

Yarl's Wood – Stephen Shaw Recommendations October 2004

Ref	Lead	Recommendation	Accept/ Reject	Comments	Progress
MAIN RECOMMENDATIONS					
To the Immigration and Nationality Directorate					
1.	GSL	I recommend that GSL review deployment of staff to incidents and the use of talk through mode on the radio allowing officers to self deploy.	Accepted and implemented	It is usual operating practice in the event of an incident for response teams to be designated to attend. This is continually reviewed.	Completed. We believe the use of 'talk-through mode' is for the duty manager to determine, according to the situation.
2.	Brian Pollett /Sue McAllister	I recommend that IND and the Prison Service give further consideration to contingency arrangements to ensure greater clarity and proper lines of accountability, and which, ideally, give IND ultimate authority and responsibility for the management of incidents. Failing this, I recommend a small cadre of potential Gold commanders be prepared/trained specifically for handling removal centre disturbances. This should include briefing on the ethos of the centres, the powers that can be exercised to control detainees, site familiarity visits and a period shadowing a centre manager.	Accepted and implemented	Contingency arrangements have been reviewed with the Prison Service	Completed. After careful consideration Prison Service staff will continue as Gold Commander with a senior IND Removal Estate manager in attendance to brief on IND specific issues.
3.	Brian Pollett / David Robinson	I also recommend that those likely to represent the Immigration Service in the Gold suite at Prison Service headquarters should attend a number of Prison Service incidents to familiarise themselves with general processes and practices.	Accepted and implemented	Two IS senior managers (Director & Deputy Director) who would attend the incident suite to decide on operational issues. Both have previous experience of operating in the Prison Service Gold Incident Suite.	Completed. Both the Director & Deputy Director of detention services have training & experience in Incident Management Support.

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4.	Brian Pollett / Sue McAllister	I recommend that the Home Office enters into discussion with the Association of Chief Police Officers to agree and distribute clear advice to all police forces on the issue of police powers in respect of disturbances in closed institutions.	Accepted	A meeting has been arranged with PS, Police and immigration, which P.S. are leading on.	Ongoing. The Prison Service is leading on the progress of this. To be reviewed at the end of July.
5.	Frank Sharp	I recommend that IND and GSL resolve the matter of twin protocols as a matter of priority since it is presumably replicated in relation to all GSL's immigration establishments.	Accepted	GSL have formally withdrawn the police protocol, however contingency arrangements with the police still exist. IND are taking forward the protocol with the Prison Service.	Ongoing. The protocol with the Prison Service has been sent to them and we are awaiting agreement by them. Completed by July 2005.
6.	Sue McAllister / Alan Hollett	I recommend that the police and the Prison Service pursue on a national basis arrangements for Prison Service Tornado units and the police to work together and for a training protocol.	Accepted	A meeting has been arranged between IND and the Prison Service to take this forward.	Ongoing. Work is ongoing to consider HMPS/Police joint capabilities, although not specifically in relation to serious incidents. To be reviewed at the end of July.
7.	Frank Sharp	I recommend that IND ensures plans and other relevant documents for each centre are placed in the Prison Service Gold command suite.	Accepted and implemented	PS HQ has a full set of plans in the Gold Suite for each Centre.	Completed. Confirmation of this has been received from PS HQ.
8.	Completed	I recommend that Group 4 reviews its roll count procedures to ensure they are accurate and efficiently carried out.	Accepted and implemented	GSL have recently reviewed all of their contingency plans, and the reviewed plans have been accepted by IS. An improved roll check has been introduced.	Completed.

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9.	Ian Bennett	I also recommend that a computerised system of real time tracking be introduced to show exactly where a given detainee is at any time – that is, in a centre, in transit or whatever. This should not rely on the completion of protracted reception procedures.	Accepted in principle	This is quite a radical proposal, which would require new investment in a software system compatible across the detention estate.	Ongoing. A system will be introduced at the commencement of the new in-county escorting contract with G4 Securicor on 1 May'05. It will provide for GPS tracking of all vehicles and live access to the system by staff at DEPMU. The precise location of detainees in transit or confirmation that they have been delivered to the destination location will also be enabled. Training ongoing and will be fully operational by the end of July.
10.	Harry Horsburgh	I recommend that the use of remotely-operated locks for zone gates be considered in all future removal centre designs, taking account of any fire safety requirements.	Accepted and implemented	Although safety and security is a matter for the Operating Contractor, we shall be looking for them to consider the recommendations made in this report.	Completed. We shall ensure that new centres look at the locking technology that is available. This will be included in the draft of the IND blueprint for future centres.
11.	Harry Horsburgh	I recommend that IND reviews the location of command suites in existing and future removal centres.	Accepted and implemented	8 out of the 10 Command suites in removal centres are now located remotely from accommodation areas.	Completed. To move the other command suites will not be possible due to building design. A copy of the site plan for Gatwick 2 showing position of command suite will be on file.

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12.	Frank Sharp	<p>I recommend that</p> <ul style="list-style-type: none"> Contractors be required to draw up and implement action plans following any serious incident. The plans should incorporate all lessons learned and, where those lessons are generic, should be applied across all the contractor's centres. IND should monitor implementation within agreed timescales; IND ensures that contractors prepare contingency plans for multi-faceted incidents; and GSL reviews training for its senior managers to ensure they are fully prepared to manage command suites. 	Accepted	Contingency plans exist in all Centres for all incidents. These plans are reviewed and tested regularly. Following any incident there is a debrief and any learning points are incorporated into the plans. IND regularly monitors the review of these plans and their testing. Such tests may include multi-faceted incidents. GSL senior managers attend the Prison Service Command of Serious Incidents Course.	<p>Ongoing.</p> <p>IND will be checking with all Centres to ensure compliance with this recommendation. Completed by September 2005.</p>
13.	David Robinson/ Linda Staveley	I recommend that the question of staffing levels be reviewed to assess if future contracts should contain more prescriptive requirements in relation to staff numbers.	Accepted and implemented	Future contracts will be prescriptive in relation to staff numbers.	<p>Completed.</p> <p>Minimum staffing levels have been included in the contract for Campsfield and will be included in all future contracts.</p>
14.	Frank Sharp	I recommend that IND reviews with contractors those sections of contracts dealing with advanced C&R.	Accepted	IND will review with the contractor those sections of the contracts than deal with advanced C&R.	<p>Ongoing.</p> <p>IND will work with CPU to ensure that all sections of contracts that deal with C&R are reviewed with the contractor by September 2005.</p>
15.	GSL	I recommend that GSL reviews its fire contingency plans to ensure they are appropriate and offer adequate protection for detainees and staff.	Accepted and implemented	GSL have reviewed their fire contingency plans in line with the new layout of the establishment.	<p>Completed.</p>

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16.	GSL	I also recommend that GSL reviews its fire signage at all its centres and carries out regular management checks to ensure all fire safety measures are complied with.	Accepted and implemented	GSL accepts that such checks are a matter of good practice. Such a review took place at Yarl's Wood in the December before the incident and these checks are part of the remit of the Fire Safety Officer.	Completed.
17.	Completed	I recommend that IND reviews its systems for assessing contract bids in the light of the Yarl's Wood experience. In particular, consideration should be given to bringing in independent expertise to help with the assessment.	Accepted, already adopted in practice	Contract bids are now subject to thorough assessment using specialist skills where appropriate.	Completed.
18.	Completed	I recommend that IND pulls together the lessons on design from the Yarl's Wood experience (size, long corridors, siting of the control room, construction materials etc) and ensures that they underpin the production of any future footprints or alternative designs submitted by contractors.	Accepted and implemented	The lessons of Yarl's Wood were used in the design of Colnbrook and will be for all future designs.	Completed.
19.	Completed	I also recommend that IND specifically and independently assesses whether a proposed construction material meets the particular needs of the project.	Accepted and implemented	The materials used in the construction of Colnbrook were selected in the light of the experience at Yarl's Wood to ensure they were fit for purpose. This will be continued in all future construction designs.	Completed.

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20.	Completed	I recommend that the Home Office restricts the use of special urgency notification procedures to cases of absolute necessity (as indeed is required by the relevant regulations.)	Accepted. This is already the case both in law and in practice.	<ul style="list-style-type: none"> • The planning requirements placed on Government Departments (for the purposes of developing Crown land) mean that a planning notification can be issued under urgent circumstances reducing the scope and period of consideration by planning authorities. In practice, we have generally shadowed the normal planning process, and this has been the case in all detention major projects since the Yarl's Wood incident. • We remain committed to following the usual planning proprieties, giving local councils full opportunity to consider, and where they find it necessary object to, our proposals. No detention projects entered into since 2002 have involved special urgency procedures. 	Completed.

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21.	Completed	I recommend that for future removal centre projects a local liaison officer be appointed, the major part of whose job will be to identify properly interested stakeholders and consult and inform local people.	Accepted already adopted in practice.	A number of changes in the organisation of detention services since the incident at Yarl's Wood have already realised this recommendation. As well as an identified IND project manager, with responsibilities in terms of local liaison, the directorate has also appointed a communications manager, whose job is to ensure timely and accurate information on developments to local stakeholders.	Completed.

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22.	Completed	I recommend that IND and the Finance and Services Directorate ensure that no major project is again allowed to proceed without a properly constituted business case.	Accepted already adopted in practice.	<p>Procedures for approval of major projects involve scrutiny of a full business case at IND's Joint Approvals Committee (for projects under £40m) or the Home Office's Group Executive Board, chaired by John Gieve. In addition, the Office of Government Commerce Gateway process examines a programme or project at critical stages in its lifecycle to provide assurance that it can progress successfully to the next stage.</p> <p>To receive approval, a business case must include detailed assessment of need, value for money and benefits realisation, procurement options, consultation and communications plans, management and monitoring, as well as detailed risks and contingencies.</p>	Completed.

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23.	Harry Horsburgh & Fire Safety	I also recommend that the fire safety adviser and the Crown Property Inspection Group take early steps to establish provenance on receipt of any request for advice and that they reserve their position until the matter has been resolved	Accepted	Discussions are ongoing with CPIG re fire safety and fire strategy within the removals estate. We shall consult widely and at an early stage.	Ongoing. A meeting with CPIG and UKDS re Harmondsworth to take place in next few weeks and strategy will form part of blueprint for future centres. Review end of July.
24.	Completed	I do not think the case is made out for the installation of sprinklers in all removal centres, no matter what their size, function, or construction. It seems to me that each case should be judged on its merits, and this is what I recommend.	Accepted and implemented	The centres at Yarl's Wood and Harmondsworth have had them fitted retrospectively. Further consideration is being given to the policy on sprinklers in the existing estate.	Completed.
25.	Completed	I recommend that arrangements are introduced to prohibit the staff of removal centres and escort contractors from membership of racist organisations.	Accepted and already adopted in practice	Staff at removal centres and escort contractors are prohibited from membership of racist organisations.	Completed.
26.	Completed	I recommend that, in future, all contractors be required to affiliate to the Custodial Care National Training Organisation.	Accepted and implemented	The contractor ensures that DCOs have the opportunity to be assessed as competent against approved occupational standards developed by the CCNTO or appropriate Sector Skills Council and achieve NVQs.	Completed.

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27.	Completed	I recommend that, when a new centre opens, the relevant Project Board issues specific instructions to DEPMU about population build up.	Accepted and implemented	IS opened Colnbrook Removal Centre in August 2004. Prior to opening, meetings were convened between managers with responsibility for Colnbrook and managers in DEPMU.	Completed. Local operating instructions and procedures, especially where they differed from other removal centres, were discussed, agreed and implemented. A similar process will be adopted for any new facility.
28.	Partly Completed	I recommend that contractors be required to establish permanent liaison arrangements with local residents.	Accepted in principle	Already in place in some centres	Ongoing. Awaiting written confirmation from contractors that this is in place at all centres. To be reviewed at the end of July.

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29.	David Robinson	I recommend that IND issues instructions to Immigration Service staff in removal centres governing effective engagement with detainees.	Accepted	Colnbrook Removal Centre was opened in August 2004. Prior to opening, meetings were convened between managers with responsibility for Colnbrook and managers in DEPMU.	Ongoing A new detainee contact management service has been developed with the detention board. This has been documented and is currently with staff and their unions for consultation. Implementation will take place during the summer of 2005. The new service will be undertaken by non-warranted IND staff and will extend to help with detainee welfare issues. A training programme to support the new procedures is also being developed.
30.	GSL	In my earlier report on Yarl's Wood, I recommended that GSL should work closely with Aramark to ensure that meals meet as wide a range of cultural needs as possible, and that, given the ever-changing population, the menu on offer should be kept constantly under review. I repeat that recommendation here.	Accepted and implemented	This recommendation has been applied and is part of the operating procedure.	Completed.

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31.	GSL	I also recommend that the food be checked daily for quality and quantity by the contract monitor.	Accepted and implemented	This recommendation has already been applied. GSL Managers and the IND Contract Monitor regularly monitor both the quality and quantity of meals. The Detainee Food Committee enables direct input by detainees.	Completed.
32.	Alan Hollett	I recommend that Group 4 (and other contractors) provides the cheapest phone service possible to detainees and that it ensures its phone systems fully meet the needs of detainees.	Accepted and implemented	It is contained within all contracts that contractors install sufficient pay phones to meet the reasonable demands of detainees and/or dependants.	Completed. The new contract for Campsfield and all future contracts to contain the provision: 'phone cards that allow Detainees to make international direct dial calls at the most economical rate available be on sale at the Centre shop.'
33.	John Ship	Given the importance of the internet in most people's daily lives, I also recommend that detainees be allowed regulated access to it. This will help them keep in touch with what is going on and may help in relation to their appeal as well as creating some sense of normality and control in their lives.	Accepted in principle	The Business Plan has been submitted regarding the trial of internet access at Yarl's Wood	Ongoing. Internet facilities have been introduced at some centres. Progress on the other centres to be reviewed in August.

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34.	Brian Pollett	I recommend that IND ensures assistance is provided to detainees to help them sort out their affairs following detention and/or to facilitate their return to the community.	Accepted	A welfare officer is being appointed at Haslar Removal Centre and consideration is being given to the implementation of similar arrangements in other Centres.	Ongoing. A postholder has been selected for the trial welfare officer role at Haslar. A training package is being designed for DCOs in centres to deal with straightforward welfare issues. Progress to be reviewed July/August.
35.	Completed	I recommend that IND hosts regular forums for centre managers and for other grades of staff.	Accepted and implemented	This recommendation has been applied. Regular meetings are currently being held between IND and Centre managers.	Completed.
36.	Barbara Nicholson	I recommend that the operating standards be completed and rolled out across the estate as soon as possible and to a published timetable.	Accepted	A total of 31 standards have been issued leaving one to be developed.	Ongoing. Rec. 63 will be in force by July 2005.
37.	Frank Sharp	I recommend that IND produces a security manual for the detention estate.	Accepted	IND are currently examining the opportunity of adopting the 'National Security Framework Document' designed by the Prison Service.	Ongoing. The National security Document will be available for use across the IS estate by July 2005.

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38.	GSL	I recommend that GSL reviews its staff training in respect of handling and defusing confrontation.	Accepted and implemented	Staff have always been selected on the basis of their inter-personal skills, understanding and awareness. Greater emphasis is now placed on training staff to defuse confrontational situations. It must be noted however that detainees may at times provoke confrontation, either to test authority or cause disruption.	Completed.
39.	David Robinson	I recommend that, as a minimum, every centre should engage the services of an in-reach psychiatric nurse and that the service be actively promoted on induction and afterwards.	Accepted in principle.	The Department of Health have been asked to review our healthcare services at centres to include the provision of psychiatric care.	Ongoing. The whole range of medical facilities at Removal Centres is currently being reviewed. To be updated at end of July.
40.	OSU	I also recommend that the use of detainees as interpreters in medical situations should cease.	Accepted in principle	Underlying principle behind recommendation entirely understandable. However, doesn't happen as a matter of routine and will only happen if a detainee consents to it.	Ongoing. To be reviewed at the end of July.
41.	Completed	I recommend that contract monitors regularly check that the Detention Centre Rules and operating standards are readily available to detainees	Accepted and implemented	IND ensures that the Contract Monitors regularly check the ready availability of these documents.	Completed.

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42.	GSL	I recommend that GSL 4 reviews its training in respect of dynamic security and that managers constantly monitor staff presence on the wings.	Accepted and implemented	Dynamic Security – which is based around “presence” and the development of appropriate professional relationships – is combined with physical security and procedural security measures. When undertaking ‘rounds’ of the Centre and throughout their usual work, the GSL managers and supervisors approach was to ensure a consistent and proactive staff presence within the residential areas. GSL’s current practice is for managers to be located on the units.	Completed.
43.	GSL	I recommend that GSL seeks the views of its existing staff to determine what more is required by way of training.	Accepted	IND will ensure that GSL does this.	Ongoing. GSL have confirmed that regular ‘Joint Consultative’ meetings are held with staff where training issues are addressed.

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44.	Completed	I also recommend that, when a new removal centre opens, staff from other centres be seconded in for the first few weeks to support and guide the new staff.	Accepted and implemented	IS opened Colnbrook Removal Centre in August 2004. Both IS and the operator ensured that a significant element of both managers and staff recruited for permanent positions had experience of working in a custodial environment. In addition, the IS ran a series of live tests just prior to its opening to augment the training process for the operator's less experienced staff	Completed.
45.	Frank Sharp	I recommend that, following assessment or action on an SIR, a copy of the document, duly completed by the relevant manager be given to the member of staff who submitted it.	Accepted	IND are currently reviewing the whole risk assessment process. This will form part of that new process.	Ongoing. The review of the risk assessment process will be completed by July 2005.
46.	GSL	I recommend that GSL reviews its management training to emphasise the need for managers to be visible, accessible and responsive.	Accepted and implemented	GSL constantly emphasise the need for managers to be visible, accessible and responsive to staff. This is incorporated into training and as part of management appraisal policy. Managers are located on the Centre's living units.	Completed.
47.	Completed	I recommend that IND reviews and clarifies its role in overseeing the operation of removal centres, notwithstanding principles pertaining to transfer of risk.	Accepted and implemented	The management structure of Detention Services has been changed to take account of the recommendation.	Completed.

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48.	GSL	I recommend GSL reviews its shift systems with a view to ensuring consistency of operation and that staff are able to perform at their optimum throughout their duty.	Accepted and implemented	This has been implemented and the shift patterns are reviewed regularly.	Completed.
49.	John Ship	I recommend that that IND reviews complaint handling in removal centres with a view to establishing greater consistency. The review should take account of procedures for recording complaints. Records should show what the complaint was, when it was made, when resolved and what the resolution was.	Accepted	The current system of complaint handling in removal centres will be reviewed in order to identify and implement improvements.	Ongoing. Contract monitors to submit arrangements/protocol for handling non IS complaints. Will be reviewed at the end of July.
50.	Completed	I also recommend that contract monitors be given training in complaints handling.	Accepted and implemented	Contract monitors have been given training in complaints handling by IS customer relations unit. An additional complaints seminar for contract monitors was held in July 2004.	Completed. There are plans to provide further training in the Autumn of 2005.
51.	Barbara Nicholson	Finally, an independent element should be introduced at the apex of the system. HM Chief Inspector of Prisons has called for the appointment of an independent Ombudsman for the immigration detention estate. The Refugee Council quite independently recommended the same. Given our existing responsibility for death in custody investigations in the Immigration Service estate, this role might sensibly accrue to the Prisons and Probation Ombudsman's office.	Accepted	Provision for this was included in the Offender Management and Sentencing Bill which was withdrawn earlier this year. We shall consider how best to take this recommendation forward.	Ongoing. Subject to the re-introduction of the Offender Management and Sentencing Bill.
52.	GSL	I recommend that fire drills are held at Yarl's Wood at least monthly and that the requirement for detainees to leave the building be rigorously enforced.	Accepted and implemented	Fire drills are now held at Yarl's Wood on a weekly basis.	Completed.

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53.	GSL	I recommend that a member of the senior management team at Yarl's Wood be given specific responsibility for fire safety.	Accepted	IND will ensure that GSL undertakes this by amendment of the operating contract.	Ongoing. The Head of Operations is responsible for fire safety and he is a member of the senior management team.
54.	David Robinson	I recommend that IND arranges for the weight of each contract monitor post to be assessed to determine both the appropriate grade of the contract monitor and the level of support he/she should have.	Accepted	IND is currently redefining the roles of its staff in removal centres and will follow this with a formal job weighting exercise by March 2005.	Ongoing. HRD have been commissioned to carry out a weighting exercise and a complete review of support staff is ongoing. Due to be completed July/August.
55.	David Robinson	I also recommend that relevant experience in either custodial management or contract management be a requirement for the post.	Accepted	As part of its work on defining roles and weighting jobs at Removal Centres, IND is seeking to identify the balance of skills required to ensure that adequate custodial and contract management expertise is maintained.	Ongoing. Headquarters Procurement and Operational Management structures strengthened with contract management and custodial expertise – from summer 2002. Will be reviewed with Rec. 54 by the end of August.

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56.	David Robinson	Finally I recommend that a comprehensive training package be drawn up for new contract monitors. This should include a period shadowing another contract monitor.	Accepted and implemented	IND has already commenced the development of a training package for Contract Monitors and will have a complete package in place by end 2004/05.	Completed. IND has delivered the first comprehensive training manual and course to contract monitors and their deputies on 21 st – 23 rd March 2005. All monitors attended and were issued with a guide book / manual outlining the role. The guidelines are being placed on a new DACS Intranet site for staff.
57.	Completed	<p>In my earlier report on Yarl's Wood, I made a range of recommendations regarding the IMB. These were that the Board:</p> <ul style="list-style-type: none"> • regularly attends training for DCOs; • undertakes training in race relations and cultural awareness; • draws up a Mission Statement; • introduces instructions for duties, which must be undertaken during the course of its visits. This should include monitoring of use of force forms; and • steps up efforts to recruit members from different cultures and age groups. <p>With the exception of the third of these,¹ I repeat these here in relation to the entire detention estate.</p>	Accepted and implemented	These recommendations have been implemented following the Ombudsman's earlier report on Yarl's Wood.	Completed.

¹ See footnote 87.

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58.	Brian Pollett	I recommend that IND reviews disciplinary arrangements in removal centres.	Accepted and implemented	This will be considered as part of a wider review of regimes and activities.	Completed. A review has taken place, which has concluded that a detainee disciplinary process is not deliverable within the removal estate. Work will continue on developing incentives and earned privileges schemes as a means of controlling behaviour within centres.
59.	Brian Pollett	I recommend that IND consults upon the merits of incentives schemes and the terms of a single national framework - to reflect a consistent set of principles and processes - within which schemes could operate.	Accepted and implemented	An operating standard on Incentive Schemes has been issued.	Completed.
60.	Brian Pollett	I recommend that a forum comprising officials, contractors and interest groups be set up to consider provision of purposeful activity in removal centres and in particular the feasibility of voluntary/charity work along the lines of (and possibly supported by) the Inside Out Trust.	Accepted and implemented	A forum to consider these issues with representation from IND, private and voluntary sectors has been set up and will meet regularly during 2005.	Completed.
61.	Brian Pollett	I recommend that IND explores this option with the Inside Out Trust.	Accepted and implemented	The Inside Out Trust is a member of the above forum	Completed. Inside Out Trust have agreed to undertake a pilot project at Dover Removal Centre.
62.	Brian Pollett	I also recommend that consideration be given to paying detainees an allowance for attending centrally organised activities.	Accepted in principle.	The forum will consider the most appropriate means of achieving this.	Ongoing. All centres are developing privilege and incentive schemes to encourage participation and organised activity.

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63.	Frank Sharp	I recommend that IND seeks speedily to reach agreement with the Prison Service about sharing of information with both DEPMU and security managers in removal centres.	Accepted	The introduction of a detainee transferable document and new risk assessment processes will facilitate a greater sharing of information.	Ongoing. The Detainee Transferable Document will be in force by July 2005. The protocol 'The Management of Foreign National Detainees Held in Prison Custody' has recently been agreed and enhances the sharing of information between IND and NOMS.
64.	Reject	When a legislative opportunity arises, I recommend that removal centres are re-badged as immigration detention centres.	Not accepted	The title of removal centre was introduced to achieve greater clarity about the role of the centres and to distinguish them from other IND functions such as accommodation, induction and reporting centres. A further change of name would detract from this.	Rejected.
65.	Harry Horsburgh	I recommend that courtesy keys and locks be introduced in removal centres.	Accepted in principle	A survey of existing buildings will be carried out to assess the feasibility of this recommendation.	Ongoing. Courtesy locks are already in some centres and the proposal to install at others will be reviewed later in the year.

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66.	Brian Pollett	I recommend that a single lock-down time be introduced across the detention estate, but that detainees be allowed to smoke in their rooms and that a television is provided in each room or dormitory.	Accepted in principle	Centres are being moved towards night lock-downs with times to reflect local needs.	Completed. All Removal Centres will observe a 'quiet time' between 12 midnight and 7am. Night lockdown will continue where physical circumstances permit.
67.	Completed	I recommend IND consults contractors when it is considering major new operations and gives them adequate time to prepare. The contract should also be re-visited where appropriate.	Accepted and already implemented	New operations are being discussed in advance with contractors and contract changes are negotiated where appropriate.	Completed.
68.	Completed	I also recommend that IND adopts a more consultative approach in the future by means of regular IND/contractor meetings at director level to discuss issues facing the detention estate.	Accepted and implemented	Regular IND/Contractor meetings at Director level are in place.	Completed.
69.	Completed	I recommend that IND ensures that a requirement immediately to inform the IMB of any major incident should be incorporated in each contractor's contingency plans.	Accepted and implemented	IND will ensure that contractors incorporate this into their contingency plans.	Completed.
70.	Frank Sharp	I recommend that IND/the IMB secretariat circulate fresh advice to contract monitors and Independent Monitoring Boards respectively about their role during a major incident.	Accepted	IND will be issuing advice to contract monitors and the IMB Secretariat will be requested to issue advice to Independent Monitoring Boards.	Ongoing. IND will work with the IMB Secretariat to ensure that new guidance is provided to Contract Monitors and the IMB by July 2005.

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71.	GSL	I recommend that Group 4 builds into its contingency plans reference to the need to follow proper procedures and to complete relevant paperwork in the aftermath of a serious incident.	Accepted and implemented	Implementation of this recommendation is largely completed and is an on-going project including staff training. We accept that record keeping in the immediate aftermath of the riot was not as good as it should have been, when standard forms were not available, having been destroyed in the fire.	Completed.
72.	David Robinson	I also recommend that contract monitors receive additional briefing on what to monitor and how to enforce compliance following a serious incident.	Accepted and implemented	A new spreadsheet tool was introduced for monitoring in 2004.	Completed. A training course for Contract Monitors took place on 21 st – 23 rd March 2005. All Monitors attended and were issued with a guide book / manual outlining the role.
73.	Completed	I recommend that, if the allegation that a detainee was assaulted by staff is not being pursued formally through the courts, GSL carries out a full investigation.	Accepted	Records will be checked to ensure there are no outstanding allegations awaiting action.	Completed.
74.	Frank Sharp	I recommend that contractors be required to include in their contingency plans the steps they will take following an incident of this kind to ensure that detainees know how to claim for lost property. The plans should include the identity of a named individual who will be responsible for addressing and resolving all such claims within one month of the incident.	Accepted	IND will check the contingency plans of all centres to make sure that this recommendation is applied.	Ongoing. IND will discuss with all IRCs regarding what they currently do and provide a national instruction by September 2005.

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75.	GSL	I recommend that GSL consults its staff to determine how best a review of the events at Yarl's Wood in 2002 can be organised.	Accepted	GSL was instructed by the CPS not to debrief its staff who had been involved in the riot by detainees before the criminal trial was concluded, although specialist-counselling services were made available for those who needed support.	Ongoing. We have to balance any benefits that might arise from a review of the incident with staff against concerns that it might not be in the best interests of all of them to revisit the experience. Will be reviewed with GSL by the end of July.
76.	Completed	Notwithstanding the advice I have received that waivers of claims under the Riot (Damages) Act are to be introduced into all future contracts, I make a formal recommendation to this effect in the hope that thereby the lesson will not be lost.	Accepted and implemented	Waivers of claims under the Riot Damages Act will be introduced into all new contracts.	Completed.
77.	Brian Pollett / Sue McAllister	I recommend that IND, jointly with the Prison Service, works with the police and the CPS to establish a national protocol for the conduct of inquiries into serious events where there is the possibility of criminal charges.	Accepted	A draft protocol is being developed to build upon the learning gained from Yarl's Wood and Harmondsworth	Ongoing. Alan Hollett to arrange a meeting with the Prison Service on his return.
78.	Brian Pollett	I recommend that the removal estate uniformly adopts the currency 'escape' in place of abscond to describe a successful break-out from a closed institution.	Accepted and implemented	This recommendation has been applied.	Completed.
79.	John Ship	I recommend that IND replaces the term 'special needs' with 'heightened risk'.	Accepted in principle	This is currently being considered within the review of 'Special Needs'.	Ongoing. To be reviewed at the end of July.