

SERVICE IMPROVEMENT PLAN – HMIP REPORT 2024 – BROOK HOUSE IMMIGRATION REMOVAL CENTRE

Concern Number	Concerns Addressed By	HMIP Concern	Home Office Response to HMIP Concerns Including Action Already Taken / Proposed to Address Concerns
1	Home Office & Centre Management	Priority concern The number of recorded fights, assaults on staff and uses of force had risen substantially since the previous inspection, and leaders had not made sufficient use of data to understand why this was the case.	<p>Since the inspection there has been a significant reduction in both the number of fights and number of assaults on staff and residents.</p> <p>Serco review figures for these areas at the monthly Security and Use of Force (UoF) meetings, both of which are chaired by the Assistant Director of Security. These are multi-disciplinary meetings involving various internal departments and the Home Office. The meetings review trends around UoF, Detention Centre Rule 40/42, assaults (on staff and other residents) and self-harm incidents and consider what processes can be developed to both reduce and prevent instances of this nature. Concerns highlighted by the Security Department are considered and any recommendations made are reviewed at the next meeting.</p> <p>There are well established processes in place at both a local and estate-wide level relating to UoF, with formal reviews taking place as appropriate. A Use of Force Monthly meeting provides trend analysis on:</p> <ul style="list-style-type: none"> UOF breakdown YTD <ul style="list-style-type: none"> o Planned o Spontaneous o Personal protection o Team presented – No force. o Handcuffs applied. o TSFNO o Total number o Use of Force locations o justifications o themes of debriefs/reviews outcome. <p>By the end of December 2024, a specific Violence reduction strategic meeting will have been established. This will include representatives from Serco, the Home Office, and the Healthcare Provider with additional stakeholders invited and encouraged to attend. This meeting will formally review collated data on assaults, use of Detention Centre Rule 40/42, and UOF. The Security department will analyse this data to establish trends and take forward action as required.</p> <p>Serco Senior Managers, working alongside the Home Office, will review and discuss these results to drive down the number of instances.</p>

SERVICE IMPROVEMENT PLAN – HMIP REPORT 2024 – BROOK HOUSE IMMIGRATION REMOVAL CENTRE

Concern Number	Concerns Addressed By	HMIP Concern	Home Office Response to HMIP Concerns Including Action Already Taken / Proposed to Address Concerns
2	Home Office /Healthcare	<p>Priority concern Policies and procedures to minimise the length of detention and protect the most vulnerable were not effective enough.</p> <p>The centre was unaware of 31 detainees assessed at the higher levels of the adults at risk policy,</p> <p>and Rule 35 reports (see Glossary) were not always submitted when necessary.</p> <p>The length of detention had increased, and case progression was often slow.</p>	<p>Adults at Risk (AAR)</p> <p>The Home Office are currently working on a process which will enable caseworkers to notify Detention Engagement Teams of a change in an individual's AAR level, allowing both suppliers and HO staff based at IRCs to provide suitable support to the detained individual.</p> <p>The Adults at Risk policy, including Detention Centre Rules 34 and 35, is currently under review; we aim to complete this review in Spring 2025. The Home Office intend to begin external engagement on new proposals for reform within the coming months.</p> <p>Detention Centre Rule 35</p> <p>A training package developed by the Home Office Rule 35 Team is currently being delivered to medical practitioners and other relevant healthcare staff estate wide. The package focuses on the process for preparing and considering reports, outlining expected standards and the key information required.</p> <p>In March 2024 NHS England developed and circulated additional clinical guidance to improve the standard of Rule 35 reports.</p> <p>The NHS will work with the Healthcare provider in respect of:</p> <ul style="list-style-type: none"> • All GPs and clinical staff to complete Royal College of General Practitioners Level 1 training. • Rule 34/35 training to be provided to all new GPs. • Regular audits of Rule 34/35 completions with a greater emphasis placed on using information, with appropriate translation services, informing patients of the importance to attend Rule 34 appointments. • Devising a Health Promotion Strategy to assist in greater engagement of patients and awareness raising of healthcare interventions. • Ensuring that mental health reviews, when appropriate, are booked at point of initial assessment. <p>To further support the healthcare provider, NHS England has allocated funding for two additional posts. A Deputy Head of Healthcare and a Substance Misuse Worker will be recruited to enhance the service's leadership capacity and improve patient care.</p>

SERVICE IMPROVEMENT PLAN – HMIP REPORT 2024 – BROOK HOUSE IMMIGRATION REMOVAL CENTRE

Concern Number	Concerns Addressed By	HMIP Concern	Home Office Response to HMIP Concerns Including Action Already Taken / Proposed to Address Concerns
			<p>Length of Detention/Case Progression</p> <p>The Home Office is clear that decisions to detain, and subsequent decisions to maintain detention or release must be well-made, with systematic safeguards and support for the vulnerable.</p> <p>However, there will always be a balance to strike between issues of vulnerability and public protection considerations.</p> <p>There are a number of safeguards underpinning detention decisions, including: the Detention Gatekeeper who reviews the suitability of individuals for detention, with a clear focus on removability and vulnerability; and the Adults at Risk policy, which sets out that vulnerable people should be detained only when the immigration factors outweigh the risk of harm to the individual in any given case.</p> <p>Once a person is in detention, the Home Office undertakes regular reviews of their detention to ensure that their detention remains lawful, appropriate, and proportionate. Case Progression Panels with independent panel members provide additional assurance and challenge on the progress of cases of individuals in detention, reinforcing the consideration of removability, vulnerability, and risk factors in decisions to maintain detention.</p> <p>The Detention Oversight Team spearheads the delivery of better detention functionality within Foreign National Offender Returns Command (FNORC). The team's primary objectives are to drive improvements in detention practices and enhance the quality of operational commands. The team lead on casework improvements and lessons learned exercises and provide a single source of support and expertise for casework colleagues.</p> <p>FNORC have recently restructured, increasing caseworking numbers by approx. 400 staff. This restructure and recruitment initially focussed on re-organising workstreams and teams to prioritise earlier decision making. The initial benefits of these changes have been seen, with an increase in ERS removals when compared to the same period the previous year. The increase in staffing has led to cases being progressed more pro-actively.</p>

SERVICE IMPROVEMENT PLAN – HMIP REPORT 2024 – BROOK HOUSE IMMIGRATION REMOVAL CENTRE

Concern Number	Concerns Addressed By	HMIP Concern	Home Office Response to HMIP Concerns Including Action Already Taken / Proposed to Address Concerns
3	Home Office & Centre Management	Priority concern Over half of operational staff had less than two years' experience, there were pockets of immature and unprofessional behaviour. Some officers continued to congregate in offices instead of proactively managing the wings.	<p>The “Passport to Detention” mentor scheme is in place for all new Serco Operational Officers. The process is 12 weeks long and had recently been implemented when the inspection took place. The scheme supports new officers into their role. This has created a consistent approach and allows managers to have more formal guidance to complete reviews on how staff are progressing in their new role. The Home Office have oversight and regularly conduct spot checks in this area.</p> <p>Serco have taken meaningful steps towards improving the culture and staff capability through the “positive detention culture project”. Any unprofessional behaviour will be addressed by operational managers when witnessed or reported. Serco use a documented process to manage staff behaviours (both positive and negative).</p> <p>The implementation of an accountability tracker aims to ensure that all operational managers have sight of staff behaviours logged by other managers. This will support improved staff performance management.</p> <p>A weekly Serco Professional Standards meeting – attended by the Home Office- takes place in a multi-disciplinary to address mire serious conduct issues are addressed.</p> <p>The Home Office has oversight of complaints of minor misconduct by staff and of complaints where the Professional Standards Unit has made recommendations.</p> <p>Residential unit “office opening times” have been introduced to ensure that officers are more visible on units. Both Serco managers and the onsite Home Office Compliance Team (who complete assurance checks on units as part of their daily role) will have oversight of this new process.</p> <p>The residential core day structure is currently being mapped out and will be published by the end of November 24 once approved by senior management. This will provide clarity on the duties of both and provide consistency across all residential areas.</p> <p>Within the wider centre, reception management staff have been assigned Positive Detention Culture objectives linked to oversight of the reception area, which includes daily briefings and direct supervision.</p>
4	Home Office & Centre Management	Priority concern The centre continued to look and feel like a prison, and not	<p>It is acknowledged that the building was designed along the lines of a prison type establishment when built, however, it is not feasible to rebuild/re-design the current structure.</p> <p>The Home Office and Serco will continue to work together to consider and, where appropriate, implement practical changes that can be made to enhance the environment for residents.</p>

SERVICE IMPROVEMENT PLAN – HMIP REPORT 2024 – BROOK HOUSE IMMIGRATION REMOVAL CENTRE

Concern Number	Concerns Addressed By	HMIP Concern	Home Office Response to HMIP Concerns Including Action Already Taken / Proposed to Address Concerns
		enough had been done to improve the environment.	Remedial works have taken place since the inspection including the repair of damaged flooring, the refurbishment of showers, re-painting and deep cleaning of B Wing, and other areas within the centre will be 'softened', where possible, whilst ensuring safety and security considerations remain paramount.
5	Healthcare NHS	<p>Priority concern There were serious problems affecting the staffing, culture, and morale of the health services team, which was not delivering a good enough service to detainees. Partnership working to help resolve these issues was poor.</p> <p><u>Please note this was formally raised by Care Quality Commission (CQC) as formal breach of regulation.</u></p>	<p>The performance of the healthcare provider will be closely monitored by the NHSE Health and Justice Commissioning team, with input from Quality Leads, Contract Leads and a Senior Commissioning Manager. This includes monthly meetings with the providers Regional Managers, where updates will be required regarding improvement progress.</p> <p>The Healthcare provider (PPG) will be required to attend quarterly contract review meetings (with the next meeting in November 24) where service delivery will be reviewed against the agreed service specifications and action plan.</p> <p>A further quality and safeguarding site visit by NHSE is also being planned for December 24 to gain assurance against the required improvements.</p> <p>Recruitment of healthcare staff remains a key challenge and NHSE is committed to continuing to support the provider's efforts to attract, recruit, and retain the appropriate level of staffing, with a new recruitment strategy being devised.</p> <p>NHSE remain focused on ensuring that the necessary improvements are made to provide high-quality healthcare services and will continue to collaborate closely with all stakeholders to achieve this goal.</p> <p>One of the concerns raised by the provider relates to the allocation of operational and clinical space for healthcare services. The NHSE commissioning team is in the process of engaging medical architecture to conduct an external review to assess the current space allocation, evaluate clinical activities (both current and projected), align workforce capacity with clinical demand, and identify potential equipment upgrades to enhance service delivery. Any recommendations will be shared with the Home Office and Serco for further consideration.</p> <p>Since October 2024 a weekly 'Local Delivery Board' meeting has been instigated to facilitate increased engagement and partnership working across Healthcare, Home Office, and Serco. Based on a successful model in practise at other IRCs, this provides an opportunity for each party to raise</p>

SERVICE IMPROVEMENT PLAN – HMIP REPORT 2024 – BROOK HOUSE IMMIGRATION REMOVAL CENTRE

Concern Number	Concerns Addressed By	HMIP Concern	Home Office Response to HMIP Concerns Including Action Already Taken / Proposed to Address Concerns
			<p>issues and concerns and to discuss the management of residents exhibiting health or mental health concerns.</p> <p>A record of actions is kept and progressed at the following meeting, and while primarily focused on healthcare issues the meeting provides an opportunity for team leads to engage on a one to one in person forum to better promote joint working on site. Issues from this meeting that cannot be resolved at this level are fed into the quarterly Partnership Board which in turn feeds into the National IRC partnership Board chaired by the leads of HO Detention Services and NHS Health and Justice.</p>
6	Home Office & Centre Management	Key concern Not enough care was given to detainees on arrival and during their early days in detention. The reception area was chaotic, and induction was not carried out consistently.	<p>Serco are planning to identify and implement improvements to the layout of and environment within the reception area. A review to determine how to best reinstate a private interview space in the reception area has started and will be complete no later than February 2025.</p> <p>Work is ongoing to revamp the cross-department house rules booklet (available in various languages). It is expected this will be completed by January 2025.</p> <p>The management of property and post will be undertaken on the discharge side of the area, reducing activity around newly arriving residents. This change will be in place by the end of 2024.</p> <p>Serco will review and improve the induction process ensuring that all elements of induction are carried out so that the newly arrived resident will have a clear understanding of the centre.</p> <p>The Home Office Compliance Team will increase its scrutiny of this area, considering compliance with both contractual and published guidance including thorough reviews of Serco self-audits.</p>
7	Home Office & Centre Management	Key concern Some security measures were disproportionate. In particular, the centre was now routinely handcuffing detainees on external escorts.	<p>An individual risk assessment is conducted for each resident, with the authority to use restraints given by the Duty Director in line with the Detention Services Order 07/2016 Use of Restraint(s) for Escorted Moves.</p> <p>An interim Operational instruction for risk management of IRC escorts was sent out to Contract directors in October 2024 which outlines the guidelines needed to be followed by IRCs. This instruction made clear that handcuffing is appropriate in certain circumstances.</p> <p>A revised DSO 07/2016 will follow on from this instruction and is expected to be published by June 2025.</p> <p>The process is subject to scrutiny by the Home Office who undertake regular reviews of the process and will raise any concerns to Senior Managers.</p>

SERVICE IMPROVEMENT PLAN – HMIP REPORT 2024 – BROOK HOUSE IMMIGRATION REMOVAL CENTRE

Concern Number	Concerns Addressed By	HMIP Concern	Home Office Response to HMIP Concerns Including Action Already Taken / Proposed to Address Concerns
8	Home Office & Centre Management	Key concern There was increasing availability of illicit drugs in the centre, but planning and resources to tackle the problem were inadequate.	<p>Since the inspection Serco have increased the number of intelligence led searches.</p> <p>Serco and Home Office have agreed for delivery of improved portable drug detection equipment, providing more devices to test illicit substances with greater accuracy and ability to detect a wider range of substances, and also more flexibility in their use. The contract change for this equipment was approved on 31 October 2024.</p> <p>A Drug Strategy Manager position has been approved by the Home Office and is currently going through the contract change process. The manager will identify trends with corruption data. The aim of this work is to increase staff searching tailored to the area. This is expected to be completed by April 2025.</p> <p>Officer patrols of the external perimeter have been increased due to “throw overs” in one courtyard. Security Coordinators search the courtyard every morning prior to association. Wing staff and Activities staff search this area every association time and search prior to opening and after closing. An extra officer has been placed on this wing to provide additional support and staff have been briefed to remain extra vigilant when patrolling the courtyard.</p> <p>A lockdown search was conducted in early October, involving colleagues from other establishments and drug detention dogs. Canine searching is an important part of the drug prevention strategy and is required as part of the contract.</p>
9	Home Office & Centre Management	Key concern Leaders had limited awareness of diverse needs in the centre as protected characteristic information about detainees was not systematically captured on their arrival.	<p>Two new Diversity Coordinators began work in September 2024. The co-ordinators will report within the monthly D&I meeting, providing trend analysis work and leading actions moving forward.</p> <p>New residents are met within 48 hours to discuss protected characteristics and to explain support available to those individuals. The coordinators will use this data to support residents, by ensuring appropriate safeguarding measures in place where required.</p>

SERVICE IMPROVEMENT PLAN – HMIP REPORT 2024 – BROOK HOUSE IMMIGRATION REMOVAL CENTRE

Concern Number	Concerns Addressed By	HMIP Concern	Home Office Response to HMIP Concerns Including Action Already Taken / Proposed to Address Concerns
10	Home Office & Centre Management	Key concern The education provision had been poorly attended for a long time, but little had been done to review the curriculum to make it more appealing to detainees.	<p>A review of the resident curriculum is part of the quality assurance work being undertaken by the education department and an external provider. The work is ongoing and since August 24 projects within the quality assurance mechanism devised by the external provider have been started or completed. These include:</p> <ul style="list-style-type: none"> • Create Quality Assurance framework document/review of the curriculum. This is currently in progress. • Agree and implement quality assurance methods for quality of teaching delivery. This work has been completed. • Timetables have been placed on notice boards, wings, outside classrooms, welfare office and in front of the gym to further promote education to the residents. • Individual learning plan templates have been created which include nationality, protected characteristics, and diverse needs information. This has been stored on Microsoft teams and is used to support each new learner. • Create a curriculum framework document showing virtual college and IRL classes, accreditation status and duration of courses. This was completed in August 24. • Standardise the use of the most common literacy assessment across all English tutors. <p>A resident survey will start in November 2024. This will be monitored by the Activities Managers to see what suggestions and improvements can be made. The first results will be available within 28 days of survey closure.</p>
11	Home Office & Centre Management	Key concern The library was poor and little used. The room was no longer suitable for library activities, and most of the book stock had been removed, with the remaining collection held in cupboards.	<p>The library is being used as a resource room including for Home Office surgeries. This provides residents with direct access to Home Office staff and the ability to drop in informally and request an update on their case.</p> <p>Core library functions are still available with residents able to access books, programmes, and resources to help support their time in detention, social connection, and social and mental health services. The resource room provides a space for residents to meet.</p> <p>Kindles, tablets and e-readers are available, and residents can order books (including religious materials and books in languages other than English) through the kindle process.</p> <p>The Home Office Compliance team will ensure that Serco meets their contractual obligations along with those set out in published guidance. This will include ensuring that self-audits are conducted and that resident surveys are considered.</p>

SERVICE IMPROVEMENT PLAN – HMIP REPORT 2024 – BROOK HOUSE IMMIGRATION REMOVAL CENTRE

Concern Number	Concerns Addressed By	HMIP Concern	Home Office Response to HMIP Concerns Including Action Already Taken / Proposed to Address Concerns
12	Home Office & Centre Management	Key concern The welfare service was under-resourced and staff lacked space to see detainees privately.	<p>Serco has developed a recruitment plan to fill the vacant positions within the Welfare Team, aiming to have the full complement of staff by February 2025.</p> <p>Existing welfare staff are being redeployed to other roles only if operationally required and as a last resort.</p> <p>The Welfare department have an open-door approach for residents to have access to their services in the morning period, however feedback from the residential forums and feedback made directly to the Welfare team was that residents found it distracting having appointments when the welfare office was open to all residents to “drop-in”.</p> <p>Specific time slots have now been put in place in both the afternoon and evening for “private” appointments. This allows the officer to give the residents all the support they need with a more 1-1 approach.</p> <p>This process has been implemented since the inspection and is currently in a trial period to ensure the new approach supports resident’s needs. This will be reviewed for the coming months and if the process in place isn’t beneficial, adaptations will be made.</p> <p>Private interviews are now available and can be booked in advance.</p> <p>A proposal to redesign the office – which will include the installation of privacy screens – is planned to complete by 30 April 25.</p>
13	Home Office	Key concern In the previous year, at least 20 detainees had been released homeless, including people assessed as vulnerable.	<p>Serco and the Home Office will continue to work together to ensure that those who are released and who are considered vulnerable are treated as per the published guidance.</p> <p>Where vulnerable residents are being released to No Fixed Abode (NFA), Multi-Disciplinary reviews will be held with caseworkers, Healthcare, Home Office Compliance, Probation Service (if applicable) and Serco to discuss issues related to safeguarding and safe release.</p> <p>In addition, NHSE is looking to embed RECONNECT - a care after custody service that seeks to improve the continuity of care of people leaving prison or an immigration removal centre (IRC) with an identified health need at Brook House.</p> <p>If a resident is destitute, they can apply for Home Office accommodation, but the onus is on them to apply, and there are strict criteria which they must meet depending on whether an application is made under s.95, s.4 or Sch.10 e.g. no recourse to public funds, be destitute, and have an outstanding or failed asylum application (not exhaustive criteria).</p>

SERVICE IMPROVEMENT PLAN – HMIP REPORT 2024 – BROOK HOUSE IMMIGRATION REMOVAL CENTRE

Concern Number	Concerns Addressed By	HMIP Concern	Home Office Response to HMIP Concerns Including Action Already Taken / Proposed to Address Concerns
			<p>It is not the Home Office's responsibility to source a bail address for all residents. The Home Office does not have the resource to house everyone who is bailed who does not have a private address. Releasing an individual to no fixed abode is a last resort once all available options have been explored and exhausted.</p> <p>For FNOs, any proposed address (private or Home Office) must be approved for suitability by the Probation Service if the FNO is subject to Probation Licence conditions. The Home Office and Probation Service have an escalation process in place which ensures that requests from Home Office to Probation for address checks are completed within appropriate timescales. The HMPPS have a 10-day SLA they should meet in providing the Home Office with a response around approving proposed accommodation addresses. Individuals sometimes will be released to NFA in certain circumstances where Probation have failed to approve the addresses, if detention becomes unlawful (i.e. if bail has been approved, or if there has been a change of circumstances and detention is no longer appropriate).</p> <p>Sourcing of suitable accommodation is often delayed due to a number of factors, such as (not exhaustive); the application has not been made or made under the wrong provision, the application has been refused as the FNO is not eligible, (although the FNO may appeal against any refusal to provide Home Office accommodation under s.95 and s.4), the FNO has risk factors which may preclude them from the majority of Home Office funded properties, Probation Service may deem the Home Office property as unsuitable so another property search is required.</p>