

Here it is.

Some points to note.

1. I have deleted the safeguarding definition they refer to, as they rightly say it is narrower than their definition of adults at risk (In fact, far narrower than we have historically interpreted it as it limits the group to detainees in need of community care).
2. I have rejected their two points that we replace references to levels of risk, with evidenced levels. They are splitting hairs and the only possible reason is an attempt to insulate their decision making from legal challenge.
3. I'm copying to Colin, as whatever line we take on these points needs to be consistent.
4. There's a problem I have come across before with editors trying to clarify technical points they don't understand and achieving the opposite. The particular example here (para 1.73) concerns the decision to maintain a torture victim because of imminent removal to a third country. Often I think technical language has to be used otherwise it can set hares running. In this case, the point was that the torture victim was being removed, but not refouled. Third country was changed to 'another country', which misses the point and is just meaningless in this context. Often with such changes the inspector drafting the report never gets to see the change and cannot correct it. I think we need to think about how we ensure these things don't happen.
5. Another change (para 1.60) see a negative statement - 'a third of detainees had no solicitor', made positive, 'two-thirds of detainees had a solicitor' How irritating!
5. On a related matter a casework recommendation has been changed to say that people torture victims should only be detained in very exceptional circumstances. That's a big change. My original recommendation was that they should be released. Not sure what our policy is here.

From: Singh Bhui, Hindpal (HMI Prisons)
Sent: 25 January 2017 18:01
To: Hughes-Roberts, Deri
Cc: Carroll, Colin (HMI Prisons)
Subject: FW: Brook House fact check

from a quick look, nothing much to trouble us here, but could do you checking Deri,

thanks,

H

From: Buchanan, Barbara (HMI Prisons)
Sent: 25 January 2017 15:55
To: Singh Bhui, Hindpal (HMI Prisons)
Subject: FW: Brook House fact check

Hindpal

Please see the attached fact check response from Immigration Enforcement. I also attach the draft report. Grateful for your comments/amends when you can.

Regards,