



G4S plc

Brook House 3 Month Action Plan

15th September 2017

Version Number: 1

Version	Date	Changes made
1	15.9.17	Published Draft



1. Executive Summary

Brook House is an immigration removal centre located near Gatwick airport. Under contract from the Home Office, G4S has operated Brook House since it opened in March 2009 as a purpose-built immigration removal centre with a prison design. Holding only adult male detainees, it has just over 500 available places. Since 2012, G4S has also provided the Healthcare at the centre – but through a separate contract with NHS England.

On the 24th August 2017 G4S was informed that BBC Panorama was preparing a report about conditions inside Brook House. Panorama told G4S that the report would contain undercover film showing officers neglecting or abusing detainees and misreporting incidents.

G4S immediately commenced an investigation into the allegations, reported them to the police and local authority, and suspended nine staff pending further investigation. We also put together a Project Team to develop this Action Plan – reporting directing to Managing Director of Custodial & Detention Services [REDACTED]. In addition, we are in the process of commissioning a wider independent review.

This Action Plan identifies our plans to ensure the safety and dignity of detainees. It will be updated as we learn more from the investigations and the independent review.

1.1 Key objectives

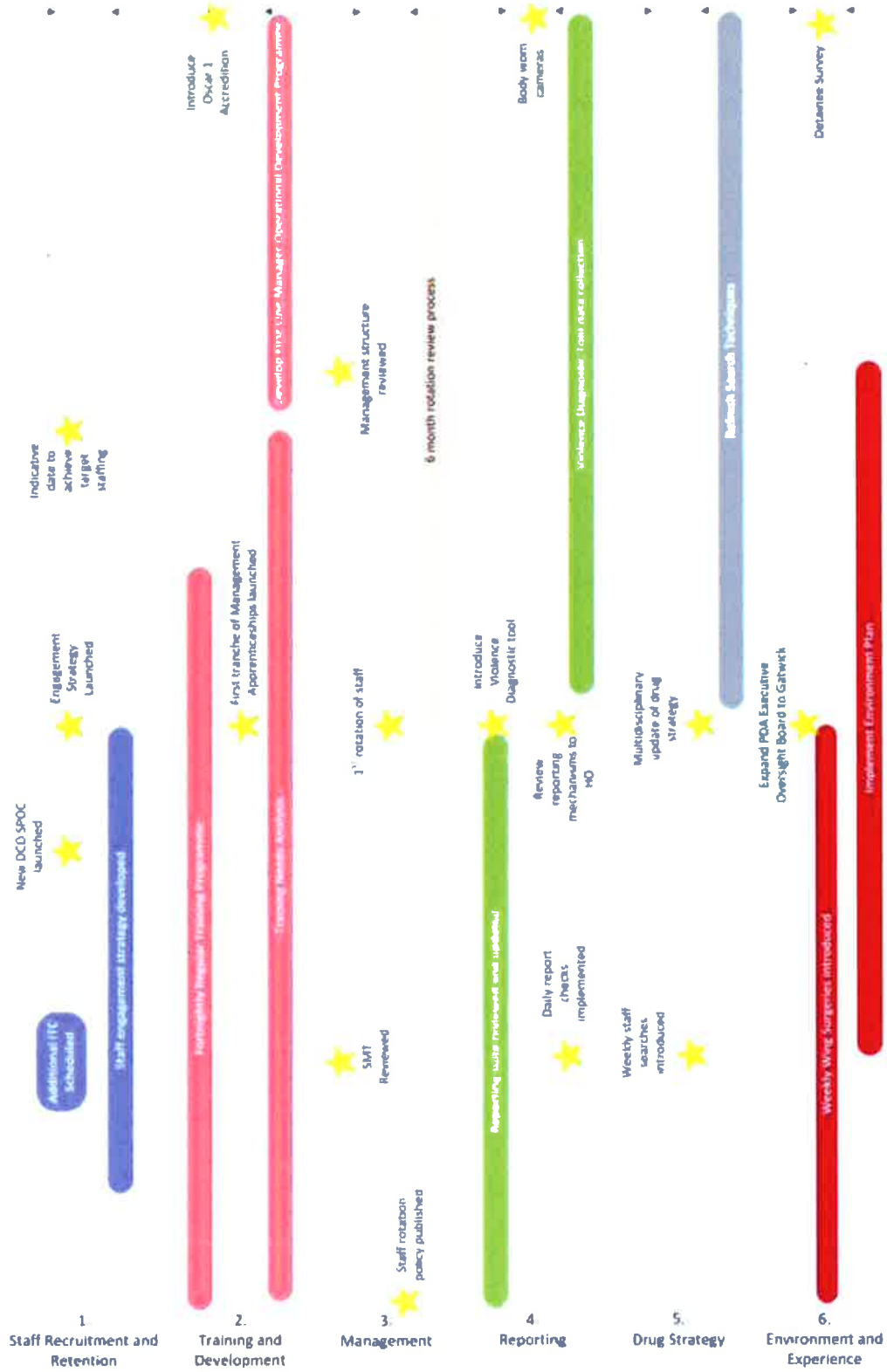
Our Plan will deliver key improvements by December 31st in 6 key areas:

- **Staff Recruitment and Retention** – ensuring we have sufficient staff to manage the centre.
- **Training and Development** – ensuring staff have the skills to deliver a consistent level of service to detainees.
- **Management Structure** - ensuring our management team has the right structure and responsibilities.
- **Reporting and Governance** – ensuring that our reporting suite and governance is sufficiently robust.
- **Drug Strategy** – ensuring that we reduce supply and effectively support detainees with substances misuse issues.
- **Detainee Experience and Environment** - ensuring that activities and facilities at the centre preserve and promote the mental and physical wellbeing of detainees.

The diagram on page 3 shows the key milestones against these areas.



Brook House Action Plan



2. Vision

This plan aims to ensure Brook House meets the HMIP's standards of a healthy establishment:

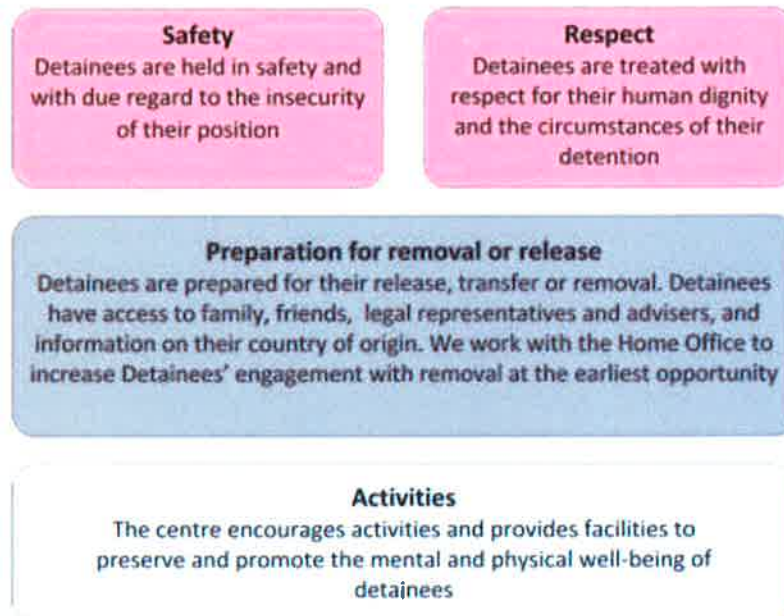


Fig 2 Brook House Vision

3. Principles

To achieve this vision the project team will work to the following principles:

- The safety of detainees is our highest priority.
- The plan is forward looking and will facilitate a "New Start" for Brook House.
- The purpose of the centre will not be disrupted and the changes must not interfere with the smooth operation of the centre.
- All parties are able to contribute and some actions will be the responsibility of organisations beyond G4S.



4 Project Management and Governance

A project board will monitor and assure that the project delivers our vision for Brook House.

<redacted>

Fig 2 Project Team

4.1 Project Schedule

The Project Board will meet at least monthly from the [20th September]. The Working Team will meet at least weekly to track progress against the project plan.

Project Board

- **Frequency:** at least monthly
- **Participants:** Project Sponsor, Workstream Sponsors, Project Director, Home Office Representative
- **Purpose:** update on all workstreams, discussion of project priorities and tracking against plan

Working Team Update

- **Frequency:** weekly
- **Participants:** Workstream Leads, Project Director
- **Purpose:** update from workstreams, review of project plan, tracking against plan and resource allocation



5. Action Plan

Ref	Objective	Actions	Date	Owner	Update	BRAG
1. Staff Recruitment & Retention						
		Update recruitment pipeline requirement against MSL/Max staffing	30 th September			On target
	Sufficient staff to effectively manage the centre.	Schedule additional Initial Training Course (ITCs)	30 th September			On target
		Indicative date to achieve Target Staffing	20 th November			On target
		Review (and provide a report to the Project Board) of the recruitment and ITC activity to inform future recruitment.	31 st January 2018			On target
		Run 5 Initial Training Courses (ITCs) by March 2018 with a total recruitment target of [100] staff to ensure full staffing.	31 st March 2018			On target
	Maintain or reduce staff attrition levels.	Start a staff engagement forum that allows residential staff to meet with the Deputy Director on a monthly basis. Allows staff to communicate ideas, frustrations and concerns; for Deputy Director to communicate with staff group directly. A written record/action sheet will be maintained of these meetings.	30 th September 2017			On target
		Re-launch staff welfare helpline – ensuring staff understand that this is an independent service they can contact should they have difficulties.	30 th September 2017			On target
		Assign staff member to be a new DCO single point of contact (SPoC). SPoC to meet with each member of each ITC to assess their current needs and concerns.	16 th October 2017			On target



Brook House Action Plan

Ref	Objective	Actions	Date	Owner	Update	BRAG
		Develop and implement a staff engagement strategy, including: <ul style="list-style-type: none"> • 'Breakfast with the Director' meetings. • A 'you said, we did' process. 	31 st October 2017			On Target
2. Staff Development / Training						
		Conduct a Training Needs Assessment exercise for all staff to ensure the correct mix of training is identified.	30 th November 2017			On Target
		Seek Home Office agreement to lock up the IRC for one half day each fortnight for 3 months to enable the delivery of training sessions to allow immediate refresher training.	21 st September 2017			On Target
		Subject to HO agreement (as above), hold refresher training session every fortnight on any identified immediate training needs.	28 th September 2017			On Target
	Provide a stable staff group with the right mix of skills to deliver a consistent level of service to detainees.	Hold staff discussion group with all staff on the Milgram experiments during staff training sessions.	Sessions to commence by 31 st October 2017			On Target
		Launch Prism Programme in Brook House to identify and address underlying causes of violence – including staff attitudes, behaviours and concerns. This programme was developed in HMP Parc and was extremely successful. We have since rolled it out in HMP Birmingham.	30 th November			On target
		Introduce Oscar 1 accreditation – significantly increasing the minimum training and responsibility of managers.	31 st December 2017			On Target
		Train all staff in Mental Health First Aid.	31 st March 2018		■	On target



Brook House Action Plan

Ref	Objective	Actions	Date	Owner	Update	BRAG
	Develop longer-term plans to meet staff training needs.	Consider developing a Middle and First Line Manager operational development programme to include incident reporting, use of force, investigations, sickness absence management, grievance hearings and incident command.	31 st December 2017	[Redacted]		On target
		Review the ITC content and DCO Induction programme.	31 st March 2018	[Redacted]		On target
		Roll out level 3 team leader apprenticeship for first line Managers (staggered cohorts).	31 st October 2018	[Redacted]		On Target
		Roll out Level 5 Strategic Leadership Apprenticeship for Middle Managers - staggered cohort.	31 st October 2018	[Redacted]		On Target
3. Management Structure						
	Ensure a professional management team with the right responsibilities and skills.	Review Senior Management Team (SMT).	30 th September 2017	[Redacted]		On Target
		Review the management and staffing structure and relative responsibilities to ensure best fit with operating requirements and accountability.	30 th November 2017	[Redacted]		On Target
	Rotate staff appropriately.	Publish Staff Rotation policy.	Complete	[Redacted]		Complete
		First rotation of staff between groups.	31 st October	[Redacted]		On Target
		Review the assignment of DCMs – include reallocation of duties and the frontline management of DCOs.	31 st October 2017	[Redacted]		On Target
		Introduce six-monthly reviews of DCM assignment to ensure management staff are including staff being regularly mixed between different teams.	31 st October 2017	[Redacted]		On Target
4. Reporting / Governance						



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Ref	Objective	Actions	Date	Owner	Update	BRAG
		Complete review and renewal of Duty Director log to allow daily cross reference with reported incidents.	30 th September 2017	[Redacted]		On Target
		Introduce unannounced walkabout log from HMP Altcourse – where SMT and external managers visit the site to complete unscheduled inspections.	30 th September 2017	[Redacted]		On Target
		Review Security Incident Report sign off process.	31 st October 2017	[Redacted]		On Target
		Introduce a process of automatic review for any staff member who has more than three complaints or three JoF in three months – completed by SMT.	31 st October 2017	[Redacted]		On Target
	Implement best practice internal governance and reporting processes.	[Redacted]: Explore the use by patients within some NHS hospitals of “Candour logs” and, if appropriate, introduce their use at Brook House.	31 st October: Research complete	[Redacted]		On Target
		Introduce Candour logs (if appropriate)	30 st November introduced (if appropriate)	[Redacted]		On Target
		[Redacted]: Define what incidents should be classified as “Never” events (i.e those that should never occur) and introduce a system for the monthly review of such incidents.	31 st October 2017	[Redacted]		On Target
		Quarterly Assurance visit reporting directly to COO – looking at reporting procedure.	31 st December 2017	[Redacted]		On Target
		Introduce new Body Worn Cameras and supporting processes.	31 st December 2017	[Redacted]		On target



Brook House Action Plan

Ref	Objective	Actions	Date	Owner	Update	BRAG
	Ensuring reporting to Home Office reflects best practice.	Share our reporting requirements with the Home Office to review for effectiveness including Self Harm/Use of Force/Food refusal and NPS incidents. Request that updates from DESAAT and PSU actions are added to the standing agenda at Monthly Contract Review Meeting.	18 th September	[Redacted]		On Target
		Review mechanism to report incidents to the Home Office following policy review.	30 th September 2017	[Redacted]		On Target
		Introduce weekly use of force review committee – SMT reviews Use of Force reports, unexplained injuries and CCTV weekly. Process to also include Home Office Monitor.	31 st October 2017	[Redacted]		On Target
	Ensure use of force governance contributes to continuous reduction in incidents and violence rates.	Introduce Violence Diagnostic Tool used in our prisons to the IRCs.	30 th September 2017	[Redacted]		On Target
		Commence data collection for the Violence Diagnostic Tool.	31 st October 2017	[Redacted]		On Target
	Increase the use of Whistleblowing procedure.	Provide all staff with whistleblowing cards.	1 st November 2017	[Redacted]		On Target
		[Redacted] recommendation: Select and train staff "Speak Out" Champions.	22nd September 2017	[Redacted]		On Target
	Ensure policies and procedures reflect current needs and HMIP Expectations.	Complete review of policies and procedures at Brook House to identify potential development needs. Review Room Sharing Risk Assessment Policy/ Process .	31 st October 2017	[Redacted]		On Target
			6 th October 2017	[Redacted]		On Target
			31 st October 2017	[Redacted]		On Target



Brook House Action Plan

Ref	Objective	Actions	Date	Owner	Update	BRAG
5.	Drugs					
		Introduce randomised weekly staff searches	30 th September 2017			On Target
		Review drug supply reduction plan and include NPS-specific section.	31 st October 2017			On Target
		G4S Security SME to review supervision of visits.	20 th October 2017			On Target
	Drugs supply reduction.	Review and increase the use of G4S Canine Services.	31 st October 2017			On Target
		Refresh and deliver search technique training to including training about NPS.	31 st December 2017			On Target
		Review Disruption Protocol	31 st December 2017			On Target
		Introduce Level 4 Security Intelligence Operations Apprenticeship.	31 st November 2017			On track
	Detainees with substance misuse problems are identified at reception and receive effective treatment and support throughout their detention.	Complete multidisciplinary review of drug strategy including Healthcare/	31 st October 2017			On Target
		Complete a review of the care officer scheme to include regular welfare check including substance misuse checks.	30 th September 2017			On Target
		Introduce monitoring system for actions identified by the Regular Welfare Checks including substance misuse actions.	30 th September 2017			On Target
6.						



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Ref	Objective	Actions	Date	Owner	Update	BRAG
		[Redacted]	30 th September	[Redacted]		On Target
		Introduce weekly minuted Wing Surgeries - attended by G4S SMT.	31 st October 2017	[Redacted]		On Target
	Ensure all detainees are treated with respect by all staff, with proper regard for the uncertainty of their situation and their cultural backgrounds.	Expand the role of the PDA Executive Oversight Board to oversee safeguarding across Gatwick.	31 st October 2017	[Redacted]		On Target
		[Redacted] : Explore the possibility of introducing a "Detainees Speakout" line with an agency such as [Redacted].	30 st November	[Redacted]		On Target
		Conduct a survey of detainees to assess the climate in the centre with the results presented the SMT & Safer Custody Team. Survey to be repeated every 6 months.	31 st December 2017	[Redacted]		On Target
		Introduce detainee advocacy role – with Healthcare Staff acting as patient advocate during incidents.	31 st December 2017	[Redacted]		On Target
		Review safeguarding policy in conjunction with [Redacted]	31 st December 2017	[Redacted]		On Target
		Review the mechanisms by which third party agencies (e.g. the [Redacted]) contribute to Safer Custody.	31 st December 2017	[Redacted]		On Target
		Explore piloting [Redacted]	31 st March 2018	[Redacted]		
	Detainees live in a safe, clean and decent environment.	Implement action plan to clean all detainee rooms and toilet areas, and track on-going completion.	31 st October 2017	[Redacted]		On target
		Develop environment plan – identifying potential changes to activities and physical environment from Detainee Focus Groups.	30 st November 2017	[Redacted]		On target



Brook House Action Plan

Ref	Objective	Actions	Date	Owner	Update	BRAG
	Detainees are aware of the routines and facilities of the unit.	Ensure key information sought by detainees is in position in at least 8 areas e.g. library, residential wings and visits waiting room.	31 st October 2017	█		On Target
		Review the Reception process including the interview process, Healthcare and Induction assessment processes to minimise the repetition and ensure appropriate privacy is afforded. The review will also consider the consistency of inductions to ensure all detainees receive a consistent induction.	31 st December 2017	█		On Target
	The centre encourages activities and provides facilities to preserve and promote the mental and physical wellbeing of detainees.	Complete a review with the Home Office and detainees, to ascertain the education and skills priorities for detainees to identify any opportunities to develop skills and employment opportunities, including working with sub-contractors and local organisations.	31 st March 2018	█		On Target
		Review the curriculum and education needs through an external Education Manager.	31 st March 2018	█		On Target
		Recruit 2 additional teachers to expand the quantity and range of the curriculum.				
		Introduce well-being strategy for detainees following Health Needs Assessment completed by █	31 st March 2018	█		On Target

6 Updating the Action Plan

In addition to the actions below above we will update our plans as we identify additional activity which could benefit detainees and the centre.

6.1 Independent Review

We will commission an independent review to understand the root causes of the matters highlighted in the Panorama programme aired on 4 September 2017.

The Home Office will be consulted before, during and at the conclusion of the review. The review will be conducted by a competent person / body.

The review will be commissioned by the General Counsel of G4S PLC on behalf of the CSR committee of the G4S board. The findings will be used by G4S to ensure that all action is taken to prevent any repeat of the behaviour shown.

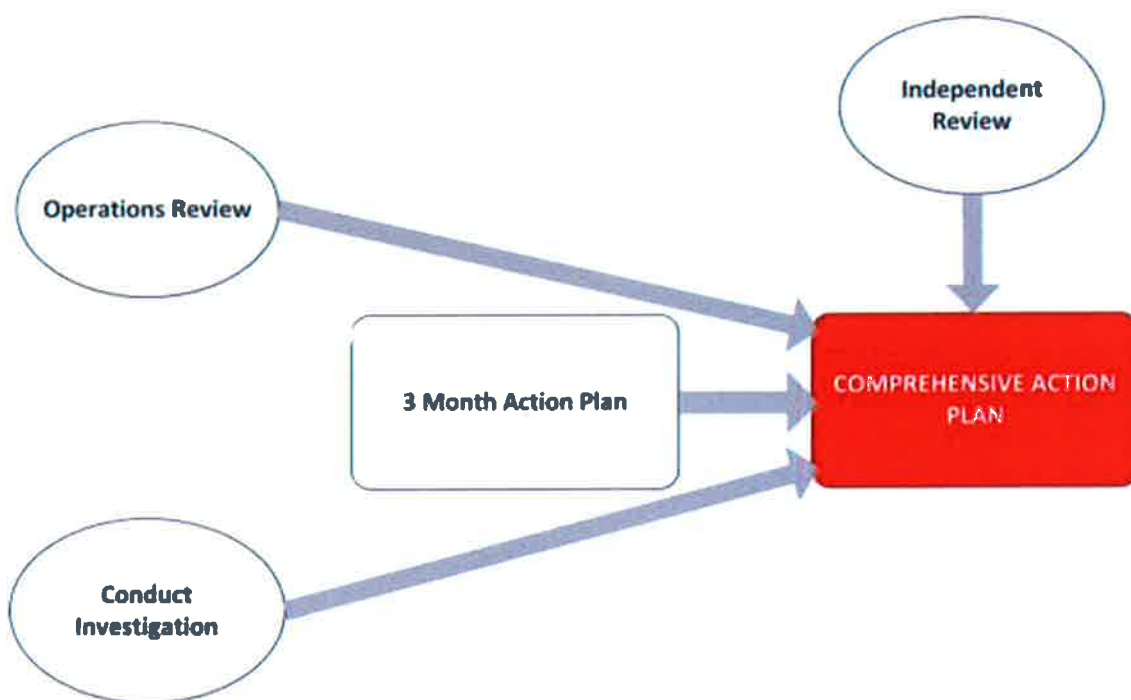


Fig 2: Plan development