.</p> <p>The Adults at Risk in Immigration Detention policy strengthens the presumption against detention for vulnerable individuals, including victims of torture, and directs caseworkers to balance evidence of vulnerability against immigration factors when deciding on the appropriateness of detention.</p> <p>It is accepted that case-owners should act with diligence and expedition and CPP 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. Cases can also be referred to the CPP on an ad hoc basis where a review is required outside of the three-monthly schedule.</p> <p>Since August 2019 AAR L3 cases have been referred to a panel if they have been in detention for more than 7 days, to provide an additional assurance around the more vulnerable. 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 CPP provide an opportunity for sharing of best practices and continuous improvement. Case progression actions are audited to ensure implementation.</p> <p>Increased feedback loops have been introduced to add further oversight and improve the consistency of panels, including quarterly observations and feedback from the UNHCR and British Red Cross.</p> <p>Independent panel members have the same role as any CPP member, but additionally they also record and report back on any CPP issues or trends, and attend meetings with detained casework leads to share lessons learned and best practice to inform the continued development of the CPP process and raise standards.</p> <p>Work is currently underway to ensure an independent panel member is part of every CPP. A recruitment campaign to permanently appoint 11 Independent panel members went live on 28 March 2021. The successful applicants, following Ministerial approval, have now been notified and we are awaiting confirmation of security clearances for onboarding to commence.</p>	6 months

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6.2	Home Office	Safety  Respect	Personal Safety  Equality, diversity and faith  (Protected characteristics)	<b>Key concern (1.39):</b> The centre held several men with a history of sexual violence against women. Before the pandemic, these men were held in a separate unit with controlled access to common parts of the centre. As a result of infection control arrangements, this was no longer considered practicable. This meant that for most of the previous six months, women had to be escorted when they moved around the site.  <b>Recommendation: Detainees who pose a risk to women should not be held in the centre when women are held.</b>	Partially accepted	N/A	There is, and will continue to be, a presumption against holding individuals who pose a risk to women at Dungavel IRC when women are held at the centre.  As COVID restrictions ease and pressures within the estate are alleviated, it is anticipated that detained individuals that pose a known risk to women will not need to be accommodated at Dungavel for anything other than staging moves.  Derwentside and Swinderby will support the strategic operation going forward and provide options for the relocation of female individuals.  The existing safeguarding policies approved by the Home Office in October 2021 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 will be documented.	N/A
6.3	Centre Manager	Respect  Activities	Daily Life (Residential services)  Education and work	<b>Key concern (1.40):</b> Most employment had ceased during the pandemic, but the rationale for removing cleaning roles was unclear and there was not enough sufficient focus on creating new roles to help support detainees' mental and physical well-being.  <b>Recommendation: Leaders should substantially increase the range of paid work opportunities for detainees to help support their mental and physical well-being.</b>	Accepted	Partially Complete	Mitie Care and Custody (Mitie C+C) recognise the value of voluntary paid activities (VPAs) for normalising life for detained individuals, providing structure and purpose to their day. Mitie C+C will be rolling out a robust VPA regime as part of the implementation process for the new contract model.  Initially the focus will be on reinstating posts such as cleaning (this will be in addition to contractual cleaning requirements) and support roles that can be completed safely within Covid safety guidelines.  The current paid activities policy is being reviewed as part of the new contract transition period which ends on 24 December 2021. The roles will then become available following approval of the policy and no later than March 2022.	12 months
6.4	Home Office and Escort Contractor	Safety	Arrival and early days in detention	Recommendation (2.12): Detainees should not be escorted during the night unless this is required for urgent operational reasons. (Repeated recommendation 1.11.)	Not Accepted	N/A	The Home Office and Mitie Care and Custody, the 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 a detained individual, 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 individuals to flight.	N/A
6.5	Home Office	Safety	Safeguarding (Safeguarding of vulnerable adults)	Recommendation (2.22): The Home Office should maintain an up-to-date record of NRM referrals made at the centre.	Not Accepted	N/A	Data is held on National Referral Mechanism (NRM) referrals and is available via <a href="https://www.gov.uk/national-referral-mechanism-statistics">National Referral Mechanism statistics - GOV.UK (www.gov.uk)</a>  These are not site specific due to the nature of how referrals can be made.	N/A

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6.6	Home Office	Safety	Safeguarding (Self-harm and suicide prevention)	Recommendation (2.31): Home Office detention engagement staff should attend all case reviews where detention or the prospect of removal are factors in a detainee's risk of self-harm.	Accepted	Partially Complete	Detention Engagement Team staff will endeavour to attend all ACDT reviews (or provide an update where unavailable) where detention or the prospect of removal are factors in a risk of self-harm.	6 months
6.7	Centre Manager and Home Office	Safety	Security and freedom of movement	Recommendation (2.51): Room and detainee searches should only be carried out where intelligence or risks suggest they are necessary.	Accepted	Complete	In accordance with the requirements of Detention Services Order 9/2012 – Searching Policy (revised in August 2018) the centre has reduced the frequency of searching of accommodation and of detained individuals.  Searches take place where indicated by intelligence or where justified as part of operational risk assessments.  Mitie C+C believe that the searching arrangements now in place at Dungavel are compatible with the safety and security of the Centre.	n/a
6.8	Centre Manager	Safety	Use of force and single separation	Recommendation (2.59): All use of force incidents should be subject to a recorded review process and leaders should ensure that all recommendations are acted on.	Accepted	Partially Complete	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.  Both Detention and Escorting Services Compliance and Security teams conduct regular assurance checks of use of force incidents.	6 months
6.9	Centre Manager	Safety	Use of force and single separation	Recommendation (2.60): All decisions concerning the separation of detainees should be clearly documented. Detainees should not be denied their clothing or bedding without express written authority from a senior member of staff and the Home Office compliance team.	Accepted	Complete	Separation of detained individuals is used infrequently within Dungavel IRC and the recommendation refers to an isolated incident that has already been addressed by GEO Centre Management.  The specific issues referenced were noted as part of the standard review process and a full investigation was completed in conjunction with the DES Compliance Team.  There have been no further issues and governance/training is in place to ensure that policies are adhered to.  The Detention and Escorting Services on-site Compliance team conduct regular assurance checks of use of Removal from Association and Temporary Confinement to ensure that compliance with Detention Services Order 02/ 2017 - Rule 40/42 is being followed.	6 months

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6.10	Centre Manager	Respect	Equality, diversity and faith (Protected characteristics)	Recommendation (3.35): Centre staff should systematically identify all detainees with a protected characteristic when they arrive in the centre and make sure their individual needs are assessed and met.	Accepted	Not complete	<p>Mitie Care and Custody will integrate Dungavel IRC with Mitie Escorting Services Scotland's operation to facilitate information sharing and early identification of those who may be vulnerable due to a protected characteristic.</p> <p>Mitie C+C will use a vulnerability risk assessment, including EDI protected characteristics, on admission to the centre with details recorded electronically on the local detainee management system (DMS). This will be used to inform support/welfare requirements tailored to each individual.</p> <p>Procedures will include local ongoing, dynamic, vulnerability risk assessments (VRA's) (which include protected characteristics) covering:</p> <ul style="list-style-type: none"> <li>• First night in detention checks.</li> <li>• Systematic welfare assessment.</li> <li>• Keyworker weekly sessions.</li> <li>• RSRA reviews.</li> <li>• Healthcare assessments/reviews.</li> <li>• Quarterly safeguarding surveys.</li> </ul> <p>This ongoing approach will ensure that all vulnerabilities by way of protected characteristics are identified and individual needs are assessed and met.</p>	12 months
6.11	Centre Manager	Respect	Health Services (Governance Arrangements)	Recommendation (3.58): Health staff should have access to a fully functioning electronic medical record system and receive training on the technology to enhance the efficiency of the service.	Partially Accepted	Partially Complete	<p>An electronic medical record system was partially installed by Vision in November 2020. Installation completion was then stalled due to Scottish COVID-19 restrictions.</p> <p>Full installation and training are expected to take place within twelve months.</p>	12 months
6.12	Centre Manager	Respect	Health Services (Governance Arrangements)	Recommendation (3.59): Detainees should be able to complain about health services through a well-advertised separate confidential health complaints system. (Repeated recommendation 2.63.)	Not Accepted	N/A	<p>Complaints, including those pertaining to healthcare, are handled in accordance with Home Office published guidance DSO 03/2015 - Handling of complaints in immigration removal centres, short term holding facilities, holding rooms and during escorts.</p> <p>Due to the contractual way in which health services are procured in Scotland it is not considered practical to introduce an alternative process at this time until wider consultation can be undertaken.</p>	N/A

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6.13	Centre Manager	Respect	Health Services (Oral Health)	Recommendation (3.86): Detainees should have access to the full range of NHS-equivalent treatment that can reasonably be delivered.	Not Accepted	N/A	<p>Detained individuals are already able to access the full range of NHS-equivalent treatments that can reasonably be delivered.</p> <p>Treatments requiring aerosol generating procedures are not routinely offered on the NHS at this time due to Covid 19 restrictions.</p> <p>Individuals are required to be escorted at all times when attending off site appointments. Due to the risk of Covid-19 transmission, escorting officers are unable to be in the room if an aerosol generating procedure is required. The unavailability of an aerosol generating procedure does not cause harm to the detained individual and all care required is delivered.</p> <p>As per Guidance for Immigration Removal Centres (IRCs), Residential Short-Term Holding Facilities (RSTHFs) and escorts during the COVID-19 pandemic, a full risk assessment on the requirement of escorts is undertaken prior to treatment.</p>	N/A
6.14	Centre Manager	Activities	Library Provision	Recommendation (4.18): Leaders should work with the local authority library service to improve the range of stock and the provision for detainees.	Accepted	Partially Complete	<p>Library stock is regularly reviewed in line with feedback from detained individuals and those detained are free to make requests for either physical books or kindle versions that can be made available for offline viewing.</p> <p>Those detained will have access via DMS Connect (Mitie C+C's online platform) to submit feedback, suggestions and concerns relating to educational and recreational activity, outside of formal surveys.</p> <p>Quarterly surveys will be published to detained individuals electronically via DMS Connect and in hard copy in the Home Office's 20 designated languages to encourage feedback. Feedback will also be requested in exit surveys.</p> <p>Educational and recreational activity will form part of the weekly Detainee Consultation Committee agenda. The Information and Learning Centre Manager will collate and analyse all feedback monthly, using this to develop the curriculum and activity schedule.</p> <p>Mitie C+C will attempt to establish links with local libraries and charities to continue to improve the selection of material available. Materials will include books, magazines and newspapers, both physically and digitally, covering a variety of genres and available in the 20 Home Office designated languages.</p>	6 months
6.15	Centre Manager	Activities	Fitness Provision	Recommendation (4.24): Leaders should repair the all-weather pitch to allow detainees access to outdoor sports facilities.	Accepted	Partially Complete	<p>In line with the enhanced focus on the welfare of those detained in the new contract, Mitie Care and Custody are working to obtain quotes to repair the all-weather pitch.</p> <p>It is expected that works will be completed and the pitch fully functional within 6 months.</p>	6 months

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6.16	Centre Manager	Preparation for Removal and Release	Welfare	Recommendation (5.5): Centre staff should make sure all welfare requests are properly recorded.	Accepted	Partially Complete	<p>The Mitie C+C Welfare Team will record details of all interactions, meetings, and assessments within the local Detainee Management System, which will auto-populate and update detained individuals action plans, including:</p> <ul style="list-style-type: none"> <li>• Date the issue/concern was raised</li> <li>• Suggested actions and anticipated resolution date</li> <li>• Actions taken and date</li> <li>• Status of action</li> <li>• Date of resolution</li> <li>• Details of other agencies/Centres/stakeholders involved</li> </ul> <p>Robust local assurance procedures will be put in place to ensure that appropriate follow up action is taken in respect of requests.</p> <p>In addition detained individuals will be assigned a named Welfare officer with whom they will meet fortnightly (minimum) to review their action plan, progress, and resolve ongoing issues. Meeting summaries will be recorded in DMS. Meetings may increase in frequency based on the detained individuals' specific issues, or upcoming discharge.</p>	6 months
6.17	Home Office	Preparation for Removal and Release	Communications	Recommendation (5.15): Detainees should only be prevented from accessing social networking sites based on an individual risk assessment.	Not Accepted	N/A	<p>The provision of internet access is an important means of helping those detained 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 undertook a pilot at selected immigration removal centres on the use of Skype and similar platforms. Following this pilot, video calling has been rolled out to immigration removal centres across the detention estate.</p> <p>Access to Skype was introduced at Dungavel House in March 2020.</p>	N/A