


Division	Safeguarding	 Gatwick IRCs
Document No.	BRO-006	
Document	Removal from Association	
Issue		


Removal from Association

DATE EFFECTIVE FROM:


CONTACT POINT: Head of Safeguarding

RESPONSIBLE MANAGER: Centre Director

Site: Brook House IRC			Date published	
Owned by: Audits & Compliance Manager			Written by:	M Dyne (Nov 2008)
Approved by: Centre Manager			Date:	
Approved by: Home Office			Date:	
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22/08/16	Reviewed and updated	M Brown		


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AMENDMENTS TO POLICY			
Amended Section:	Page:	Date	Reason for & Description of update:
Introduction	1	22/08/16	Inclusion of Detention Centre Rule 40
Index – Section 14	3	22/08/16	Detainee Information System to Detainee Administrative Tool
Index – Section 7	3	22/08/16	Wardrobe Keys to Wardrobe and locker keys
Throughout	Throughout	22/08/16	Change Removal From Association (RFA) to Care and Separation (CSU)
Responsibility	5	22/08/16	Change UKBA to Home Office
Description of accommodation	5	22/08/16	Location of CSU
Throughout	Throughout	22/08/16	Change Team Leader to Detainee Custody Manager
Telephone Calls	7	22/08/16	Change DECT phone to mobile phone. Added supervised phone calls.
Induction & Information	8	22/08/16	Removed Grievance and added Complaints
Detainees without funds or clothing	9	22/08/16	Removal of Issues Log – this does not exist or is necessary.
RFA – Security	10	22/08/16	Amended wording and association entitlement. Added Body Worn Cameras by Officers
Recreational Facilities	11	22/08/16	Television entitlement, portable TVs / DVDs. Education entitlement
Healthcare	12	22/08/16	Inclusion of Healthcare Assessment screening within two hours.

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This policy is in accordance to Detention Centre Rule 2001 - Removal From Association Rule 40 –

(1) “Where it appears necessary in the interests of security or safety that a detained person should not associate with other detained persons, either generally or for particular purposes, the Secretary of State (in the case of a contracted-out detention centre) or the manager (in the case of a directly managed detention centre) may arrange for the detained person’s Removal from Association accordingly.

(2) “In cases of urgency, the Manager of the contracted-out detention centre may assume the responsibility of the Secretary of State under paragraph (1) but shall notify the Secretary of State as soon as possible making necessary arrangements.

(3) A detained person shall not be removed under this rule for a period of more than 24 hours without authority of the Secretary of State.

(4) An authority under paragraph (3) shall be for a period not exceeding 14 days.


(5) Notice of removal from association under this rule shall be given without delay to a member of the visiting committee, the medical practitioner and the manager of religious affairs.

(6) Where a detained person has been removed from association he shall be given written reasons for such removal within 2 hours of that removal.

(7) The manager will arrange at his discretion for such a detained person as aforesaid to resume association with other detained persons, and shall do if in any case the medical practitioner so advises on medical grounds.

(8) Particulars of every case of removal from association shall be recorded by the manager in a manner to be directed by the Secretary of State.

(9) The manager, the medical practitioner and (at a contracted –out detention centre) an Officer of the Secretary of State shall visit all detained persons who have been removed from association at least once each day for so long as they remain so removed.

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1. INTRODUCTION


Brook House will have a dedicated Removal from Association (Rule 40) area entitled Care and Separation Unit (CSU). Detainees who are located in the Care and Separation Unit will have restricted freedom of movement and access to the facilities available within that unit. They are not given the freedom of movement that Detainees in normal accommodation are given. This acts as an incentive to conform to the Detention Centre rules and therefore be placed back on to normal accommodation. The primary function of the CSU unit is to cater for those detainees who are proving to be too difficult to manage in the more relaxed regime of ordinary accommodation. There will be occasions when a Detainee requests to be removed from association for their own safety / wellbeing, or because they are feeling vulnerable. Such cases should not occur without a case conference between all interested parties.

The appropriate documentation, DCF 1, will be used to monitor and record the behaviour of the Detainee with a view to returning them to ordinary accommodation as soon as is practicable.

2. RESPONSIBILITY

The Care and Separation Unit Officers are responsible for:

- Providing a safe, secure and friendly environment for Detainees
- Complete Detainee personal unit file system and entering the Detainees details in the unit monthly logbook
- Ensure that all visits of authorised personnel are recorded in the unit diary
- The recording of all staff on duty, and all detainees held in CSU
- Providing a focal point for information to and from Detainees
- Ensuring Detainees where applicable, receive the appropriate hygiene packs and, where it is deemed necessary, clothing and shoes
- Ensuring Detainees are advised and made ready for activities, particularly interviews, during their stay.
- Monitoring the use of recreational facilities in the Care and Separation Unit
- Ensuring Detainees receive incoming mail and accept outgoing mail for despatch.
- Ensuring that all Detainees located in the Care and Separation Unit have appropriate documentation completed, and are authorised to be located there.
- Ensuring that only authorised personnel have access to the unit and all visitors to a detainee complete the appropriate section of Form DCF1 as well as note all visitors are recorded in the unit diary.

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The Residential Detainee Custody Manager is responsible for the day-to-day supervision of the Care and Separation Unit and ensuring all Officers understand and are competent in carrying out their duties. The DCF paperwork will include what other measures have been considered prior to locating a Detainee in CSU (Rule 40)

Where possible, prior authority regarding the use of CSU Rule 40 should be obtained from a Home Office Manager, however, in the event that CSU – Rule 40 is used retrospectively, it is the responsibility of the Detainee Custody Manager to notify the IMB, Home Office Manager, Healthcare and the Religious Affairs Manager that a Detainee has been removed from association, and that action has been recorded.

Detainees will receive written confirmation of the justification of their Removal From Association within two hours of placement into CSU.

Where deemed necessary for Detainees to remain in CSU – Rule 40 for periods exceeding 24 hours – the responsible Detainee Custody Manager will present reasons to the Secretary of State and request an extension. This will also apply for detainees exceeding 14 days in CSU.

3. ALLOCATION OF BEDROOMS

When a Detainee is allocated to the Care and Separation Unit, the Unit Officer will allocate a room to each Detainee.

When not in use all other bedrooms in the CSU unit must be kept locked.


On arrival to the CSU Unit, the Escorting Officer will hand over to the CSU Unit Officer a unit file which carries a photograph of the Detainee and the following information:

- Detainees full name and any known alias;
- Full Port Reference;
- Nationality;
- Arrival date at Brook House

4. DESCRIPTION OF ACCOMMODATION

The CSU Unit is located on the Ground Floor of B wing at the far end of Eden Wing.

There is a small association area. The servery is located in Eden Wing, subject to risk assessment; Detainees will be able to collect their meals or be provided meals in their rooms.

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5. LATE NIGHT ARRIVALS

Detainees who arrive in the Care and Separation Unit late at night, when others have gone to bed, must be encouraged to keep as quiet as possible and respect other Detainees.

6. BED LINEN ISSUES

It is the responsibility of the Care and Separation Unit Officer to ensure that Detainees have adequate bed linen when they arrive on the unit.

Each bed is fitted with a mattress and a pillow. Bed linen issues as a minimum will consist of a sheet and duvet cover, a pillowslip, 1 towel and a duvet.

It is the responsibility of the unit officer to ensure that all bedding is changed for fresh linen every time there is a change of occupancy of the bed or when any item has been soiled.

Care and Separation Unit Officers must be particularly vigilant upon the departure from the centre of Detainees and must check that all items of issued bed linen are recovered for laundering prior to their departure. Where it is found that any item of bed linen cannot be accounted for, the Care and Separation Unit Officers must carry out a search of the baggage of the Detainee in an effort to recover the missing items.

7. UNDER BED STORAGE


Every Detainee will, upon arrival to CSU (Rule 40) will be allocated a key to the under bed storage area in their room.

All items of the Detainee's property should be kept in the under bed locker.

8. CLEANING REGIME

The Cleaning Sub Contractors are responsible for all cleaning tasks within the Care and Separation Unit. It is the responsibility of the Care and Separation Unit Officers to monitor the cleanliness of the accommodation and to bring to the attention of the Detainee Custody Manager any defects in cleaning.

The Care and Separation Unit will be cleaned in accordance with an agreed schedule.

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It is the responsibility of cleaning staff to adhere to all of the requirements of the Health and Safety Act and regulations, particularly in relation to the safeguarding of cleaning fluid and materials. Wet floors should be adequately sign-posted. It is the responsibility of the Unit Officer to monitor compliance by the Cleaning Sub Contractor with the Health and Safety Act and Regulation requirements.

If the detainee requests the laundering of their personal clothing then unit staff will make provisions for the laundering of the clothing. The Residential Detainee Custody Manager is to be consulted for such requests.

9. TELEPHONE CALLS

Detainees will be able to keep their personal mobiles phones with them whilst in the CSU unit and may continue to make a receive phone calls. Where information regarding security or safeguarding concerns are noted, individuals only access telephone usage under supervision.

10. VISITS

Detainees located in CSU (Rule 40) will not be restricted in their entitlement to domestic or official visits except to the extent determined by their conduct in the visits room or by security intelligence.

Social Visits


Whilst in the CSU Unit, a detainee will receive their visitors in the main Visits Hall unless otherwise instructed by the Centre Director or Duty Director.

All Detainees will be escorted to and from visits by Detainee Custody Officers and will be subject to a rub down search before and after each visit

Official Visits:

There are official visits rooms available Brook House These are to facilitate private interviews between a Detainee and an official visitor.

Detainees will be escorted to and from visits by Detainee Custody Officers and will be subject to a rub down search before and after each visit.

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11. INDUCTION AND INFORMATION

It is vital that Detainees receive as much information as possible concerning the CSU Unit and the facilities that are available to them.

The induction will cover the following points:

- i) To inform the Detainee of the kind of regime which the unit will offer, (providing the Detainee complies with the behavioural responsibilities expected of them).
- ii) Facilities and aspects of the regime, which the Detainee could reasonably expect would be provided for them.
- iii) To confirm that the Detainee understands:
 - Care and Separation Unit routine
 - Regime of Residential Units
 - Timetable to include Shop opening hours
 - Dining arrangements
 - Obtaining of information
 - Complaints Procedure
 - Visit times
 - Surgery times
 - Availability of Immigration Officers and other agencies.


Any concerns during the induction with a Detainee should be brought to the attention of the Residential Detainee Custody Manager.

12. DETAINEES WITHOUT FUNDS OR CLOTHING

If it appears that a Detainee is without funds or adequate clothing, the Officer on duty should examine the Detainee's database on the Detainee Administrative Tool to ascertain if they have any property in safekeeping. If this is the case, arrangements should be made for the Detainee to have access to their property.

Clothing will not be issued to Detainees who have adequate changes of clothing but all requests will be dealt sympathetically.

Whilst a detainee is in CSU at the request of the detainee the laundering of clothing can be facilitated.

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13. INTERVIEWS

It is critical to the operation of the Centre that Detainees attend all the interviews arranged for them. Failure to attend or attending the interviews late will seriously disrupt the interview process and it therefore follows that particular care needs to be exercised to ensure all Detainees scheduled attend those interviews.

It is the responsibility of the unit officer, to ensure that all Detainees scheduled for interview attend their interview at the appointed time. It is the responsibility of the unit officer to ensure that the Detainee is aware of the interview.

14. DETAINEE ADMINISTRATIVE TOOL

The computerised Detainee Administrative Tool (DAT) with print facility is available in the CSU Unit Office. In the event that there is a need to view a Detainee's file or to print off a report, this can be done. Reports will be printed off in the unit office.

15. MOVEMENT LOG


All movements of all detainees that are held in Care and Separation will be recorded in the unit diary and personal file.

16. CARE AND SEPARATION UNIT - SECURITY

- The Care and Separation Unit is located on the Ground Floor of B wing and is accessible through two points, staff should not be present in the unit, unless on official business. All visitors to the unit must be logged in the Eden Wing Unit Diary.
- There are CCTV cameras positioned strategically in the unit that are monitored in the Control Room.

Detainees who are residing in the CSU Unit have restricted access to association (ie one hour) with further consideration given to visits and access to prayer rooms.

Vigilance must be maintained by all staff to prevent unauthorised access into the CSU Unit.

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All visitors to the CSU Unit will be required to report to the Unit Officer. As a general rule, any official visitors will be accompanied around the unit, and where officers are in any doubt the Residential Detainee Custody Manager must be contacted.

Staff working in CSU Unit must remain vigilant and any indication of change in the Detainees behaviour or demeanour must be discreetly investigated and reported to the Residential DCM. Change is normally a sign of a problem, for example, self-harm; escape plans, attacks on other individuals, stress, organised disruption or depression.

Roll checks are carried out on four occasions each day within the Centre: - 07:45, 12:15, 17:45 and 21.00, the CSU Unit Officer must account for each Detainee located in the unit, and report the numbers to the control room via the telephone.
If Control orders a recount this must be completed without delay and the numbers reported to the control room via the telephone.

If any Detainee is not accounted for, the missing detainee must be located and the relevant Response Plan followed. If there are more Detainees than there should be, the additional Detainees must be fully identified and a report passed to the DCM.

At the beginning and end of each day, the association area will be thoroughly searched. The showers in the CSU Unit will also be searched for any unacceptable items, which may have been hidden.


The Residential DCM may carry out random checks of the Roll Check process in the CSU Units under his/her control.

The principle CSU Unit Officer will also be equipped with Body Worn Cameras whilst on duty.

17. RECREATIONAL FACILITIES

The six rooms in CSU are not automatically equipped with televisions; however, subject to risk assessment and authority, televisions can be added to rooms. Equally portable televisions and DVD players can be provided.

Detainees located in the CSU have access to religious artefacts, books, educational learning, board and card games. These will be returned to the office when not in use.

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18. EXERCISE

All detainees in CSU (Rule 40) will have the opportunity to exercise for a minimum period of 1 hour daily in the open air in a dedicated exercise area accessible from the unit. The exercise yard must be searched before and after any exercise period.

19. MAIL

Incoming mail for Detainees will be delivered to the office in CSU office by the ACO responsible for mail.

Any Registered or Recorded Mail will be logged and signed for by the detainee on the relevant form with the following details recorded:

- Name;
- Room number;
- Cid Ref. no.

The Registered/Recorded Letters must be delivered to the Detainee within four hours of receipt in the centre.


The Detainee will be shown the address on the Registered/Recorded item and must sign as acknowledgement of receipt once they have confirmed the mail is for them. The CSU Unit Officer will also sign as confirmation of receipt.

Ordinary mail for Detainees will be checked against the Roll Board/Location List to ensure that the Detainee is present in the CSU Unit.

Mail received for a Detainee who has left the CSU Unit and any mail for Detainees that have left the Centre, or who cannot be identified must be returned to the Mail Officer who will make arrangements for returning to the sender or to the Home Office for forwarding on to an alternative Removal Centre if applicable.

20. MEDICAL

Detainees located in the CSU Unit (Rule40) will be assessed by Healthcare within two hours of placement. The Healthcare member of staff will confirm the Detainees suitability to be placed into

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Care and Separation. Based on the Healthcare Assessment, the Duty Manager / Duty Director will then make an informed decision about the individual's ongoing regime and location.

In the event that a Detainee is reported to be ill, the Nurse will be contacted and, if circumstances dictate, at the request of the staff, will attend the Unit to assess the situation. Under no circumstances will medical treatment or investigation be prevented or delayed by reason of the detainee's location.

A First Aid Kit and SASH (Self Harm and Suicide) box is available in the unit office.

21. DETAINEE REQUESTS/COMPLAINTS/GRIEVANCES

Detainees located in the CSU Unit (Rule 40) have the same rights of access to the requests/complaints/grievances procedures that apply to any other Detainee at Gatwick IRC's

22. DINING ARRANGEMENTS


Meals and refreshments will be delivered to the Eden Wing servery. Meals will be routinely served to individuals in their room in CSU.

Detainees will have access to hot water and tea/coffee making facilities via requests from CSU Officers.

23. LIBRARY

- All detainees in the CSU (Rule 40) will be offered the opportunity to borrow books from the library. There will be books in the RFA offering a reasonable selection.
- Requests for special books for educational purposes will be dealt with by the education/activity staff.
- An activity member of staff will visit the CSU Unit each week to change a selection of the books.

Staff will take special orders for books from detainees that will be forwarded to the Library. Staff will collect finished books from detainees and examine them for damage.

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Staff will question the detainee about any damage found and, if necessary, may refer it to the Activity Detainee Custody Manager to pursue replacement costs.

Detainees requiring input from the education department will be visited in the CSU unit by the education / activities staff.

24. SHOP

- Each Detainee located in the CSU Unit will have the opportunity to place a shop order daily – from the shopping list.
- Detainees will be offered a shop order form and a list of items available in the shop each morning.
- Each Detainee will receive their shop order on the day ordered.
- Detainees who have difficulty with reading, understanding or writing English will receive assistance in completing their shop order form.


25. DAILY VISITORS TO CARE AND SEPARATION UNIT

Visitors to the Detainee in the Care and Separation Unit on a daily basis (7 days a week) will include:

- Duty Director
- Medical Officer
- Home Office Manager / Representative
- Detainee Custody Manager

and may include:

- The Independent Monitoring Board
- Visiting Chaplaincy
- Education Staff

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- All Visitors will be recorded in the Eden Unit Diary.
- Anyone visiting a Detainee in CSU (Rule 40) will be required to make a comment in the history sheet of the DCF1 documentation.

Arrangements will be made for any of the above to visit the detainee in either their room or in the association area


Visitors must be informed of any concerns regarding unsettled detainees who may prove difficult, and where appropriate, advised against seeing the Detainee unaccompanied.

When requested not to be present in the room with the visitor, CSU Officers will stand outside of the room, within sight of the visitor / Detainee. When these requests are made, they must always be recorded in the Eden Unit Diary.

Apart from the daily unit officers, all other officers will be classed as visitors and will be required to make a record of their visit in the unit diary.

26. DETAINEE CUSTODY MANAGER / DUTY DIRECTOR

- Will visit the CSU Unit at least once each day.
- Will discuss with the staff any problems they may have with the running of the unit or the detainees accommodated within it.
- Will visit each detainee and make general enquiries about their welfare and treatment.
- Will contribute towards the assessment of whether a detainee is required to remain in CSU – Rule 40.

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ANNEX B

Removal from Association Initial Health Assessment**Detainee Details**

Name		Cid Reference	
Time of assessment		Date of Birth	

Initial screening

To be completed within two hours of a detainee being removed from association (DC rules 40 & 42). If no Registered nurse or Duty doctor available to complete within two hours of a detainee being removed from association, then the detainee is to be observed by wing staff four times per hour or inline with ACDT observations if greater. Clinical records and ACDT plans should also be considered.

Is the Detainee currently being assessed or sectioned under section 48 of the Mental Health ACT?

Yes/ No

Is the detainee currently on an Open ACDT plan, are there any recent acts of self harm OR is the detainee currently taking any anti-psychotic medication?

Yes/ No

Does the detainee show signs of being acutely unwell (e.g. Psychotic/ withdrawal from drugs/ significant injury) at the present time?

Yes/ No

Do you think the detainee will be able to cope with a period of removal from association?


Yes/ No

Do you think the detainee's mental health will deteriorate from being removed from association?

Yes/ No

Health Assessment

Following the above screening are there any clinical reasons to advise against removal from separation at this time?

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YES		NO	Delete as appropriate	
Signature			Name	
Grade			Time	Date
Where necessary this form should be part of a multi-disciplinary review culminating in a care map for the individual				

Notes for Healthcare

This assessment must be completed for all detainees being removed from association (DC Rule 40 & 42). The purpose of this assessment is to determine if there are any healthcare reasons against removing a detainee from association, and to provide a snapshot of the detainee's mental health at the time of the assessment. However if there are any immediate physical health concerns these should also be considered.

It is not intended to be a comprehensive mental or physical health assessment. It is not intended to predict or anticipate a change in the detainee's condition over time. If you have any concerns about the detainee you are screening seek further guidance from healthcare colleagues or from the on call healthcare manager. A multi-disciplinary case review maybe required.

The assessment should be completed after:

- A discussion with the detainee
- Reference to his clinical record and any other relevant documentation, e.g. incident reports, ACDT if appropriate.
- Gathering information from other members of staff in contact with the detainee.
- Reviewing the nature of the incident which led to removal from association.

The Duty Director will make the final decision on where to locate the detainee.


Duty Director / Duty Operations Manager

(Sign at the bottom on all occasions)

The Duty Director (or Operations Manager in their absence) uses this section to acknowledge the healthcare assessment overleaf.

If a doctor or a registered nurse indicates that there are healthcare reasons to advise against removal from association and the Duty Director considers that removal from association necessary for safety or security reasons a case review must be held immediately to discuss the best location for the detainee and any actions that could be taken to mitigate healthcare issues raised recorded on a Care map.

Following the Healthcare assessment I the Duty Director/ Operations Manager have decided that the detainee will				
Continue to be removed from association	Yes		NO	Delete as appropriate
Duty Director Comments				

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Signature		Name	
Grade		Time	Date
Is a Care Map needed to mitigate Issues raised by Healthcare assessment			
Yes		NO	Delete as appropriate


Care Map

To be completed in all cases where initial assessment by Healthcare has indicated that there are medical considerations to be made after removing a detainee from association.

Actions to be considered should include;

- Action to lessen effects of isolation
- Increased observation from wing staff or Healthcare staff
- Review of prescribed medications
- Transfer to a Medical bed at another IRC
- Talking Therapy with an RMN

Issue Number	Issue	Goals	Action Required	By whom and when	Status of Action
1.					
2.					
3.					
4.					
5.					

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6.					

Name	Role	Signature	Date	Time
	Duty Director			
	Duty Operations Manager			
	Health Care			
	Wing Staff			

DRAFT