



Expectations for immigration detention

Criteria for assessing the conditions for and treatment of immigration detainees

Version 5, 2024

This document contains drafts of six sets of immigration expectations:

- Leadership (applies to all detention settings)
- Centres for adult men
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- Short-term holding facilities
- Overseas escorts
- Family detention

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Introduction

This is the fifth edition of our *Expectations for immigration detention* – the criteria we use during our inspections to assess the treatment and conditions of those held in all forms of immigration detention, including immigration removal centres, short-term holding facilities, family detention and under escort, both within the UK and overseas. This is not a comprehensive update, but rather a refreshed version, which incorporates recent developments in inspection practice, mainly in the areas of leadership and fair treatment and inclusion.

Expectations help us to deliver independent and objective assessments of outcomes for detainees, thereby helping the UK to meet its responsibilities as a signatory to the Optional Protocol to the Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT). They continue to provide the foundation for robust independent inspection of immigration detention that seeks to ensure all immigration detainees are held safely for the shortest time possible, treated respectfully and given the help they need to prepare for release or return.

Expectations are based on and referenced against international human rights standards. They reflect the fact that immigration detainees should be held in non-punitive and non-carceral environments. Our expectations often go beyond the associated human rights standards, many of which focus on the minimum standards expected in a criminal justice context.¹

We have published these *Expectations* exclusively online and will begin to use them in our inspections from January 2025.

Charlie Taylor
HM Chief Inspector of Prisons

December 2024

¹ There are currently no comprehensive human rights standards relating to administrative or immigration detention. Where relevant, we have used specific standards relating to persons seeking asylum, migrants, and to places of detention generally, as well as standards that relate specifically to women, children and other groups. Where we have drawn on standards derived from the criminal justice context, we have read them in light of the fact that immigration detainees have distinct needs and should not be held in prison-like environments.

Section 1: Leadership

Leaders provide the direction, encouragement and resources to enable good outcomes for detainees.

Expectations

- 1. Direction: Leaders work collaboratively with staff, stakeholders and detainees to set and communicate strategic priorities that will improve outcomes for detainees.**

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Leaders and staff understand the centre's strengths and weaknesses and where outcomes need to improve.
- Leaders have a good understanding of the experiences of detainees and staff in the centre.
- Leaders share an ambitious vision for the centre which recognises the non-punitive and non-carceral nature of immigration detention and the vulnerability of detainees.
- Realistic, aspirational plans are in place to improve outcomes for detainees.
- Staff understand and share the aims and priorities of the centre.
- Leaders develop successful working relationships with key partners and stakeholders, which include community and voluntary sector organisations, in order to deliver the centre's aims and improve outcomes for detainees.
- Leaders ensure that immigration detention is for the shortest time possible and that effective processes for identifying and expediting release of the most vulnerable are in place.

- 2. Engagement: Leaders create a culture in which staff and other stakeholders engage in activities to improve outcomes for detainees.**

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Leaders at every level are visible and approachable.
- Leaders take time to listen to staff and detainees and follow up issues raised.

- Effective communication is used to promote understanding of current priorities, share information, and encourage collaboration and multidisciplinary working.
- Leaders set, model and enforce standards of staff behaviour and detainee care that ensure detainees are treated with dignity.
- Leaders ensure that all detainees have access to a range of suitable and meaningful activity that promotes mental health and well-being.
- Leaders actively promote the well-being of staff.
- Staff feel motivated and supported in their work.
- Leaders show and encourage innovation and creativity to solve problems and meet the needs of detainees.
- Effective practice is recognised and shared.
- The organisational culture encourages staff to reflect on and learn from their mistakes and, where necessary, there is appropriate challenge.
- Leaders from all agencies working in the centre maintain open communication and promptly raise concerns that may negatively affect detainee outcomes.

3. Enabling: Leaders provide the necessary resources to enable good outcomes for detainees.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Staffing levels are sufficient to deliver a safe and respectful environment.
- Staff have the knowledge, skills and attitudes necessary to meet the needs of detainees.
- Staff can develop their learning through the offer of relevant training and educational opportunities.
- Leaders make good use of the staff and buildings at their disposal.
- Leaders identify resource constraints and seek to resolve them.
- The senior management team has the experience and skills necessary to improve outcomes for detainees.
- Line managers support their staff, challenge where necessary and provide suitable professional development opportunities.
- ICT systems support effective working practices.

4. Continuous improvement: Leaders focus on delivering priorities that support good outcomes for detainees. They closely monitor progress against these priorities.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Data is used effectively to understand the impact and fairness of policies, and to track progress against improvement plans.
- Feedback from detainees, staff and other stakeholders is used to generate ideas, create plans and measure progress.
- Relevant managers respond promptly and effectively to any complaints made against staff or leaders in the centre.
- Decisions are made and plans are amended in response to new information and leaders provide feedback and support as needed.
- Leaders welcome and encourage internal and external scrutiny.
- Inspection recommendations, audit findings, serious incident reports and best practice ideas are used to encourage improvement.
- Leaders use quality assurance processes to drive continuous improvement.
- Collaboration with relevant managers and colleagues in other centres, community and voluntary sector organisations, and other partner organisations, supports improvements.

These Expectations should be practised within a framework that is responsive to the distinct rights, needs and vulnerabilities of immigration detainees.

In relation to expectations 1–4, human rights standards emphasise that detention should be managed within a context which recognises the obligation to treat all detainees with dignity and the non-punitive and non-carceral nature of immigration detention. Standards recognise the important role of staff in safeguarding detainees and the need for adequate staffing levels to ensure a safe environment. Staff should receive ongoing training, including to undertake specialist roles. Arrangements should be in place to ensure good communication and coordination both within and outside of the centre and the involvement of voluntary organisations should be encouraged. See EPR 6, 8, 72–87, 89–91, 93; SMR 1, 3, 74–80, 83; BOP 1; BR 1, 29, 33, 35; HR 81–87; TGFR 10; UNHCR-DG 8, 9; CPT 5, 6.

1. CENTRES FOR ADULT MEN

Section 1: Safety

Detainees are held in safety and with due regard to the insecurity of their position.

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- Arrival and early days in detention
- Safeguarding
 - Safeguarding adults at risk
 - Self-harm and suicide prevention
- Safeguarding children
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Arrival and early days in detention

Detainees travelling to and arriving at the centre are treated with respect and care. Risks are identified and acted on. Detainees are supported on their first night. Induction is comprehensive.

Expectations

1. Detainees travel in decent conditions, are treated with respect and are fully informed about their transfer.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees are told, in a language they understand, where they are going, why they are being transferred and what to expect when they arrive.
- Detainees are given sufficient notice of transfer and can make telephone calls to their families and legal advisers before transfer.
- Detainees are not subject to multiple movements around the detention estate and there is due regard to the impact of transfer on local support networks and legal advice.
- Detainees are not transferred between centres during the night and all other night-time moves are kept to an absolute minimum.
- Detainees are swiftly transferred from police cells and spend no longer than one night in police custody.
- Detainees are given adequate comfort breaks and refreshments during transfer.
- Detainees are not kept waiting on vehicles after arrival.
- Detainees arrive in sufficient time to allow reception and first night procedures to be conducted effectively.
- Property, medication and paperwork arrive with detainees transferred to the centre.

2. Detainees are safe at all times while under escort, and individual needs are recognised and given proper attention.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Vehicles are safe, secure, clean and comfortable, and the needs of detainees with diverse needs, e.g. those with disabilities or those needing to take medication, are met.
- Escorting staff are aware of detainees' individual needs and provide an effective briefing to receiving staff.

- Any medical notes should be given to escort staff in a sealed confidential envelope.
- Arrest teams allow detainees adequate time to prepare for their journey, to dress appropriately and to collect essential belongings, including medication and paperwork.

3. Detainees are treated with respect and sensitivity on arrival at the centre.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees are received promptly into a welcoming and supportive reception environment, where they are greeted courteously by staff.
- Translated information is provided and interpretation is used as necessary to ensure good communication with detainees.
- All staff, especially those conducting searches, are able to identify signs of abuse and are trained to respond appropriately.
- The gender ratio of staff in reception is appropriate for receiving and searching detainees. Searching is carried out sensitively.
- If a passport or any other documents are withheld by staff, detainees are provided with reasons, a receipt and a copy of the documentation.
- Soon after arrival, detainees are able to make free telephone calls in private, have a shower and change into clean clothing, and are offered hot drinks and food.
- The reception process is completed swiftly and detainees are offered something to occupy them while they are waiting.
- Detainees' first night accommodation has been prepared, is clean and provides a comfortable environment.
- Detainees are able to obtain basic toiletries on arrival.

4. Children and other dependants are not put at risk as a result of their carer's detention.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Home Office staff know whether detainees have children and are assured that care arrangements for them are appropriate before their carer is detained.
- Home Office staff have due regard to their duty to safeguard and promote the welfare of children in any decision regarding detention.
- Appropriate action is taken to identify and promote the safety of children or other dependants who may be at risk as a result of their carer's detention.

- Detainees are allowed the time and facilities necessary to make arrangements for children and other dependants, including free phone calls.
- The names, ages and current care arrangements for detainees' children or other dependants are recorded on reception, and subsequently used to generate a support plan.
- Reception staff have ready access to social services contacts in the event that they cannot resolve concerns about the welfare of detainees' children. Any potential child safeguarding concerns are relayed to the centre's safeguarding lead.

5. Detainees feel and are safe on their reception into the centre and for the first few days in detention. Vulnerability² and risk are identified and detainees are given necessary support.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- All detainees arrive with correct documentation, including any assessment of their vulnerability, evidence of authority to detain (IS91) and the reasons for detention (IS91R).
- Detainees who may be vulnerable receive appropriate priority.
- Detainees receive a private interview, including an assessment of vulnerability, the risk of self-harm or suicide and a room sharing risk assessment, before location in residential units. Risk of harm information is shared with appropriate staff and, where relevant, the Home Office (see 'Safeguarding of vulnerable adults').
- Detainees are promptly screened by health services staff in private. Screening includes an assessment of the vulnerability of detainees, including their mental capacity (see 'Safeguarding of vulnerable adults').
- Detainees are given immediate assistance with pressing support needs.

² There is no universally agreed definition of vulnerability in detention. As Stephen Shaw's 2016 report, *Review into the Welfare in Detention of Vulnerable Persons: A Report to the Home Office* (CM9186), points out, some commentators consider all of those in detention to be vulnerable because they are detained. Others prefer to describe groups that are in 'situations of vulnerability', as opposed to intrinsically vulnerable groups, thereby stressing the largely contextual nature of vulnerability. It is common for groups such as those with serious mental or physical health problems, children, elderly people, pregnant women, LGBTI people, people with disabilities, asylum-seekers, and those who have experienced torture, trafficking or gender-based violence, including female genital mutilation, to be considered especially at risk of harm or neglect in detention. In these *Expectations*, we use the terms 'vulnerable' and 'vulnerability' to refer to these groups, but also to any other individuals or groups who may be at risk of harm or neglect as a result of other personal, social and environmental factors; these factors may be fixed or change over time and the degree of vulnerability may change as a result.

- Detainees spending their first night in the centre are identified to night staff, who offer appropriate support and regularly check on their well-being throughout the night.
- Staff introduce themselves to new detainees in the residential units and wear identification that clearly displays their name and status.
- Information about detainees' needs is communicated between staff sensitively, especially if it is related to medical issues.

6. Detainees understand the centre's routines and how to access available services that will help them cope with detention.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it:

- Detainees receive a comprehensive and multidisciplinary induction, which starts no later than the day after their arrival.
- Information is reinforced as needed over the course of the detention.
- Induction includes a private conversation with a member of staff to help alleviate any immediate concerns.
- Detainees are meaningfully occupied throughout the induction period and able to participate in activities swiftly.
- Induction provides detainees with key information, such as how to access visits, immigration staff, legal advice, health care, activities and the Independent Monitoring Board.
- Induction informs detainees of sources of internal and external support, such as the multi-faith team, peer support workers, welfare staff, visitors and community support groups, and enables them to meet them.
- Induction is provided in a range of accessible formats with interpretation and translation where necessary.

In relation to expectations 1–6 above: Human rights standards set out a number of requirements applicable to arrival and early days in detention. These include in relation to conditions of transport, requiring the provision of information in a language and way detainees understand, identifying the health care and other needs of detainees and allowing detainees to contact family and legal counsel. See SMR 1, 7, 50, 54, 55, 58, 62, 67, 68, 73; EPR 15.1, 15.2, 16; 24.8, 30, 31, 32, 37; BOP 1, 16, 24, 31; UNHCR–DG 7, 8; TGFR 10; CPT 2, 4, 9, 10.

Safeguarding

The centre promotes the welfare of all detainees and protects them from all kinds of harm and neglect. The centre provides a safe environment which reduces the risk of self-harm and suicide. Detainees at risk of self-harm or suicide are identified at an early stage and given the necessary care and support.

Expectations

Safeguarding of vulnerable adults

7. Adults who are vulnerable to harm or neglect are held in a safe environment and given appropriate care and support.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Safeguarding procedures and guidance are known and used by all staff, including on how to make the necessary referrals.
- There is a joint local safeguarding strategy that recognises risks of harm to detainees which could arise from: health and/or social support needs; past or possible future experience of torture, trafficking or trauma, including sexual or gender-based violence; detention injuriously affecting health; suspected suicidal intentions; and protected characteristics. The joint strategy includes all providers, including health, and has input from the local authority.
- A comprehensive central record of detainees considered by the Home Office to be at risk in detention is maintained and shared with centre contractors.
- A multidisciplinary committee, including health care staff, meets frequently and provides effective oversight and quality assurance of safeguarding practice, policies and procedures.
- The committee also considers the risks to and needs of detainees who may be vulnerable to harm and, where necessary, agrees a thorough and regularly reviewed care plan.
- Named case managers are allocated for all detainees with a care plan and are responsible for oversight of plans between reviews and for keeping the Home Office informed of the condition of the detainee.
- The centre has a well understood code of conduct that encourages staff to raise legitimate concerns about the behaviour of any individual towards detainees. Staff are confident in using 'whistle-blowing' procedures.

- When abuse of a detainee is alleged or suspected to have occurred, prompt and appropriate action is taken to protect the detainee and this is swiftly communicated to the Home Office.
- Staff engage with all relevant agencies and individuals to ensure detainees are appropriately cared for and supported.
- Detainees who lack mental capacity are not normally detained. If there are exceptional circumstances that result in detention, these are clearly documented. Detainees have access to independent advocates to aid their understanding and have their interests represented.
- Where detainees are released because they are found to lack mental capacity, there is a multi-agency review, lessons are learned and are reflected in future practice.
- Detainees are protected from extremist ideologies.

8. Processes are in place to identify adults who may be at risk of harm in detention, and to share information about risk.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- All detainees are effectively screened for vulnerabilities on arrival (see 'Arrival and early days in detention').
- All staff in contact with detainees are trained in the identification and care of detainees who may be vulnerable, especially those who may have mental health problems or who have been affected by trauma. They use the correct procedures effectively, raising concerns whenever appropriate.
- The centre reviews the cases of all detainees after one month and thereafter at regular intervals to identify emerging vulnerability. The review is supported by a regular medical assessment of the impact of detention on the health of the detainee.
- The centre promptly informs the Home Office of all detainees who may be vulnerable to harm in detention. The Home Office keeps centre staff informed about its assessment of risk to individual detainees.
- Staff are aware of issues around sexual exploitation and human trafficking and know how to identify potential victims. Relevant information is provided to detainees.
- Potential victims of trafficking are referred under the National Referral Mechanism (NRM). Any referral to the NRM should be made with informed consent whenever possible.

9. Detention of people who may be at particular risk of harm is only maintained in exceptional circumstances, and the reasons for maintaining detention are clearly documented and explained to the detainee.³

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- There are time-limited processes under which custodial and/or health care staff report to the Home Office and, where appropriate, the local authority, any concerns about detainees who may be at risk of harm or neglect.
- All such reports are comprehensive and provide an assessment of the impact of detention on the detainee. Health care reports also provide an assessment of the appropriate therapeutic environment for the treatment of the detainee and are written by a professional suitably qualified for the task.
- The Home Office reviews the decision to detain promptly on receipt of such reports and following any other notification from the centre concerning the vulnerability of a detainee.
- The outcome of the review, with reasons, is communicated in writing to the centre and the detainee, and appropriate action is taken.
- The Home Office takes full account of the information provided when reviewing the decision to detain.
- On site Home Office staff follow up late review responses.

10. Detainees who are potential victims of human trafficking are supported and referred to appropriate community services in the UK and other countries.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Potential victims of trafficking are not normally detained. If there are exceptional circumstances that result in them being detained, these are clearly documented.
- All staff, and particularly those working in health care, reception and the first night unit, are alert to the signs that detainees have been trafficked and have an understanding of the ways in which they may be affected by the experience of human trafficking.
- There is a local policy describing how men identified as potential victims of trafficking will be supported, which is advertised across the centre.

³ We do not refer specifically to Detention Centre Rule 35, which includes some but not all aspects of vulnerability.

- There is a single nominated point of contact, with knowledge of how to support victims of human trafficking.
- Where appropriate, the NRM is used. Any referral is recorded and communicated appropriately to staff. Referrals are made with informed consent whenever possible.
- Care is taken to identify and use the real name of potential victims of human trafficking.
- Victims of human trafficking are offered support to re-establish contact with their families, if they choose to do so.
- Professional counselling is made available to detainees who need it.

11. Men who have been the victims of abuse, rape or domestic violence are identified and supported to address their specific needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees are encouraged to disclose any experience of domestic or sexual violence or abuse, and this triggers a review of their detention. Disclosure is managed sensitively by appropriately trained staff of the same gender.
- Men receive information on the support available to them on removal or release, including in the destination country.
- Staff at the centre work closely with external organisations to address the support needs of men who have experienced gender-based violence.
- If appropriate, men who have experienced domestic violence receive help to prepare safety plans.

In relation to expectations 7–11 above: Persons held in immigration detention may be or become vulnerable to harm during their detention, including harm that arises or is exacerbated because they are detained. Human rights standards require the individual needs and circumstances of detainees to be assessed and regularly reviewed to identify their vulnerabilities, monitor the impact of detention on them and safeguard them from harm. Human rights standards also recognise that some individuals should not be held in immigration detention due to their vulnerability. See UNHCR–DG 8 [48(vi)], 9.1, 9.4–9.7; SMR 2, 33, 34, 109; BOP 5; EPR 12.1, 12.2, 16, 25.4, 42.3, 43.1, 52.1; CPRD 5, 12, 14–17, 25; CPT 9, 10.

Human rights standards require prompt and impartial investigation where there are reasonable grounds to believe an act of torture or ill-treatment has occurred in detention, or when an allegation of torture or ill-treatment is made by a detained individual. See SMR 1, 30, 34, 54–57, 71, 72, 76; EPR 1, 42, 81; BOP 33; CAT 2, 12, 13, 16; ECHR 3; ICCPR 7, 10.1; CPT 8.

Self-harm and suicide prevention

12. The centre provides a safe environment which actively reduces the risk of self-harm and suicide.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- There is a clear strategy for preventing self-harm and suicide, which includes effective multidisciplinary procedures and care planning to help reduce risks.
- A multidisciplinary committee meets frequently and provides effective oversight and quality assurance of safer detention practice, policies and procedures. It is well attended by a range of staff and includes detainees.
- All staff, including night and escort staff, are clear about their responsibility to preserve life and what to do in an emergency.
- There are enough trained staff on duty at all times, including at night, to respond to any incidents of self-harm, and all custodial staff carry anti-ligature knives.
- Any data relevant to self-harm is closely monitored and any emerging patterns are acted on.
- The findings of investigations into deaths in custody and serious 'near miss' incidents are acted on and regularly reviewed. Recommendations for improvement are implemented.
- Staff are alert to and take seriously the vulnerability of detainees who are not eating. Missed meals are monitored and detainees are given encouragement, care and support to resume eating.
- Detainees' families and friends and external agencies are encouraged to provide support, as well as information which may help to identify and support those likely to be bullied or with a history of self-harming behaviour. Any information received from external agencies in relation to vulnerability is acknowledged and acted on appropriately.

13. Detainees at risk of self-harm or suicide receive personal and consistent care and support to address their individual needs and have unhindered access to help.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- A thorough care and support process⁴ identifies risks, needs, strategies for reducing risk and individual staff members responsible for supporting the detainee.
- All detainees are monitored at high-risk times, such as when appeals fail or removal is imminent.
- Staff engage in a supportive and constructive way with detainees at risk of self-harm.
- Reviews of those considered to be at risk of self-harm are chaired by a consistent case manager who has relevant experience and expertise, and are attended by staff from a range of disciplines.
- Detainees can access a range of support services, and can involve their families, friends and external agencies in their care.
- Detainees have access to peer support, counsellors, Samaritans and other sources of external support in the local community. Wherever possible, assistance is provided by people who speak the same language as the detainee.
- Separation and/or strip conditions are not used to manage the risk of self-harm.
- Constant supervision is only used when a detainee's safety cannot be assured in any other way and for the minimum possible time. Staff create a positive environment that encourages and facilitates access to activity.

In relation to expectations 12 and 13 above: In addition to human rights standards that require vulnerable adults to be safeguarded, human rights standards require the right to life of detainees to be protected and promoted, and detainees to be treated with respect for their dignity and human rights. Specific standards require detainees to be provided with sufficient mental health care. See SMR 1, 2, 30, 31, 33; EPR 1, 25.4, 42.3, 43.1, 47.2, 52.2, 52.4; CCLEO 6; UNHCR-DG 8[48(vi)]; ECHR 2; ICCPR 6, 10; CPT 2, 9.

⁴ IRCs currently use the 'Assessment, Care in Detention and Teamwork' (ACDT) process, developed in prisons, to support detainees at risk of self-harm.

Safeguarding children

The centre promotes the welfare of children and protects them from all kinds of harm and neglect.

Expectations

14. Children are properly protected in a safe environment. All staff safeguard and promote their welfare.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Home Office staff know whether detainees have children and are assured that care arrangements for them are appropriate.
- A comprehensive child protection policy and guidance are in place, and have been agreed by the local safeguarding children board or equivalent.
- All staff are aware of their personal and professional duty of care to any children in the centre, and receive appropriate training.
- Staff promptly raise any concerns about the safety and welfare of children in accordance with agreed referral procedures.
- All staff who have contact with children are properly vetted and trained.
- Staff are aware of their duty to raise legitimate concerns about the conduct of colleagues in relation to the treatment and management of children. Staff are encouraged by managers to raise any such concerns, and feel confident and safe to do so.
- Children visiting the centre are safe and can enjoy visits in an environment that is sensitive to their needs.
- Visits staff are aware of detainees who may pose a risk to children and take appropriate and proportionate steps to ensure children's safety.

15. Detainees who say they are under 18 are promptly assessed and properly cared for while in the centre.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- The burden of proof in age dispute cases is on the Home Office. Detainees have a prompt Merton-compliant assessment unless their demeanour and appearance is clearly that of an adult significantly over the age of 18.⁵ All detainees who say they are children are treated as such until it is determined otherwise.

⁵ This will be reviewed in the light of changes in legislation.

- If, despite a chief immigration officer's (CIO's) assessment to the contrary, centre staff believe that a detainee may be a child, they understand they have a duty to act on their assessment, and immediately inform centre managers, social services and the Home Office.
- Where social services assess a detainee to be a child there is a multi-agency review of any prior CIO assessment; lessons are learned and reflected in future practice.
- Age assessments are promptly reviewed if fresh evidence is received.
- Multidisciplinary care planning is in place for all detainees whose age is in dispute. Their location in and movement around the centre is on the basis of a risk assessment and pays due attention to their individual needs.
- Detainees assessed to be under 18 are released into appropriate care as soon as possible. Comprehensive written information is kept on each age dispute case, showing the time taken for assessment and, where relevant, release.
- Detainees who say they are children are assisted to obtain legal advice and representation and supported to contact any other individuals or agencies.

In relation to expectations 14 and 15 above: Human rights standards prohibit the arbitrary detention of children and provide children with the right to challenge the legality of their detention. Children should only be detained as a last resort and for the shortest possible period of time. Unaccompanied children should not be detained and must be provided with special protection and alternative care. The best interests of the child must be a primary consideration in all actions concerning children. See CRC 3, 20, 22.1, 37(b), (d); ICCPR 9.1, 9.4; HR 2; UNHCR–DG 9.2; CPT 10.

Any child who is visiting a detention centre must be protected from exploitation and abuse and be provided with care and protection to ensure their well-being. Children's rights to, among other things, education, play and to the highest attainable standard of health, must be promoted. See CRC 3.2, 3.3, 24.1, 31, 33–37, 39; UNHCR–DG 8, 9.2; HR 82, 85–87; CPT 10.

Personal safety

Everyone is and feels safe. The centre promotes positive behaviour and protects detainees from bullying and victimisation. Security measures and the use of force are proportionate to the need to keep detainees safe.

Expectations

16. A clear and coordinated multidisciplinary approach ensures that detainees feel and are safe from victimisation from other detainees or staff.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees are made aware of behaviour that is unacceptable through a well-publicised policy and are informed of the consequences of victimising others.
- There is an effective strategy to reduce violence, antisocial behaviour and other factors that lead to feelings of insecurity, which is based on a thorough analysis of relevant data.
- The strategy involves all agencies or individuals involved in the care and management of detainees, including the Home Office, voluntary and community sector groups and, where appropriate, friends and family.
- Detainees are consulted on and involved in determining how their lives in detention can be made safer, and on how positive behaviour can be promoted and conflicts resolved.
- Detainees know where they can get help to report fear, victimisation or violence, or to resolve conflicts.
- Staff supervision provides protection for detainees in all areas of the centre.
- Allegations of bullying behaviour and other forms of victimisation are addressed promptly, consistently and fairly, incidents are investigated thoroughly and outcomes are recorded.
- Staff engage in and promote positive and supportive relationships, and identify and address problematic behaviour, including unwanted sexual attention. Mediation is used to help resolve disputes where appropriate.
- Victims of violent or other antisocial behaviour are supported and protected, and perpetrators receive support to change their behaviour.
- Staff identify detainees who self-isolate and provide support to encourage them to participate in the life of the centre.
- Any rewards scheme encourages participation in the regime and is not punitive.

In relation to expectation 16 above: Human rights standards include in relation to safety, discipline and order, systems of privileges and the use of mediation and conflict resolution. See SMR 36, 38; EPR 52.2, 55, 56; UNHCR–DG 8[48(xv), (xvi)]; CPT 7.

Security and freedom of movement

Detainees feel secure. They have a relaxed regime with as much freedom of movement as is consistent with the need to maintain a safe and well-ordered community.

Expectations

- 17. Detainees are able to live in an environment where security is proportionate and there is as much freedom of movement as is consistent with the need to maintain a safe and well-ordered community.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- The centre provides an open and relaxed environment, and strives to provide living conditions that are as near as possible to normal life in the community.
- Detainees' freedom of movement is limited only by the requirements of safety and good order. They are not locked in rooms.
- There are no obvious weaknesses or anomalies in the physical and procedural security of the centre.
- Routine searching involves a rub/pat down search by someone of the same gender as the detainee in the presence of at least one other member of staff.
- There is no routine strip-searching of detainees. This is only carried out exceptionally and for sound security reasons. It is recorded and authorised by senior managers and conducted in the presence of another member of staff.
- There is no routine room searching. Searching of detainees' bedrooms is on the basis of specific intelligence only. Detainees are informed that their bedrooms or personal property are being searched and of the reasons for the search. Their bedrooms and personal possessions are left in the same condition in which they were found.
- Restraints are not used during escort, including to medical or any other appointments outside the centre, unless justified by individual risk assessment.

18. Detainees' well-being is safeguarded by effective security intelligence systems and a robust approach to misconduct or illegal behaviour by staff.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- The elements of dynamic security are in place: relationships between staff and detainees are positive and detainees feel safe to report concerns; detainees are treated as individuals and receive personal attention from staff.
- Security systems are sufficient to identify current and emerging threats to the well-being of detainees and the safety of the centre.
- Effective intelligence and security measures guard against the trafficking of drugs or alcohol.
- Detainees know how to make confidential complaints about staff, and are confident that the system works effectively.
- Immediate protection from reprisals is provided to detainees and staff who report misconduct or ill-treatment by staff.
- Reports of misconduct and ill-treatment are investigated by a competent and appropriately senior and independent authority.

In relation to expectations 17 and 18 above: Persons who are detained should be held with no more security restrictions than necessary to ensure safe custody. See SMR 36; EPR 18.10; CPT 3, 5.

In addition, human rights standards establish that searches should only be carried out in accordance with defined procedures and in accordance with the principles of proportionality, legality and necessity. Any search must be carried out with respect for the dignity of detainees and their possessions. See SMR 50–52; EPR 54.

Use of force and single separation

Force is only used as a last resort and for legitimate reasons. Detainees are placed in the separation unit on proper authority, for safety reasons only and are held in the unit for the shortest possible period.

Expectations

- 19. Detainees are only subject to force as a last resort when other methods have failed. When used, force is legitimate, necessary and proportionate, and subject to rigorous governance.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Staff are trained in and routinely use de-escalation techniques.
- Restraints are used as a last resort and for the shortest possible period.
- Staff are not routinely equipped with items, such as batons, that are not in keeping with the ethos of immigration detention.
- Planned use of force is properly authorised and video recorded. All staff involved in the use of force complete appropriate reports promptly and in detail.
- Health staff recognise risks associated with restraint and attend all planned uses of force and other incidents wherever possible, to share relevant health information and ensure the detainee's safety.
- All detainees and staff involved in a use of force incident are debriefed as soon as possible following the incident.
- Detainees are not located in unfurnished accommodation, or placed in mechanical restraints or anti-rip clothing, except as a last resort and with proper authorisation.
- Use of force data are monitored and any emerging patterns are identified and acted on.
- Use of force documentation and associated CCTV or video footage is scrutinised by senior managers to identify opportunities for improvement and possible ill-treatment. Any concerns are investigated, lessons are learned and appropriate action taken.
- There is effective oversight of use of force by the Home Office and Independent Monitoring Board.

- 20. Detainees are held safely and decently in the separation unit for the shortest possible period and for legitimate reasons only.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees are separated with the proper authorisation and only to keep other detainees safe.
- Detainees are given the reasons for single separation in writing and in a language they understand, within two hours.
- Decisions to separate are made in consultation with health care professionals.
- Separation units are not used to manage risks arising from a detainee's vulnerability, such as mental illness or risk of self-harm.
- If the centre cannot safely manage detainees in the normal location, they are referred to the Home Office for an immediate review of detention.
- Detainees are never subjected to a regime which amounts to solitary confinement.⁶
- A multidisciplinary staff group monitors detainees held in separation to ensure they are held there as a last resort and for the shortest time possible.
- Detainees kept separated are monitored daily for their physical, emotional and mental well-being. Staff keep accurate records of the behaviour of detainees to ensure continuity of care.
- Those in single separation are allowed access to religious ministers, books, education staff, phones, exercise, social and legal visitors and a daily shower.

In relation to expectations 19 and 20 above: Human rights standards only allow for the use of force and restraints when absolutely necessary and as a measure of last resort. If it is absolutely necessary to use force or restraint, this must be the minimum necessary and only imposed for the time period required. There must be clear procedures governing the use of force and restraint.

In relation to restraint, see SMR 47–49; EPR 68, CPT 6, 7. In relation to the use of force see SMR 82; EPR 64–66; BPUFF 15.

As with any restrictions imposed on people already deprived of their liberty, human rights standards require that segregation or other practices that isolate detainees must only be used when absolutely necessary, for the shortest time possible, and be proportionate to the legitimate objective for which they are imposed. Because of the harm that can be caused by isolation, specific and additional safeguards also need to be in place. See SMR 43–46; CPT 7; UNHCR–DG 9.7[65]; ECHR 3; ICCPR 7; CAT 1, 2, 16.

⁶ 'Solitary confinement' is when detainees are confined alone for 22 hours or more a day without meaningful human contact (United Nations Standard Minimum Rules for the treatment of prisoners, Rule 44).

Legal rights

Detainees are fully aware of and understand their detention, following their arrival at the centre and on release. Detainees are supported by the centre staff to freely exercise their legal rights.

Expectations

21. Detainees understand why they are being detained and are informed about the progress of their case.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Each detainee has a named and easily accessible Home Office contact to answer their questions and keep them informed of the progress on their case. Detainees are given the name and contact details of the responsible Home Office case owner.
- On site Home Office staff meet with detainees within 24 hours of arrival to answer questions and explain individual reasons for their detention, appeal and bail rights, how to obtain good quality independent legal representation and any other relevant matters.
- Detainees who have been detained following a custodial sentence understand their position and have appropriate documentation explaining their status, including any licence conditions.
- Detainees are given progress reports at least monthly and following any change of circumstances or submission of new information to the Home Office. Reports focus on progress and do not simply repeat previous information.
- All information is given to detainees in a language and format they understand. Interpreters are always available in interviews to allow detainees to express themselves fully and understand their rights and any important decisions.

22. Casework is progressed promptly and reviewed effectively to reduce the potential harmful impact of ongoing detention.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Casework is progressed promptly and case planning ensures that detention is for the shortest period that is reasonable to reduce the potential harmful impact of ongoing detention.
- There is effective oversight of case planning.

- Detainees are only held for reasons that are legitimate and for purposes that are achievable within a reasonable period of time.
- Detention is reviewed regularly, taking full account of factors for and against the decision to detain, alternatives to detention, and any information/assessment of vulnerability held by the centre.

23. Detainees have effective access to independent legal representation.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees are able to speedily obtain regulated and good quality independent legal advice and representation in a language they understand, including prompt and unrestricted access to advice surgeries when needed.
- Detainees receive information on how to complain about poor quality legal representation. Centre staff are alert to detainees being exploited by poor or fraudulent advisors.
- Detainees are able to contact their legal representatives without impediment and can take copies of legal documents before sending them to legal representatives, the Home Office, tribunal or courts.
- Detainees are able to communicate with their legal representatives confidentially by phone, fax, letter, email and video conferencing.
- In appropriate cases, detainees are able to have their legal representatives, and interpreter if necessary, present during interviews with immigration staff and are provided with a copy of interview notes or recordings.
- Detainees have prompt and unrestricted access to private legal visits.
- Legal representatives have access to their laptops and a phone, and can arrange to pay for the centre's telephone interpretation facilities if needed.
- Detainees have prompt access to their Home Office and medical records and are advised of their right to request them.
- External doctors commissioned to report on the health of detainees are given prompt access.
- Detainees have access to up-to-date legal textbooks, their personal documentation and other reports or material necessary to help their immigration or asylum case.

24. Detainees are easily able to make applications for release.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Bail application forms and information about procedures are available.

- Detainees receive proper notice of bail and appeal hearings, and are able to attend on time.
- On conclusion of a bail hearing, detainees have a copy of the bail notice and understand the reasons for any refusal of bail.
- Detainees are not transferred when this would frustrate a bail application listed locally.
- Detainees receive copies of bail summaries by 2pm on the working day before their bail hearing, regardless of whether or not they are legally represented. Where the detainee cannot read English, the contents are explained in a language they understand.

In relation to expectations 21–24 above: Human rights standards permit detention for immigration purposes only in accordance with law and only as a measure of last resort. Detainees must have the reasons for their detention explained to them and be able to challenge the lawfulness of their detention. See EPR 30.3; BOP 9–14; TGFR 6–9; ECHR 5; ICCPR 9; UNHCR–DG 4, 7; CPT 1, 2.

In addition, standards require detainees to be able to access independent legal advice and to be allowed confidential visits and correspondence with their legal representative. See EPR 23; BOP 17, 18; SMR 61; BRPL 8; CPT 2.

Section 2: Respect

Detainees are treated with respect for their human dignity and the circumstances of their detention.

Contents

- Staff-detainee relationships
- Daily life
 - Living conditions
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 - Mental health
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 - Medicines optimisation and pharmacy services
 - Oral health

Staff-detainee relationships

Detainees are treated with respect by all staff, with proper regard for the uncertainty of their situation and their cultural backgrounds.

Expectations

- 26. Detainees are treated with humanity and with respect for their human dignity at all times. Relationships between detainees and staff are positive and courteous.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Staff and detainees are fair and courteous to each other.
- Staff have training in and show proper regard for the uncertainty of detainees' situations, particularly immigration issues, cultural backgrounds and the vulnerabilities of a population that may have experienced victimisation before detention.
- Staff understand the impact of life experiences – such as family separation, trauma, abuse and mental illness – on detainees' behaviour.
- Staff engage proactively with detainees and seek to know them as individuals.
- Staff routinely knock and wait for a response before entering rooms, except in emergencies.
- Staff support and encourage detainees to engage positively with activities that can help to reduce the stress of detention.
- There is an organised and structured peer support scheme that allows detainees to help and support each other.

- 27. Detainees have a named member of staff they can turn to on a day-to-day basis who is aware of their individual needs. Staff provide timely support as needed, including assistance with removal or release.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Staff strive to develop supportive relationships with individual detainees, understand their personal circumstances and encourage family ties.
- All detainees have a designated officer to whom they can turn as an initial point of contact for support or to resolve problems in the centre.

- There is a regular chronological record of contact with detainees, which identifies any significant events.
- Regular group meetings are held, with the help of interpreters where necessary, to enhance communication between staff and detainees.
- Staff are aware of external service providers and use them to help detainees.
- Staff use care plans for detainees who need them to coordinate care and to help manage specific risks or needs.

In relation to expectations 26 and 27 above: Human rights standards recognise that places of detention should be managed in accordance with the obligation to respect the humanity and inherent dignity of those detained, and require that staff and managers have the necessary aptitude and training to perform their roles. See SMR 74.1, 75, 76, 79.1; EPR 71–77, 81, 83, 87.1; UNHCR–DG 8[48(xvi)]; CPT 6.

Staff working with detainees with particular vulnerabilities should be given specialised training. See EPR 81.

Daily life

Detainees live in a clean and decent environment suitable for immigration detainees. Detainees are aware of the rules and routines of the centre. They are provided with essential basic services, are consulted regularly and can apply for additional services and assistance. The complaints and redress processes are efficient and fair. Food is prepared and served according to religious, cultural and prevailing food safety and hygiene regulations.

Expectations

Living conditions

28. Detainees live in a clean and decent environment which is in a good state of repair and is fit for purpose.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- The accommodation is conducive to an open and relaxed regime.
- The accommodation and all communal areas are clean, free of graffiti and offensive displays, well lit (including adequate natural light), and well decorated.
- The accommodation is in a good state of repair, and suitably heated and ventilated.

- Rooms provide adequate space for the number of detainees. All detainees have, as a minimum, their own bed, chair, table and lockable cupboard, and sufficient space to store personal belongings.
- Detainees have free access to decent, well-maintained and fully screened showers and toilets.
- Staff ensure that sleeping areas are as quiet as possible at night to enable sleep and rest.
- Detainees have free access to basic toiletries and sanitary products without having to ask staff.
- Freshly laundered bedding is provided for each new detainee on arrival and then at least weekly or when soiled. Mattresses and pillows are replaced as necessary.

29. Detainees feel and are safe in their residential units, both in their rooms and communal areas.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- All detainees have access to staff or emergency call bells that work and which receive a response within five minutes.
- Family members are located together unless they choose to be separated.
- Unrelated male and female detainees are held in separate accommodation with separate toilets, showers and washing facilities.
- Staff knock and wait for an answer before entering a bedroom, except in emergencies.
- Detainees have keys to their rooms.
- Detainees only share accommodation following a suitable risk assessment process.
- Detainees understand the local rules and routines, which are applied openly, fairly and consistently, with no discrimination.
- Notices and rules are translated into the main languages of the current detainee population, and internationally recognised symbols are used wherever possible.
- When a detainee breaches the rules, staff take time to explain how and why to the detainee concerned using interpretation as needed.

30. Detainees have enough clean clothing of the right kind, size, quality and design to meet individual needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees wear their own clothing if they have it, and are able to receive clothing from visitors.

- Any centre clothing provided is suitable for all detainees, sufficient in quantity, in reasonable condition and provides all-weather protection.
- Detainees have at least weekly access to laundry facilities so they can wash and iron their clothes. They have priority access if removal or tribunal hearings are imminent.
- Clean underwear is available daily.

31. Detainees' property held in storage is secure and detainees can promptly access their property on request.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees can receive parcels and have property handed to them during visits.
- Detainees are allowed to store valuable and other property in a secure area.
- The amount of property in possession and storage that detainees are allowed takes account of individual needs.
- Detainees are fairly compensated for clothing and possessions lost while in storage.

In relation to expectations 28–31 above: Human rights standards require that detainees be housed in accommodation that respects their human dignity and privacy. Accommodation should be clean, adequately ventilated and lit (by both natural and artificial light) and provide sufficient living space. See EPR 18, 19, 21; SMR 12–21; UNHCR–DG 8[48(x)]; CPT 4.

Standards also provide that detainees may only share sleeping accommodation if it is suitable for sharing and following an assessment that detainees are suitable to share with one another. Places of detention must have an alarm system that allows detainees to contact staff without delay. See EPR 18; SMR 12.

Suitable clothing must be provided to those who do not have their own. See EPR 20; SMR 19–20; UNHCR–DG 8[48(x)]; CPT 4. In addition, standards require that detainees' property should be kept safely when not in their possession. See EPR 31; SMR 67; CPT 4.

Poor living conditions, in and of themselves, can and have been found to violate ICCPR 10 and ECHR 3. A lack of resources does not justify detention conditions that infringe a detainee's human rights. See EPR 4.

Detainee consultation, applications and redress

32. Detainees are able to take an active role in influencing decisions about services, routines and facilities in the centre and in managing their own day-to-day lives.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees are regularly consulted about centre life and given the opportunity to present any areas of grievance or dissatisfaction directly to managers.
- Staff work creatively to overcome obstacles to consultation, such as language difficulties and detainees' fears of repercussions.
- Detainees can challenge decisions appropriately and are confident that their views are taken seriously.
- Detainees are informed of the outcomes of consultation in the languages most commonly used in the centre, and provided with justifiable reasons for any decisions made.
- Ongoing feedback mechanisms, for example, food comments books, are readily available, regularly checked and responded to appropriately.

33. Staff and detainees are encouraged to resolve requests informally. When this is not possible detainees understand how to apply for available services, and are able to do so easily.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Staff and detainees are encouraged to resolve requests informally, before making a formal, written application.
- Detainees know how to make applications and can do so confidentially.
- Staff help detainees to make applications, as requested.
- Detainees receive timely responses to their applications that are respectful, easy to understand and address the issues raised.
- There are effective and thorough quality assurance arrangements in place.

34. Detainees have confidence in complaints procedures, which are effective, timely and well understood.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees know how to complain and have access to information about complaints procedures in a range of formats and languages.
- Detainees have easy access to complaint forms in a range of languages.
- Detainees can submit complaint forms confidentially at any time, including to the Home Office and/or the Independent Monitoring Board.
- There is a separate health complaints system to preserve medical confidentiality.
- Responses to complaints are clear, respectful, prompt, and address all the issues raised.
- Determined efforts are made to communicate responses to detainees who have left the centre.
- Responses are communicated in the language in which the complaint was submitted.
- Where necessary, detainees receive help to make a complaint.
- There is an effective quality assurance process for complaint responses.
- An effective monitoring system is in place to analyse complaints, both against contractors and the Home Office. Centre managers have full information about all complaints made by detainees in their care and the responses. Results are used to identify trends, and emerging concerns are addressed.

35. Detainees feel safe from repercussions when using complaints procedures and can appeal decisions easily.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees are not pressured to withdraw complaints.
- Complaints about staff are investigated by appropriately independent and senior persons. Restrictions on the involvement of staff who are the subject of a complaint are implemented where necessary.
- Detainees who make complaints against staff and/or other detainees are protected from possible recriminations.
- Detainees know how to appeal against decisions and appeals are dealt with swiftly.
- Detainees have access to recognised external organisations offering support in pursuing a complaint.
- Detainees know how to contact members of the Independent Monitoring Board and the Prisons and Probation Ombudsman, and can do so in confidence.
- Information about the Legal Ombudsman is available.

- Detainees receive help to pursue complaints and grievances beyond the centre, if they need to do so. They receive help in contacting legal advisors or making direct applications to the courts.

In relation to expectations 32–35 above: Human rights standards require detainees to be able to make requests and complaints and to do so without reprisal or punishment. Requests and complaints must be responded to promptly. See SMR 56, 57; EPR 70; BOP 33; UNHCR–DG 8 [48(xv)]; CPT 8.

Residential services

36. Detainees have a palatable, varied, healthy and balanced diet which meets their individual needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Meals are adequately spaced and there is at least one substantial hot meal each day.
- Detainees are involved in the preparation of food, which is appropriate to their own culture, and have opportunities to cook independently for themselves and their friends.
- Detainees have a choice of meals, including vegetarian, vegan, religious, cultural and medical diet options. All menu choices provided meet the same standard.
- Detainees can obtain drinking water and hot drinks at any time.
- Detainees are able to select from a menu that is translated into languages commonly used in the centre, includes pictures of meals and indicates whether they are suitable for different cultures, religious requirements and diets.
- Detainees are able to register any comments in their own language in a food comments book that is regularly read and taken account of by the catering manager.
- Detainees are consulted about their food and represented on a catering committee.

37. Detainees' food and meals are stored, prepared and served in line with religious, cultural and other special dietary requirements and prevailing safety and hygiene regulations.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- All areas where food is stored, prepared or served conform to the relevant food and safety hygiene regulations, and are properly equipped and well managed.

- Catering staff meet religious, cultural or other specific dietary needs.
- All detainees and staff who work with food are health-screened and trained, wear proper clothing and can gain appropriate qualifications.
- Detainees are able to eat together.

38. Detainees can purchase a suitable range of goods at reasonable prices to meet their diverse needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees are provided with a weekly personal allowance, which is sufficient to meet essential needs.
- Detainees arriving without private money are offered an advance to use for purchases, with repayment staged over a period of time.
- Detainees are able to buy snacks and drinks throughout the day.
- Detainees have access to a shop that stocks a range of culturally appropriate items, including skin and hair care products.
- Prices are broadly equivalent to those in the community.
- Arrangements are in place for detainees to purchase other approved items that are not provided by internal facilities.
- Detainees have unlimited access to their own cash and accurate financial records are kept by the centre. Foreign currency can be exchanged at reasonable rates.
- Detainees can purchase newspapers and magazines and place catalogue orders.

In relation to expectations 36–38 above: Human rights standards require that detainees be provided with nutritious food that takes into account their personal needs (such as religion, age, health and culture) and, in addition, that they have the opportunity to purchase food and other goods. See EPR 22, 31.5; SMR 22; UNHCR–DG 8[48(xi)]; CPT 4.

Fair treatment and inclusion

There is a clear approach to promoting equality and diversity, underpinned by processes to identify and address any inequality or discrimination. Distinct needs arising from detainees' protected characteristics are recognised and addressed.

Expectations

- 39. Leaders take seriously the experiences and views of detainees with diverse needs and identities. They communicate with them effectively and use information about equality and diversity to drive improvement.**

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Leaders are aware of the experiences and feelings of those in protected groups and consider factors affecting their well-being.
- Specialist resources are used to improve communication with protected groups.
- Accredited interpreting services are used with detainees wherever accuracy or confidentiality are important.
- Accurate records are kept of staff and detainees who are able to speak languages other than English.
- Key information about the centre is available in foreign languages.
- Leaders confidently collect, analyse and communicate data on equality and diversity across a range of indicators of life in the centre. They use it to effect change, and monitor, maintain and share progress.
- A named person of appropriate seniority has overall responsibility for equality, diversity and inclusion.

- 40. Detainees feel safe and are able to share their experiences, including with leaders in the centre. Procedures are in place and action is taken to identify and address discrimination and disparities.**

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Detainees' protected characteristics are identified systematically on arrival and initial assessments take account of their specific needs.

- Detainees who are vulnerable to victimisation in detention as a result of their protected characteristics, or who need assistance to complete everyday activities, are detained only in exceptional circumstances. When identified, they are referred to the Home Office for an immediate review of detention.
- Leaders have put processes and structures in place to improve mutual understanding and communication between diverse groups, for example through competently facilitated forums, and activities centred around food or the arts.
- Leaders have put processes and structures in place to improve fairness, for example effective equality monitoring and complaints systems, and suitable adaptations and adjustments.
- Detainees and staff know what is acceptable in terms of behaviour and language to show respect to all groups.
- Potential or actual discrimination is effectively identified.
- Leaders and staff respond to all identified concerns proactively, comprehensively and respectfully.

41. Staff have the skills and knowledge to work with detainees in an inclusive and culturally competent way.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- The centre's culture helps it to improve equality and diversity outcomes for detainees and staff.
- Leaders strive to recruit and retain staff who represent the diverse backgrounds and needs of the centre's population.
- Leaders obtain support from specialist organisations and groups to promote fair treatment and best practices. They enable them to work effectively with staff and detainees.
- Staff are trained and supported to identify and eliminate unlawful discrimination.
- Staff and detainees are encouraged to develop mutual understanding of each other's perspectives and experiences.

42. Fair treatment is effectively promoted and developed in the centre.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Awareness of diverse needs is promoted by educational and celebratory events.
- Leaders work effectively to understand, communicate, and discuss issues of ethnic and racial identity with staff and detainees.
- The specific needs of women detainees held in shared facilities are met, with appropriate female staff ratios, and they have regular and equitable access to facilities and activities (see Expectations for Centres holding women).
- Detainees with disabilities of all kinds have fair access to every aspect of the centre's life, and can participate in them safely and constructively.
- Staff are aware of the needs of detainees with neurodivergent conditions and learning disabilities, and adjustments are made to meet them.
- Whatever their gender identity, all detainees receive fair, equal and respectful treatment.
- LGBT+ detainees can play a full, open and equal part in the life of the centre.
- Staff are aware of the distinct needs of young adults, and recognise and respond to individual levels of maturity.
- Older detainees receive appropriate assessment and support from staff who have had relevant training.
- Appropriate activities are provided for all age groups.
- Detainees of all faiths and belief systems receive equitable treatment.
- All other minority groups, such as veterans, are recognised and their specific needs are met, including any additional support required to make sure they receive equal and inclusive treatment.

In relation to all fair treatment, inclusion and religion expectations, non-discrimination is a fundamental principle enshrined in human rights treaties and standards. See ICCPR 26; CERD 1, 2; CEDAW 1, 2; ICESCR 2.2; CAT 1; CRPD 5. Human rights standards relating to places of detention should be applied impartially and without discrimination. See SMR 2; EPR 13; BOP 5.

In addition to the general non-discrimination provisions, there are specific human rights standards relating to some protected characteristics, including the following:

- Detainees with disabilities: CRPD 2, 3, 5, 9, 14; SMR 5.2, 55.2, 109.2; UNHCR–DG 9.5.
- Detainees from national, ethnic, cultural, religious or linguistic minorities: DRM 2; EPR 38.
- Sexual orientation and gender identity: UNHCR–DG 9.7; Yogyakarta Principles; Council of Europe Committee of Ministers, *Recommendations on measures to combat discrimination on grounds of sexual orientation or gender identity*.
- Older detainees: UNHCR–DG 9.6.
- Women: In relation to ensuring private accommodation for women, see UNHCR–DG 8[48(v)]; SMR 11; EPR 18.8. See generally Bangkok Rules (those which are relevant to specific expectations are noted in the Expectations relating to Centres for Adult Women).

Faith and religion⁷

Detainees are able to practise their religion. The multi-faith team plays a full part in centre life and contributes to detainees' overall care and support.

43. Detainees are able to practise their religion fully and in safety.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- All detainees have access to corporate worship and faith-based classes and groups each week, and to ministers of their faith.
- Detainees know the timings of religious services, which are well advertised. Timings are appropriate to the different religions.
- The composition of the multi-faith team is commensurate with the centre's faith populations.
- Multi-faith rooms and worship areas are equipped with facilities and resources for all faiths and are accessible for all detainees to allow contemplation, reflection and prayer.
- Activities are arranged so that detainees are able to attend corporate worship.

⁷ In this section, religion includes 'religion and belief' as they are understood in the context of the Equality Act 2010 and related case law.

44. Different religious faiths are recognised and respected.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Staff are aware of religious diversity and the way it interacts with cultural and racial identities.
- Searches of staff, visitors, detainees and their property are conducted in a religiously and culturally sensitive manner.
- Detainees can fulfil religious lifestyle requirements.
- Detainees can learn about different faiths.
- Monitoring of the different religions in the centre population is comprehensive, accurate and reviewed regularly to shape service provision.
- Detainees are able to obtain, keep and use artefacts that have religious significance.
- Detainees are able to celebrate all major religious festivals and the centre actively promotes them.

45. Detainees are fully supported by the multi-faith team, which contributes to their overall care, support and preparation for removal or release.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Religious leaders meet all new detainees in private within 24 hours of their arrival in the centre.
- Religious leaders provide support at times of personal crisis, such as family bereavement, the death or serious illness of a detainee, and imminent removal.
- Religious leaders demonstrate tolerance and cooperate with each other, working closely with other staff in the centre.
- Religious leaders establish and maintain links with faith communities and places of worship according to the individual needs of detainees.
- Religious leaders are consulted about care planning for detainees where appropriate, and are invited to assist in preparations for release, removal or transfer.

In relation to expectations 43–45, all persons have the right to freedom of thought, conscience and religion. See ICCPR 18; ECHR 9. Human rights standards require that there be no discrimination on the grounds of religion or religious belief and that prisoners belonging to religious minorities must be able

to profess and practise their religion without any interference. See EPR 13, 29; SMR 2, 65, 66; BOP 5; UNHCR–DG 8 [48(ix)].

Health services

Health services assess and meet detainees’ health needs while in detention and promote continuity of health and social care on release. Health services recognise the specific needs of detainees as displaced persons who may have experienced trauma. The standard of health service provided is equivalent to that which people could expect to receive elsewhere in the community.

In relation to all health services expectations below: Everyone has the right to the enjoyment of the highest attainable standard of physical and mental health, see ICESCR 12. Human rights standards require that detainees be provided with the same standard of health care as available in the community and that places of detention should safeguard and improve the health of those in their care. See SMR 24, 25; EPR 39, 40; CPT 9; UNHCR–DG 8 [48(vi)].

In the context of immigration detention, it is important that the vulnerabilities of individuals are identified to ensure the impact of detention on vulnerable detainees is monitored and that they are safeguarded from harm (see standards in relation to expectations 7–11).

Expectations

Strategy, clinical governance and partnerships

54. Patients are cared for by a health service that accurately assesses and meets their health, social care and substance misuse needs while in detention and which promotes continuity of care on release.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Commissioning arrangements ensure that health, social care and substance misuse services are informed by and meet the assessed needs of the centre’s population.
- Effective governance systems and partnership working between the centre, commissioners and providers ensure that health and social care provision meets the required regulatory standards.
- Adverse incidents and near misses are reported, monitored and investigated.

- Service delivery is informed by effective detainee consultation and lessons learned from adverse incidents/near misses, audits, complaints and case reviews.
- Health staff are easily recognisable. Staffing levels and the skills mix meet service user need.
- Detainees are treated by staff who receive relevant training, supervision and support to execute their roles and professional responsibilities.
- Health staff recognise and promptly report any signs of trauma, torture or other health issues that affect fitness to detain and make all necessary referrals, including those under the National Referral Mechanism. Referrals are made with informed consent whenever possible.
- Any detainees under the age of 18 have access to competent health staff with specialist skills.
- Every patient has a single clinical record that meets contemporary record keeping standards.
- Information is shared within the bounds of medical confidentiality to promote continuity of care and maintain patient safety.

55. Patients receive safe, accessible, caring and compassionate treatment, which is sensitive to their diverse needs, from competent staff in an environment that promotes dignity and maintains privacy.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Patients are treated with respect, compassion and cultural sensitivity while they receive care and treatment.
- Patients are referred promptly for appropriate care and treatment at external medical facilities where there is no available treatment for them in detention.
- All detainees have equal access to health, well-being and social care services and are not unnecessarily restricted by language barriers, disabilities, location, security procedures or regime.
- Detainees can request a health practitioner of their own gender and are made aware of this.
- Detainees' primary languages are recorded and professional interpreting services are used routinely for all confidential interactions with detainees who are not fluent in English.
- There are sufficient rooms for the provision of appropriate and accessible care and patients are seen in private, except in clearly documented exceptional circumstances.
- Infection prevention and control measures are robust.
- Competent health staff respond promptly to medical emergencies with appropriate emergency equipment.

- All clinical equipment is appropriately maintained and serviced to ensure patient safety.
- There are effective arrangements for gaining and reviewing the service user's consent. When service users lack mental capacity to make a decision, health professionals make 'best interests' decisions in accordance with legislation.
- Service users are kept safe and safeguarded from abuse, and have access to independent advocacy services if required.
- Service users can easily complain, compliment or raise concerns about their care and treatment internally and externally and are protected from possible repercussions. Responses are timely, easy to understand and address all the issues raised.

56. Detainees are supported and encouraged to optimise their health and well-being.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- There is a whole-centre approach to promoting health and well-being.
- Information about available health services and current national health campaigns is easily accessible in all required formats and languages.
- Detainees can easily access information and services that help them to optimise their health and well-being.
- Detainees can access relevant national and local age-appropriate screening and immunisation programmes, including screening and treatment for blood-borne viruses if clinically indicated.
- Detainees can access travel vaccinations and/or malarial prophylaxis if required, prior to deportation.
- Older detainees receive proactive care from competent staff who understand their health, social care and well-being needs.
- Detainees are advised of the risks of smoking and can access smoking cessation support, including self-care options similar to those in the community.
- Robust systems are in place to prevent, identify and manage the outbreak of communicable diseases.
- Barrier protection, contraception and sexual health advice are freely available while in the centre and on release.
- Detainees receive relevant individual health promotion advice and resources on release.

In relation to expectations 54–56 above: Human rights standards emphasise the role of health care staff in evaluating, promoting, protecting and improving the physical and mental health of detainees, paying particular attention to those with special health care needs. There should be an interdisciplinary team with full clinical independence. There must be prompt access to medical care in urgent

cases and referral to external care when needed. See SMR 25–27, 31; EPR 40–42, 46.

Primary care and inpatient services

57. Detainees' immediate health, substance misuse and social care needs are recognised on reception and responded to promptly and effectively.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- A competent health professional screens all new arrivals promptly to identify their immediate needs and vulnerabilities, and assess their mental capacity. Appropriate onward referrals are made.
- All relevant risk, vulnerability and care planning information is shared between centre and health staff, and the Home Office where appropriate, on the first night and throughout detention to ensure detainees' safety.
- With consent the patient's medical records are obtained and any relevant care agencies are contacted promptly to ensure continuity of care.
- Detainees who have vulnerabilities that indicate detention would be harmful receive a prompt and comprehensive assessment from suitably competent health professionals, which clearly states the impact of detention on their well-being.
- Patients receive a secondary health assessment from a competent health professional within 24 hours of arrival to identify and address their broader health and well-being needs, *with further assessment to follow as appropriate*.

58. Patients' individual ongoing health care needs are addressed through an appropriate range of care services. Continuity of care is maintained on transfer, release or removal.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees can access primary care and social care services, including mobility and living aids that meet their needs within similar waiting times to the community.
- The appointment system ensures clinical time is used effectively and patients do not have excessive waits in the health department before or after their appointments.

- Detainees can access effective and responsive out-of-hours and emergency medical cover.
- Patients with long-term conditions and complex health needs (including food and/or fluid refusal) receive appropriate care, including regular reviews, in line with good practice, to support them to maximise their well-being.
- Continuity of care is supported by effective care planning which routinely demonstrates patient involvement.
- Health services staff provide community-based services on the wings when required.
- Patients requiring secondary care services are referred promptly and are seen within community-equivalent waiting times. Transfer or removal is curtailed to provide essential ongoing medical treatment.
- Sufficient officer escorts are available to enable patients to access secondary care services in a timely manner. Security measures during hospital escorts are based on an individual risk assessment and are proportionate.
- In partnership with the centre, health staff promptly identify and respond to a deterioration in a detainee's physical or mental health or an increase in identified risks of harm, including advising the Home Office of the need to review the appropriateness of detention when required.
- Comprehensive fitness to travel assessments, including the availability of required treatments in the country of destination and the implications of a lack of required treatments, are submitted to the Home Office in a timely manner.
- Pre-release and removal assessments and interventions are provided in a timely manner based on clinical need. Detainees are given information on all relevant community support and are assisted to register with community health services if required.
- Detainees being removed are given information about sources of support in the destination country.
- Joint working with relevant centre departments, community agencies and escort staff supports effective continuity of care.
- Health staff work collaboratively with the centre, Home Office and community services to ensure effective release planning for those with complex needs.
- Detainees being released are offered a summary of their medical notes.
- A summary of medical notes is given to escort staff in a sealed confidential envelope for detainees being removed.

59. Patients requiring 24-hour nursing care are supported by a regime, facilities, and health staff to meet their individual needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees requiring 24-hour nursing care are not normally detained. If there are exceptional circumstances that result in them being detained, they are clearly documented. Detainees are released as soon as possible.
- Health professionals admit and discharge patients from 24-hour nursing care facilities using agreed clinical criteria.
- Patients receive a timely comprehensive assessment of their care needs and wherever possible are involved in developing their own care plans.
- Patients have access to normal centre activities, unless their clinical condition precludes it.
- Patients have access to therapeutic, meaningful and constructive activities to support their well-being and/or recovery.
- Patients' ongoing care needs are met following discharge from the unit.

In relation to expectations 57–59 above: Human rights standards require detainees' health care needs to be assessed on arrival, including identifying all health care needs, the risk of self-harm and any previous ill-treatment. See EPR 40; SMR 30. Standards require health needs to be monitored and met throughout detention. See EPR 39–43, 46; SMR 24, 27, 31–34. See also standards relating to leaving the centre (in relation to expectations 76 and 77).

Mental health

60. Detainees with mental health problems are identified promptly and supported by community-equivalent services to optimise their mental well-being during their stay and on transfer, release or removal.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees with ongoing mental health needs have a review of their detention, which takes into account the appropriate therapeutic environment for treatment and evidence of the detrimental impact of detention.
- Detainees receive an assessment of their immediate mental health needs on reception and appropriate onward referrals are made.

- Detainees can easily access mental health services through a clear referral pathway and are seen within agreed response times for all mental health problems.
- Referrals are reviewed promptly and appointments are allocated based on clinical need and risk.
- Sufficient competent practitioners deliver an appropriate and timely range of culturally sensitive, evidence-based mental health interventions for all mental health disorders and trauma.
- Prescribing reviews, including related physical health checks, occur as needed.
- Patients are assessed using a standardised format and additional information from other sources is obtained as required.
- Patients have written care plans which are regularly reviewed with their mental health practitioners.
- In cases of co-morbidity there are clear care pathways in place for liaison and joint working with substance misuse services and primary care.
- Patients with severe and enduring mental illness are supported within the Care Programme Approach and, where clinically indicated, release to treatment in the community is arranged expeditiously.
- Patients with serious and enduring mental health problems who require treatment under the Mental Health Act are assessed and transferred promptly.
- Patients with severe mental illness are only separated on the recommendation of a suitably competent medical practitioner and only in exceptional circumstances, for the minimum time and with assertive mental health support.
- Relevant information is provided to the receiving services on discharge from the mental health service.
- Effective discharge planning and liaison with case workers and community mental health services ensure continuity of care and appropriate support following release into the UK.

In relation to expectation 60 above: Human rights standards require places of detention to monitor and meet detainees' mental health needs and to ensure referrals are made to external care when needed. See EPR 39–43, 46, 47.2; SMR 24–27, 31–34.

Substance use treatment

The supply of illicit substances is curtailed and detainees with drug and/or alcohol problems receive effective individualised interventions to support their recovery.

Expectations

- 61. An effective whole centre approach ensures that the demand for drugs and alcohol is reduced and that detainees can access appropriate treatment which meets the assessed needs of the population.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- A multi-agency drug and alcohol committee develops, implements and monitors a strategic approach to drugs and alcohol and ensures effective joint working between all relevant stakeholders.
- A regular and comprehensive needs assessment informs the strategy and action plans.
- Staff receive training to enable them to recognise when a detainee requires referral to substance use services, and there is a clear referral pathway.
- During induction, newly arrived detainees receive information on substance misuse services and harm reduction.
- Detainees have prompt access to psychosocial and harm reduction interventions which meet their individual identified needs, including mutual aid, such as trained and supervised peer supporters.
- Effective intelligence and security measures guard against the trafficking or manufacturing of drugs or alcohol.
- Sufficient competent staff provide effective evidence-based psychosocial and clinical services. Service user outcomes, feedback from service users and lessons learned from complaints and incidents inform service delivery and improvement.
- Drug and/or alcohol-dependent detainees who are newly arrived receive prompt first night screening, plus regular additional monitoring and individualised treatment in their early days.
- Specialist clinical staff complete a comprehensive assessment to determine a suitable management plan promptly after a detainee's arrival or following a request for a clinical intervention.
- Prescribing regimes are flexible, conform to national clinical guidelines and adequately meet the individual patient's needs, including treatment availability following removal. Subject to confirmation, existing prescribing regimes are continued or equivalents provided.

- Patients receive regular multidisciplinary prescribing reviews and are actively involved in their own care planning.
- During induction, newly arrived detainees receive information on substance misuse services and harm reduction around the use of illicit substances in the centre.
- Detainees have prompt access to psychosocial and harm reduction interventions which meet their individual identified needs, including mutual aid.
- Psychosocial and clinical substance misuse services are well integrated with each other and with primary and mental health services.
- Service users receive information on harm minimisation and on service provision in their destination country in a language they can understand.
- Effective discharge planning and liaison with relevant resettlement and community services, including in the country to which the detainee is being removed, ensure continuity of support following release.

In relation to expectation 61 above: Human rights standards provide that initial health assessments should include an assessment of symptoms of withdrawal resulting from the use of drugs, alcohol or medication, and note the need for continuity of care for drug dependence. See SMR 24.2, 30; EPR 42.3.

Medicines optimisation⁸ and pharmacy services

62. Patients receive community-equivalent, person-centred medicines optimisation and pharmacy services.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Patients' medication histories, including allergies, are recorded during the initial reception screen and a full medicines reconciliation is completed within 72 hours of admission.
- Any disruption in prescribing regimens is minimised and urgent/critical medicines can be accessed promptly.
- Patients have direct access to clinical pharmacy services and advice.
- All medicines are handled, transported and stored legally, safely and securely with effective pharmaceutical stock management and use.
- Alerts, drug recalls and adverse reactions to medicines are managed appropriately.
- Robust governance processes ensure safe and effective medicines management, including monitoring of prescribing trends.

⁸ 'Medicines optimisation' refers to a service that is responsive to individual needs. Simply put, it is about patients receiving the correct choice of medicine at the most appropriate time to address their individual needs.

- Patients' medicines are prescribed safely in line with evidence-based practice and agreed local protocols and are administered at clinically appropriate times.
- Patients' adherence to medication is monitored and support is given to maximise patient safety.
- Patients can store their medicines securely and self-administer safely following an in-possession risk assessment which is regularly reviewed.
- Detainees can easily access simple self-care medicines at all times.
- Medication is administered in an appropriate environment that ensures the safety of patients and staff while maintaining patient confidentiality.
- Detainees are given information about their medicines in a format they can understand and receive regular clinical reviews of their prescribed medicines in line with current guidelines.
- Detainees are released or transferred with a confidential medical summary and sufficient medication for their needs, including for the duration of any escort journey.

See the standards under health services heading above.

Oral health

63. Detainees receive timely community-equivalent dental services, including oral health promotion.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees have timely access to emergency dental services based on clinical need, and to the full range of NHS-equivalent treatment that can reasonably be delivered while they are detained.
- Detainees receive evidence-based interventions in oral health promotion and disease prevention.
- Detainees have prompt access to required medicines following dental interventions.
- Governance processes ensure that patients receive dental care that meets contemporary professional clinical standards in an appropriate environment.

In relation to expectation 63 above: Human rights standards require detainees to have access to dental services. See SMR 25.2; EPR 41.5.

Section 3: Activities

Contents

- Access to activities
- Education and work
- Library provision
- Fitness provision

Activities

The centre encourages activities and provides facilities to preserve and promote the mental and physical well-being of detainees.

Expectations

Access to activities

65. Detainees have regular and equitable access to facilities and activities that meet their needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Activities and facilities provide physical and mental stimulation. They include suitable outdoor activities.
- Activities are available every day, including in the evenings.
- Detainees are free to move throughout the centre. Any restrictions are justified by clear evidence of risk.
- Detainees are not prevented from taking part in activities or using facilities as a result of scheduling conflicts.
- There is a good range of recreational activities and facilities.
- Detainees have easy access to outside areas and fresh air, which is restricted only on the basis of assessed risks.

In relation to expectation 65 above: Human rights standards require detainees to be allowed to participate in activities that allow social interaction and meet their welfare needs. Freedom of movement should be restricted as little as possible. See EPR 25; SMR 105; CPT 5.

Education and work

66. Detainees benefit from learning and skills provision that meets their needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Learning and skills provision promotes the mental and physical well-being of detainees.
- Detainees are able to develop skills that will be useful to them after release or removal.

- Detainees have access to a range of classes, training and creative pursuits. They include English and classes that promote relaxation and self-expression.
- The range, frequency, quantity and quality of courses are sufficient to meet differing needs, including those of detainees held for short and long periods, and detainees' protected characteristics.
- Detainees can complete both short and, where appropriate, more substantial, units of education and training.
- Tutors and managers have suitable expertise.
- Effective arrangements assure and improve the quality of learning and skills provision.

67. A suitable and sufficient range of paid work is available to detainees.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- All detainees are able to undertake paid work within the centre during the working day.
- Detainees are not deprived of the positive physical and mental health benefits of work unless there is clear evidence of risk.
- Compliance or non-compliance with immigration enforcement staff does not influence access to work.
- Recruitment is timely, transparent and appropriate.
- Pay rates are equitable.
- Detainees receive suitable training for their work roles.

In relation to expectations 66 and 67 above: Human rights standards are clear that detainees must be provided with access to educational programmes that meet their needs and aspirations. See ICESCR 13; SMR 104; EPR 28; UNHCR–DG 8[48(xiii)]; CPT 5.

In addition, human rights standards require detainees to be provided with adequate opportunities to undertake work should they so choose, for which they must receive remuneration. See ISCECR 6, 7; SMR 96-99, 101–103, 116; EPR 26.

Library provision

68. Detainees have regular access to a suitable library and learning resources that meet their needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees can visit the library every day, including at weekends.

- The library provides an opportunity for research, learning and social interaction in an informal, relaxed setting.
- Library resources enable detainees to find out about the situation in destination countries.
- Suitably skilled staff are on hand to help detainees make the best use of the library.
- The quantity and quality of library materials is sufficient to meet the needs of the detainee population. This includes books, newspapers, dictionaries, CDs and DVDs in languages that correspond with the major languages and national groups in the population.
- Detainees have sufficient time to use library materials if they are unable to take them away from the library.

In relation to expectation 68 above: Human rights standards require places of detention to have an adequately stocked library. See SMR 63, 64; EPR 28.5; UNHCR–DG 8[48(xii)].

Fitness provision

69. Fitness provision is safe and meets the needs of all detainees.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees have the opportunity to use the fitness facilities every day and are able to shower safely after each session.
- The range of fitness activities is varied and meets the needs of the population.
- Fitness staff have appropriate qualifications and expertise.
- Before first using the fitness facilities or undertaking strenuous exercise all detainees are assessed by health services staff and the information made readily available to fitness staff.
- Effective joint working between gym staff and health/substance misuse staff supports safe gym use for all detainees.
- Detainees who use the fitness facilities can access appropriate and clean clothing.
- Records of accidents and injuries are monitored regularly and appropriate action is taken.

In relation to expectation 69 above: Human rights standards recognise the need for detainees to be able to safely undertake adequate exercise and maintain their fitness. See SMR 23; EPR 25, 27; UNHCR–DG 8[48(viii)]; CPT 5.

Section 4: Preparation for removal and release

Detainees are able to maintain contact with family, friends, support groups, legal representatives and advisors, access information about their destination country and be prepared for their release, transfer or removal. Detainees are able to retain or recover their property.

Contents

- Welfare
- Visits and family contact
- Communications
- Leaving the centre

Welfare

Detainees are supported by welfare services during their time in detention and prepared for release, transfer or removal before leaving detention.

Expectations

71. Detainees' welfare needs are systematically assessed and addressed while they are in detention.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- There is an accessible welfare service to address needs. Welfare staff are appropriately selected and trained, and their work with detainees is properly documented and evaluated.
- Detainees are able to obtain support for immediate, pressing welfare matters caused by their detention from an appropriate person in private, within 24 hours of their arrival.
- Support needs, and in particular those relating to release or removal, are systematically assessed on arrival and dealt with through ongoing casework documented in a regularly reviewed welfare plan.
- Welfare casework includes support with practical matters inside detention and help with external problems caused by ongoing detention, or which are difficult to resolve because of detention.
- Welfare casework ensures that detainees who are removed are able to settle their affairs in the UK, that their bank accounts are closed and they do not leave behind any property or money.
- Welfare casework ensures that detainees who are released into the UK have good quality advice and support with housing, finance and other practical matters.
- Detainees are helped to contact their consular officials and are given appropriate advice about re-entry bans.
- External voluntary and community sector organisations are proactively engaged by the centre to enhance support for detainees.

In relation to expectation 71 above: Human rights standards emphasise that consideration must be given from the beginning of a period of detention to the detainee's future after release, including the detainee's need for assistance on release. See SMR 107, 108.

Visits and family contact

Detainees can easily maintain contact with their families and the outside world. Visits take place in a clean, respectful and safe environment.

Expectations

72. Detainees can maintain contact with the outside world through regular and easy access to visits.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees are able to receive social visits lasting a minimum of two hours every day, including evenings.
- The visits booking system is accessible and able to deal with the number and diverse requirements of visitors, including those who are not fluent in English.
- Volunteer visitor groups are actively supported by the centre and their existence is publicised.
- Extended visits are facilitated on the basis of need.
- Detainees' visitors are given information about how to get to the centre, visiting hours and details about what to expect when they arrive.
- If public transport stops some distance from the establishment, transport arrangements are in place to assist visitors.

73. Detainees can maintain good contact with their families. The impact of separation on both children and their parents is recognised and addressed.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Welfare casework helps detainees to maintain contact with their families and children, wherever they may be located.
- The impact on detainees of separation from children and families is explored with them and addressed as far as possible, for example through video calling or private visits.
- Detainees' families and friends know how to share concerns they have about a detainee and how to seek support.
- The visits area and any visitor centres have activities to keep children entertained.
- Search and entry processes are child-friendly.

74. Detainees and their visitors are able to attend visits in a clean, respectful and safe environment which meets their needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Visits areas are comfortable and comparable to a normal family environment.
- Visitors are treated with respect and courtesy by centre staff.
- The searching of detainees, visitors and their property is proportionate to risk and conducted in a way that is sensitive to religion and culture.
- Detainees and visitors are not barred from bringing documents into the visits room, other than on the basis of a risk assessment.
- Visitors are not subjected to excessive security checks.
- Visitors' personal bio-data is only taken, used and retained in accordance with guidelines from the Information Commissioner's Office.
- Detainees and their family members are allowed appropriate physical contact in the visits room.
- Visitors and detainees are able to give staff feedback on the visit, suggest improvements and, if necessary, complain using an accessible complaints procedure.
- Visitors can buy a range of refreshments during visits.

In relation to expectations 72–74 above: Human rights standards clearly require places of detention to ensure that detainees are able to remain in contact with family and others and to receive visits. Visiting areas should be child friendly. See SMR 58, 106; EPR 24; BOP 19; UNHCR–DG 8[48(vii)]; CPT 2, 5.

Communications

Detainees can maintain contact with the outside world regularly using a full range of communications media.

Expectations

75. Detainees are able to maintain contact with the outside world and plan for the future through regular access to a full range of communications media.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- There is sufficient access to telephones at all times.
- Detainees can make international phone calls at rates comparable to those available in the community.
- Detainees without money are provided with a reasonable number of free calls of sufficient length.
- Detainees are able to use personal email accounts and have internet access for communication, information and leisure purposes, and can open attachments.
- All legitimate websites are accessible. There are effective procedures for quickly and permanently unblocking sites that have been inappropriately restricted.
- Detainees have free access to video calling and social networking to support contact with family and friends. Access is restricted only on the basis of documented individual risk assessment.
- Detainees can quickly and easily send and receive faxes, without charge and without restrictions on length, to ensure that legal documents are transmitted in their entirety.
- Detainees are able to send letters free of charge if they have no money, and are informed of how to do so. Detainees' mail is not opened by centre staff unless there are identified individual risks.

In relation to expectation 75 above: Human rights standards require detainees to be able to keep in contact with the outside world through various means, including digital means. See SMR 58, 63; EPR 24; BOP 19; UNHCR-DG 8[48(vii)]; CPT 2, 5.

Leaving the centre

Detainees leaving detention are prepared for their release, transfer or removal. Detainees are treated sensitively and humanely and are able to retain or recover their property.

Expectations

76. Detainees are helped to prepare for their release, transfer or removal.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- All detainees, including those released at short notice, are seen shortly before leaving the centre to ensure needs have been addressed.
- Detainees are given advice and assistance on immediate needs, such as housing and finance. Every effort is made to ensure that no one is released without accommodation.
- Detainees are given reasonable notice of the date and time of their removal and any planned transfer or release in a language they understand.
- Detainees are only placed on a reserve list for removal on a voluntary basis.
- Detainees are able to inform legal advisers, family and friends of when they are to be released, transferred or removed from the centre, subject to any legitimate security issues.
- Those being transferred into further detention are informed of the reasons for this decision and about the centre to which they are being transferred in a language they understand.
- The Home Office informs relevant agencies of detainees released under licence and licence conditions are explained to detainees.
- The Home Office maintains a well-researched toolkit about returning to common destination countries.
- The toolkit is sufficient to inform Home Office and centre staff of arrangements, including financial support, that need to be put in place to enable the detainee to travel safely to their final destination and to access appropriate local support.

77. Detainees who are to be removed or released are treated sensitively, humanely and safely.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- There is a multidisciplinary review of detainees who are considered to be at risk of harm. Care plans are put in place or amended as appropriate and, where necessary, describe arrangements to ensure continuity of medical care for detainees being released.
- Sealed copies of health treatment documentation accompany detainees when they leave the centre. This includes summary medical notes and other important information. (See 'Health services'.)
- Detainees with substance misuse problems can continue their treatment regime at another establishment and in the community if released. They receive information on harm minimisation and on service provision in their country of origin in a language they can understand.
- Allegations of assault on detainees during removal attempts, which are supported by medical evidence, are thoroughly investigated with a view to prosecution, and removals are delayed for this purpose.
- Detainees being removed have clothing suitable for the climate to which they are going and can carry their belongings in a suitable bag.
- Detainees about to leave the centre are able to have visits at short notice.
- Detainees being released are provided with adequate funds to reach final destinations and maintain themselves in the period immediately following their arrival.
- Immediate housing, financial and other support needs are addressed before detainees are released.

In relation to expectations 76 and 77 above: Human rights standards emphasise that consideration must be given from the beginning of a period of detention to the detainee's future after release, including the detainee's need for assistance on release. Detainees must be provided with adequate clothing and sufficient means to reach their destination and to maintain themselves in the period immediately following their release. See SMR 108; EPR 33.7, 33.8.

In addition, standards require removal orders to be issued in accordance with law and detainees to be informed in advance of their removal. See TGFR 2, 4, 15. Standards also cover conditions of transport and return of property. See SMR 73; EPR 31, 32, 33.4. Detainees must be treated with respect for their dignity and human rights at all times. See SMR 1; EPR 1.

See also standards relating to safeguarding vulnerable adults (in relation to expectations 7–11 above).

2. CENTRES FOR ADULT WOMEN

Section 1: Safety

Women are held in safety and with due regard to the insecurity of their position.

Contents

- Arrival and early days in detention
- Safeguarding
 - Safeguarding adults at risk
 - Self-harm and suicide prevention
- Safeguarding children
- Personal safety
- Security and freedom of movement
- Use of force and single separation
- Legal rights

Arrival and early days in detention

Women travelling to and arriving at the centre are treated efficiently and with respect and care. Risks are identified and acted on. Women are supported on their first night. Induction is comprehensive.

Expectations

1. Women travel in decent conditions, are treated with respect and are fully informed about their transfer.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Women are told, in a language they understand, where they are going, how long it will take, why they are being transferred and what to expect when they arrive.
- Women are given sufficient notice of transfer and can make telephone calls to their families and legal advisers before transfer.
- Women are not subject to multiple movements around the detention estate and there is due regard to the impact of transfer on local support networks and legal advice.
- Women are not transferred between centres during the night and all other night-time moves are kept to an absolute minimum.
- Women are swiftly transferred from police cells and spend no longer than one night in police custody.
- Women are given adequate comfort breaks and refreshments during transfer.
- Women are provided with a pack containing sanitary products before transfer.
- Women are not kept waiting on vehicles after arrival.
- Women arrive in sufficient time to allow reception and first night procedures to be conducted effectively.
- Property, medication and paperwork arrive with women transferred to the centre.

2. Women are safe at all times while under escort, and individual needs are recognised and given proper attention.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Vehicles are safe, secure, clean and comfortable, and the needs of women with diverse needs, e.g. those with disabilities or those needing to take medication, are met.

- Escorting staff are aware of women's individual needs and provide an effective briefing to receiving staff.
- Male and female detainees are transported separately, unless related.
- Appropriate vehicles are used to transport women with specific needs, such as pregnant women and women with a disability, in a dignified manner.
- Women are always accompanied by at least one female officer on escort.
- Any medical notes should be given to escort staff in a sealed confidential envelope.
- Arrest teams allow women adequate time to prepare for their journey, to dress appropriately and to collect essential belongings, including medication and paperwork.

3. Women are treated with respect and sensitivity on arrival at the centre.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Women are received promptly into a welcoming and supportive reception environment, where they are greeted courteously by staff.
- Translated information is provided and interpretation, using a female interpreter whenever possible, is used as necessary to ensure good communication with women.
- All staff, especially those conducting searches, are able to identify signs of abuse and are trained to respond appropriately.
- Women are searched sensitively by a member of the same sex. Religious/cultural needs are taken into account.
- If a passport or any other documents are withheld by staff, women are provided with reasons, a receipt and a copy of the documentation.
- Soon after arrival, women are able to make free telephone calls in private, have a shower and change into clean clothing, and are offered hot drinks and food.
- The reception process is completed swiftly and women are offered something to occupy them while they are waiting.
- Women's first night accommodation has been prepared, is clean and provides a comfortable environment.
- Women are able to obtain basic toiletries on arrival.

4. Children and other dependants are not put at risk as a result of a woman's detention.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Home Office staff know whether women have children and are assured that care arrangements for them are appropriate before their carer is detained.
- Home Office staff have due regard to their duty to safeguard and promote the welfare of children in any decision regarding detention.
- Appropriate action is taken to identify and promote the safety of children or other dependants who may be at risk as a result of their carer's detention.
- Women are allowed the time and facilities necessary to make arrangements for children and other dependants, including free phone calls.
- The names, ages and current care arrangements for children or other dependants are recorded on reception, and subsequently used to generate a support plan.
- Reception staff have ready access to social services contacts in the event that they cannot resolve concerns about the welfare of a detained woman's children. Any potential child safeguarding concerns are relayed to the centre's safeguarding lead.

5. Women feel and are safe on their reception into the centre and for the first few days in detention. Vulnerability⁹ and risk are identified and women are given necessary support.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

⁹ There is no universally agreed definition of vulnerability in detention. As Stephen Shaw's 2016 report, *Review into the Welfare in Detention of Vulnerable Persons: A Report to the Home Office* (CM9186), points out, some commentators consider all of those in detention to be vulnerable because they are detained. Others prefer to describe groups that are in 'situations of vulnerability', as opposed to intrinsically vulnerable groups, thereby stressing the largely contextual nature of vulnerability. It is common for groups such as those with serious mental or physical health problems, children, elderly people, pregnant women, LGBTI people, people with disabilities, asylum-seekers, and those who have experienced torture, trafficking or gender-based violence, including female genital mutilation, to be considered especially at risk of harm or neglect in detention. In these *Expectations*, we use the terms 'vulnerable' and 'vulnerability' to refer to these groups, but also to any other individuals or groups who may be at risk of harm or neglect as a result of other personal, social and environmental factors; these factors may be fixed or change over time and the degree of vulnerability may change as a result.

- All women arrive with correct documentation, including any assessment of their vulnerability, evidence of authority to detain (IS91) and the reasons for detention (IS91R).
- Vulnerable women receive appropriate priority.
- Women receive a private interview, including an assessment of vulnerabilities, the risk of self-harm or suicide and a room sharing risk assessment, before location in residential units. Risk of harm information is shared with appropriate staff and, where relevant, the Home Office (see 'Safeguarding of vulnerable adults').
- All sensitive one-to-one interviews are conducted by a female member of staff, using professional interpretation when required. The interpreter is a woman whenever possible.
- Staff working in reception, first night and induction alert first responders to potential victims of trafficking. Potential victims of trafficking are referred to the National Referral Mechanism. Referrals are made with informed consent whenever possible.
- Women are promptly screened by female health services staff in private. Screening includes an assessment of vulnerabilities, including their mental capacity (see 'Safeguarding of vulnerable adults').
- Women are given immediate assistance with pressing support needs.
- Women spending their first night in the centre are identified to night staff, who offer appropriate support and regularly check on their well-being throughout the night.
- Staff introduce themselves to new women in the residential units and wear identification that clearly displays their name and status.
- Information about women's needs is communicated between staff sensitively, especially if it is related to medical issues.

6. Women understand the centre's routines and how to access available services that will help them cope with detention.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Women receive a comprehensive and multidisciplinary induction, which starts no later than the day after their arrival.
- Information is reinforced as needed over the course of the detention.
- Induction includes a private conversation with a member of staff to help alleviate any immediate concerns.
- Women are meaningfully occupied throughout the induction period and able to participate in activities swiftly.
- Induction provides women with key information, such as how to access visits, immigration staff, legal advice, health care, activities and the Independent Monitoring Board.
- Induction informs women of sources of internal and external support such as the multi-faith team, peer support workers, welfare staff,

visitors and community support groups, and enables them to meet them. This includes providing information for women who are pregnant, or who have been trafficked and/or have experienced sexual or gender-based violence.

- Induction is provided in a range of accessible formats with interpretation and translation where necessary.

In relation to expectations 1–6 above: Human rights standards set out a number of requirements applicable to arrival and early days in detention. These include in relation to conditions of transport, requiring the provision of information in a language and way detainees understand, identifying the health care and other needs of detainees and allowing detainees to contact family and legal counsel. See SMR 1, 7, 50, 54, 55, 58, 62, 67, 68, 73; EPR 15.1, 15.2, 16; 24.8, 30, 31, 32, 37; BOP 1, 16, 24, 31; UNHCR–DG 7, 8; TGFR 10; CPT 2, 4, 9, 10. See additionally in relation to women, BR 2, 3, 5–8, 19; EPR 19.7.

Safeguarding

The centre promotes the welfare of all detainees and protects them from all kinds of harm and neglect. The centre provides a safe environment which reduces the risk of self-harm and suicide. Women at risk of self-harm or suicide are identified at an early stage and given the necessary care and support.

Expectations

Safeguarding of adults at risk of harm

7. Women who are vulnerable to harm or neglect are held in a safe environment and given appropriate care and support.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Safeguarding procedures and guidance are known and used by all staff, including on how to make the necessary referrals.
- There is a joint local safeguarding strategy that recognises risks of harm to detainees which could arise from: health and/or social support needs; past or possible future experience of torture, trafficking or trauma, including sexual or gender-based violence; detention injuriously affecting health; suspected suicidal intentions; and protected characteristics. The joint strategy includes all providers, including health, and has input from the local authority.

- A comprehensive central record of detainees considered by the Home Office to be at risk in detention is maintained and shared with centre contractors.
- A multidisciplinary committee, including health care staff, meets frequently and provides effective oversight and quality assurance of safeguarding practice, policies and procedures.
- The committee also considers the risks to and needs of women who may be vulnerable to harm and, where necessary, agrees a thorough and regularly reviewed care plan.
- Named case managers are allocated for all women with a care plan and are responsible for oversight of plans between reviews and for keeping the Home Office informed of the condition of the detainee. Where possible case managers should be women.
- The centre has a well understood code of conduct that encourages staff to raise legitimate concerns about the behaviour of any individual towards women. Staff are confident in using 'whistle-blowing' procedures.
- When abuse of a detainee is alleged or suspected to have occurred, prompt and appropriate action is taken to protect the detainee and this is swiftly communicated to the Home Office.
- Staff engage with all relevant agencies and individuals to ensure women are appropriately cared for and supported.
- Women who lack mental capacity are not normally detained. If there are exceptional circumstances that result in detention, these are clearly documented. Women have access to independent advocates to aid their understanding and have their interests represented.
- Where women are released because they are found to lack mental capacity, there is a multi-agency review, lessons are learned and are reflected in future practice.
- Women are protected from extremist ideologies.

8. Processes are in place to identify women who may be vulnerable to harm in detention, and to share information about risk.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- All women are effectively screened for vulnerability on arrival (see 'Arrival and early days in detention').
- All staff in contact with women are trained in the identification and care of women who may be vulnerable, especially those who may have mental health problems or who have been affected by trauma. They use the correct procedures effectively, raising concerns whenever appropriate.
- The centre reviews the cases of all women after one month and thereafter at regular intervals to identify emerging vulnerability. The

review is supported by a regular medical assessment of the impact of detention on the health of the detainee.

- The centre promptly informs the Home Office of all women who may be vulnerable to harm in detention. The Home Office keeps centre staff informed about its assessment of risk to individual women.
- Staff are aware of issues around sexual exploitation and human trafficking and know how to identify potential victims. Relevant information is provided to women.
- Potential victims of trafficking are referred under the National Referral Mechanism (NRM). Any referral to the NRM should be made with informed consent whenever possible.

9. Detention of women who may be at particular risk of harm is only maintained in exceptional circumstances, and the reasons for maintaining detention are clearly documented and explained to the detainee.¹⁰

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- There are time-limited processes under which custodial and/or health care staff report to the Home Office and, where appropriate, the local authority, any concerns about women who may be at risk of harm or neglect.
- All such reports are comprehensive and provide an assessment of the impact of detention on the detainee. Health care reports also provide an assessment of the appropriate therapeutic environment for the treatment of the detainee and are written by a professional suitably qualified for the task.
- The Home Office reviews the decision to detain promptly on receipt of such reports and following any other notification from the centre concerning the vulnerability of a detainee.
- The outcome of the review, with reasons, is communicated in writing to the centre and the detainee, and appropriate action is taken.
- The Home Office takes full account of the information provided when reviewing the decision to detain.
- On site Home Office staff follow up late review responses.

¹⁰ We do not refer specifically to Detention Centre Rule 35, which includes some but not all aspects of vulnerability.

10. Women who are potential victims of human trafficking are supported and referred to appropriate community services in the UK and other countries.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Potential victims of trafficking are not normally detained. If there are exceptional circumstances that result in them being detained, these are clearly documented.
- All staff, and particularly those working in health care, reception and first night care, are alert to the signs that a woman has been trafficked and have an understanding of the ways in which women may be affected by the experience of human trafficking.
- There is a local policy describing how women identified as potential victims of trafficking will be supported, which is advertised across the centre.
- There is a single nominated point of contact, with knowledge of how to support victims of human trafficking.
- Where appropriate, the NRM is used. Any referral is recorded and communicated appropriately to staff. Referrals are made with informed consent whenever possible.
- Care is taken to identify and use the real name of potential victims of human trafficking.
- Victims of human trafficking are offered support to re-establish contact with their families, if they choose to do so.
- Professional counselling is made available to women who need it.

11. Women who have been the victim of abuse, rape or domestic violence are identified and supported to address their specific needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Women who have been victims of gender-based violence are not normally detained. If there are exceptional circumstances that result in them being detained, they are clearly documented.
- Women are encouraged to disclose any experience of domestic violence, rape or abuse, including female genital mutilation, and this triggers a review of their detention. Disclosure is managed sensitively by appropriately trained staff of the same gender.
- Women receive information on the support available to them on removal or release, including in the destination country.

- Centre staff work closely with external organisations to address the support needs of women who have experienced gender-based violence.
- If appropriate, women who have experienced domestic violence receive help to prepare safety plans.
- Women are encouraged to disclose any involvement in prostitution and are given access to information and support to address their specific needs.

In relation to expectations 7–11 above: Persons held in immigration detention may be or become vulnerable to harm during their detention, including harm that arises or is exacerbated because they are detained. Human rights standards require the individual needs and circumstances of detainees to be assessed and regularly reviewed to identify their vulnerabilities, monitor the impact of detention on them and safeguard them from harm. Human rights standards also recognise that some individuals should not be held in immigration detention due to their vulnerability. See UNHCR–DG 8 [48(vi)], 9.1, 9.4–9.7; SMR 2, 33, 34, 109; BOP 5; EPR 12.1, 12.2, 16, 25.4, 42.3, 43.1, 52.1; CPRD 5, 12, 14–17, 25; CPT 9, 10. See, additionally in relation to women, UNHCR–DG 9.3; CEDAW 6; BR 25, 31, 33, 42.4, 66; EPR 34.1, 34.2.

Human rights standards require prompt and impartial investigation where there are reasonable grounds to believe an act of torture or ill-treatment has occurred in detention, or when an allegation of torture or ill-treatment is made by a detained individual. See SMR 1, 30, 34, 54–57, 71, 72, 76; EPR 1, 42, 81; BOP 33; CAT 2, 12, 13, 16; ECHR 3; ICCPR 7, 10.1; CPT 8.

Self-harm and suicide prevention

12. The centre provides a safe environment which actively reduces the risk of self-harm and suicide.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- There is a clear strategy for preventing self-harm and suicide, which includes effective multidisciplinary procedures and care planning to help reduce risks. The strategy includes consideration of the specific risks to women.
- A multidisciplinary committee meets frequently and provides effective oversight and quality assurance of safer detention practice, policies and procedures. It is well attended by a range of staff and includes women.
- All staff, including night and escort staff, are clear about their responsibility to preserve life and what to do in an emergency.

- There are enough trained staff on duty at all times, including at night, to respond to any incidents of self-harm, and all custodial staff carry anti-ligature knives.
- Any data relevant to self-harm is closely monitored and any emerging patterns are acted on.
- The findings of investigations into deaths in custody and serious 'near miss' incidents are acted on and regularly reviewed. Recommendations for improvement are implemented.
- Staff are alert to and take seriously the vulnerability of detainees who are not eating. Missed meals are monitored and detainees are given encouragement, care and support to resume eating.
- Women's families and friends and external agencies are encouraged to provide support, as well as information which may help to identify and support those likely to be bullied or who have a history of self-harming behaviour. Any information received from external agencies in relation to vulnerability is acknowledged and acted on appropriately.

13. Women at risk of self-harm or suicide receive personal and consistent care and support to address their individual needs and have unhindered access to help.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- A thorough care and support process¹¹ identifies risks, needs, strategies for reducing risk and individual staff members responsible for supporting the detainee.
- All women are monitored at high-risk times, such as when appeals fail or removal is imminent.
- Staff engage in a supportive and constructive way with women at risk of self-harm.
- Reviews of those considered to be at risk of self-harm are chaired by a consistent case manager, who has relevant experience and expertise, and are attended by staff from a range of disciplines.
- Women can access a range of support services, and can involve their families, friends and external agencies in their care.
- Women have access to peer support, counsellors, Samaritans and other sources of external support in the local community. Wherever possible, assistance is provided by people who speak the same language as the woman.
- Separation and/or strip conditions are not used to manage the risk of self-harm.

¹¹ IRCs currently use the 'Assessment, Care in Detention and Teamwork' (ACDT) process, developed in prisons, to support detainees at risk of self-harm.

- Constant supervision is only used when a detainee's safety cannot be assured in any other way and for the minimum possible time. Staff create a positive environment that encourages and facilitates access to activity.
- Only female staff conduct constant supervision of detainees.

In relation to expectations 12 and 13 above: In addition to human rights standards that require vulnerable adults to be safeguarded, human rights standards require the right to life of detainees to be protected and promoted, and detainees to be treated with respect for their dignity and human rights. Specific standards require detainees to be provided with sufficient mental health care. See SMR 1, 2, 30, 31, 33; EPR 1, 25.4, 42.3, 43.1, 47.2, 52.2, 52.4; CCLEO 6; UNHCR–DG 8[48(vi)]; ECHR 2; ICCPR 6, 10; CPT 2, 9. See additionally in relation to women, BR 12, 13, 16, 35.

Safeguarding children

The centre promotes the welfare of children and protects them from all kinds of harm and neglect.

Expectations

14. Children are properly protected in a safe environment. All staff safeguard and promote their welfare.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Home Office staff know whether women have children and are assured that care arrangements for them are appropriate.
- A comprehensive child protection policy and guidance are in place, and have been agreed by the local safeguarding children board or equivalent.
- All staff are aware of their personal and professional duty of care to any children in the centre, and receive appropriate training.
- Staff promptly raise any concerns about the safety and welfare of children in accordance with agreed referral procedures.
- All staff who have contact with children are properly vetted and trained.
- Staff are aware of their duty to raise legitimate concerns about the conduct of colleagues in relation to the treatment and management of children. Staff are encouraged by managers to raise any such concerns, and feel confident and safe to do so.
- Children visiting the centre are safe and can enjoy visits in an environment that is sensitive to their needs.

- Visits staff are aware of women who may pose a risk to children and take appropriate and proportionate steps to ensure children's safety.

15. Women who say they are under 18 are promptly assessed and properly cared for while in the centre.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- The burden of proof in age dispute cases is on the Home Office. Detainees have a prompt Merton-compliant assessment unless their demeanour and appearance is clearly that of an adult significantly over the age of 18.¹² All detainees who say they are children are treated as such until it is determined otherwise.
- If, despite a chief immigration officer's (CIO's) assessment to the contrary, centre staff believe that a detainee may be a child, they understand they have a duty to act on their assessment, and immediately inform centre managers, social services and the Home Office.
- Where social services assess a detainee to be a child there is a multi-agency review of any prior CIO assessment; lessons are learned and reflected in future practice.
- Age assessments are promptly reviewed if fresh evidence is received.
- Multidisciplinary care planning is in place for all detainees whose age is in dispute. Their location in and movement around the centre is on the basis of a risk assessment and pays due attention to their individual needs.
- Detainees assessed to be under 18 are released into appropriate care as soon as possible. Comprehensive written information is kept on each age dispute case, showing the time taken for assessment and, where relevant, release.
- Detainees who say they are children are assisted to obtain legal advice and representation and supported to contact any other individuals or agencies.

In relation to expectations 14 and 15 above: Human rights standards prohibit the arbitrary detention of children and provide children with the right to challenge the legality of their detention. Children should only be detained as a last resort and for the shortest possible period of time. Unaccompanied children should not be detained and must be provided with special protection and alternative care. The best interests of the child must be a primary consideration in all actions concerning children. See CRC 3, 20, 22.1, 37(b), (d); ICCPR 9.1, 9.4; HR 2; UNHCR-DG 9.2; CPT 10.

¹² This will be reviewed in light of changes in legislation.

Any child who is visiting a detention centre must be protected from exploitation and abuse and be provided with care and protection to ensure their well-being. Children's rights to, among other things, play and to the highest attainable standard of health must be promoted. See CRC 3.2, 3.3, 24.1, 31, 33–37, 39; UNHCR–DG 8, 9.2; HR 82, 85–87; CPT 10. See additionally in relation to women, BR 28.

Personal safety

Everyone is and feels safe. The centre promotes positive behaviour and protects women from bullying and victimisation. Security measures and the use of force are proportionate to the need to keep women safe.

Expectations

- 16. A clear and coordinated multidisciplinary approach ensures that women feel and are safe from victimisation from other women or staff.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Women are made aware of behaviour that is unacceptable through a well-publicised policy and are informed of the consequences of victimising others.
- There is an effective strategy to reduce violence, antisocial behaviour and other factors that lead to feelings of insecurity, which is based on a thorough analysis of relevant data.
- The strategy involves all agencies or individuals involved in the care and management of women, including the Home Office, voluntary and community sector groups and, where appropriate, friends and family.
- Women are consulted on and involved in determining how their lives in detention can be made safer, and on how positive behaviour can be promoted and conflicts resolved.
- Women know where they can get help to report fear, victimisation or violence, or to resolve conflicts.
- Staff supervision provides protection for women in all areas of the centre.
- Allegations of bullying behaviour and other forms of victimisation are addressed promptly, consistently and fairly, incidents are investigated thoroughly and outcomes are recorded.
- Staff engage in and promote positive and supportive relationships, and identify and address problematic behaviour, including unwanted sexual

attention. Mediation is used to help resolve disputes where appropriate.

- Victims of violent or other antisocial behaviour are supported and protected, and perpetrators receive support to change their behaviour.
- Staff identify women who self-isolate and provide support to encourage them to participate in the life of the centre.
- Any rewards scheme encourages participation in the regime and is not punitive.

In relation to expectation 16 above: Human rights standards include in relation to safety, discipline and order, systems of privileges and the use of mediation and conflict resolution. See SMR 36, 38; EPR 52.2, 55, 56; UNHCR–DG 8[48(xv), (xvi)]; CPT 7. See additionally in relation to women, BR 25, 31.

Security and freedom of movement

Women feel secure. They have a relaxed regime with as much freedom of movement as is consistent with the need to maintain a safe and well-ordered community.

Expectations

- 17. Women are able to live in an environment where security is proportionate and there is as much freedom of movement as is consistent with the need to maintain a safe and well-ordered community.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- The centre provides an open and relaxed environment, and strives to provide living conditions that are as near as possible to normal life in the community.
- Women's freedom of movement is limited only by the requirements of safety and good order. They are not locked in rooms.
- There are no obvious weaknesses or anomalies in the physical and procedural security of the centre.
- Routine searching involves a rub/pat down search by a female detention custody officer (DCO) in the presence of at least one other female member of staff.
- There is no routine strip-searching of women. This is only carried out exceptionally and for sound security reasons. It is recorded and

authorised by senior managers. It is conducted by a female member of staff in the presence of at least one other female staff member.

- There is no routine room searching. Searching of women's bedrooms is on the basis of specific intelligence only. Women are informed that their bedrooms or personal property are being searched and of the reasons for the search. Their bedrooms and personal possessions are left in the same condition in which they were found. Searches are conducted by two female members of staff.
- Restraints are not used during escort, including to medical or any other appointments outside the centre, unless justified by individual risk assessment.

18. Women's well-being is safeguarded by effective security intelligence systems and a robust approach to misconduct or illegal behaviour by staff.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- The elements of dynamic security are in place: relationships between staff and detainees are positive and women feel safe to report concerns; women are treated as individuals and receive personal attention from staff.
- Security systems are sufficient to identify current and emerging threats to the well-being of women and the safety of the centre.
- Effective intelligence and security measures guard against the trafficking of drugs or alcohol.
- Women know how to make confidential complaints about staff, and are confident that the system works effectively.
- Immediate protection from reprisals is provided to women and staff who report misconduct or ill-treatment by staff.
- Reports of misconduct and ill-treatment are investigated by a competent and appropriately senior and independent authority.

In relation to expectations 17 and 18 above: Persons who are detained should be held with no more security restrictions than necessary to ensure safe custody. See SMR 36; EPR 18.10; CPT 3, 5.

In addition, human rights standards establish that searches should only be carried out in accordance with defined procedures and in accordance with the principles of proportionality, legality and necessity. Any search must be carried out with respect for the dignity of detainees and their possessions. See SMR 50–52; EPR 54. See additionally in relation to women, BR 19.

Use of force and single separation

Force is only used as a last resort and for legitimate reasons. Women are placed in the separation unit on proper authority, for safety reasons only and held in the unit for the shortest possible period.

Expectations

- 19. Women are only subject to force as a last resort when other methods have failed. When used, force is legitimate, necessary and proportionate, and subject to rigorous governance.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Staff are trained in and routinely use de-escalation techniques.
- Restraints are used as a last resort and for the shortest possible period.
- Staff are not routinely equipped with items, such as batons, that are not in keeping with the ethos of immigration detention.
- Planned use of force is properly authorised and video recorded. All staff involved in the use of force complete appropriate reports promptly and in detail.
- Health staff recognise risks associated with restraint and attend all planned uses of force and other incidents whenever possible, to share relevant health information and ensure detainees' safety.
- Force is never used against pregnant women simply to effect removal. It is only used to protect them or others from harm.
- All detainees and staff involved in a use of force incident are debriefed as soon as possible following the incident.
- Women are not located in unfurnished accommodation, or placed in mechanical restraints or anti-rip clothing, except as a last resort and with proper authorisation.
- Use of force data are monitored and any emerging patterns are identified and acted on.
- Use of force documentation and associated CCTV or video footage is scrutinised by senior managers to identify opportunities for improvement and possible ill-treatment. Any concerns are investigated, lessons are learned and appropriate action taken.
- There is effective oversight of use of force by the Home Office and Independent Monitoring Board.

20. Women are held safely and decently in the separation unit for the shortest possible period and for legitimate reasons only.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Women are separated with the proper authorisation and only to keep other women safe.
- Women are given the reasons for single separation in writing and in a language they understand, within two hours.
- Decisions to separate are made in consultation with health care professionals.
- Separation units are not used to manage risks arising from a woman's vulnerability, such as mental illness and risk of self-harm.
- If the centre cannot safely manage women in the normal location, they are immediately referred to the Home Office for an immediate review of detention.
- Women are never subjected to a regime which amounts to solitary confinement.¹³
- A multidisciplinary staff group monitors women held in separation to ensure they are held there as a last resort and for the shortest time possible.
- Women kept separated are monitored daily for their physical, emotional and mental well-being. Staff keep accurate records of the behaviour of women to ensure continuity of care.
- Those in single separation are allowed access to religious ministers, books, education staff, phones, exercise, social and legal visitors and a daily shower.

In relation to expectations 19 and 20 above: Human rights standards only allow for the use of force and restraints when absolutely necessary and as a measure of last resort. If it is necessary to use force or restraint, this must be the minimum necessary and only imposed for the time period required. There must be clear procedures governing the use of force and restraint.

In relation to restraint, see SMR 47–49; EPR 68, CPT 6, 7. In relation to the use of force see SMR 82; EPR 64–66; BPUFF 15. See additionally in relation to women, BR 24.

As with any restrictions imposed on people already deprived of their liberty, human rights standards require that segregation or other practices that isolate detainees must only be used when absolutely necessary, for the shortest time

¹³ 'Solitary confinement' is when detainees are confined alone for 22 hours or more a day without meaningful human contact (United Nations Standard Minimum Rules for the treatment of prisoners, Rule 44).

possible, and be proportionate to the legitimate objective for which they are imposed. Because of the harm that can be caused by isolation, specific and additional safeguards also need to be in place. See SMR 43–46; CPT 7; UNHCR–DG 9.7[65]; ECHR 3; ICCPR 7; CAT 1, 2, 16. See additionally in relation to women, BR 22.

Legal rights

Women are fully aware of and understand their detention, following their arrival at the centre and on release. Women are supported by the centre staff to freely exercise their legal rights.

Expectations

21. Women understand why they are being detained and are informed about the progress of their case.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Each detainee has a named and easily accessible Home Office contact to answer their questions and keep them informed of the progress on their case. Women are given the name and contact details of the responsible Home Office case owner.
- On site Home Office staff meet with women within 24 hours of arrival to answer questions and explain individual reasons for their detention, appeal and bail rights, how to obtain good quality independent legal representation and any other relevant matters.
- Women who have been detained following a custodial sentence understand their position and have appropriate documentation explaining their status, including any licence conditions.
- Women are given progress reports at least monthly and following any change of circumstances or submission of new information to the Home Office. Reports focus on progress and do not simply repeat previous information.
- All information is given to women in a language and format they understand. Interpreters are always available in interviews to allow women to express themselves fully, and understand their rights and any important decisions.

22. Casework is progressed promptly and reviewed effectively to reduce the potential harmful impact of ongoing detention.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Casework is progressed promptly and case planning ensures that detention is for the shortest period that is reasonable to reduce the potential harmful impact of ongoing detention.
- There is effective oversight of case planning.
- Women are only held for reasons that are legitimate and for purposes that are achievable within a reasonable period of time.
- Detention is reviewed regularly taking full account of factors for and against the decision to detain, alternatives to detention, and any information/assessment of vulnerability¹⁴ held by the centre.

23. Women have effective access to independent legal representation.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Women are able to speedily obtain regulated and good quality independent legal advice and representation in a language they understand, including prompt and unrestricted access to advice surgeries when needed.
- Women receive information on how to complain about poor quality legal representation. Centre staff are alert to detainees being exploited by poor or fraudulent advisers.
- Women are able to contact their legal representatives without impediment and can take copies of legal documents before sending them to legal representatives, the Home Office, tribunal or courts.
- Women are able to communicate with their legal representatives confidentially by phone, fax, letter, email and video conferencing.

¹⁴ There is no universally agreed definition of vulnerability in detention. As Stephen Shaw's 2016 report (*Review into the Welfare in Detention of Vulnerable Persons: A Report to the Home Office*, CM9186) points out, some commentators consider all of those in detention to be vulnerable because they are detained. Others prefer to describe groups that are in 'situations of vulnerability', as opposed to intrinsically vulnerable groups, thereby stressing the largely contextual nature of vulnerability. It is common for groups such as those with serious mental or physical health problems, children, elderly people, pregnant women, LGBTI people, people with disabilities, asylum-seekers, and those who have experienced torture, trafficking or gender-based violence, including female genital mutilation, to be considered especially at risk of harm or neglect in detention. In these *Expectations*, we use the terms 'vulnerable' and 'vulnerability' to refer to these groups, but also to any other individuals or groups who may be at risk of harm or neglect as a result of other personal, social and environmental factors; these factors may be fixed or change over time and the degree of vulnerability may change as a result.

- In appropriate cases, women are able to have their legal representatives, and interpreter if necessary, present during interviews with immigration staff and are provided with a copy of interview notes or recordings.
- Women have prompt and unrestricted access to private legal visits.
- Legal representatives have access to their laptops and a phone, and can arrange to pay for the centre's telephone interpretation facilities if needed.
- Women have prompt access to their Home Office and medical records and are advised of their right to request them.
- External doctors commissioned to report on the health of detainees are given prompt access.
- Women have access to up-to-date legal textbooks, their personal documentation and other reports or material necessary to help their immigration or asylum case.

24. Women are easily able to make applications for release.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Bail application forms and information about procedures are available.
- Women receive proper notice of bail and appeal hearings, and are able to attend on time.
- On conclusion of a bail hearing, women have a copy of the bail notice and understand the reasons for any refusal of bail.
- Women are not transferred when this would frustrate a bail application listed locally.
- Women receive copies of bail summaries by 2pm on the working day before their bail hearing, regardless of whether or not they are legally represented. Where the detainee cannot read English, the contents are explained in a language they understand.

In relation to expectations 21–24 above: Human rights standards permit detention for immigration purposes only in accordance with law and only as a measure of last resort. Detainees must have the reasons for their detention explained to them and be able to challenge the lawfulness of their detention. See EPR 30.3; BOP 9–14; TGFR 6–9; ECHR 5; ICCPR 9; UNHCR–DG 4, 7; CPT 1, 2.

In addition, standards require detainees to be able to access independent legal advice and to be allowed confidential visits and correspondence with their legal representative. See EPR 23; BOP 17, 18; SMR 61; BRPL 8; CPT 2.

Section 2: Respect

Women are treated with respect for their human dignity and the circumstances of their detention.

Contents

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- Daily life
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 - Oral health

Staff-detainee relationships

Women are treated with respect by all staff, with proper regard for the uncertainty of their situation and their cultural backgrounds.

Expectations

- 26. Women are treated with humanity and with respect for their human dignity at all times. Relationships between women and staff are positive and courteous.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Staff and detainees are fair and courteous to each other.
- At least 60% of staff in direct contact with women and 60% of managers are also women. There is a strategy to continue improving this ratio.
- Staff have training in and show proper regard for the uncertainty of women's situations, particularly immigration issues, cultural backgrounds and the vulnerabilities of a population that may have experienced victimisation before detention.
- Staff understand the impact of life experiences – such as family separation, trauma, abuse and mental illness – on women's behaviour.
- Staff engage proactively with women and seek to know them as individuals.
- Staff routinely knock and wait for a response before entering rooms, except in emergencies.
- Staff support and encourage women to engage positively with activities that can help to reduce the stress of detention.
- There is an organised and structured peer support scheme that allows women to help and support each other.

- 27. Women have a named member of staff they can turn to on a day-to-day basis who is aware of their individual needs. Staff provide timely support as needed, including assistance with removal or release.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Staff strive to develop supportive relationships with individual women, understand their personal circumstances and encourage family ties.
- All women have a designated officer to whom they can turn as an initial point of contact for support or to resolve problems in the centre.

- There is a regular chronological record of contact with women, which identifies any significant events.
- Regular group meetings are held, with the help of interpreters where necessary, to enhance communication between staff and women.
- Staff are aware of external service providers and use them to help women.
- Staff use care plans for women who need them to coordinate care and to help manage specific risks or needs.

In relation to expectations 26 and 27 above: Human rights standards recognise that places of detention should be managed in accordance with the obligation to respect the humanity and inherent dignity of those detained, and require that staff and managers have the necessary aptitude and training to perform their roles. See SMR 74.1, 75, 76, 79.1; EPR 71–77, 81, 83, 87.1; UNHCR–DG 8[48(xvi)]; CPT 6.

Staff working with detainees with particular vulnerabilities should be given specialised training. See EPR 81.

Daily life

Women live in a clean and decent environment suitable for immigration detainees. Women are aware of the rules and routines of the centre. They are provided with essential basic services, are consulted regularly and can apply for additional services and assistance. The complaints and redress processes are efficient and fair. Food is prepared and served according to religious, cultural and prevailing food safety and hygiene regulations.

Expectations

Living conditions

28. Women live in a clean and decent environment which is in a good state of repair and fit for purpose.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- The accommodation is conducive to an open and relaxed regime.
- The accommodation and all communal areas are clean, free of graffiti and offensive displays, well lit (including adequate natural light), and well decorated.

- The accommodation is in a good state of repair, and suitably heated and ventilated.
- Rooms provide adequate space for the number of women. All women have, as a minimum, their own bed, chair, table and lockable cupboard, and sufficient space to store personal belongings.
- Women have free access to decent, well-maintained and fully screened showers and toilets.
- Staff ensure that sleeping areas are as quiet as possible at night to enable sleep and rest.
- Women have free access to basic toiletries and sanitary products without having to ask staff.
- Freshly laundered bedding is provided for each new detainee on arrival and then at least weekly or when soiled. Mattresses and pillows are replaced as necessary.

29. Women feel and are safe in their residential units, both in their rooms and communal areas.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- All women have access to staff or emergency call bells that work and which receive a response within five minutes.
- Family members are located together unless they choose to be separated.
- Unrelated male and female detainees are held in separate accommodation with separate toilets, showers and washing facilities.
- Male staff do not enter women's rooms unless invited to do so, except in emergencies.
- Staff knock and wait for an answer before entering a bedroom, except in emergencies.
- Women have keys to their rooms.
- Women only share accommodation following a suitable risk assessment process.
- Women understand the local rules and routines, which are applied openly, fairly and consistently, with no discrimination.
- Notices and rules are translated into the main languages of the current detainee population, and internationally recognised symbols are used wherever possible.
- When a detainee breaches the rules, staff take time to explain how and why to the detainee concerned using interpretation as needed.

30. Women have enough clean clothing of the right kind, size, quality and design to meet individual needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Women wear their own clothing if they have it, and are able to receive clothing from visitors.
- Any centre clothing provided is suitable for all detainees, including pregnant women, and women with specific religious and cultural needs. It is sufficient in quantity, in reasonable condition and provides all-weather protection.
- Women have at least weekly access to laundry facilities so they can wash and iron their clothes. They have priority access if removal or tribunal hearings are imminent.
- Clean underwear is available daily.

31. Property held in storage is secure and women can promptly access it on request.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Women can receive parcels and have property handed to them during visits.
- Women are allowed to store valuable and other property in a secure area.
- The amount of property in possession and storage that women are allowed takes account of individual needs.
- Women are fairly compensated for clothing and possessions lost while in storage.

In relation to expectations 28–31 above: Human rights standards require that detainees be housed in accommodation that respects their human dignity and privacy. Accommodation should be clean, adequately ventilated and lit (by both natural and artificial light) and provide sufficient living space. See EPR 18, 19, 21; SMR 12–21; UNHCR–DG 8[48(x)]; CPT 4. See additionally in relation to women, BR 5.

Standards also provide that detainees may only share sleeping accommodation if it is suitable for sharing and following an assessment that detainees are suitable to share with one another. Places of detention must have an alarm system that allows detainees to contact staff without delay. See EPR 18; SMR 12.

Suitable clothing must be provided to those who do not have their own. See EPR 20; SMR 19–20; UNHCR–DG 8[48(x)]; CPT 4. In addition, standards require that

detainees' property should be kept safely when not in their possession. See EPR 31; SMR 67; CPT 4.

Poor living conditions, in and of themselves, can and have been found to violate ICCPR 10 and ECHR 3. A lack of resources does not justify detention conditions that infringe a detainee's human rights. See EPR 4.

Detainee consultation, applications and redress

32. Women are able to take an active role in influencing decisions about services, routines and facilities in the centre and in managing their own day-to-day lives.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Women are regularly consulted about centre life and given the opportunity to present any areas of grievance or dissatisfaction directly to managers.
- Staff work creatively to overcome obstacles to consultation, such as language difficulties and women's fears of repercussions.
- Women can challenge decisions appropriately and are confident that their views are taken seriously.
- Women are informed of the outcomes of consultation in the languages most commonly used in the centre, and provided with justifiable reasons for any decisions made.
- Ongoing feedback mechanisms, for example, food comments books, are readily available, regularly checked and responded to appropriately.

33. Staff and detainees are encouraged to resolve requests informally. When this is not possible women understand how to apply for available services, and are able to do so easily.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Staff and detainees are encouraged to resolve requests informally, before making a formal, written application.
- Women know how to make applications and can do so confidentially.
- Staff help women to make applications, as requested.
- Women receive timely responses to their applications that are respectful, easy to understand and address the issues raised.
- There are effective and thorough quality assurance arrangements in place.

34. Women have confidence in complaints procedures, which are effective, timely and well understood.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Women know how to complain and have access to information about complaints procedures in a range of formats and languages.
- Women have easy access to complaint forms in a range of languages.
- Women can submit complaint forms confidentially at any time, including to the Home Office and/or the Independent Monitoring Board.
- There is a separate health complaints system to preserve medical confidentiality.
- Responses to complaints are clear, respectful, prompt and address all the issues raised.
- Determined efforts are made to communicate responses to women who have left the centre.
- Responses are communicated in the language in which the complaint was submitted.
- Where necessary, women receive help to make a complaint.
- There is an effective quality assurance process for complaint responses.
- An effective monitoring system is in place to analyse complaints, both against contractors and the Home Office. Centre managers have full information about all complaints made by women in their care and the responses. Results are used to identify trends, and emerging concerns are addressed.

35. Women feel safe from repercussions when using complaints procedures and can appeal decisions easily.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Women are not pressured to withdraw complaints.
- Complaints about staff are investigated by appropriately independent and senior persons. Restrictions on the involvement of staff who are the subject of a complaint are implemented where necessary.
- Women who make complaints against staff and/or other detainees are protected from possible recriminations.
- Women know how to appeal against decisions and appeals are dealt with swiftly.
- Women have access to recognised external organisations offering support in pursuing a complaint.

- Women know how to contact members of the Independent Monitoring Board and the Prisons and Probation Ombudsman, and can do so in confidence.
- Information about the Legal Ombudsman is available.
- Women receive help to pursue complaints and grievances beyond the centre, if they need to do so. They receive help in contacting legal advisors or making direct applications to the courts.

In relation to expectations 32–35 above: Human rights standards require detainees to be able to make requests and complaints and to do so without reprisal or punishment. Requests and complaints must be responded to promptly. See SMR 56, 57; EPR 70; BOP 33; UNHCR–DG 8 [48(xv)]; CPT 8.

Residential services

36. Women have a palatable, varied, healthy and balanced diet which meets their individual needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Meals are adequately spaced and there is at least one substantial hot meal each day.
- Women are involved in the preparation of food, which is appropriate to their own culture, and have opportunities to cook independently for themselves and their friends.
- Women have a choice of meals, including vegetarian, vegan, religious, cultural and medical diet options. All menu choices provided meet the same standard.
- Women can obtain drinking water and hot drinks at any time.
- Women are able to select from a menu that is translated into languages commonly used in the centre, includes pictures of meals and indicates whether they are suitable for different cultures, religious requirements and diets.
- Women are able to register any comments in their own language in a food comments book that is regularly read and taken account of by the catering manager.
- Women are consulted about their food and represented on a catering committee.

37. Women's food and meals are stored, prepared and served in line with religious, cultural and other special dietary requirements and prevailing safety and hygiene regulations.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- All areas where food is stored, prepared or served conform to the relevant food and safety hygiene regulations, and are properly equipped and well managed.
- Catering staff meet religious, cultural or other specific dietary needs.
- All women and staff who work with food are health-screened and trained, wear proper clothing, and can gain appropriate qualifications.
- Women are able to eat together.

38. Women can purchase a suitable range of goods at reasonable prices to meet their diverse needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Women are provided with a weekly personal allowance, which is sufficient to meet essential needs.
- Women arriving without private money are offered an advance to use for purchases, with repayment staged over a period of time.
- Women are able to buy snacks and drinks throughout the day.
- Women have access to a shop that stocks a range of culturally appropriate items, including skin and hair care products.
- Prices are broadly equivalent to those in the community.
- Arrangements are in place for women who want to purchase other approved items that are not provided by internal facilities.
- Women have unlimited access to their own cash and accurate financial records are kept by the centre. Foreign currency can be exchanged at reasonable rates.
- Women can purchase newspapers and magazines and place catalogue orders.

In relation to expectations 36–38 above: Human rights standards require that detainees be provided with nutritious food that takes into account their personal needs (such as religion, age, health and culture) and, in addition, that they have the opportunity to purchase food and other goods. See EPR 22, 31.5; SMR 22; UNHCR–DG 8[48(xi)]; CPT 4.

Fair treatment and inclusion

There is a clear approach to promoting equality and diversity, underpinned by processes to identify and address any inequality or discrimination. Distinct needs arising from detainees' protected characteristics are recognised and addressed.

Expectations

- 39. Leaders take seriously the experiences and views of women with diverse needs and identities. They communicate with them effectively and use information about equality and diversity to drive improvement.**

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Leaders are aware of the experiences and feelings of those in protected groups and consider factors affecting their well-being.
- Specialist resources are used to improve communication with protected groups.
- Accredited interpreting services are used with women wherever accuracy or confidentiality are important.
- Accurate records are kept of staff and detainees who are able to speak languages other than English.
- Key information about the centre is available in foreign languages.
- Leaders confidently collect, analyse and communicate data on equality and diversity across a range of indicators of life in the centre. They use it to effect change, and monitor, maintain and share progress.
- A named person of appropriate seniority has overall responsibility for equality, diversity and inclusion.

- 40. Women feel safe and are able to share their experiences, including with leaders in the centre. Procedures are in place and action is taken to identify and address discrimination and disparities.**

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Women's protected characteristics are identified systematically on arrival and initial assessments take account of their specific needs.

- Women who are vulnerable to victimisation in detention as a result of their protected characteristics, or who need assistance to complete everyday activities, are detained only in exceptional circumstances. When identified, they are referred to the Home Office for an immediate review of detention.
- Leaders have put processes and structures in place to improve mutual understanding and communication between diverse groups, for example through competently facilitated forums, and activities centred around food or the arts.
- Leaders have put processes and structures in place to improve fairness, for example effective equality monitoring and complaints systems, and suitable adaptations and adjustments.
- Detainees and staff know what is acceptable in terms of behaviour and language to show respect to all groups.
- Potential or actual discrimination is effectively identified.
- Leaders and staff respond to all identified concerns proactively, comprehensively and respectfully.

41. Staff have the skills and knowledge to work with women in an inclusive and culturally competent way.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- The centre's culture helps it to improve equality and diversity outcomes for detainees and staff.
- Leaders strive to recruit and retain staff who represent the diverse backgrounds and needs of the centre's population.
- Leaders obtain support from specialist organisations and groups to promote fair treatment and best practices. They enable them to work effectively with staff and women.
- Staff are trained and supported to identify and eliminate unlawful discrimination.
- Staff and women are encouraged to develop mutual understanding of each other's perspectives and experiences.
- The specific needs of women detainees held in shared facilities are met, with appropriate female staff ratios, and they have regular and equitable access to facilities and activities.
- Policies and procedures recognise the specific needs of women from the first point of detention.
- Pregnant women are not normally detained. If there are exceptional circumstances that result in them being detained for short periods,

they should have appropriate support. Force is never used against them unless it is to prevent harm.

- Pregnant women are fully supported in detention by appropriately trained staff, and receive services equivalent to those provided in the community. (See 'Health services'.)

42. Fair treatment is effectively promoted and developed in the centre.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Awareness of diverse needs is promoted by educational and celebratory events.
- Leaders work effectively to understand, communicate, and discuss issues of ethnic and racial identity with staff and detainees.
- Women with disabilities of all kinds have fair access to every aspect of the centre's life, and can participate in them safely and constructively.
- Staff are aware of the needs of women with neurodivergent conditions and learning disabilities, and adjustments are made to meet them.
- Whatever their gender identity, all detainees receive fair, equal and respectful treatment.
- LGBT+ detainees can play a full, open and equal part in the life of the centre.
- Staff are aware of the distinct needs of young women, and recognise and respond to individual levels of maturity.
- Older women receive appropriate assessment and support from staff who have had relevant training.
- Appropriate activities are provided for all age groups.
- Women of all faiths and belief systems receive equitable treatment.
- All other minority groups, such as veterans, are recognised and their specific needs are met, including any additional support required to make sure they receive equal and inclusive treatment.

In relation to all fair treatment, inclusion and religion expectations, non-discrimination is a fundamental principle enshrined in human rights treaties and standards. See ICCPR 26; CERD 1, 2; CEDAW 1, 2; ICESCR 2.2; CAT 1; CRPD 5. Human rights standards relating to places of detention should be applied impartially and without discrimination. See SMR 2; EPR 13; BOP 5.

In addition to the general non-discrimination provisions, there are specific human rights standards relating to some protected characteristics, including the following:

- Detainees with disabilities: CRPD 2, 3, 5, 9, 14; SMR 5.2, 55.2, 109.2; UNHCR-DG 9.5.

- Detainees from national, ethnic, cultural, religious or linguistic minorities: DRM 2; EPR 38.
- Sexual orientation and gender identity: UNHCR–DG 9.7; Yogyakarta Principles; Council of Europe Committee of Ministers, *Recommendations on measures to combat discrimination on grounds of sexual orientation or gender identity*.
- Older detainees: UNHCR–DG 9.6.
- Women: In relation to ensuring private accommodation for women, see UNHCR–DG 8[48(v)]; SMR 11; EPR 18.8. See generally Bangkok Rules (those which are relevant to specific expectations are noted in the Expectations relating to Centres for Adult Women).

Faith and religion¹⁵

Women are able to practise their religion. The multi-faith team plays a full part in centre life and contributes to detainees' overall care and support.

43. Women are able to practise their religion fully and in safety.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- All women have access to corporate worship and faith-based classes and groups each week, and to ministers of their faith.
- Women know the timings of religious services, which are well advertised. Timings are appropriate to the different religions.
- The composition of the multi-faith team is commensurate with the centre's faith populations.
- Multi-faith rooms and worship areas are equipped with facilities and resources for all faiths and are accessible for all women to allow contemplation, reflection and prayer.
- Activities are arranged so that women are able to attend corporate worship.

44. Different religious faiths are recognised and respected.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Staff are aware of religious diversity and the way it interacts with cultural and racial identities.

¹⁵ In this section, religion includes 'religion and belief' as they are understood in the context of the Equality Act 2010 and related case law.

- Searches of staff, visitors, women and their property are conducted in a religiously and culturally sensitive manner.
- Women can fulfil religious lifestyle requirements.
- Women can learn about different faiths.
- Monitoring of the different religions in the centre population is comprehensive, accurate and reviewed regularly to shape service provision.
- Women are able to obtain, keep and use artefacts that have religious significance.
- Women are able to celebrate all major religious festivals and the centre actively promotes them.

45. Women are fully supported by the multi-faith team, which contributes to their overall care, support and preparation for removal or release.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Religious leaders meet all new detainees in private within 24 hours of their arrival in the centre.
- Religious leaders provide support at times of personal crisis, such as family bereavement, the death or serious illness of a detainee, and imminent removal.
- Religious leaders demonstrate tolerance and cooperate with each other, working closely with other staff in the centre.
- Religious leaders establish and maintain links with faith communities and places of worship according to the individual needs of women.
- Religious leaders are consulted about care planning for women where appropriate, and are invited to assist in preparations for release, removal or transfer.

In relation to expectations 43–45, all persons have the right to freedom of thought, conscience and religion. See ICCPR 18; ECHR 9. Human rights standards require that there be no discrimination on the grounds of religion or religious belief and that prisoners belonging to religious minorities must be able to profess and practise their religion without any interference. See EPR 13, 29; SMR 2, 65, 66; BOP 5; UNHCR–DG 8 [48(ix)].

Health services

Health services assess and meet women's health needs while in detention and promote continuity of health and social care on release. Health services recognise the specific needs of women as displaced persons who may have experienced trauma. The standard of health service provided is equivalent to that which people could expect to receive elsewhere in the community.

In relation to all health services expectations below: Everyone has the right to the enjoyment of the highest attainable standard of physical and mental health. See ICESCR 12. Human rights standards require that detainees be provided with the same standard of health care as available in the community and that places of detention should safeguard and improve the health of those in their care. See SMR 24, 25; EPR 39, 40; CPT 9; UNHCR–DG 8 [48(vi)].

In the context of immigration detention, it is important that the vulnerabilities of individuals are identified to ensure the impact of detention on vulnerable detainees is monitored and that they are safeguarded from harm. See standards relating to safeguarding of adults (in relation to expectations 7–11 above).

Expectations

Strategy, clinical governance and partnerships

55. Women are cared for by a health service that accurately assesses and meets their health, social care and substance misuse needs while in detention and which promotes continuity of care on release.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Commissioning arrangements ensure that health, social care and substance misuse services are informed by and meet the assessed needs of the centre's population.
- Effective governance systems and partnership working between the centre, commissioners and providers ensure that health and social care provision meets the required regulatory standards.
- Adverse incidents and near misses are reported, monitored and investigated.
- Service delivery is informed by effective detainee consultation and lessons learned from adverse incidents/near misses, audits, complaints and case reviews.
- Health staff are easily recognisable. Staffing levels and the skills mix meet service user need.

- Women are treated by staff who receive relevant training, supervision and support to execute their roles and professional responsibilities.
- Health staff recognise and promptly report any signs of trauma, torture or other health issues that affect fitness to detain and make all necessary referrals, including those under the National Referral Mechanism. Referrals are made with informed consent whenever possible.
- Women are treated by staff who have received training in the health implications of gender-based violence, human trafficking, prostitution and migration.
- Any women under the age of 18 have access to competent health staff with specialist skills.
- Every patient has a single clinical record that meets contemporary record keeping standards.
- Information is shared within the bounds of medical confidentiality to promote continuity of care and maintain patient safety.

56. Women receive safe, accessible, caring and compassionate treatment, which is sensitive to their diverse needs, from competent staff in an environment that promotes dignity and maintains privacy.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Women are treated with respect, compassion and cultural sensitivity while they receive care and treatment.
- Women are referred promptly for appropriate care and treatment at external medical facilities where there is no available treatment for them in detention.
- All women have equal access to health, well-being and social care services and are not unnecessarily restricted by language barriers, disabilities, location, security procedures or regime.
- Women can request a health practitioner of their own gender and are made aware of this. If this cannot be facilitated at short notice, a female chaperone is used.
- Women's primary languages are recorded and professional interpreting services are used routinely for all confidential interactions with women who are not fluent in English.
- There are sufficient rooms for the provision of appropriate and accessible care and women are seen in private, except in clearly documented exceptional circumstances.
- Infection prevention and control measures are robust.
- Competent health staff respond promptly to medical emergencies with appropriate emergency equipment.
- All clinical equipment is appropriately maintained and serviced to ensure patient safety.

- There are effective arrangements for gaining and reviewing the service user's consent. When service users lack mental capacity to make a decision, health professionals make 'best interests' decisions in accordance with legislation.
- Service users are kept safe and safeguarded from abuse, and have access to independent advocacy services if required.
- Service users can easily complain, compliment or raise concerns about their care and treatment internally and externally and are protected from possible repercussions. Responses are timely, easy to understand and address all the issues raised.

57. Women are supported and encouraged to optimise their health and well-being.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- There is a whole-centre approach to promoting health and well-being.
- Information about available health services and current national health campaigns is easily accessible in all required formats and languages.
- Women can easily access information and services that help them to optimise their health and well-being.
- Women can access relevant national and local age-appropriate screening and immunisation programmes, including screening and treatment for blood-borne viruses if clinically indicated.
- Women can access travel vaccinations and/or malarial prophylaxis if required, prior to deportation.
- Older women receive proactive care from competent staff who understand their health, social care and well-being needs.
- Women are advised of the risks of smoking and can access smoking cessation support, including self-care options similar to those in the community.
- Robust systems are in place to prevent, identify and manage the outbreak of communicable diseases.
- Barrier protection, contraception and sexual health advice are freely available while in the centre and on release.
- Women receive relevant individual health promotion advice and resources on release.

In relation to expectations 55–57 above: Human rights standards emphasise the role of health care staff in evaluating, promoting, protecting and improving the physical and mental health of detainees, paying particular attention to those with special health care needs. There should be an interdisciplinary team with full clinical independence. There must be prompt access to medical care in urgent cases and referral to external care when needed. See SMR 25–27, 31; EPR 40–42, 46.

Primary care and inpatient services

58. Women's immediate health, substance misuse and social care needs are recognised on reception and responded to promptly and effectively.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- A competent health professional screens all new arrivals promptly to identify their immediate needs and vulnerabilities, and assess their mental capacity. Appropriate onward referrals are made.
- All relevant risk, vulnerability and care planning information is shared between centre and health staff, and the Home Office where necessary, on the first night and throughout a woman's detention to ensure her safety.
- With consent the patient's medical records are obtained and any relevant care agencies are contacted promptly to ensure continuity of care.
- Women who have vulnerabilities that indicate detention would be harmful receive a prompt and comprehensive assessment from suitably competent health professionals, which clearly states the impact of detention on their well-being.
- Women receive a secondary health assessment from a competent health professional within 24 hours of arrival to identify and address their broader health and well-being needs, with further assessment to follow as appropriate.

59. Women's individual ongoing health care needs are addressed through an appropriate range of care services. Continuity of care is maintained on transfer, release or removal.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Women can access primary care and social care services including mobility and living aids that meet their needs within similar waiting times to the community.
- The appointment system ensures clinical time is used effectively and women do not have excessive waits in the health department before or after their appointments.
- Women can access effective and responsive out-of-hours and emergency medical cover.
- Women have easy access to a female GP, and unbiased evidence-based information services about choices in pregnancy are available to those awaiting discharge.

- Women with long-term conditions and complex health needs (including food and/or fluid refusal) receive appropriate care, including regular reviews, in line with good practice, to support them to maximise their well-being.
- Continuity of care is supported by effective care planning which routinely demonstrates patient involvement.
- Health services staff provide community-based services on the wings when required.
- Women requiring secondary care services are referred promptly and are seen within community-equivalent waiting times. Transfer or removal is curtailed to provide essential ongoing medical treatment.
- Sufficient officer escorts are available to enable women to access secondary care services in a timely manner. Security measures during hospital escorts are based on an individual risk assessment and are proportionate.
- In partnership with the centre, health staff promptly identify and respond to a deterioration in a woman's physical or mental health or an increase in identified risks of harm, including advising the Home Office of the need to review the appropriateness of detention when required.
- Comprehensive fitness to travel assessments, including the availability of required treatments in the country of destination and the implications of a lack of required treatments, are submitted to the Home Office in a timely manner.
- Pre-release and removal assessments and interventions are provided in a timely manner based on clinical need. Women are given information on all relevant community support and are assisted to register with community health services if required.
- Women being removed are given information about sources of support in the destination country.
- Joint working with relevant centre departments, community agencies and escort staff supports effective continuity of care.
- Health staff work collaboratively with the centre, Home Office and community services to ensure effective release planning for women with complex needs.
- Women being released are offered a summary of their medical notes.
- A summary of medical notes is given to escort staff in a sealed confidential envelope for women being removed.

60. Women requiring 24-hour nursing care are supported by a regime, facilities and health staff to meet their individual needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees requiring 24-hour nursing care are not normally detained. If there are exceptional circumstances that result in them being detained,

they are clearly documented. Women are released as soon as possible.

- Health professionals admit and discharge women from 24-hour nursing care facilities using agreed clinical criteria.
- Women receive a timely comprehensive assessment of their care needs and wherever possible are involved in developing their own care plans.
- Women have access to normal centre activities, unless their clinical condition precludes it.
- Women have access to therapeutic, meaningful and constructive activities to support their well-being and/or recovery.
- Patients' ongoing care needs are met following discharge from the unit.

In relation to expectations 58–60 above: Human rights standards require detainees' health care needs to be assessed on arrival, including identifying all health care needs, the risk of self-harm and any previous ill-treatment. See EPR 40; SMR 30. See additionally in relation to women, BR 6–8. Standards require health needs to be monitored and met throughout detention. See EPR 39–43, 46; SMR 31–34 and additionally in relation to women BR 10, 11, 18. See also standards relating to leaving detention (in relation to expectations 77–78 below).

Mental health

61. Women with mental health problems are identified promptly and supported by community-equivalent services to optimise their mental well-being during their stay and on transfer, release or removal.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Women with ongoing mental health needs have a review of their detention, which takes into account the appropriate therapeutic environment for treatment and evidence of the detrimental impact of detention.
- Women receive an assessment of their immediate mental health needs on reception and appropriate onward referrals are made.
- Women can easily access mental health services through a clear referral pathway and are seen within agreed response times for all mental health problems.
- Referrals are reviewed promptly and appointments are allocated based on clinical need and risk.
- Sufficient competent practitioners deliver an appropriate and timely range of culturally sensitive, evidence-based mental health interventions for all mental health disorders and trauma.

- Prescribing reviews, including related physical health checks, occur as needed.
- Women are assessed using a standardised format and additional information from other sources is obtained as required.
- Women have written care plans which are regularly reviewed with their mental health practitioners.
- In cases of co-morbidity there are clear care pathways in place for liaison and joint working with substance misuse services and primary care.
- Women with severe and enduring mental illness are supported within the Care Programme Approach and, where clinically indicated, release to treatment in the community is arranged expeditiously.
- Women with serious and enduring mental health problems who require treatment under the Mental Health Act are assessed and transferred promptly.
- Women with severe mental illness are only separated on the recommendation of a suitably competent medical practitioner and only in exceptional circumstances, for the minimum time and with assertive mental health support.
- Relevant information is provided to the receiving services on discharge from the mental health service.
- Effective discharge planning and liaison with case workers and community mental health services ensure continuity of care and appropriate support following release into the UK.

In relation to expectation 61 above: Human rights standards require places of detention to monitor and meet detainees' mental health needs and to ensure referrals are made to external care when needed. See EPR 39–43, 46, 47.2; SMR 24–27, 31–34. See additionally in relation to women, BR 12, 13, 16.

Substance use treatment

The supply of illicit substances is curtailed and women with drug and/or alcohol problems receive effective individualised interventions to support their recovery.

Expectations

- 62. An effective whole centre approach ensures that the demand for drugs and alcohol is reduced and that women can access appropriate treatment which meets the assessed needs of the population.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- A multi-agency drug and alcohol committee develops, implements and monitors a strategic approach to drugs and alcohol and ensures effective joint working between all relevant stakeholders.
- A regular and comprehensive needs assessment informs the strategy and action plans.
- Staff receive training to enable them to recognise when a detainee requires a referral to substance use services, and there is a clear referral pathway.
- During induction, newly arrived women receive information on substance misuse services and harm reduction.
- Women have prompt access to psychosocial and harm reduction interventions which meet their individual identified needs, including mutual aid, such as trained and supervised peer supporters.
- Effective intelligence and security measures guard against the trafficking or manufacturing of drugs or alcohol.
- Sufficient competent staff provide effective evidence-based psychosocial and clinical services. Service user outcomes, feedback from service users and lessons learned from complaints and incidents inform service delivery and improvement.
- Drug and/or alcohol-dependent women who are newly arrived receive prompt first night screening, plus regular additional monitoring and individualised treatment in their early days.
- Specialist clinical staff complete a comprehensive assessment to determine a suitable management plan promptly after a detainee's arrival or following a request for a clinical intervention.
- Prescribing regimes are flexible, conform to national clinical guidelines and adequately meet the individual patient's needs, including treatment availability following removal. Subject to confirmation, existing prescribing regimes are continued or equivalents provided.
- Women receive regular multidisciplinary prescribing reviews and are actively involved in their own care planning.
- During induction, newly arrived women receive information on substance misuse services and harm reduction around the use of illicit substances in the centre.
- Women have prompt access to psychosocial and harm reduction interventions which meet their individual identified needs, including mutual aid.
- Psychosocial and clinical substance misuse services are well integrated with each other and with primary and mental health services.
- Service users receive information on harm minimisation and on service provision in their destination country in a language they can understand.

- Effective discharge planning and liaison with relevant resettlement and community services, including in the country to which the detainee is being removed, ensure continuity of support following release.

In relation to expectation 62 above: Human rights standards provide that initial health assessments should include symptoms of withdrawal resulting from the use of drugs, alcohol or medication and note the need for continuity of care for drug dependence. See SMR 24.2, 30; EPR 42.3. See additionally in relation to women, BR 15.

Medicines optimisation¹⁶ and pharmacy services

63. Women receive community-equivalent person-centred medicines optimisation and pharmacy services.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Women's medication histories, including allergies, are recorded during the initial reception screening and a full medicines reconciliation is completed within 72 hours of admission.
- Any disruption in prescribing regimens is minimised and urgent/critical medicines can be accessed promptly.
- Women have direct access to clinical pharmacy services and advice.
- All medicines are handled, transported and stored legally, safely and securely with effective pharmaceutical stock management and use.
- Alerts, drug recalls and adverse reactions to medicines are managed appropriately.
- Robust governance processes ensure safe and effective medicines management, including monitoring of prescribing trends.
- Women's medicines are prescribed safely in line with evidence-based practice and agreed local protocols and administered at clinically appropriate times.
- Patients' adherence to medication is monitored and support given to maximise patient safety.
- Women can store their medicines securely and self-administer safely following an in-possession risk assessment which is regularly reviewed.
- Women can easily access simple self-care medicines at all times.
- Medication is administered in an appropriate environment that ensures the safety of women and staff while maintaining patient confidentiality.

¹⁶ 'Medicines optimisation' refers to a service that is responsive to individual needs. Simply put, it is about patients receiving the correct choice of medicine at the most appropriate time to address their individual needs.

- Women are given information about their medicines in a format they can understand and receive regular clinical reviews of their prescribed medicines in line with current guidelines.
- Women are released or transferred with a confidential medical summary and sufficient medication for their needs, including for the duration of any escort journey.

See the standards under health services heading above.

Oral health

64. Women receive timely community-equivalent dental services, including oral health promotion.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Women have timely access to emergency dental services based on clinical need, and to the full range of NHS-equivalent treatment that can reasonably be delivered while they are detained.
- Women receive evidence-based interventions in oral health promotion and disease prevention.
- Women have prompt access to required medicines following dental interventions.
- Governance processes ensure that women receive dental care that meets contemporary professional clinical standards in an appropriate environment.

In relation to expectation 64 above: Human rights standards require detainees to have access to dental services. See SMR 25.2; EPR 41.5.

Section 3: Activities

Contents

- Access to activities
- Education and work
- Library provision
- Fitness provision

Activities

The centre encourages activities and provides facilities to preserve and promote the mental and physical well-being of women.

Expectations

Access to activities

66. Women have regular and equitable access to activities and facilities that meet their needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Activities and facilities provide physical and mental stimulation. They include suitable outdoor activities.
- Activities are available every day, including in the evenings.
- Women are free to move throughout the centre. Any restrictions are justified by clear evidence of risk.
- Women are not prevented from taking part in activities or using facilities as a result of scheduling conflicts.
- There is a good range of recreational activities and facilities.
- Women have easy access to outside areas and fresh air, which is restricted only on the basis of assessed risks.

In relation to expectation 66 above: Human rights standards require detainees to be allowed to participate in activities that allow social interaction and meet their welfare needs. Freedom of movement should be restricted as little as possible. See EPR 25; SMR 105; CPT 5.

Education and work

67. Women benefit from learning and skills provision that meets their needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Learning and skills provision promotes the mental and physical well-being of women.
- Women are able to develop skills that will be useful to them after release or removal.

- Women have access to a range of classes, training and creative pursuits. They include English and classes that promote relaxation and self-expression.
- The range, frequency, quantity and quality of courses are sufficient to meet differing needs, including those of women held for short and long periods, and women's protected characteristics.
- Women can complete both short and, where appropriate, more substantial, units of education and training.
- Tutors and managers have suitable expertise.
- Effective arrangements assure and improve the quality of learning and skills provision.

68. A suitable and sufficient range of paid work is available to women.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- All women are able to undertake paid work within the centre during the working day.
- Women are not deprived of the positive physical and mental health benefits of work unless there is clear evidence of risk.
- Compliance or non-compliance with immigration enforcement staff does not influence access to work.
- Recruitment is timely, transparent and appropriate.
- Pay rates are equitable.
- Women receive suitable training for their work roles.

In relation to expectations 67 and 68 above: Human rights standards are clear that detainees must be provided with access to educational programmes that meet their needs and aspirations. See ICESCR 13; SMR 104; EPR 28; UNHCR–DG 8[48(xiii)]; CPT 5.

In addition, human rights standards require detainees to be provided with adequate opportunities to undertake work should they so choose, for which they must receive remuneration. See ISCECR 6, 7; SMR 96–99, 101–103, 116; EPR 26.

Library provision

69. Women have regular access to a suitable library and learning resources that meet their needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Women can visit the library every day, including at weekends.

- The library provides an opportunity for research, learning and social interaction in an informal, relaxed setting.
- Library resources enable women to find out about the situation in destination countries.
- Suitably skilled staff are on hand to help women make the best use of the library.
- The quantity and quality of library materials is sufficient to meet the needs of the detainee population. This includes books, newspapers, dictionaries, CDs and DVDs in languages that correspond with the major languages and national groups in the population.
- Women have sufficient time to use library materials if they are unable to take them away from the library.

In relation to expectation 69 above: Human rights standards require places of detention to have an adequately stocked library. See SMR 63, 64; EPR 28.5; UNHCR–DG 8[48(xii)].

Fitness provision

70. Fitness provision is safe and meets the needs of all women.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Women have the opportunity to use the fitness facilities every day and are able to shower safely after each session.
- The range of fitness activities is varied and meets the needs of the population.
- Fitness staff have appropriate qualifications and expertise.
- Before first using the fitness facilities or undertaking strenuous exercise all women are assessed by health services staff and the information made readily available to fitness staff.
- Effective joint working between gym staff and health/substance misuse staff supports safe gym use for all women.
- Women who use the fitness facilities can access appropriate and clean clothing.
- Records of accidents and injuries are monitored regularly and appropriate action is taken.

In relation to expectation 70 above: Human rights standards recognise the need for detainees to be able to safely undertake adequate exercise and maintain their fitness. See SMR 23; EPR 25, 27; UNHCR–DG 8[48(viii)]; CPT 5.

Section 4: Preparation for removal and release

Women are able to maintain contact with family, friends, support groups, legal representatives and advisors, access information about their destination country and be prepared for their release, transfer or removal. Women are able to retain or recover their property.

Contents

- Welfare
- Visits and family contact
- Communications
- Leaving the centre

Welfare

Women are supported by welfare services during their time in detention and prepared for release, transfer or removal before leaving detention.

Expectations

72. Women's welfare needs are systematically assessed and addressed while they are in detention.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- There is an accessible welfare service to address needs. Welfare staff are appropriately selected and trained, and their work with women is properly documented and evaluated.
- Women are able to obtain support for immediate pressing welfare matters caused by their detention from an appropriate person in private, within 24 hours of their arrival.
- Support needs, and in particular those relating to release or removal, are systematically assessed on arrival and dealt with through ongoing casework documented in a regularly reviewed welfare plan.
- Welfare casework includes support with practical matters inside detention and help with external problems caused by ongoing detention, or which are difficult to resolve because of detention.
- Welfare casework ensures that women who are removed are able to settle their affairs in the UK, that their bank accounts are closed and they do not leave behind any property or money.
- Welfare casework ensures that women who are released in the UK have good quality advice and support with housing, finance and other practical matters.
- Women are helped to contact their consular officials and are given appropriate advice about re-entry bans.
- External voluntary and community sector organisations are proactively engaged by the centre to enhance support for women, including gender-specific services and support for women who have experienced gender-based violence and exploitation.

In relation to expectation 72 above: Human rights standards emphasise that consideration must be given from the beginning of a period of detention to the detainee's future after release, including the detainee's need for assistance on release. See SMR 107, 108.

Visits and family contact

Women can easily maintain contact with their families and the outside world. Visits take place in a clean, respectful and safe environment.

Expectations

73. Women can maintain contact with the outside world through regular and easy access to visits.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Women are able to receive social visits lasting a minimum of two hours every day, including evenings.
- The visits booking system is accessible and able to deal with the number and diverse requirements of visitors, including those who are not fluent in English.
- Volunteer visitor groups are actively supported by the centre and their existence is publicised.
- Extended visits are facilitated on the basis of need.
- Women's visitors are given information about how to get to the centre, visiting hours and details about what to expect when they arrive.
- If public transport stops some distance from the establishment, transport arrangements are in place to assist visitors.

74. Women can maintain good contact with their families. The impact of separation on both children and their parents is recognised and addressed.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Welfare casework helps women to maintain contact with their families and children, wherever they may be located.
- The impact on women of separation from children and families is explored with them and addressed as far as possible, for example through video calling or private visits.
- Women's families and friends know how to share concerns they have about a detainee and how to seek support.
- The visits area and any visitor centres have activities to keep children entertained.
- Search and entry processes are child-friendly.

75. Women and their visitors are able to attend visits in a clean, respectful and safe environment which meets their needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Visits areas are comfortable and comparable to a normal family environment.
- Visitors are treated with respect and courtesy by centre staff.
- The searching of women, visitors and their property is proportionate to risk and conducted in a way that is sensitive to religion and culture.
- Women and visitors are not barred from bringing documents into the visits room, other than on the basis of a risk assessment.
- Visitors are not subjected to excessive security checks.
- Visitors' personal bio-data is only taken, used and retained in accordance with guidelines from the Information Commissioner's Office.
- Women and their family members are allowed appropriate physical contact in the visits room.
- Visitors and women are able to give staff feedback on the visit, suggest improvements and, if necessary, complain using an accessible complaints procedure.
- Visitors can buy a range of refreshments during visits.

In relation to expectations 73–75 above: Human rights standards clearly require places of detention to ensure that detainees are able to remain in contact with family and others and to receive visits. Visiting areas should be child friendly. See SMR 58, 106; EPR 24; BOP 19; UNHCR–DG 8[48(vii)]; CPT 2, 5.

Communications

Women can maintain contact with the outside world regularly using a full range of communications media.

Expectations

76. Women are able to maintain contact with the outside world and plan for the future through regular access to a full range of communications media.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- There is sufficient access to telephones at all times.
- Women can make international phone calls at rates comparable to those available in the community.
- Women without money are provided with a reasonable number of free calls of sufficient length.
- Women are able to use personal email accounts and have internet access for communication, information and leisure purposes, and can open attachments.
- All legitimate websites are accessible. There are effective procedures for quickly and permanently unblocking sites that have been inappropriately restricted.
- Women have free access to video calling and social networking to support contact with family and friends. Access is restricted only on the basis of documented individual risk assessment.
- Women can quickly and easily send and receive faxes, without charge and without restrictions on length, to ensure that legal documents are transmitted in their entirety.
- Women are able to send letters free of charge if they have no money, and are informed of how to do so. Women's mail is not opened by centre staff unless there are identified individual risks.

In relation to expectation 76 above: Human rights standards require detainees to be able to keep in contact with the outside world through various means, including digital means. See SMR 58, 63; EPR 24; BOP 19; UNHCR-DG 8[48(vii)]; CPT 2, 5.

Leaving the centre

Women leaving detention are prepared for their release, transfer, or removal. Women are treated sensitively and humanely and are able to retain or recover their property.

Expectations

77. Women are helped to prepare for their release, transfer or removal.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- All women, including those released at short notice, are seen shortly before leaving the centre to ensure needs have been addressed.

- Women are given advice and assistance on immediate needs, such as housing and finance. Every effort is made to ensure that no one is released without accommodation.
- Women are given reasonable notice of the date and time of their removal and any planned transfer or release in a language they understand.
- Women are only placed on a reserve list for removal on a voluntary basis.
- Women are able to inform legal advisers, family and friends of when they are to be released, transferred or removed from the centre, subject to any legitimate security issues.
- Those being transferred into further detention are informed of the reasons for this decision and about the centre to which they are being transferred in a language they understand.
- The Home Office informs relevant agencies of women released under licence and licence conditions are explained to women.
- The Home Office maintains a well-researched toolkit about returning to common destination countries.
- The toolkit is sufficient to inform Home Office and centre staff of arrangements, including financial support, that need to be put in place to enable the detainee to travel safely to their final destination and to access appropriate local support.

78. Women who are to be removed or released are treated sensitively, humanely and safely.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- There is a multidisciplinary review of women who are considered to be vulnerable to harm. Care plans are put in place or amended as appropriate and, where necessary, describe arrangements to ensure continuity of medical care for women being released.
- Sealed copies of health treatment documentation accompany women when they leave the centre. This includes summary medical notes and other important information. (See 'Health services'.)
- Women with substance misuse problems can continue their treatment regime at another establishment and in the community if released. They receive information on harm minimisation and on service provision in their country of origin in a language they can understand.
- Allegations of assault on women during removal attempts, which are supported by medical evidence, are thoroughly investigated with a view to prosecution, and removals are delayed for this purpose.
- Women being removed have clothing suitable for the climate to which they are going and can carry their belongings in a suitable bag.
- Women about to leave the centre are able to have visits at short notice.

- Women being released are provided with adequate funds to reach final destinations and maintain themselves in the period immediately following their arrival.
- Immediate housing, financial and other support needs are addressed before women are released.

In relation to expectation 77 and 78 above: Human rights standards emphasise that consideration must be given from the beginning of a period of detention to the detainee's future after release, including the detainee's need for assistance on release. Detainees must be provided with adequate clothing and sufficient means to reach their destination and to maintain themselves in the period immediately following their release. See SMR 108; EPR 33.7, 33.8.

In addition, standards require removal orders to be issued in accordance with law and detainees to be informed in advance of their removal. See TGFR 2, 4, 15. Standards also cover conditions of transport and return of property. See SMR 73; EPR 31, 32, 33.4. Detainees must be treated with respect for their dignity and human rights at all times. See SMR 1; EPR 1.

See also standards relating to safeguarding vulnerable adults (in relation to expectations 7–11).

3. SHORT-TERM HOLDING FACILITIES

Section 1: Safety

Contents

- Arrival and early days in detention
- Safeguarding adults and personal safety
- Safeguarding children
- Legal rights

Arrival and early days in detention

Detainees travelling to and arriving at the facility are treated with respect and care. Risks are identified and acted on. Induction is comprehensive.

Expectations

1. Detainees travel in decent conditions, are treated with respect and are fully informed about their transfer.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees are told, in a language they understand, where they are going, why they are being transferred and what to expect when they arrive.
- Detainees are not subject to multiple movements around the detention estate and are not transferred between centres during the night. Specific reasons for any such moves are clearly recorded on movement documentation. All other night-time moves are kept to an absolute minimum.
- Detainees are swiftly transferred from police cells and spend no longer than one night in police custody.
- Detainees are given adequate comfort breaks and refreshments during transfer.
- Detainees should receive an adequate meal and drink at mealtimes.
- Detainees are not kept waiting on vehicles after arrival.

2. Detainees are safe at all times while under escort, and individual needs are recognised and given proper attention.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Vehicles are safe, secure, clean and comfortable, and the needs of detainees with diverse needs, e.g. those with disabilities or those needing to take medication, are met.
- Escorting staff are aware of detainees' individual needs and provide an effective briefing to receiving staff.
- Arrest teams allow detainees adequate time to prepare for their journey, to dress appropriately and to collect essential belongings, including medication and paperwork.

3. Detainees feel and are safe on their arrival at the facility.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Escort providers routinely contact the facility to which they are travelling before arrival to advise them of whom they are carrying.
- All detainees are held with correct documentation, including any assessment of their vulnerability, evidence of authority to detain (IS91) and the reasons for detention (IS91R).
- Detainees with specific needs, such as pregnant women, families with babies, older and disabled detainees and those with mental health problems, receive appropriate priority.
- Detainees receive a private interview to establish immediate risks and needs.
- Detainees are supported on their first night in detention by staff who check on their well-being during the night.¹⁷
- Induction provides detainees with key information, such as the existence of the Independent Monitoring Board and how to get in touch with a member of the Board.
- Induction is provided in a range of accessible formats with interpretation and translation where necessary.

4. Detainees are treated with respect and sensitivity on arrival at the facility.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees are received promptly into a welcoming and supportive reception environment, where they are greeted courteously by staff.
- Translated information is provided and interpretation is used as necessary to ensure good communication with detainees.
- The gender ratio of staff is appropriate for receiving detainees and undertaking searching procedures. Searching is carried out sensitively.
- If a passport or any other documents are withheld by staff, detainees are provided with reasons, a receipt and a copy of the documentation.
- Soon after arrival, detainees are able to make free telephone calls in private and are offered drinks and food. Those without means to pay for telephone calls are able to make free calls as necessary throughout their detention.

¹⁷ Some of these expectations relate to residential short-term holding facilities only, but may also apply if detainees are held for extended periods in facilities that are nominally non-residential. The applicability of expectations will be judged by inspectors according to the circumstances they find.

- Detainees are able to retain all items of clothing unless an individual risk assessment indicates otherwise.
- Detainees held for longer periods are able to have a shower. If necessary, clean clothing is provided.
- Detainees held for more than 24 hours receive a health screening.
- Detainees are able to obtain or retain basic toiletries on arrival.

In relation to expectations 1–4 above: Human rights standards set out a number of requirements applicable to arrival and early days in detention. These include in relation to conditions of transport, requiring the provision of information in a language and way detainees understand, identifying the health care and other needs of detainees and allowing detainees to contact family and legal counsel. See SMR 1, 7, 50, 54, 55, 58, 62, 67, 68, 73; EPR 15.1, 15.2, 16; 24.8, 30, 31, 32, 37; BOP 1, 16, 24, 31; UNHCR–DG 7, 8; TGFR 10; CPT 2, 4, 9, 10. See additionally in relation to women, BR 2, 3, 5–8, 19; EPR 19.7.

Safeguarding adults and personal safety

The facility promotes the welfare of all detainees and protects them from all kinds of harm and neglect. The facility provides a safe environment which reduces the risk of self-harm and suicide. Detainees are protected from bullying and victimisation, and force is only used as a last resort and for legitimate reasons.

Expectations

5. Adults who are vulnerable to harm or neglect are held in a safe environment and given appropriate care and support.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Safeguarding procedures and guidance are known and used by all staff, including on how to make the necessary referrals.
- All staff in contact with detainees are trained in the identification and care of vulnerable detainees.¹⁸

¹⁸ There is no universally agreed definition of vulnerability in detention. As Stephen Shaw's 2016 report, *Review into the Welfare in Detention of Vulnerable Persons: A Report to the Home Office* (CM9186), points out, some commentators consider all of those in detention to be vulnerable because they are detained. Others prefer to describe groups that are in 'situations of vulnerability', as opposed to intrinsically vulnerable groups, thereby stressing the largely contextual nature of vulnerability. It is common for groups such as those with serious mental or physical health problems, children, elderly people, pregnant women, LGBTI people, people with disabilities, asylum-seekers, and those who have experienced torture, trafficking or gender-based violence, including female genital mutilation, to be considered especially at risk of harm or neglect in detention. In these *Expectations*, we use the terms

- The facility promptly informs the Home Office of all detainees who may be vulnerable to harm in detention. The Home Office keeps facility staff informed about its assessment of risk to individual detainees.
- An individual care plan is in place to address a detainee's assessed needs.
- The risks to all detainees are recognised and there are guidance and procedures to help reduce and prevent harm or abuse from occurring.
- When abuse of a detainee is alleged or suspected to have occurred, prompt and appropriate action is taken to protect the detainee and this is swiftly communicated to the Home Office.
- Staff are subject to recruitment and vetting procedures which comply with necessary legislation.

6. The facility provides a safe environment which actively reduces the risk of self-harm and suicide.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- There is a clear strategy for preventing self-harm and suicide, which includes effective multidisciplinary procedures and care planning to help reduce risks.
- All staff are fully trained in suicide prevention.
- Rooms and toilets are free of ligature points as far as is practicable and suitable levels of supervision are in place.
- Detainees are monitored at high-risk times, such as when removal is imminent.
- Staff are alert to and take seriously the vulnerability of detainees who are not eating. Missed meals are monitored and detainees are given encouragement, care and support to resume eating.
- Staff routinely carry anti-ligature knives.
- Incidents of self-harm are closely monitored and analysed at regular intervals to establish any trends and to implement preventive measures. Serious incidents are properly investigated to establish what lessons can be learned and to promote good practice.

7. A clear and coordinated multidisciplinary approach ensures that detainees feel and are safe from victimisation from other detainees or staff.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

'vulnerable' and 'vulnerability' to refer to these groups, but also to any other individuals or groups who may be at risk of harm or neglect as a result of other personal, social and environmental factors; these factors may be fixed or change over time and the degree of vulnerability may change as a result.

- Detainees are supervised and know how to summon help if necessary.
- Clear rules setting out expected standards of behaviour are published in the main languages of detainees and are readily available.
- Staff are alert to potential bullying and all forms of victimisation.
- Staff confront and challenge unacceptable behaviour.
- Detainees are protected from unwanted sexual attention.
- Female detainees are offered the option of a separate holding area.
- Separate, private accommodation is provided for women, with separate toilets, showers and washing facilities.
- Detainees are not allocated to shared accommodation until a room-sharing risk assessment has been carried out.

8. Detainees are only subject to force as a last resort when other methods have failed. When used, force is legitimate, necessary and proportionate, and subject to rigorous governance.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Staff are trained in and routinely use de-escalation techniques.
- Restraints are only used as a last resort and for the shortest possible period.
- Planned use of force is properly authorised and video recorded. All staff involved in the use of force complete appropriate reports promptly and in detail.
- Detainees subject to control and restraint procedures are seen by a health care practitioner as soon as possible after restraint is removed.
- Use of force data are monitored and any emerging patterns are identified and acted on.
- Use of force documentation and associated CCTV or video footage is scrutinised by senior managers to identify opportunities for improvement and possible ill-treatment. Any concerns are investigated, lessons are learned and appropriate action is taken.
- There is effective oversight of use of force by the Home Office and Independent Monitoring Board.
- Detainees kept separate are in appropriate accommodation, and are monitored closely for their physical, emotional and mental well-being. Staff keep accurate records.

In relation to expectations 5–8 above: Persons held in immigration detention may be or become vulnerable to harm during their detention, including harm that arises or is exacerbated because they are detained. Human rights standards require the individual needs and circumstances of detainees to be assessed and regularly reviewed in order to identify their vulnerabilities, monitor the impact of detention on them and safeguard them from harm. Human rights standards also

recognise that some individuals should not be held in immigration detention due to their vulnerability.

See UNHCR–DG 8 [48(vi)], 9.1, 9.4–9.7; SMR 2, 33, 34, 109; BOP 5; EPR 12.1, 12.2, 16, 25.4, 42.3, 43.1, 52.1; CPRD 5, 12, 14–17, 25; CPT 9, 10. See, additionally in relation to women, UNHCR–DG 9.3; CEDAW 6; BR 25, 31, 33, 42.4, 66; EPR 34.1, 34.2.

Human rights standards require prompt and impartial investigation where there are reasonable grounds to believe an act of torture or ill-treatment has occurred in detention, or when an allegation of torture or ill-treatment is made by a detained individual. See SMR 1, 30, 34, 54–57, 71, 72, 76; EPR 1, 42, 81; BOP 33; CAT 2, 12, 13, 16; ECHR 3; ICCPR 7, 10.1; CPT 8.

For standards in relation to safety and reporting abuse, see EPR 52.2, 55; BR 25.1, 31; UNHCR–DG 8[48(xv), (xvi)]. In relation to ensuring private accommodation for women and room allocations, see UNHCR–DG 8[48(v)], HR 28, 29; SMR 11, 12.2; EPR 18.5-18.8.

In addition to human rights standards that require vulnerable adults to be safeguarded, human rights standards require the right to life of detainees to be protected and promoted, and detainees to be treated with respect for their dignity and human rights. Specific standards require detainees to be provided with sufficient mental health care. See SMR 1, 2, 30, 31, 33; EPR 1, 25.4, 42.3, 43.1, 47.2, 52.2, 52.4; CCLEO 6; UNHCR–DG 8[48(vi)]; ECHR 2; ICCPR 6, 10; CPT 2, 9. See additionally in relation to women, BR 12, 13, 16, 35.

Human rights standards only allow for the use of force and restraints when absolutely necessary and as a measure of last resort. If it is absolutely necessary to use force or restraint, this must be the minimum necessary and only imposed for the time period required. There must be clear procedures governing the use of force and restraint. In relation to restraint, see SMR 47–49; EPR 68, CPT 6, 7. In relation to the use of force see SMR 82; EPR 64–66; BPUFF 15. See additionally in relation to women, BR 24.

Safeguarding children

The facility promotes the welfare of children and protects them from all kinds of harm and neglect.

Expectations

9. Children are properly protected in a safe environment. All staff safeguard and promote their welfare.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- A comprehensive child protection policy and guidance are in place, which have been agreed by the local safeguarding children board or equivalent.
- All staff are aware of their personal and professional duty of care to any children in the centre, and receive appropriate training.
- Staff promptly raise any concerns about the safety and welfare of children in accordance with agreed referral procedures.
- All staff who have contact with children are properly vetted and trained.
- Staff are aware of their duty to raise legitimate concerns about the conduct of colleagues in relation to the treatment and management of children. Staff are encouraged by managers to raise any such concerns, and feel confident and safe to do so.
- There is regular monitoring of the number of children detained, their age and the duration of their detention.
- The burden of proof in age dispute cases is on the Home Office. Detainees have a Merton-compliant assessment unless their demeanour and appearance is clearly that of an adult significantly over the age of 18.¹⁹ All detainees who say they are children are treated as such until it is determined otherwise.
- If, despite a chief immigration officer's (CIO's) assessment to the contrary, facility staff believe that a detainee may be a child, they understand they have a duty to act on their assessment, and immediately inform facility managers, social services and the Home Office.
- There is effective governance of CIO age assessments which are monitored and subject to quality assurance. Where social services assess a detainee to be a child there is a multi-agency review of any prior CIO assessment; lessons are learned and reflected in future practice.

¹⁹ This will be reviewed in light of changes in legislation.

In relation to expectation 9 above: Human rights standards prohibit the arbitrary detention of children and provide children with the right to challenge the legality of their detention. Children should only be detained as a last resort and for the shortest possible period of time. Unaccompanied children should not, as a rule, be detained and must be provided with special protection and alternative care. The best interests of the child must be a primary consideration in all actions concerning children. See CRC 3, 20, 22.1, 37(b), (d); ICCPR 9.1, 9.4; HR 2; UNHCR–DG 9.2; CPT 10.

Any child who is detained or who is visiting a detention centre must be protected from exploitation and abuse and be provided with care and protection to ensure their well-being. Children's rights to, among other things, education, play and to the highest attainable standard of health, must be promoted. See CRC 3.2, 3.3, 24.1, 28.1, 31, 33–37, 39; UNHCR–DG 8, 9.2; HR 82, 85–87; CPT 10. See additionally in relation to women, BR 28.

Legal rights

Detainees are fully aware of and understand their detention, following their arrival at the facility and on release. Detainees are supported by the facility staff to freely exercise their legal rights.

Expectations

10. Detainees understand why they are detained and are informed about the progress of their case.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Home Office staff explain to detainees, in a language they understand, the individual reasons for their detention and their status and rights, and keep them updated with progress.

11. Casework is progressed promptly and reviewed effectively to reduce the potential harmful impact of ongoing detention.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Casework is progressed promptly and case planning ensures that detention is for the shortest period that is reasonable to reduce the potential harmful impact of ongoing detention.

- Interpreters are always available in interviews so that detainees can express themselves fully, and understand their rights and any important decisions.
- Detainees are only held for reasons that are legitimate and for purposes that are achievable within a reasonable period of time.
- Detention is reviewed regularly, taking full account of factors for and against the decision to detain, alternatives to detention, and any information/assessment of vulnerability held by the facility.
- Potential victims of trafficking are identified and referred to the National Referral Mechanism. Referrals are made with informed consent whenever possible.

12. Detainees have effective access to independent legal representation.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees are able to speedily obtain regulated and good quality independent legal advice and representation in a language they understand.
- Detainees receive information on how to complain about poor quality legal representation.
- Detainees are able to contact their legal representatives without impediment.
- Detainees are able to communicate with their legal representatives confidentially by phone, fax, letter, email and video conferencing.
- Detainees have prompt and unrestricted access to private legal visits.
- Detainees have access to up-to-date legal textbooks, their personal documentation and other reports/materials necessary to help their immigration or asylum case.
- Bail application forms and information about procedures are available.
- All information is given to detainees in a language and format they understand.

In relation to expectations 10–12 above: Human rights standards permit detention for immigration purposes only in accordance with law and only as a measure of last resort. Detainees must have the reasons for their detention explained to them and be able to challenge the lawfulness of their detention. See EPR 30.3; BOP 9–14; ECHR 5; ICCPR 9; UNHCR–DG 4, 7; CPT 1, 2. See additionally the standards relating to vulnerable adults (in relation to expectations 5–8 above).

In addition, standards require detainees to be able to access independent legal advice and to be allowed confidential visits and correspondence with their legal representative. See EPR 23; BOP 17, 18; SMR 61; BRPL 8; CPT 2.

Section 2: Respect

Contents

- Accommodation and facilities
- Respectful treatment

Accommodation and facilities

Detainees are held in a safe, clean and decent environment. They are offered varied meals according to their individual requirements. The facility encourages activities to promote mental well-being.

Expectations

14. Detainees are held in a safe, clean and decent environment which is in a good state of repair and is fit for purpose.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- The environment of the facility is not oppressive and is suitable for a detainee population. Access to fresh air is limited only by the requirements of safety.
- The facility is properly ventilated, kept at a comfortable temperature and provides a separate no smoking area, or is no smoking.
- Detainees have access to single sex sanitation and washing facilities that are clean and in working order, and that afford privacy.
- Detainees have free access to basic toiletries and sanitary products and there are nappy changing facilities for babies.
- All detainees can easily and quickly gain staff attention in an emergency.
- Detainees' property is stored securely and is properly accounted for.
- Sufficient comfortable beds and seating areas are provided for the number held during the day and overnight and are suitable and in a good state of repair.
- Families are normally held together even in cases when individual family members are over 18²⁰. Families are able to eat together as a unit and are located in shared or adjoining rooms.

15. Detainees are offered a suitable range of food and drink which meets their individual needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Those detained for several hours are offered a hot meal.
- Food is healthy, varied, balanced and suitable for the detainees' diverse needs.

²⁰ The term 'families' is used here in a broad sense and may, for example, include unmarried and same sex couples.

- Snacks and hot and cold drinks are freely available.
- Detainees are able to register any food complaints in their own language and complaints are regularly checked by a manager.
- All areas where food is stored, prepared or served are properly equipped and well managed.

16. Detainees have access to activities and facilities that meet their needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- There are sufficient activities and facilities to enable detainees to occupy themselves.
- Detainees have access to books, newspapers and dictionaries in a range of languages, as well as TVs and DVDs.
- Detainees held for several hours have access to exercise in the fresh air.
- Suitable recreational activities are provided for children, which include exercise, play opportunities and access to the fresh air.

In relation to expectations 14–16 above: Human rights standards require that detainees be housed in accommodation that respects their human dignity and privacy. Accommodation should be clean, adequately ventilated and lit (by both natural and artificial light) and provide sufficient living space. See EPR 18, 19, 21; SMR 12–21; UNHCR–DG 8[48(x)]; CPT 4. See additionally in relation to women, BR 5, and children, HR 31–34.

Standards require that detainees be provided with nutritious food that takes into account their personal needs (such as religion, age, health and culture). See EPR 22; SMR 22; UNHCR–DG 8[48(xi)]; CPT 4.

Standards also require that detainees be allowed to participate in activities that allow social interaction and meet their welfare needs. See EPR 25; SMR 105; CPT 5. Detainees must have access to educational and recreational books and other media. See SMR 63, 64; EPR 28.5; UNHCR–DG 8[48(xii)]. They should be able to safely undertake adequate exercise and maintain their fitness. See SMR 23; EPR 25, 27; UNHCR–DG 8[48(viii)]; CPT 5. In relation to children, see HR 41 (library provision), 47 (recreation); CRC 31 (rest, leisure and play); CPT 10 (activities and centres catering specifically for children).

Children have a right to family unity. In the exceptional circumstances in which children are detained, the best interests of the child must be a primary consideration in all actions concerning them. Children should therefore be accommodated together with their family members unless this would not be in their best interest. See CPT 10; CRC 3, 5, 7, 8, 9, 37(b), HR 2; UNHCR–DG 9.2.

Respectful treatment

Detainees are treated with respect by all staff. Effective complaints procedures are in place for detainees. There is understanding of detainees' diverse cultural backgrounds. Detainees' health care needs are met.

Expectations

- 17. Detainees are treated with humanity and respect for their human dignity at all times. Relationships between detainees and staff are positive and courteous.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Staff and detainees are fair and courteous to each other.
- Staff have training in and show proper regard for the uncertainty of detainees' situations, particularly immigration issues and their cultural backgrounds.
- Staff set a personal example in the way they carry out their duties.
- Staff introduce themselves to new detainees and wear identification that clearly displays their name and status.
- Information about detainees' needs is communicated between staff sensitively.

- 18. Detainees have confidence in complaints procedures, which are effective, timely and well understood.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees know how to provide feedback or to complain and have access to information about complaints procedures in a range of formats and languages.
- Detainees have easy access to feedback and complaint forms in a range of languages.
- Detainees can submit complaint forms confidentially at any time, including to the Home Office and/or the Independent Monitoring Board.
- Responses to complaints are clear, respectful, prompt, and address all the issues raised.
- Determined efforts are made to communicate responses to detainees who have left the facility.
- Responses are communicated in the language in which the complaint was submitted.

19. Leaders take seriously the experiences and views of detainees with diverse needs and identities. Procedures are in place and action is taken to identify and address discrimination and disparities.

The following indicators describe evidence that may show this expectation being met, but do not exclude other ways of achieving it.

- Detainees' protected characteristics are identified systematically on arrival and initial assessments take account of their specific needs.
- Detainees who are vulnerable to victimisation in detention as a result of their protected characteristics, or who need assistance to complete everyday activities, are detained only in exceptional circumstances. When identified, they are referred to the Home Office for an immediate review of detention.
- Leaders have put processes and structures in place to improve fairness, for example effective equality monitoring and complaints systems, and suitable adaptations and adjustments.
- Staff promote awareness of equality, anticipating and addressing the needs of detainees.
- Leaders and staff promote an understanding of and demonstrate respect for all ethnic, national, cultural and other diverse groups. Inappropriate language or conduct by staff, visitors or detainees is challenged.

20. Detainees of all groups are treated equitably and according to their individual needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Professional interpretation is used wherever necessary to ensure effective communication with detainees who are not fluent in English.
- Detainees are able to practise their religion and commonly needed religious items are available.
- The facility provides for the needs of detainees and visitors with disabilities.

21. The specific needs of female detainees held in shared facilities are met.²¹

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

²¹ See separate Expectations for women in immigration detention.

- Female staffing ratios are appropriate to the size of the female population.
- All staff have a clear understanding of the specific needs of women, including those who are separated from dependants and pregnant women.
- Policies and procedures recognise the specific needs of women from the first point of detention.
- Women in shared facilities have regular and equitable access to facilities and activities, with appropriate levels of privacy.
- Women are provided with suitable hygiene and sanitary products.
- Pregnant women are detained only in exceptional circumstances and receive appropriate support. Force is never used against them simply to effect removal. It is only used to prevent harm.

22. Detainees' health care needs are met.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees are promptly screened by health services staff on arrival.
- All detainees have access to health care provided by suitably qualified staff.
- Detainees held for more than 24 hours receive a health screening.
- Detainees continue to have access to their prescribed medication unless it is discontinued on medical advice.
- Substance use needs are identified and treated appropriately.

In relation to expectations 17–22 above: Human rights standards recognise that places of detention should be managed in accordance with the obligation to respect the humanity and inherent dignity of those detained, and require that staff and managers have the necessary aptitude and training to perform their roles. See SMR 74.1, 75, 76, 79.1; EPR 71–77, 81, 83, 87.1; UNHCR–DG 8[48(xvi)]; CPT 6.

Staff working with detainees with particular vulnerabilities should be given specialised training. See EPR 81.

Human rights standards require detainees to be able to make requests and complaints and to do so without reprisal or punishment. Requests and complaints must be responded to promptly. See SMR 56, 57; EPR 70; BOP 33; UNHCR–DG 8 [48(xv)]; CPT 8.

Non-discrimination is a fundamental principle enshrined in human rights treaties and standards. See ICCPR 26; CERD 1, 2; CEDAW 1,2; ICESCR 2.2; CAT 1; CRPD 5. Human rights standards relating to places of detention should be

applied impartially and without discrimination. See SMR 2; EPR 13; BOP 5. See additionally in relation to women BR 1, 30–33.

In addition to the general non-discrimination provisions set out above, there are specific human rights standards relating to some protected characteristics, including the following:

- Detainees with disabilities: CRPD 2, 3, 5, 9, 14; SMR 5.2, 55.2, 109.2; UNHCR–DG 9.5.
- Detainees from national, ethnic, cultural, religious or linguistic minorities: DRM 2; EPR 38. See additionally BR 54.
- Sexual orientation and gender identity: UNHCR–DG 9.7; Yogyakarta Principles; Council of Europe Committee of Ministers, Recommendations on measures to combat discrimination on grounds of sexual orientation or gender identity.
- Older detainees: UNHCR–DG 9.6.
- Women: In relation to ensuring private accommodation for women, see UNHCR–DG 8[48(v)]; SMR 11; EPR 18.8.
- All persons have the right to freedom of thought, conscience and religion. See ICCPR 18; ECHR 9. Human rights standards require that there be no discrimination on the grounds of religion or religious belief and that prisoners belonging to religious minorities must be able to profess and practise their religion without any interference, see EPR 13, 29; SMR 2, 65, 66; BOP 5; UNHCR–DG 8 [48(ix)].

See also standards relating to safeguarding vulnerable adults (in relation to expectations 5–8 above).

Standards require detainees' health care needs to be assessed on arrival, including identifying all health care needs, the risk of self-harm and any previous ill-treatment. See EPR 40; SMR 30. See additionally in relation to women, BR 6–8. Standards require health needs to be monitored and met throughout detention. See EPR 39, 46; SMR 24, 27, 31–34 and additionally in relation to women BR 10, 11, and children, CRC 24; HR 49, 50.

Section 3: Preparation for removal and release

Contents

- Communications
- Leaving the centre

Communications

Detainees are able to maintain contact with the outside world using a full range of communications media.

Expectations

24. Detainees are able to maintain contact with the outside world through easy access to visits and a full range of communications media.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- There is sufficient access to telephones at all times.
- Detainees can make international phone calls at rates comparable to those available in the community.
- Detainees without money are provided with a reasonable number of free calls of sufficient length.
- Detainees are able to use personal email accounts and have internet access, and can open attachments.
- All legitimate websites are accessible. There are effective procedures for quickly and permanently unblocking sites that have been inappropriately restricted.
- Detainees have free access to video calling and social networking to support contact with family and friends. Access is restricted only on the basis of documented individual risk assessment.
- Detainees can quickly and easily send and receive faxes, without charge and without restrictions on length, to ensure that legal documents are transmitted in their entirety.
- Information about local or national visiting groups is available to detainees.
- Unless there are legitimate security considerations, detainees are able to have visitors. Visitors are able to deliver property.

In relation to expectation 24 above: Human rights standards require detainees to be able to keep in contact with the outside world through various means, including digital means and visits. See SMR 58, 63, 106; EPR 24; BOP 19; UNHCR–DG 8[48(vii)]; CPT 2, 5. See additionally in relation to women, BR 26, 28.

Leaving the centre

Detainees are prepared for their release, transfer or removal. They are able to retain or recover their property. Families with children and others with specific needs are not detained without items essential for their welfare.

Expectations

25. Detainees are helped to prepare for their release, transfer or removal.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Immigration staff work with other staff in the facility to ensure that detainees are prepared for their removal and are given adequate time and facilities to consult their legal representatives.
- Detainees are able to inform legal advisers, family and friends of when they are to be released, transferred or removed from the centre, subject to any legitimate security issues.
- Those being transferred to further detention are informed of the reasons for this decision and about the centre to which they are being transferred in a language they understand.
- Detainees being removed are given information about sources of support in the destination country.
- Detainees are given advice and assistance on immediate needs, such as housing and finance. Every effort is made to ensure that no one is released without accommodation.

26. Detainees who are to be removed or released are treated sensitively and humanely. Detainees are able to retain or recover their property.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees considered to be vulnerable to harm or neglect, or to be at risk of self-harm or violent behaviour, have an individual risk assessment and care plan where appropriate.
- Systems are in place to arrange for property to be restored and any private cash to be withdrawn from accounts prior to removal/release.
- Detainees being removed have clothing suitable for the climate to which they are going and can carry their belongings in a suitable bag.
- Immediate housing, financial and other support needs are addressed before detainees are released.

In relation to expectations 25 and 26 above: Human rights standards emphasise that consideration must be given from the beginning of a period of detention to the detainee's future after release, including the detainee's need for assistance on release. Detainees must be provided with adequate clothing and sufficient means to reach their destination and to maintain themselves in the period immediately following their release. See SMR 108; EPR 33.7, 33.8. See additionally in relation to women, BR 46–47.

In addition, standards require removal orders to be issued in accordance with law and detainees to be informed in advance of their removal. See TGFR 2, 4, 15. Standards also cover conditions of transport and return of property. See SMR 73; EPR 31, 32, 33.4. Detainees must be treated with respect for their dignity and human rights at all times. See SMR 1; EPR 1.

See also standards relating to safeguarding vulnerable adults (in relation to expectations 5–8 above).

4. OVERSEAS ESCORTS²²

Section 1: Safety

Contents

- Preparation and departure from removal centres
- Safeguarding adults and personal safety
- Safeguarding children
- Legal rights

²² These Expectations are used for both international and domestic escort inspections, with expectations that are not relevant to domestic inspections disregarded.

Preparation and departure from removal centres

Detainees are escorted in safety and due regard is given to individual needs and risks. Removals are conducted in accordance with law. Security and good order are maintained through proportional operational arrangements and force is only used as a last resort.

Expectations

- 1. Detainees are adequately prepared for the removal. They are treated with respect and sensitivity at the initiation of the journey, and staff understand individual needs and risks.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees are not subject to unnecessary or ill-timed journeys in the 48 hours before the removal.
- Collection from the place of detention is managed sensitively and humanely. The needs and potential distress of detainees are understood and reflected in staff behaviour during the discharge process.
- Escort staff introduce themselves to new detainees.
- Information about detainees' needs is communicated between staff sensitively.
- Detainees considered vulnerable²³ have a risk assessment and a care plan where appropriate, which travel with them at all times. Information relating to health and special needs, such as whether they are accompanied by children, or whether they are at risk of harm to themselves or others, is relayed to escort staff.
- Systems are in place to arrange for property to be restored and any private cash to be withdrawn from accounts before removal.

²³ There is no universally agreed definition of vulnerability in detention. As Stephen Shaw's 2016 report, *Review into the Welfare in Detention of Vulnerable Persons: A Report to the Home Office* (CM9186), points out, some commentators consider all of those in detention to be vulnerable because they are detained. Others prefer to describe groups that are in 'situations of vulnerability', as opposed to intrinsically vulnerable groups, thereby stressing the largely contextual nature of vulnerability. It is common for groups such as those with serious mental or physical health problems, children, elderly people, pregnant women, LGBTI people, people with disabilities, asylum-seekers, and those who have experienced torture, trafficking or gender-based violence, including female genital mutilation, to be considered especially at risk of harm or neglect in detention. In these *Expectations*, we use the terms 'vulnerable' and 'vulnerability' to refer to these groups, but also to any other individuals or groups who may be at risk of harm or neglect as a result of other personal, social and environmental factors; these factors may be fixed or change over time and the degree of vulnerability may change as a result.

In relation to expectation 1 above: Human rights standards require removal orders to be issued in accordance with law and detainees to be informed in advance of their removal. See TGFR 2, 4, 15. Standards also cover conditions of transport and return of property. See SMR 73; EPR 31, 32, 33.4. Detainees must be treated with respect for their dignity and human rights at all times. See SMR 1; EPR 1.

In addition, see standards relating to safeguarding vulnerable adults (in relation to expectation 2–5 below).

Safeguarding adults and personal safety

Detainees are escorted safely with due regard for their vulnerability. Security and good order are maintained through proportionate operational arrangements and force is only used as a last resort.

Expectations

2. Security and good order are maintained through effective, reasonable and proportionate operational arrangements.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees are searched sensitively and the gender ratio of staff is appropriate to care for men and women.
- Instructions to detainees are clear, reasonable and respectful.
- Rules are applied openly, fairly and consistently.
- The behaviour and appearance of staff are not threatening or intimidating.
- The purpose of any protective measures, such as filming of detainees during boarding, is explained to detainees and in advance whenever possible.

3. Force is only used as a last resort, to the minimum degree and for the shortest possible time.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Force is used only when all non-violent means of securing compliance have failed. It is comprehensively recorded and subject to rigorous management monitoring and governance.
- Staff are trained in and routinely use de-escalation techniques.

- Force is never used against pregnant women simply to effect removal. It is only used to prevent harm.
- Restraints are only used as a last resort and for the shortest possible period. Restraints are necessary, proportionate and properly authorised.
- Detainees subject to control and restraint procedures are seen by a health care practitioner as soon as possible after restraint is removed.
- Use of force data are monitored and any emerging patterns are identified and acted on.
- Use of force documentation and associated CCTV or video footage is scrutinised by senior managers to identify opportunities for improvement and possible ill-treatment. Any concerns are investigated, lessons are learned and appropriate action is taken.
- Detainees transported separately are in appropriate vehicles, and monitored closely for their physical, emotional and mental well-being. Staff keep accurate records.

4. Detainees feel and are safe from bullying and victimisation.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees are supervised and safe at all times.
- Staff are alert to potential bullying and all forms of victimisation.
- Staff wear identification and challenge colleagues whose behaviour falls below acceptable standards.
- Detainees are protected from unwanted sexual attention.
- Male and female detainees and children are transported separately, unless related.
- Staff are aware of their personal and professional responsibility to safeguard adults at risk and undergo appropriate training.

5. Adults who are at risk of harm or suicide receive personal and consistent support to address their individual needs and have unhindered access to help.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it:

- There are effective procedures for managing the risks of self-harm, e.g. individual observation logs.
- Staff show care for those who are distressed or are vulnerable to harm, record significant events and refer quickly to medical staff when necessary. There is continuity of care throughout the removal process.
- All staff are fully trained in suicide prevention and understand contingency and intervention plans.

In relation to expectation 2–5 above: In addition to human rights standards that require vulnerable adults to be safeguarded, human rights standards require the right to life of detainees to be protected and promoted, and detainees to be treated with respect for their dignity and human rights. Specific standards require detainees to be provided with sufficient mental health care. See SMR 1, 2, 30, 31, 33; EPR 1, 25.4, 42.3, 43.1, 47.2, 52.2, 52.4; CCLEO 6; UNHCR–DG 8[48(vi)]; ECHR 2; ICCPR 6, 10; CPT 2, 9. See additionally in relation to women, BR 12, 13, 16, 35.

Human rights standards establish that searches should only be carried out in accordance with defined procedures and in accordance with the principles of proportionality, legality and necessity. Any search must be carried out with respect for the dignity of detainees and their possessions. See SMR 50–52; EPR 54, BR 19.

In addition, human rights standards only allow for the use of force and restraints when absolutely necessary and as a measure of last resort. If it is absolutely necessary to use force or restraint, this must be the minimum necessary and only imposed for the time period required. There must be clear procedures governing the use of force and restraint.

In relation to restraint, see SMR 47–49; EPR 68, CPT 6, 7. In relation to the use of force see SMR 82; EPR 64–66; BPUFF 15. See additionally in relation to women, BR 24.

For standards relating to safety and reporting abuse generally, see EPR 52.2, 55; BR 25.1, 31; UNHCR–DG 8[48(xv), (xvi)].

Safeguarding children

The welfare of children is promoted and they are protected from all kinds of harm and neglect during escort.

Expectations

6. Children are properly protected during all stages of a removal. All staff safeguard and promote their welfare.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- A comprehensive child protection policy and guidance are in place, which have been agreed by the local safeguarding children board or equivalent.
- All staff are aware of their personal and professional duty of care to any children, and receive appropriate training.
- Staff promptly raise any concerns about the safety and welfare of children in accordance with agreed referral procedures.
- All staff who have contact with children are properly vetted and trained.
- Staff are aware of their duty to raise legitimate concerns about the conduct of colleagues in relation to the treatment and management of children. Staff are encouraged by managers to raise any such concerns, and feel confident and safe to do so.
- If any detainee claims to be under 18 before or during any part of the removal, they are referred immediately to the Home Office for advice.

In relation to expectation 6 above: For human rights standards relating to the safeguarding of children, see CRC 3, 33–37; CPT 10; UNHCR–DG 9.2.

Legal rights

Detainees can exercise their legal rights. Removals are conducted in accordance with law.

Expectations

- 7. Removal is conducted in accordance with law and published policy. Detainees understand their legal rights and can communicate freely with their legal representatives.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- All detainees are served with correct documentation for removal, in accordance with legally set timescales, in a language that they understand.
- Detainees have proper access to legal advice. They are able to tell legal advisers and family when they are to be removed from the centre. Free telephone and fax facilities are made available for this purpose.
- Home Office staff present during the removal ensure that both legal requirements and the duty of care are carried out properly.

In relation to expectation 7 above: Human rights standards require removal orders to be issued in accordance with law and detainees to be informed in advance of their removal. See TGFR 2, 4, 15.

In addition, standards require detainees to be able to access independent legal advice and to be allowed confidential visits and correspondence with their legal representative. See EPR 23; BOP 17, 18; SMR 61; BRPL 8; CPT 2.

Section 2: Respect

Contents

- Physical conditions and property
- Respectful treatment

Physical conditions and property

Detainees are escorted in decent physical conditions and individual needs are addressed. Detainees are treated with humanity and respect.

Expectations

9. The physical conditions for detainees during the journey are decent, and cater for those who have specific needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees travel by road in vehicles that are safe, secure, clean and comfortable, with adequate storage for their property and with emergency supplies and hygiene packs suitable for the needs of women and children.
- Detainees with special needs – including pregnant women, parents with babies, children, older or disabled detainees or those with a mental health problem – receive appropriate treatment during transit and are treated with dignity.
- Detainees are held in vehicles or aircraft for the minimum possible period of time. Any delays are explained.
- Seating arrangements in aircraft are comfortable and adequate for the length of journey. Detainees have sufficient freedom of movement, subject to risk assessment.
- During their journeys, detainees have access to drinking water and refreshments at no charge. Food is healthy, varied, balanced and suitable for diverse needs. Hot food and drinks are provided on flights.
- Detainees have private access to sanitation and to washing facilities that are clean and in working order. Women's sanitary products are freely available. Nappies and nappy changing facilities are available for babies.

10. Detainees have adequate clothing and their possessions are stored securely.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees being removed have clothing, suitable for the climate to which they are going, and can carry their belongings in a suitable bag.
- Detainees' property is handled with proper care, and any concerns about property or money are handled effectively and with consideration.

- Reasonable and determined steps are taken to recover missing property.
- Detainees can keep money and valuables with them if they wish, subject to risk assessment.
- Detainees are provided with blankets and pillows during flights.

In relation to expectations 9 and 10 above: Human rights standards cover conditions of transport and return of property. See SMR 73; EPR 31, 32, 33.4. Standards also require suitable clothing to be provided to those who do not have their own. See EPR 20; SMR 19–20; UNHCR–DG 8[48(x)]; CPT 4.

Detainees must be treated with respect for their dignity and human rights at all times. See SMR 1; EPR 1.

Respectful treatment

Detainees are treated with respect by all staff. Effective complaints procedures are in place for detainees. There is understanding of detainees' diverse cultural backgrounds. Detainees' health care needs are met.

11. Detainees are treated with humanity and respect for their human dignity at all times. Escort staff interact positively with them.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Staff interact politely and positively with detainees, use preferred names and check detainees understand what is said to them.
- Staff have training in and show proper regard for the uncertainty of detainees' situations, particularly immigration issues and cultural backgrounds.
- Staff set a personal example in the way they carry out their duties.
- Staff introduce themselves to new detainees and wear identification that clearly displays their name and status.
- Staff establish the nationality of the detainee and their first and any other languages, and are careful to make themselves understood and to understand what the detainee may wish to say.
- Staff do not use inappropriate language or behave in ways that are likely to cause or increase stress or discomfort.
- Information about detainees' needs is communicated between staff sensitively.

- Sufficient information is provided to detainees about the process and about what will happen. This is translated where necessary.

12. An effective complaints system is in place.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees are able to submit feedback or complaints in their own language, about any aspect of their treatment, including confidential written complaints, both during escort and following arrival in the destination country. They are informed of how to do so, advised of the procedure and assisted by staff if necessary.
- Determined efforts are made to ensure that detainees receive a swift response to comments or complaints, regardless of location.
- Responses are communicated in the language in which the complaint was submitted.

13. All staff work effectively to eliminate unlawful discrimination and promote fair treatment.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Managers and staff promote an understanding of and demonstrate respect for all ethnic, national, cultural and other diverse groups. Inappropriate language or conduct by staff or detainees is challenged.
- Staff are trained in diversity issues and understand the potential needs and vulnerabilities of detainees that relate to their protected characteristics.
- Professional interpretation is used wherever necessary to ensure effective communication with detainees who do not speak fluent English.
- Detainees with special needs receive appropriate treatment.
- Detainees are able to practise their religion as far as is practicable.

14. The specific needs of female detainees are met.²⁴

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Female detainees are escorted by female staff.

²⁴ See separate *Expectations* for women in immigration detention.

- All staff have a clear understanding of the specific needs of women in detention, including those who are separated from dependants and pregnant women.
- Policies and procedures recognise the specific needs of women in detention.
- Women have regular, equitable and safe access to any available facilities and activities, with appropriate levels of privacy.
- Women are provided with suitable hygiene and sanitary products.
- If pregnant women are removed under escort, force is never used against them simply to effect removal. It is only used to prevent harm.

15. Detainees' health needs are met.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- All detainees have immediate access to health care from suitably qualified staff, and detainees with significant health needs have easy access to health care professionals.
- Detainees who need to take medication during escort are able to do so.
- Health staff at the centre share pertinent medical information with the escorting health professional to ensure continuity of care. The escorting health professional can access a patient's medical summary in a medical emergency.
- Before removal, detainees are provided with a summary of their medical notes or discharge letter to ensure continuity of care.

In relation to expectations 11–15 above: Human rights standards recognise that places of detention should be managed in accordance with the obligation to respect the humanity and inherent dignity of those detained, and require that staff and managers have the necessary aptitude and training to perform their roles. See SMR 74.1, 75, 76, 79.1; EPR 71–77, 81, 83, 87.1; UNHCR–DG 8[48(xvi)]; CPT 6. Staff working with detainees with particular vulnerabilities should be given specialised training. See EPR 81.

Human rights standards require detainees to be able to make requests and complaints and to do so without reprisal or punishment. Requests and complaints must be responded to promptly. See SMR 56, 57; EPR 70; BOP 33; UNHCR–DG 8 [48(xv)]; CPT 8.

Non-discrimination is a fundamental principle enshrined in human rights treaties and standards. See ICCPR 26; CERD 1, 2; CEDAW 1, 2; ICESCR 2.2; CAT 1; CRPD 5. Human rights standards relating to places of detention should be applied impartially and without discrimination. See SMR 2; EPR 13; BOP 5. See additionally in relation to women BR 1, 30–33.

In addition to the general non-discrimination provisions set out above, there are specific human rights standards relating to some protected characteristics, including the following:

- Detainees with disabilities: CRPD 2, 3, 5, 9, 14; SMR 5.2, 55.2, 109.2; UNHCR–DG 9.5.
- Detainees from national, ethnic, cultural, religious or linguistic minorities: DRM 2; EPR 38. See additionally BR 54.
- Sexual orientation and gender identity: UNHCR-DG 9.7; Yogyakarta Principles; Council of Europe Committee of Ministers, Recommendations on measures to combat discrimination on grounds of sexual orientation or gender identity.
- Older detainees: UNHCR–DG 9.6.
- All persons have the right to freedom of thought, conscience and religion. See ICCPR 18; ECHR 9. Human rights standards require that there be no discrimination on the grounds of religion or religious belief and that prisoners belonging to religious minorities must be able to profess and practise their religion without any interference. See EPR 13, 29; SMR 2, 65, 66; BOP 5; UNHCR–DG 8 [48(ix)].

See also standards relating to safeguarding vulnerable adults (in relation to expectations 2–5 above).

Human rights standards require that the health care needs of detainees are monitored and met. See ICESCR 12; SMR 27; EPR 39.

Section 3: Preparation for reintegration

Contents

- Preparation for reintegration

Preparation for reintegration

Detainees are prepared for their arrival and early days in the destination country. Any unacceptable behaviour in destination countries is appropriately challenged.

Expectations

- 17. Detainees are helped to prepare for their arrival and early days in the destination country and the arrival is managed as smoothly and constructively as possible.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees are given information about the destination country, including assistance for those without means to support themselves, or without family and friends in that country. Such information is also given in advance of the removal and detainees are helped to contact sources of support and advice.
- Staff promptly refer any concerns expressed by detainees about reintegration to Home Office staff, and Home Office staff give appropriate information and advice.
- Home Office staff liaise with the officials of the receiving country, ensuring clarity in handover arrangements, and brief senior escort staff on the arrangements.
- Final disembarkation is managed calmly and in accordance with agreed procedures.

- 18. If Home Office or escort staff witness any threatening, abusive or unacceptable behaviour by receiving authorities on disembarkation, this is appropriately challenged.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Any unacceptable behaviour is clearly documented.
- There is a mechanism for representations to be made to receiving countries.
- Detainees are able to complain of any unacceptable behaviour during the removal process after removal.

Standards require removal orders to be issued in accordance with law and detainees to be informed in advance of their removal. See TGFR 2, 4, 15. Standards also require detainees to be able to make a complaint about treatment that occurred during removal. See TGFR 20. They also cover conditions of transport and return of property. See SMR 73; EPR 31, 32, 33.4. Detainees must be with respect for their dignity and human rights at all times, see SMR 1; EPR 1.

See also standards relating to safeguarding vulnerable adults (in relation to expectations 5–8 above).

5. FAMILY DETENTION

Section 1: Safety

Contents

- Arrival and early days in detention
- Safeguarding adults and personal safety
- Safeguarding children
- Legal rights

Arrival and early days in detention

Families²⁵ travelling to and arriving at the centre are treated with respect and care. Risks are identified and acted on. Families are supported on their first night and given an effective induction. They are welcomed into safe and decent conditions. Due regard is given to the specific needs of children.

Expectations

1. Families travel in decent conditions and are treated with respect.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Escort staff are polite and respectful to detainees and are aware of the particular needs of children and families. They ensure that parents have what they need to enable them to take care of their children during the journey.
- Families are given comfort breaks and refreshments during transfer sufficient to meet the needs of babies and children.
- Families are only subject to night-time moves in exceptional circumstances.
- Families should receive an adequate meal and drink at mealtimes.
- Families are not kept waiting on vehicles after arrival.

2. Families are safe at all times while under escort, and individual needs are recognised and given proper attention.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Vehicles are safe, secure, clean and comfortable, with adequate storage for families' property and with emergency supplies and hygiene packs suitable for the needs of women and children.
- Appropriate vehicles are used to transport detainees with specific needs, such as pregnant women, women with babies, children, and detainees with a disability, in a dignified manner.
- Families are transported together. Unrelated male and female detainees and children are transported separately.
- The fears and anxieties of children are recognised by escort staff and they assist parents appropriately to comfort and reassure their children.

²⁵ The term 'families' is used here in a broad sense and may, for example, include unmarried and same sex couples.

- Staff who escort children are subject to enhanced criminal background checks and are trained in and fully conversant with their statutory duty to safeguard and promote the welfare of children.
- Information relating to individual needs and risks is passed between places of detention and is known to escort staff.
- Methods of restraint are only used on adults in exceptional circumstances and for the shortest possible time, and the impact on children of any such action is considered.
- The Home Office obtains and makes available relevant background information on children and families for escort staff prior to detention.
- Arrest teams allow families adequate time to prepare for their journey, to dress appropriately and to collect essential belongings, including medication and paperwork.

3. Families understand where they are going and what to expect when they arrive.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Parents are given reasonable notice of, and reasons for planned transfers in a language they understand. They have the opportunity to make a telephone call to their families and legal advisers.
- Parents are allowed time to talk to their children and explain what is going to happen in order to minimise their fears and anxieties as far as is possible.
- Detainees are given information in a format and language they understand.

4. Families feel and are safe on their arrival at the centre.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Escort providers routinely contact the centre to which they are travelling before arrival to advise them of whom they are carrying.
- All detainees are held with correct documentation, including any assessment of their vulnerability, evidence of authority to detain (IS91) and the reasons for detention (IS91R).
- Families have their immediate needs assessed on arrival in an appropriate environment. Parents are allowed time with their children on arrival so that they are able to comfort and reassure them.
- Interpretation is used for those who are not fluent in English.

5. Families are treated with respect and sensitivity on arrival at the centre.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Centre staff have detailed advance knowledge of families and take steps to prepare a tailored welcome for them.
- Families are received promptly into a welcoming and supportive reception environment that is clean, supervised and suitable for children.
- There is a discrete area where parents can spend time with their children to comfort and reassure them.
- Families are greeted courteously in the centre. Staff establish the nationality of the detainees and languages spoken.
- There are staff available who are trained to work with children in distress.
- Translated information is provided and interpretation is used as necessary to ensure good communication with detainees.
- The gender ratio of staff is appropriate for receiving detainees and undertaking searching procedures. Searching is carried out sensitively and is kept to a minimum.
- Soon after arrival, detainees are able to make free telephone calls in private and are offered drinks and food.
- Detainees are able to retain all items of clothing unless an individual risk assessment indicates otherwise.
- Detainees are able to have a shower. If necessary, clean clothing is provided.
- Parents are given what they need for their children.

6. Families are fully supported on arrival and for the duration of detention.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Families are able to obtain assistance with pressing support needs.
- Staff introduce themselves to new families and wear identification that clearly displays their name and status. Information about detainees' needs is communicated between staff sensitively.
- Parents are asked about their children's routines so that they can be maintained as far as possible while in detention.
- Families are encouraged and enabled to be self-sufficient. Parents are encouraged and enabled to parent their children.
- Families understand the centre's routines and how to access available services that will help them cope with detention.

- Staff provide appropriate support to families during their first night in detention.
- Detainees are able to obtain or retain basic toiletries on arrival.

In relation to expectations 1–6 above: Human rights standards set out a number of requirements applicable to arrival and early days in detention. These include in relation to conditions of transport, requiring the provision of information in a language and way detainees understand, identifying the health care and other needs of detainees and allowing detainees to contact family and legal counsel. See SMR 1, 7, 50, 54, 55, 58, 62, 67, 68, 73; EPR 15.1, 15.2, 16; 24.8, 30, 31, 32, 37; BOP 1, 16, 24, 31; UNHCR–DG 7, 8; TGFR 10; CPT 2, 4, 9, 10. See additionally in relation to women, BR 2, 3, 5–8, 19; EPR 19.7.

In relation to the arrival and early days of children in detention, see HR 21, 26, 50; CRC 2, 3, 19, 22. In relation to the right of children to be cared for by their parents, see CRC 3.2, 5, 18.2.

Any search must be carried out with respect for the dignity of detainees and their possessions. See SMR 50-52; EPR 54; BR 19.

Safeguarding adults and personal safety

The centre promotes the welfare of families and protects them from all kinds of harm and neglect and reduces the risk of self-harm and suicide. Families are protected from bullying and victimisation and the use of force is proportionate to the need to keep detainees safe. Force is never used against children unless it is to protect them or others from immediate harm.

Expectations

7. Families feel and are safe around other detainees and staff.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- There are systems in place to ensure that staff identify, fully assess and properly manage the risk that detainees may present to children.
- Staff are alert to potential bullying and all forms of victimisation.
- Staff confront and challenge unacceptable behaviour.
- Staff supervision provides protection for detainees in all areas of the centre.
- Detainees are protected from unwanted sexual attention.

8. Adults who are vulnerable to harm or neglect are held in a safe environment and given appropriate care and support.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Safeguarding procedures and guidance are known and used by all staff, including on how to make the necessary referrals.
- All staff in contact with detainees are trained in the identification and care of vulnerable detainees.²⁶
- The centre promptly informs the Home Office of all detainees who may be vulnerable to harm in detention. The Home Office keeps centre staff informed about its assessment of risk to individual detainees.
- An individual care plan is in place to address a detainee's assessed needs.
- When abuse of a detainee is alleged or suspected to have occurred, prompt and appropriate action is taken to protect the detainee and this is swiftly communicated to the Home Office.
- Staff are aware of their personal and professional responsibility to protect adults at risk and undergo appropriate training.
- Staff are subject to recruitment and vetting procedures which comply with necessary legislation.

9. The centre provides a safe environment which actively reduces the risk of self-harm and suicide.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- There is a clear strategy for preventing self-harm and suicide, which includes effective multidisciplinary procedures and care planning to help reduce risks.
- All staff are fully trained in suicide prevention.
- Rooms and toilets are free of ligature points as far as is practicable and suitable levels of supervision are in place.

²⁶ There is no universally agreed definition of vulnerability in detention. As Stephen Shaw's 2016 report, *Review into the Welfare in Detention of Vulnerable Persons: A Report to the Home Office* (CM9186), points out, some commentators consider all of those in detention to be vulnerable because they are detained. Others prefer to describe groups that are in 'situations of vulnerability', as opposed to intrinsically vulnerable groups, thereby stressing the largely contextual nature of vulnerability. It is common for groups such as those with serious mental or physical health problems, children, elderly people, pregnant women, LGBTI people, people with disabilities, asylum-seekers, and those who have experienced torture, trafficking or gender-based violence, including female genital mutilation, to be considered especially at risk of harm or neglect in detention. In these *Expectations*, we use the terms 'vulnerable' and 'vulnerability' to refer to these groups, but also to any other individuals or groups who may be at risk of harm or neglect as a result of other personal, social and environmental factors; these factors may be fixed or change over time and the degree of vulnerability may change as a result.

- Staff manage the risk to children when members of their family are at risk of self-harm.
- Detainees are monitored at high-risk times, such as when removal is imminent.
- Staff are alert to and take seriously the vulnerability of detainees who are not eating. Missed meals are monitored and detainees are given encouragement, care and support to resume eating.
- Staff routinely carry anti-ligature knives.
- Incidents of self-harm are closely monitored and analysed at regular intervals to establish any trends and to implement preventive measures. Serious incidents are properly investigated to establish what lessons can be learned and to promote good practice.

10. Detainees are only subject to force as a last resort when other methods have failed. When used, force is legitimate, necessary and proportionate, and subject to rigorous governance. Force is never used against children unless it is to protect them or others from immediate harm.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Staff are trained in and routinely use de-escalation techniques.
- There is an up-to-date and published policy on how children who are resisting removal are to be managed.
- Restraints are only used as a last resort and for the shortest possible period.
- Force is only used in exceptional circumstances with due regard to the effect on children witnessing it. If used in front of children, the impact on the child is promptly and appropriately assessed and recorded.
- Force is never used on children or on pregnant women unless it is to protect them or others from immediate harm. Only approved techniques are used in such circumstances.
- Planned use of force is properly authorised and video recorded. All staff involved in the use of force complete appropriate reports promptly and in detail.
- Detainees subject to control and restraint procedures are seen by a health care practitioner as soon as possible after restraint is removed.
- Use of force documentation and associated CCTV or video footage is scrutinised by senior managers to identify opportunities for improvement and possible ill-treatment. Any concerns are investigated, lessons are learned and appropriate action taken.
- Detainees and their legal representatives are able to promptly access records that staff hold of incidents where force has been used on them.

- There is effective oversight by the Home Office and Independent Monitoring Board.
- Detainees kept separate are in appropriate accommodation, and are monitored closely for their physical, emotional and mental well-being. Staff keep accurate records.
- Detainees are separated for the shortest possible period. They have access to phones and social and legal visitors, and are visited by religious ministers, welfare staff and centre managers.

In relation to expectations 7–10 above: Persons held in immigration detention may be or become vulnerable to harm during their detention, including harm that arises or is exacerbated because they are detained. Human rights standards require the individual needs and circumstances of detainees to be assessed and regularly reviewed in order to identify their vulnerabilities, monitor the impact of detention on them and safeguard them from harm. Human rights standards also recognise that some individuals should not be held in immigration detention due to their vulnerability. See UNHCR–DG 8 [48(vi)], 9.1, 9.4–9.7; SMR 2, 33, 34, 109; BOP 5; EPR 12.1, 12.2, 16, 25.4, 42.3, 43.1, 52.1; CPRD 5, 12, 14–17, 25; CPT 9, 10. See additionally in relation to women, UNHCR–DG 9.3; CEDAW 6; BR 25, 31, 33, 42.4, 66; EPR 34.1, 34.2.

Human rights standards require prompt and impartial investigation where there are reasonable grounds to believe an act of torture or ill-treatment has occurred in detention, or when an allegation of torture or ill-treatment is made by a detained individual. See SMR 1, 30, 34, 54–57, 71, 72, 76; EPR 1, 42, 81; BOP 33; CAT 2, 12, 13, 16; ECHR 3; ICCPR 7, 10.1; CPT 8.

For standards in relation to safety and reporting abuse, see EPR 52.2, 55; BR 25.1, 31; UNHCR–DG 8[48(xv)], (xvi)].

In addition to human rights standards that require vulnerable adults to be safeguarded, human rights standards require the right to life of detainees to be protected and promoted, and detainees to be treated with respect for their dignity and human rights. Specific standards require detainees to be provided with sufficient mental health care. See SMR 1, 2, 30, 31, 33; EPR 1, 25.4, 42.3, 43.1, 47.2, 52.2, 52.4; CCLEO 6; UNHCR–DG 8[48(vi)]; ECHR 2; ICCPR 6, 10; CPT 2, 9. See additionally in relation to women, BR 12, 13, 16, 35.

Human rights standards only allow for the use of force and restraints when absolutely necessary and as a measure of last resort. If it is absolutely necessary to use force or restraint, this must be the minimum necessary and only imposed for the time period required. There must be clear procedures governing the use of force and restraint. In relation to restraint, see SMR 47–49; EPR 68, CPT 6, 7. In relation to the use of force, see SMR 82; EPR 64–66; BPUFF 15. See additionally in relation to women, BR 24, and children, HR 63–65.

Safeguarding children

The centre promotes the welfare of children and protects them from all kinds of harm and neglect.

Expectations

11. Children are held in a secure environment that protects them from harm and neglect. They are given effective care and support.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- The welfare of the child is paramount in all reviews and decisions relating to ongoing detention.
- All staff who have contact with children are properly vetted and trained.
- There is regular monitoring of the number of children detained, their age and the duration of their detention.
- Staff are alert to children's distress and appropriate specialist support is provided. Families are involved appropriately and are used as a source of support and protection for their children.
- There is evidence of ongoing links between the local safeguarding children board or equivalent, and the centre.
- The centre is fully compliant with the requirements of any independent review, or other such process, initiated by the local safeguarding children board (or equivalent) following instances of significant harm occurring to a child or young person in detention.

12. Children are properly protected in a safe environment. All staff safeguard and promote their welfare.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- A comprehensive child protection policy and guidance are in place, which have been agreed by the local safeguarding children board or equivalent.
- There is a child protection coordinator who is a senior member of staff and is suitably trained and experienced to carry out this task.
- Accurate and up-to-date information is provided to the centre in advance, in particular, on any child who is on a child protection register or any adult who is subject to public protection measures.
- Staff are aware of their duty to raise legitimate concerns about the conduct of colleagues in relation to the treatment and management of

children. Staff are encouraged by managers to raise any such concerns, and feel confident and safe to do so.

- When abuse is alleged or suspected to have occurred, prompt and appropriate action is taken to protect the child and support them.
- Referral procedures and subsequent arrangements for investigation by the local authority are clearly set out in the policy. Removal is delayed pending the outcome of any such investigation.
- Referral criteria take account of the specific needs of children in detention.
- Visitors and families know how to make a referral directly to the local authority if they are concerned that a child is being, or has been, maltreated while in custody.
- Any allegation of maltreatment of a child by a member of staff is referred to the local authority designated officer whose role is clearly described.
- The centre provides a range of therapeutic, counselling and advice services, either directly or through external providers, which are available to children who have suffered any form of abuse.
- Staff receive specific training on how to handle a disclosure of abuse made to them by a child or young person. Staff are offered ongoing supervision and support following their involvement in a disclosure.
- There is a robust 'checks and balances' system that ensures that all allegations of maltreatment are quality assured by more than one senior person who has the expertise and independence to deal with the allegations objectively.
- The child protection database records all child protection referrals, the outcomes of investigations and the stage that those yet to be completed have reached. It is held securely so that an appropriate level of confidentiality is maintained with access granted to the duty manager as required.
- Child protection referrals are monitored to identify patterns and trends.

In relation to expectations 11 and 12 above: Human rights standards prohibit the arbitrary detention of children and provide children with the right to challenge the legality of their detention. Children should only be detained as a last resort and for the shortest possible period of time. Unaccompanied children should not be detained and must be provided with special protection and alternative care. The best interests of the child must be a primary consideration in all actions concerning children. See CRC 3, 20, 22.1, 37(b), (d); ICCPR 9.1, 9.4; HR 2; UNHCR–DG 9.2; CPT 10.

Any child who is detained or who is visiting a detention centre must be protected from exploitation and abuse and be provided with care and protection to ensure their well-being. Children's rights to, among other things, education, play and to the highest attainable standard of health must be promoted. See CRC 3.2, 3.3,

24.1, 28.1, 31, 33–37, 39; UNHCR–DG 8, 9.2; HR 82, 85–87; CPT 10. See additionally in relation to women, BR 28.

Legal rights

Parents are fully aware of and understand their detention, following their arrival at the centre and on release. Parents are supported by the centre staff to freely exercise their legal rights.

Expectations

13. Detainees understand why they are detained and are informed about the progress of their case.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees have a named and easily accessible Home Office contact to answer their questions and keep them informed of the progress on their case. Detainees are given the name and contact details of the responsible Home Office case owner.
- On site Home Office staff meet with detainees within 24 hours of arrival to answer questions and explain individual reasons for their detention, appeal and bail rights, how to obtain good quality legal representation and any other relevant matters.
- Detainees are given progress reports at least monthly and following any change of circumstances or submission of new information to the Home Office. Reports focus on progress and do not simply repeat previous information.
- All information is given to detainees in a language and format they understand. Interpreters are always available in interviews to allow detainees to express themselves fully, and understand their rights and any important decisions.

14. Casework is progressed promptly and reviewed effectively to reduce the potential harmful impact of ongoing detention.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Casework is progressed promptly and case planning ensures that detention is for the shortest period that is reasonable to reduce the potential harmful impact of ongoing detention.
- There is effective oversight of case planning.

- Families are only held in exceptional circumstances and for the minimum time. The individual welfare needs of the child are taken into account when deciding whether to detain and throughout the detention process.
- Detention is reviewed regularly, taking full account of factors for and against the decision to detain, alternatives to detention, and any information/assessment of vulnerability²⁷ held by the centre.

15. Detainees have effective access to independent legal representation.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees are able to speedily obtain regulated and good quality legal advice and representation in a language and format they understand, including prompt and unrestricted access to advice surgeries when needed.
- Detainees receive information on how to complain about poor quality legal representation. Centre staff are alert to detainees being exploited by poor or fraudulent advisers.
- Detainees are able to contact their legal representatives without impediment and can take copies of legal documents before sending them to legal representatives, the Home Office, tribunal or courts.
- Detainees are able to communicate with their legal representatives confidentially by phone, fax, letter, email and video conferencing.
- In appropriate cases, detainees are able to have their legal representatives, and interpreter if necessary, present during interviews with immigration staff and are provided with a copy of interview notes or recordings.
- Detainees have prompt and unrestricted access to private legal visits.
- Appropriate childcare facilities are provided during legal and immigration interviews.

²⁷ There is no universally agreed definition of vulnerability in detention. As Stephen Shaw's 2016 report (*Review into the Welfare in Detention of Vulnerable Persons: A Report to the Home Office*, CM9186) points out, some commentators consider all of those in detention to be vulnerable because they are detained. Others prefer to describe groups that are in 'situations of vulnerability', as opposed to intrinsically vulnerable groups, thereby stressing the largely contextual nature of vulnerability. It is common for groups such as those with serious mental or physical health problems, children, elderly people, pregnant women, LGBTI people, people with disabilities, asylum-seekers, and those who have experienced torture, trafficking or gender-based violence, including female genital mutilation, to be considered especially at risk of harm or neglect in detention. In these *Expectations*, we use the terms 'vulnerable' and 'vulnerability' to refer to these groups, but also to any other individuals or groups who may be at risk of harm or neglect as a result of other personal, social and environmental factors; these factors may be fixed or change over time and the degree of vulnerability may change as a result.

- Legal representatives have access to their laptops and a phone, and can arrange to pay for the centre's telephone interpretation facilities if needed.
- Detainees have prompt access to their Home Office and medical records and are advised of their right to request them.
- External doctors commissioned to report on the health of detainees are given prompt access.
- Detainees have access to up-to-date legal textbooks, their personal documentation and other reports or material necessary to help their immigration or asylum case.
- Detainees are easily able to make applications for release. Bail application forms and information about procedures are available.

In relation to expectations 13–15 above: Human rights standards permit detention for immigration purposes only in accordance with law and only as a measure of last resort. Detainees must have the reasons for their detention explained to them and be able to challenge the lawfulness of their detention. See EPR 30.3; BOP 9–14; TGFR 6–9; ECHR 5; ICCPR 9; UNHCR–DG 4, 7; CPT 1, 2. Children should only be detained in exceptional circumstances and for the shortest possible period of time. See CPT 10; CRC 9, 37(b), HR 2; UNHCR–DG 9.2.

In addition, standards require detainees to be able to access independent legal advice and to be allowed confidential visits and correspondence with their legal representative. See EPR 23; BOP 17, 18; SMR 61; BRPL 8; CPT 2.

Section 2: Respect

Contents

- Staff-detainee relationships
- Accommodation and facilities
- Fair treatment and inclusion
- Faith and religion
- Health services

Staff-detainee relationships

Families are treated with respect by all staff, with proper regard for the uncertainty of their situation and their cultural backgrounds. Complaints and feedback procedures are effective.

Expectations

- 17. Families are treated with humanity and respect for their human dignity at all times. Relationships between detainees and staff are positive and courteous.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Staff and detainees are fair and courteous to each other.
- Staff have training in and show proper regard for the uncertainty of detainees' situations, particularly immigration issues and their cultural backgrounds.
- Staff set a personal example in the way they carry out their duties.
- Staff introduce themselves to new families and wear identification that clearly displays their name and status.
- Information about detainees' needs is communicated between staff sensitively.
- Staff interact appropriately with children, with full regard to the wishes of their parents.

- 18. Families have confidence in complaints procedures, which are effective, timely and well understood.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it

- Detainees know how to provide feedback or to complain and have access to information about complaints procedures in a range of formats and languages.
- Detainees have easy access to feedback and complaint forms in a range of languages.
- There are appropriate arrangements for children to make complaints.
- Detainees can submit complaint forms confidentially at any time, including to the Home Office and/or the Independent Monitoring Board.
- Responses to complaints are clear, respectful, prompt and address all the issues raised.

- Determined efforts are made to communicate responses to detainees who have left the facility.
- Responses are communicated in the language in which the complaint was submitted.

In relation to expectations 17 and 18 above: Human rights standards recognise that places of detention should be managed in accordance with the obligation to respect the humanity and inherent dignity of those detained, and require that staff and managers have the necessary aptitude and training to perform their roles. See SMR 74.1, 75, 76, 79.1; EPR 71–77, 81, 83, 87.1; UNHCR–DG 8[48(xvi)]; CPT 6.

Staff working with detainees with particular vulnerabilities should be given specialised training. See EPR 81. See additionally in relation to children, HR 82–87.

Human rights standards also require detainees to be able to make requests and complaints and to do so without reprisal or punishment. Requests and complaints must be responded to promptly. See SMR 56, 57; EPR 70; BOP 33; UNHCR–DG 8 [48(xv)]; CPT 8. See additionally in relation to assistance being provided to children to make complaints, HR 24, 25, 75–78.

Accommodation and facilities

Families are held in a safe, clean and decent environment. They are offered varied meals according to their individual requirements.

Expectations

- 19. Families are held in a safe, clean and decent environment which is in a good state of repair and fit for purpose.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- The environment of the centre is not oppressive and is suitable for a detainee population. Access to fresh air is limited only by the requirements of safety.
- The centre is properly ventilated, kept at a comfortable temperature and provides a separate no smoking area, or is no smoking.
- Accommodation is fully equipped and properly designed to cater for the residential and domestic needs of families, including those with babies.

- Families have access to well-maintained sanitation, washing facilities that are clean and in working order, and that afford privacy.
- Detainees have free access to basic toiletries and sanitary products and there are nappy changing facilities for babies.
- All detainees can easily and quickly gain staff attention in an emergency.
- Detainees' property is stored securely and is properly accounted for.
- Families are normally held together, even in cases when individual family members are over 18²⁸. Families are able to eat together as a unit and are located in shared or adjoining rooms.
- Detainees have keys to their rooms.
- Families are able to reside in an environment where security is proportionate.

20. Adults and children are offered a suitable range of food and drink which meets their individual needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- There is at least one substantial cooked meal each day.
- Food is healthy, varied, balanced and suitable for the diverse needs of families, including children and young people.
- Baby food and powdered milk are available to mothers with young babies.
- Snacks and hot and cold drinks are freely available.
- Appropriate extra food supplies are available for families arriving or being discharged late and for pregnant women.
- Detainees are able to register any food complaints in their own language and complaints are regularly checked by a manager.
- All areas where food is stored, prepared and served are properly equipped and well managed.
- Families are able to eat together.

In relation to expectations 19–20 above: Human rights standards require that detainees be housed in accommodation that respects their human dignity and privacy. Accommodation should be clean, adequately ventilated and lit (by both natural and artificial light) and provide sufficient living space. See EPR 18, 19, 21; SMR 12–21; UNHCR–DG 8[48(x)]; CPT 4. See additionally in relation to women, BR 5, and children, HR 31–34.

In addition, standards require that detainees be provided with nutritious food that takes into account their personal needs (such as religion, age, health and

²⁸ The term 'families' is used here in a broad sense and may, for example, include unmarried and same sex couples.

culture). See EPR 22; SMR 22; UNHCR–DG 8[48(xi)]; CPT 4. See additionally in relation to pregnant or breastfeeding women, BR 48.

Children have a right to family unity. In the exceptional circumstances in which children are detained, the best interests of the child must be a primary consideration in all actions concerning them. Children should therefore be accommodated together with their family members unless this would not be in their best interest. See CPT 10; CRC 3, 5, 7, 8, 9, 37(b), HR 2; UNHCR–DG 9.2.

Fair treatment and inclusion

There is a clear approach to promoting equality and diversity, underpinned by processes to identify and address any inequality or discrimination. Distinct needs arising from detainees’ protected characteristics are recognised and addressed.

Expectations

- 21. Leaders take seriously the experiences and views of detainees with diverse needs and identities. Procedures are in place and action is taken to identify and address discrimination and disparities.**

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Detainees’ protected characteristics are identified systematically on arrival and initial assessments take account of their specific needs.
- Detainees with protected characteristics that would make them vulnerable to victimisation in detention, or who need assistance to complete everyday activities, are detained only in exceptional circumstances. When identified, they are referred to the Home Office for an immediate review of detention.
- Leaders have put processes and structures in place to improve fairness, for example effective equality monitoring and complaints systems, and suitable adaptations and adjustments.
- Staff promote awareness of equality, anticipating and addressing the needs of detainees.
- Leaders and staff promote an understanding of and demonstrate respect for all ethnic, national, cultural and other diverse groups. Inappropriate language or conduct by staff, visitors or detainees is challenged.

- Professional interpretation is used wherever necessary to ensure effective communication with detainees who are not fluent in English.

22. Families are able to practise their religion fully and in safety.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Families are able to practise their religion and commonly needed religious items are available.
- Families have access to religious leaders and an appropriate multi-faith room.
- Searches of detainees, visitors and their property are conducted in a religiously and culturally sensitive manner.

In relation to expectations 21 and 21 above: Non-discrimination is a fundamental principle enshrined in human rights treaties and standards. See ICCPR 26; CERD 1, 2; CEDAW 1,2; ICESCR 2.2; CAT 1; CRPD 5. Human rights standards relating to places of detention should be applied impartially and without discrimination. See SMR 2; EPR 13; BOP 5. See additionally in relation to women BR 1, 30–33, and children, HR 4, CRC 2.

In addition to the general non-discrimination provisions set out above, there are specific human rights standards relating to some protected characteristics, including the following:

- Detainees with disabilities: CRPD 2, 3, 5, 9, 14; SMR 5.2, 55.2, 109.2; UNHCR–DG 9.5.
- Detainees from national, ethnic, cultural, religious or linguistic minorities: DRM 2; EPR 38. See additionally BR 54.
- Sexual orientation and gender identity: UNHCR–DG 9.7; Yogyakarta Principles; Council of Europe Committee of Ministers, *Recommendations on measures to combat discrimination on grounds of sexual orientation or gender identity*.
- Older detainees: UNHCR–DG 9.6.
- Women: In relation to ensuring private accommodation for women, see UNHCR–DG 8[48(v)]; SMR 11; EPR 18.8.
- All persons have the right to freedom of thought, conscience and religion, see ICCPR 18; ECHR 9. Human rights standards require that there be no discrimination on the grounds of religion or religious belief and that prisoners belonging to religious minorities must be able to profess and practise their religion without any interference. See EPR 13, 29; SMR 2, 65, 66; BOP 5; UNHCR–DG 8 [48(ix)]. See additionally in relation to children HR 48, CRC 14.

See also standards relating to safeguarding vulnerable adults (in relation to expectations 7–10 above).

Health services

Health services assess and meet families' health needs while in detention and promote continuity of health and social care on release. Health services recognise the specific needs of detainees as displaced persons who may have experienced trauma. The standard of health service provided is equivalent to that which people could expect to receive elsewhere in the community.

Expectations

23. Health services assess and meet the specific health needs of parents and children in detention and promote continuity of health and social care on release.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Families are promptly screened by health services staff on arrival. When required, they can access a doctor within 24 hours.
- Families have prompt access to appropriate primary physical and mental health services. Secondary health care is immediately accessed when necessary.
- Health services are based on a health needs assessment.
- Clinical governance arrangements are in place, which include the management and accountability of staff.
- Health care staff have sufficient knowledge and qualifications to care for children.
- Staff are trained to recognise, treat and report any signs of trauma and torture or other health issues that may affect fitness to detain.
- Detainees with mental health problems are transferred to specialist secondary and tertiary care if clinically indicated.
- Detainees continue to have access to their prescribed medication unless this is discontinued on medical advice.
- Substance use needs are identified, assessed and treated appropriately.

In relation to expectation 23 above: Everyone has the right to the enjoyment of the highest attainable standard of physical and mental health. See ICESCR 12. Human rights standards require that detainees be provided with the same standard of health care as available in the community and that places of

detention should safeguard and improve the health of those in their care. See SMR 24, 25; EPR 39, 40; CPT 9; UNHCR–DG 8 [48(vi)].

Standards require detainees' health care needs to be assessed on arrival, including identifying all health care needs, the risk of self-harm and any previous ill-treatment. See EPR 40; SMR 30. See additionally in relation to women, BR 6-8. Standards require health needs to be monitored and met throughout detention. See EPR 39–43, 46, 47.2; SMR 25–27, 30–34 and additionally in relation to women BR 10, 11, 18 and children, CRC 24; HR 49–54.

In the context of immigration detention, it is important that the vulnerabilities of individuals are identified to ensure the impact of detention on vulnerable detainees is monitored and that they are safeguarded from harm. See standards relating to safeguarding vulnerable adults (in relation to expectations 7–10 above).

Section 3: Activities

Contents

- Access to activities

Access to activities

The centre encourages activities and provides facilities to preserve and promote the mental and physical well-being of adults and children.

Expectations

25. Families have regular access to activities and facilities that meet their needs.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- Activities and facilities provide physical and mental stimulation for children and adults.
- Families are free to move throughout the centre. Any restrictions are justified by clear evidence of risk.
- Families have access to a suitable library and learning resources every day, including at weekends.
- The quantity and quality of library material are sufficient to meet the needs of the population. They include books, newspapers, dictionaries, CDs and DVDs in languages that correspond with the major language and national groups in the population.
- Suitable activities are provided for children of all ages, including exercise, play opportunities, access to the fresh air and education where appropriate and practicable.
- Fitness provision is safe, easily accessible and meets the needs of all detainees.

In relation to expectation 25 above: Human rights standards require detainees to be allowed to participate in activities that allow for social interaction and meet their welfare needs. Freedom of movement should be restricted as little as possible. See EPR 25; SMR 105; CPT 5.

Standards also require that detainees must be provided with access to educational programmes that meet their needs and aspirations. See ICESCR 13; SMR 104; EPR 28; UNHCR–DG 8[48(xiii)]; CPT 5. In addition, detainees must have access to an adequately stocked library. See SMR 63, 64; EPR 28.5; UNHCR–DG 8[48(xii)].

Standards also recognise the need for detainees to be able to safely undertake adequate exercise and maintain their fitness. See SMR 23; EPR 25, 27; UNHCR–DG 8[48(viii)]; CPT 5.

In relation to children, see HR 38 and 39 (education), 41 (library provision), 47 (recreation); CRC 28, 29 (education), and 31 (rest, leisure and play); CPT 10 (activities and centres catering specifically for children).

Section 4: Preparation for removal and release

Contents

- Communications
- Leaving the centre

Communications

Families are able to maintain contact with the outside world using a full range of communications media.

Expectations

27. Families are able to maintain contact with the outside world through easy access to visits and a full range of communications media.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- There is sufficient access to telephones at all times.
- Detainees can make international phone calls at rates comparable to those available in the community.
- Families without money are provided with a reasonable number of free calls of sufficient length.
- Families are able to use personal email accounts and have internet access, and can open attachments.
- All legitimate websites are accessible. There are effective procedures for quickly and permanently unblocking sites that have been inappropriately restricted.
- Families have free access to video calling and social networking to support contact with family and friends. Access is restricted only on the basis of documented individual risk assessment.
- Families can quickly and easily send and receive faxes, without charge and without restrictions on length, to ensure that legal documents are transmitted in their entirety.
- Families can receive daily visits. Visitors are treated with respect and are subject to minimum security checks. Visitors are able to deliver property.

In relation to expectation 27 above: Human rights standards require detainees to be able to keep in contact with the outside world, including through digital means and visits. See SMR 58, 63, 106; EPR 24; BOP 19; UNHCR–DG 8[48(vii)]; CPT 2, 5. See additionally in relation to women, BR 26, 28, and children, HR 59–62.

Leaving the centre

Families are prepared for their release, transfer or removal. Families are able to retain or recover their property. Families with children and others with specific needs are not detained without items essential to their welfare.

Expectations

28. Families' welfare needs are systematically assessed and addressed while they are in detention.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- There is an accessible welfare service to address needs. Welfare staff are appropriately selected and trained, and their work with families is properly documented and evaluated.
- Detainees are able to obtain support with immediate pressing welfare matters caused by their detention from an appropriate person in private, within 24 hours of their arrival.
- Support needs, and in particular those relating to release or removal, are systematically assessed on arrival and dealt with through ongoing casework documented in a regularly reviewed welfare plan.
- Welfare casework includes support with practical matters inside detention and help with external problems caused by ongoing detention, or which are difficult to resolve because of detention.
- Welfare casework ensures that families that are removed are able to settle their affairs in the UK, that their bank accounts are closed and they do not leave behind any property or money.
- Welfare casework ensures that families who are released in the UK have good quality advice and support with housing, finance and other practical matters.
- Detainees are helped to contact their consular officials and are given appropriate advice about re-entry bans.
- External voluntary and community sector organisations are proactively engaged by the centre to enhance support for families, and children in particular.

29. Families who are to be removed or released are treated sensitively, humanely and safely.

The following indicators describe evidence that may show this expectation being met. They do not exclude other ways of achieving it.

- There is a multidisciplinary review of detainees who are considered to be vulnerable to harm. Care plans are put in place or amended as appropriate and, where necessary, describe arrangements to ensure continuity of medical care for detainees being released.
- Sealed copies of health treatment documentation accompany detainees when they leave the centre. This includes summary medical notes.
- Allegations of assault on detainees during removal attempts, which are supported by medical evidence, are thoroughly investigated with a view to prosecution, and removals delayed for this purpose.
- Families being removed have clothing suitable for the climate to which they are going, and can carry their belongings in a suitable bag.
- Families about to leave the centre are able to have visits at short notice.
- Families being released are provided with adequate funds to reach final destinations and maintain themselves in the period immediately following their arrival.
- Immediate housing, financial and other support needs are addressed before families are released.
- Detainees are able to inform legal advisers, family and friends of when they are to be released, transferred or removed from the centre, subject to any legitimate security issues.
- The Home Office maintains a well-researched toolkit about returning to common destination countries.
- The toolkit is sufficient to inform Home Office and centre staff of arrangements, including financial support, that need to be put in place to enable the family to travel safely to their final destination and to access appropriate local support.

In relation to expectations 28 and 29 above: Human rights standards emphasise that consideration must be given from the beginning of a period of detention to the detainee's future after release, including the detainee's need for assistance on release. Detainees must be provided with adequate clothing and sufficient means to reach their destination and to maintain themselves in the period immediately following their release. See SMR 108; EPR 33.7, 33.8. See additionally in relation to women, BR 46–47, and in relation to children, HR 80.

In addition, standards require removal orders to be issued in accordance with law and detainees to be informed in advance of their removal. See TGFR 2, 4, 15. Standards also cover conditions of transport and return of property, see SMR 73; EPR 31, 32, 33.4, and in relation to children, HR 26, 35. Detainees must be treated with respect for their dignity and human rights at all times. See SMR 1; EPR 1 and in relation to children, HR 12.

See also standards relating to safeguarding vulnerable adults (in relation to expectations 7–10) and children (in relation to expectations 11 and 12).

References

<u>BOP</u>	Body of Principles for the Protection of All Persons under Any Form of Detention or Imprisonment
<u>BPUFF</u>	Basic Principles on the Use of Force and Firearms by Law Enforcement Officials
<u>BR</u>	United Nations Rules for the Treatment of Women Prisoners and Non-custodial Measures for Women Offenders (the Bangkok Rules)
<u>CAT</u>	Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment
<u>CEDAW</u>	Convention on the Elimination of All forms of Discrimination against Women
<u>CERD</u>	International Convention on the Elimination of All Forms of Racial Discrimination
<u>CPT</u>	European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment, Factsheet: Immigration detention (2017)
<u>CRC</u>	Convention on the Rights of the Child
<u>CRPD</u>	Convention on the Rights of Persons with Disabilities
<u>DRM</u>	Declaration on the Rights of Persons Belonging to National or Ethnic, Religious and Linguistic Minorities
<u>ECHR</u>	European Convention for the Protection of Human Rights and Fundamental Freedoms
<u>EPR</u>	European Prison Rules
<u>HR</u>	United Nations Rules for the Protection of Juveniles Deprived of their Liberty (the 'Havana Rules')
<u>ICCPR</u>	International Covenant on Civil and Political Rights
<u>SMR</u>	United Nations Standard Minimum Rules for the Treatment of Prisoners (the Nelson Mandela Rules)
<u>TGFR</u>	Twenty Guidelines on Forced Return

[UNHCR-DG](#)

United Nations High Commissioner for Refugees (UNHCR)
Detention Guidelines (Guidelines on the Applicable Criteria
and Standards relating to the Detention of Asylum-Seekers
and Alternatives to Detention)