

SERVICE IMPROVEMENT PLAN – HMIP INSPECTION OF COLNBROOK IRC - 2022

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	Centre Manager & Home Office	Safety	Arrival and Early Days in Detention	<p>Key concern 1.38:</p> <p>The reception and induction of new arrivals were weak; they waited up to five hours in vans outside reception and it could take a further two-and-a-half hours to process them before they were taken to their first night accommodation. Most arrivals were not offered a private interview, and interviews were insufficiently focused on safety. The induction process was ineffective.</p> <p>Recommendation:</p> <p>New arrivals should be received promptly into the centre and reception processes, including interviews with detainees, should promote disclosure of vulnerabilities. Detainees should receive an induction that informs them of how to access all key activities and services in the centre, supported by written information that they can understand.</p>	Partially Accepted	Partially Complete	<p>It is acknowledged that on occasion there are delays in the arrival process - especially at times where there are charter flights taking place or where social distancing due to COVID restrictions are in place.</p> <p>Mitie Care & Custody will always look to avoid potential delays during charter operations, liaising with Home Office colleagues regularly to avoid receptions (gate freezes) during discharge times. A process is in place to discuss and arrange such requests – via regular charter conference calls.</p> <p>Mitie Care & Custody will endeavour to keep delays to a minimum and the Home Office Compliance Team will review on a monthly basis the times taken to process those arriving at the centre.</p> <p>Staff will be reminded to routinely ask residents questions during the searching process if they required confidential screening and the use of private interview rooms. This will be monitored by both Mitie Care & Custody and the Home Office Compliance Team so that individuals may feel more able to disclose vulnerabilities. In addition, a member of the Welfare Team will attend reception to assist new arrivals, where available.</p> <p>A reception handover sheet is in place, and this is completed by reception staff highlighting observations, concerns, and safeguarding questions. This form is handed over to the intake unit to ensure that no information is lost during the initial 24 to 72 hrs of a resident's arrival into the centre.</p> <p>Regarding inductions – Mitie Care & Custody will review the current information provided to ensure that it meets all requirements of Detention Service Order 06/2013 (revised September 2021) Reception and Induction Checklist and Supplementary Guidance and Detention Centre Rules, while looking at innovative technology such as the use of Virtual Reality Headsets.</p> <p>Unit staff conduct the short induction package to provide the immediate and necessary information before the primary induction is concluded the following day.</p>	12 months
6.2	Healthcare Provider and Home Office	Safety	Safeguarding of Vulnerable Adults	<p>Key concern 1.39:</p> <p>Rule 35 reports lacked detail and did not always provide an adequate assessment of the impact of continued detention on a detainee's physical and mental health.</p> <p>Recommendation:</p> <p>Rule 35 reports should provide a clear and detailed assessment of the detainee's injuries and a comprehensive assessment of the impact of continued detention on their physical and mental health.</p>	Accepted	Partially Complete	<p>A training pack has been developed for medical practitioners across the immigration detention estate and delivery is expected to start in Summer 2022.</p> <p>This training will provide clarity on the process and outline the standards and key information to include within Rule 35/32 reports.</p> <p>Additionally, the Home Office has recently restarted work to review the Adults At Risk policy and Detention Centre Rules 2001, which includes the Rule 35 process, following a pause to allow for a wide-ranging review of the immigration system as part of the New Plan for Immigration.</p> <p>The new Healthcare Provider are aware of the concerns in this area and are actively working with the Home Office in this respect to address these concerns.</p>	6-12 months

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6.3	Home Office	Safety	Legal Rights	<p>Key concern 1.40:</p> <p>The Home Office detention engagement team had not been engaging routinely with detainees face to face, and many detainees faced difficulties contacting them by telephone.</p> <p>Recommendation:</p> <p>The detention engagement team should resume face-to-face contact with detainees as a priority and make sure that all detainees can telephone their engagement worker easily.</p>	Accepted	Complete	<p>Home Office Detention Engagement Team surgeries have now resumed in Colnbrook IRC twice a week.</p> <p>Most engagement by the Detention Engagement Team (DET) is completed face to face whenever possible. All telephone contact numbers have been reviewed.</p>	N/A
6.4	Centre Manager	Safety	Legal Rights	<p>Key concern 1.41:</p> <p>Key concern: Some detainees who were due to be removed on charter flights were located on Echo Unit as part of the centre's approach to preventing the spread of Covid-19. This resulted in limited access to the internet to communicate with their legal representatives at a critical time.</p> <p>Recommendation:</p> <p>All detainees should be able to communicate freely with their legal representatives at all times, including prompt access to emails.</p>	Partially Accepted	Partially Complete	<p>Access to emails and IT systems has always been available for all residents upon request. Residents also have access to their mobile phones and welfare services.</p> <p>Regarding individuals on Echo unit, access to the regime is controlled during charter operations, this does not prevent access to their legal representatives and does not prevent their access to the internet and e-mails. Residents placed into Echo unit also retain access to their mobile phones.</p> <p>Any time where freedom of movement is restricted, ad-hoc requests for access to these facilities will be accommodated by Mitie Care & Custody in line with normal regimes.</p> <p>Residents will be made aware of this verbally when entering Echo unit for charter operations.</p>	6 months

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6.5	Centre Manager and Home Office	Respect	Daily Life – Living Conditions	<p>Key concern 1.42:</p> <p>Poor ventilation remained a problem and the shower facilities were in a poor condition. Showers and toilets remained inadequately screened and some mattresses were not fit for purpose. Despite some work to the outside exercise areas, they remained bleak and prison-like, with few or no facilities to encourage outdoor exercise.</p> <p>Recommendation:</p> <p>The environment should be improved through well-ventilated residential units that are kept in good repair, showers and toilets that are properly screened, and well-equipped and more welcoming exercise yards.</p>	Partially Accepted	Partially complete	<p>Detention Service Order 06/2018 – Accommodation, Lighting, Heating and Ventilation provides guidance on this area.</p> <p>Ventilation of the building cannot be altered without significant preventative building works and associated costs.</p> <p>The Home Office commissioned a survey on the ventilation and the findings are being considered.</p> <p>Regarding room ventilation, the Facilities team clean Air Handling Units, replace filters and replace drive belts twice a year. Supply/extraction of air flow (variable air volume valves, inverters etc) are checked on a rolling month by month, block by block on a Pre-Planned Maintenance schedule.</p> <p>CO2 monitors have been funded by the Home Office and are placed in communal staffing areas and are used to monitor residential areas, with periodic checks by the Mitie Care & Custody Facilities Management team.</p> <p>The oversight of the fabric and cleanliness of the residential units is now overseen by a Mitie Care & Custody manager who conducts regular inspections to ensure that daily cleaning standards are maintained.</p> <p>A rotational deep clean of all areas commenced in 2021 and improvements are underway including renewal of flooring (where required) and floor polishing, a redecoration programme, and the screening of in room toilet facilities was completed in June 2019</p> <p>Additional outside furniture will be purchased via the Resident Welfare Fund (RWF).</p>	12 months
6.6	Centre Manager	Respect	Equality, Diversity and Faith – Strategic Management	<p>Key concern 1.43:</p> <p>During the pandemic, equality, diversity and inclusion work had focused on identifying individuals with protected characteristics who might need support, and the networks of staff equality liaison officers and detainee equality representatives had fallen into disuse. Colnbrook did not yet have a sound structure for meeting the requirements of equality, diversity and inclusion as it returned to its role as a regular IRC.</p> <p>Recommendation:</p> <p>The centre should address issues of equality, diversity and inclusion comprehensively, supported by sufficient staff to make sure that monitoring, analysis, provision and support are consistent for all protected characteristics, and that the detainee voice is heard and acted on.</p>	Accepted	Partially Complete	<p>C&C have appointed an Equality Diversity and Inclusion (EDI) Officer who is now in place and have also recently appointed six EDI Champions at manager level, which is aimed at improving EDI culture amongst staff and residents.</p> <p>Following the easing of restrictions from the pandemic and the ramp up of residents within the centre, EDI Meetings are being reinstated.</p> <p>Mitie Care & Custody are working towards being able to identify trends and provide analysis across both centres, as part of holistic reporting (incorporating EDI, Safeguarding & Security).</p> <p>On a wider scale, Mitie Corporate are holding webinar sessions with their staff on topics such as Pride, which is hoped will encourage a more inclusive environment for staff, residents, and visitors.</p>	12 months

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6.7	Centre Manager and Home Office	Safety	Safeguarding – Safeguarding of Vulnerable Adults	Recommendation 2.17: The Home Office should ensure that all information shared about adults at risk is accurate.	Accepted	Partially Complete	<p>The Home Office provides a weekly list of detained individuals recognised as Adults at Risk to each IRC. The information highlights each person’s level of risk and provides an opportunity for IRC Healthcare, contractor staff and Home Office staff to comment and add any additional relevant detail. This feedback is shared with caseworkers who consider any updates and review detention of individuals, where appropriate.</p> <p>Material or urgent changes to the vulnerability of individuals are communicated through other established reported mechanisms, such as Rule 35 of the Detention Centre Rules 2001, Food and Fluid refusal reports and IS.91RA Part Cs.</p> <p>All “live” changes on individual cases can be obtained through the Home Office Case Information Database and Atlas, pending updates being made to the weekly list.</p>	6 months
6.8	Centre Manager	Safety	Safeguarding – Safeguarding of Vulnerable Adults	Recommendation 2.18: Leaders should investigate and address the reasons for some staff being unwilling to raise whistleblowing concerns.	Accepted	Partially complete	<p>Detention Service Order (DSO) 03/2020 – Whistleblowing sets out guidance on this area.</p> <p>Mitie Care & Custody continue to promote and train staff on Restorative Practices (RP) both on initial training and under the promotion of the RP Guidance Team.</p> <p>Mitie Care & Custody have recently conducted an “Upload Survey” in April 2022 (and occurs every year) which aims to record staff responses to questions such as their confidence in raising complaints to their managers, and their confidence in raising issues through the Whistleblowing process.</p> <p>After these results have been reviewed, an action plan will be formulated to address such concerns with staff. These results are then published to the staffing group.</p>	12 months
6.9	Centre Manager and Home Office	Safety	Use of Force and Single Separation	Recommendation 2.44: All use of separation should be proportionate and fully justified.	Accepted	Partially Complete	<p>Detention Service Order (DSO) 02/2017 – Detention Centre Rule 40 -Removal from Association (RFA) and Rule 42 -Temporary Confinement (TC) sets out guidance in this area.</p> <p>The use of the RFA and TC unit is dictated by the risk an individual or individuals present to the safety and good order of the IRCs. This can be either as part of a planned move, or a spontaneous move where required.</p> <p>Subsequent reviews of the efficacy of continued use of DC Rule 40/42 for individuals take place and consist of a multidisciplinary approach attended by the Home Office, Healthcare and Care & Custody.</p> <p>The Home Office Compliance team conduct assurance checks of completed booklets to ensure reasoning and justification is appropriate, proportionate and fully documented carefully considering all the relevant details before providing authority to extend its use.</p> <p>Mitie Care & Custody also undertake assurance checks of Rule 40/42 documentation, as part of their self-audit procedure.</p> <p>Refresher training on Rule 40/42 is regularly delivered to Home Office staff.</p>	6 months

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6.10	Home Office	Safety	Legal Rights	Recommendation 2.51: The Home Office should make sure that detention is not prolonged unnecessarily when there is little prospect of a detainee's removal within a reasonable timescale.	Accepted	Partially Complete	The Home Office only detain people where removal is a realistic prospect within a reasonable timeframe, or initially to establish their identity or basis of claim. This is set out in both legislation and domestic caselaw. Decisions on the appropriateness of an individual's detention, or continued detention, are made on a case-by-case basis. Home Office published detention policy makes it clear that immigration detention must only be used where necessary, and for the shortest possible time. We have a series of detention safeguards, including the Detention Gatekeeper, Case Progression Panels, and our Adults at Risk in immigration detention policy, to ensure proper scrutiny of detention decisions throughout the detention journey. Individuals in detention also have the option of applying for bail at any time.	6 months
6.11	Centre Manager	Respect	Staff – Detainee Relationships	Recommendation 3.4: Officers should be visible in units and interact regularly and positively with individual detainees to help support them during their detention. (Repeated recommendation 2.4)	Accepted	Partially Complete	Since the inspection took place a notice to Mitie Care & Custody staff has been issued setting out expectations of unit officers. Officers being visible in units and interacting regularly with those detained has also been set as a performance objective for all managers. Duty Shift Manager and Duty Directors will complete daily unit checks to ensure compliance. In addition, the Home Office Compliance Team will report any observations of concern when visiting the units daily, to a Home Office Senior manager, who will take forward with Mitie Care & Custody as appropriate.	6 months
6.12	Centre Manager	Respect	Equality, Diversity and Faith – Protected Characteristics	Recommendation 3.23: The centre should use an organised system of staff interpreters to assist detainees who have little or no English and should use a professional interpreting service whenever full confidentiality is required.	Partially Accepted	Partially Complete	As set out in DSO 06/2013 "Reception, Induction and Discharge" professional interpreting facilities must be used whenever language barriers are identified on reception, induction, or discharge. The centre currently utilises professional interpreting services when a resident has been identified as having a language barrier, and this starts at the reception stage. Whenever these services are used, these are recorded on the local IT system and any associated paperwork (such as within ACDT review booklets). Mitie Care & Custody conduct their own Compliance checks relating to interpreting services and their use monthly. A Notice to staff will be sent inviting any staff willing to volunteer their services to agree to have their name and languages spoken added to a central database. New operational guidance, Detention Services Order 'Interpretation Services and use of Translation Devices' will be published shortly. This guidance will set out the provisions, including interpretation services and translation devices, available for individuals held in immigration detention and the circumstances in which these should be used.	6 months
6.13	Healthcare Provider and Home Office	Respect	Health Services – Mental Health	Recommendation 3.53: Psychological interventions should be offered to meet the needs of detainees.	Accepted	Not Complete	A new Healthcare supplier Practice Plus Group started at Colnbrook in April 2022 and will deliver this service in partnership with Barnet, Enfield & Haringey Mental Health Trust for psychology and psychiatry.	12 months

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6.14	Centre Manager	Respect	Health Services – Mental Health	Recommendation 3.54: Detention staff should be trained in mental health awareness to promote trauma-informed custodial care.	Accepted	Partially complete	Mitie Care & Custody staff receive Mental Health Awareness training (provided by the Healthcare supplier) as part of their initial training and subsequent refresher training as part of Assessment Care in Detention and Teamwork (ACDT) training. In addition to this, staff are provided Mental Health & Stress management awareness as part of their Health & Safety refresher training.	12 months
6.15	Centre Manager	Activities	Education and Work	Recommendation 4.17: Managers should investigate the reasons for poor take-up of education courses, and devise plans to make them more attractive to detainees and increase enrolments.	Accepted	Partially Complete	Although it is acknowledged that improvements are required it should be noted that at the time of the inspection and for several months prior to this the centre was operating a reverse co-horting system resulting in short length of stays for many individuals at Colnbrook. Now that reverse co-horting has concluded, Mitie Care & Custody will monitor education uptake amongst residents and identify and address any areas of concern. Tutoring staff attend the wings daily between 1200 – 1300 to promote their departments. Regime’s managers will attend the re-instated Resident Consultative Committees. Regimes notice boards will be refreshed. A Resident survey will be issued promoting feedback/ideas/suggestions monthly. Copies of this survey will be available in all classrooms.	12 months
6.16	Centre Manager	Activities	Fitness Provision	Recommendation 4.27: PE staff should make sure that only detainees who have been fully inducted into the use of fitness equipment are allowed to use it.	Accepted	Partially Complete	As part of Mitie Care & Custody’s route out of the pandemic, inductions are conducted daily on residents that arrived in the previous day. Where individuals have not been inducted, when their ID card is scanned to access sports facilities, this will highlight this ensuring access is prevented. All PE staff have been refreshed on the correct procedure. Flash cards are available and utilised in the event of any language barrier.	12 months
6.17	Centre Manager	Preparation for Removal and Release	Visits and Family Contact	Recommendation 5.10: The centre should identify detainees who do not receive a visit. They should be supported to ensure they are not at an increased risk of isolation and heightened vulnerability, and referrals made to support organisations as necessary. (Repeated recommendation 4.19)	Accepted	Ongoing	Mitie Care & Custody will consider developing formal processes using local IT systems to highlight individuals who have not received a social visit for a set period. In the interim unit staff will identify via fortnightly welfare checks if a social visit has taken place. This information will be passed to the Unit Manager for signposting to visiting/befriending groups and the availability of this service will be highlighted to individuals via Welfare and inductions.	6 months
6.18	Centre Manager	Preparation for Removal and Release	Visits and Family Contact	Recommendation 5.11: Visitors should be able to contact the centre easily and discreetly to report concerns about the safety or well-being of a detainee, and to record suggestion or views arising from their visit.	Accepted	Not Complete	Following the process failure due to a technical problem of the hotline. Mitie Care & Custody will review how to make the idea of the safer community hot line work in practice. Visitors comment cards/forms to record suggestions or views arising from their visits will be put in place.	12 months

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6.19	Centre Manager and Home Office	Preparation for Removal and Release	Communications	Recommendation 5.17: Detainees should be made aware that they can use video calling, and other social networking sites should be made available.	Partially Accepted	Complete	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. Detention Services Order 04/2016 on access to the internet was published in May 2016 and does not permit access to social networks. Detention Service Order 01/2020 – Access to Video Calls provides guidance on Skype video calling. Mitie Care & Custody promoting this service via posters in the units advertising the service, via the Welfare team and within the Induction process	N/A
6.20	Centre Manager	Preparation for Removal and Release	Communications	Recommendation 5.18: Post should be monitored and delivered to detainees on all days of the week it is received.	Accepted	Partially Complete	Mitie Care & Custody currently have a full time post-delivery operative and are currently training Detainee Custody Officers to cover the distribution of post received out of hours and over the weekend.	12 months
6.21	Home Office	Preparation for Removal and Release	Leaving the Centre	Recommendation 5.27: The Home Office should convene multidisciplinary meetings to plan for the removal and release of more vulnerable detainees to make sure their welfare is promoted and suitable arrangements are in place, as needed, for their travel, reception and continuity of care.	Accepted	Complete	During the pandemic, the multidisciplinary meetings to plan for the removal and release were combined with the Vulnerable persons weekly review meeting. However these multidisciplinary meetings have now been reconvened.	N/A
6.22	Home Office	Preparation for Removal and Release	Leaving the Centre	Recommendation 5.28: The Home Office should gather data on the use of electronic monitoring and provide effective oversight of the process of fitting tags.	Partially Accepted	Complete	Data relating to electronic monitoring is available to the Home Office. Subject to the scope, urgency, and appropriateness of any information request, data is distributed according to agreed guidelines. The complexity in gathering data naturally impacts upon the Department's ability to distribute data within a specific timeframe. Electronic monitoring (EM) service and performance is routinely reviewed by the Home Office FNO RC EM Service Delivery function alongside partners within the MOJ and the EM service provider. This ensures that services and processes relating to electronic monitoring of FNOs are as effective as possible. In addition an updated Detention Services Order - 05/2014 – Electronic Monitoring Devices has recently been published.	N/A