



G4S plc

Brook House 3 Month Action Plan

2nd November 2017

Version Number: 1.6

Version	Date	Changes made
1.2	6.10.17	Action progress updated
1.3	11.10.17	Action progress updated
1.4	19.10.17	Action progress updated
1.5	27.10.17	Action progress updated

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 directly to Managing Director of Custodial & Detention Services, Jerry Petherick. 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:

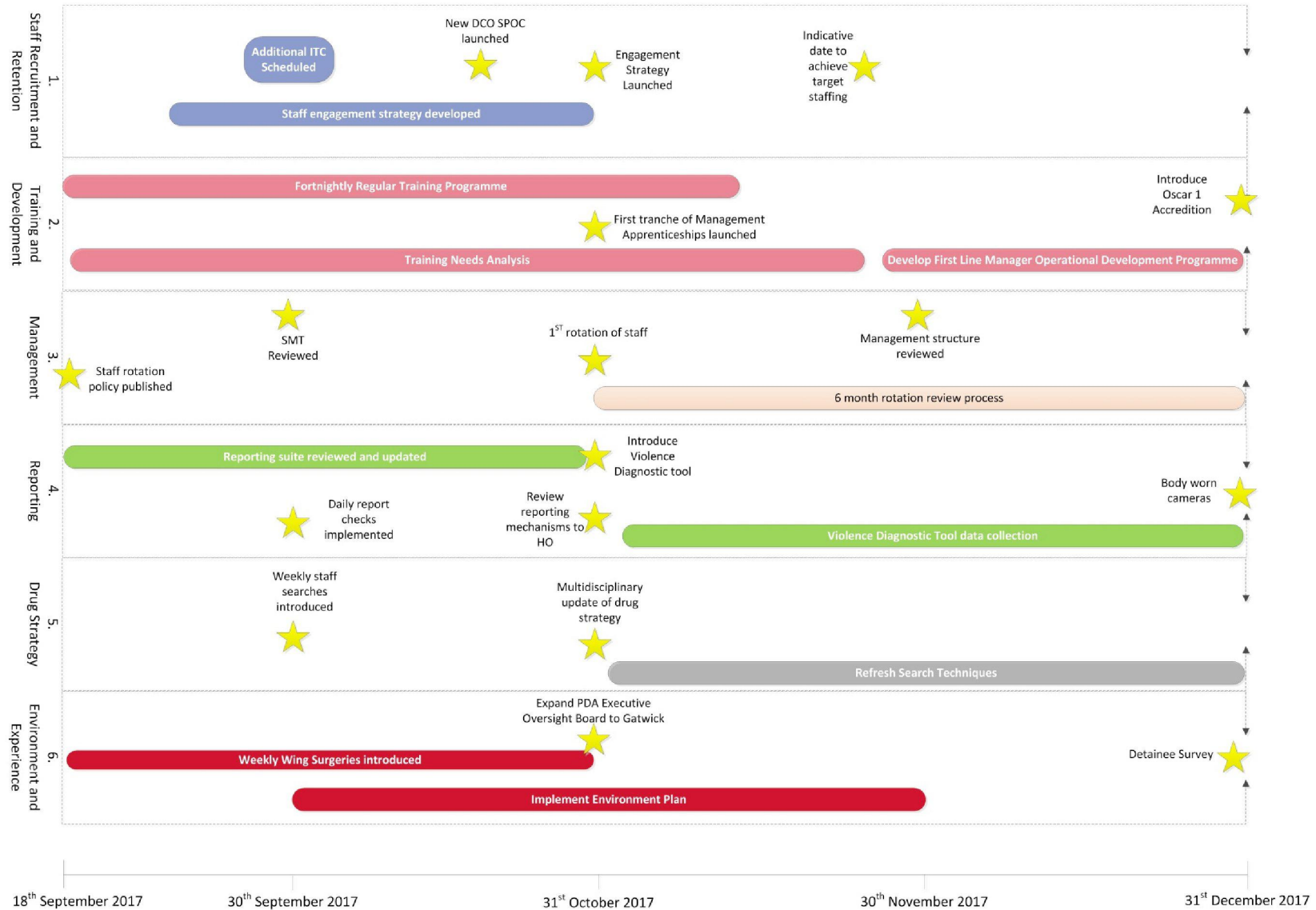
- **Staff Recruitment and Retention** – ensuring we have sufficient staff to manage the centre.
- **Training and Development** – ensuring staff have the skills to deliver a consistent level of service to detainees.
- **Management Structure** - ensuring our management team has the right structure and 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.



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Brook House Action Plan



2. Vision

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

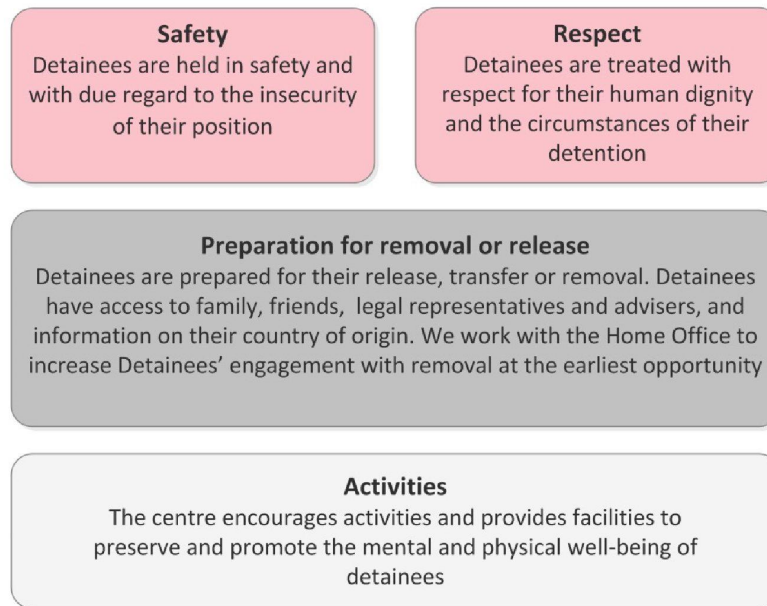


Fig 2 Brook House Vision

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.

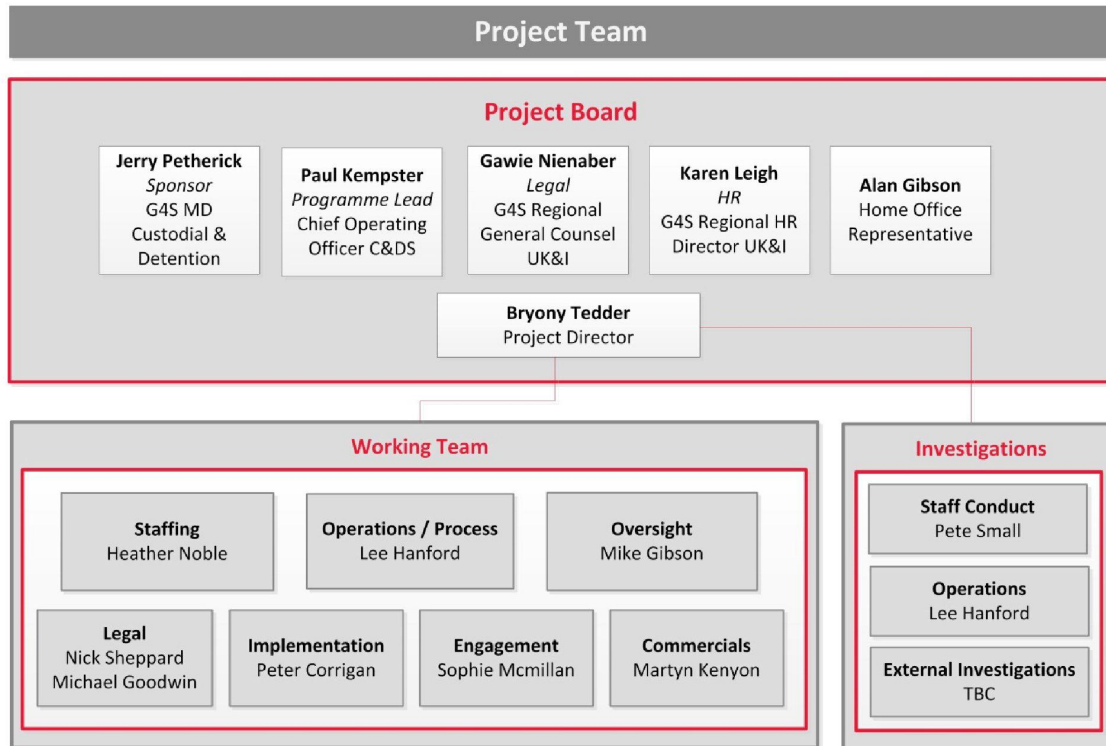


Fig 2 Project Team

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.

<p>Project Board</p> <ul style="list-style-type: none"> ▪ 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 	<p>Working Team Update</p> <ul style="list-style-type: none"> ▪ Frequency: weekly ▪ Participants: Workstream Leads, Project Director ▪ Purpose: update from workstreams, review of project plan, tracking against plan and resource allocation
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5. Action Plan

Ref	Objective	Actions	Date	Owner	Update	BRAG
1. Staff Recruitment & Retention						
	Sufficient staff to effectively manage the centre.	Update recruitment pipeline requirement against MSL/Max staffing	30 th September	Lee Hanford	Recruitment pipeline completed	Complete
		Schedule additional Initial Training Course (ITCs)	30 th September	Lee Hanford	ITC Plan completed	Complete
		Indicative date to achieve Target Staffing	20 th November	Lee Hanford	A further assessment day was run 30.10.17 and an additional 16 new entrants were selected for Initial Training. We current number of candidates assessed and awaiting training courses is 62, (although about 10% are likely to drop out through vetting or other offers of employment) ITC 3 has 15 starters. Further assessment day are being timetabled for November and discussions continue with a recruitment agency, (Hayes), to increase the number of potential candidates for assessment.	At risk
		Review (and provide a report to the Project Board) of the recruitment and ITC activity to inform future recruitment.	31 st January 2018	Lee Hanford		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	Lee Hanford	Target dependent on updated pipeline requirement – current plan allows significant contingency. Four ITC course will produce 120 new starters.	On target



Ref	Objective	Actions	Date	Owner	Update	BRAG
	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	Steve Skitt	The additional hours and loyalty bonus scheme continues to have a positive impact with 81 staff having applied to join the scheme. This will generate an additional 460 staff hours per week or 12 full time equivalents.	Complete
		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	Sarah Grady	Local notice board has been updated with the current care team and guidance on the Employee Care Scheme information booklets	Complete
		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	Steve Skitt	DCO Ryan Harkness has been appointed to support the current ITC – Go live date 30.10.17	Complete
		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	Lee Hanford	Staff engagement forums are being conducted on a monthly basis by the Deputy Director, (Steve Skitt), these are diared and minuted. The Deputy Director plans to have a monthly staff surgery for staff and a suggestion box in the gate. Equipment ordered to be fitted in gatehouse In the meantime forums have commenced. A ‘You said we did’ board is in the gate. It will be moved to a more prominent position and updated on a regular basis.	Complete
2. Staff Development / Training						
	Provide a stable staff group with the right mix of skills to deliver	Conduct a Training Needs Assessment exercise for all staff to ensure the correct mix of training is identified.	30 st November 2017	Jane Shannon	Jane Shannon was on site 9/10.10.17. Initial training needs identified for Front Line Managers. Corndell, (Training Company), appointed for first tranche of 1:2:1 coaching.	On target



Ref	Objective	Actions	Date	Owner	Update	BRAG
	a consistent level of service to detainees.	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.	21st September 2017	Lee Hanford	Approval given by the Home Office, (Michelle Smith), subject to a training needs analysis and an undertaking that the time will be effectively used.	Complete
		Subject to HO agreement (as above), hold refresher training session every fortnight on any identified immediate training needs.	28 th September 2017	Steve Skitt	Approval given by Michelle Smith subject to a training needs analysis and an undertaking that the time will be effectively used.	Complete
		Jill Dando Institute recommendation: Hold staff discussion group with all staff on the Milgram experiments during staff training sessions.	Sessions to commence by 31 st October 2017	Dan Houghton	An initial review has taken place of the Milgram experiment. The first discussion prior to roll-out will be at the next SMT, Tues 7th November	At risk
		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	Lisette Saunders	The PRISM (violence risk management tool) assessment commenced w/c 23 rd October. Focus groups with staff have taken place with initial feedback given to the Director. Focus groups with detainees will take place w/c 13 th November with the final report and recommendations available by the end of November.	On target
		Introduce Oscar 1 accreditation – significantly increasing the minimum training and responsibility of managers.	31 st December 2017	Dan Haughton	All Oscar 1 will attend the Incident Management/Preservation of Evidence training	
		Train all staff in Mental Health First Aid.	31 st March 2018	Dan Haughton	Reviewed with Jane Shannon on 10.10.17	On target
	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	Dan Haughton	Reviewed with Jane Shannon on 10.10.17. Corndell, (Training Company), appointed to introduce a level 3 CIPD accredited training programme focusing on knowledge skills and behaviours to be supported by professional development experts, (1:2:1 sessions).	On target



Ref	Objective	Actions	Date	Owner	Update	BRAG
		Review the ITC content and DCO Induction programme.	31 st March 2018	Dan Haughton	Review with Jane Shannon on 10.10.17 See training handout	
		Roll out level 3 team leader apprenticeship for first line Managers (staggered cohorts).	31st October 2018	Jane Shannon	Cornell commissioned to support the recruitment of DCMs. Cohorts as below to be added as actions after Project board approval: Cohort 1 – Feb 2018 Cohort 2 – April 2018 Cohort 3 – June 2018	Complete
		Roll out Level 5 Strategic Leadership Apprenticeship for Middle Managers - staggered cohort.	31st October 2018	Jane Shannon	Reviewed with Jane Shannon. Phase One proposes that all newly appointed DCMs undertake level 5 qualification (Advert for places to be published w/c16.1.17)	Complete
3. Management Structure						
	Ensure a professional management team with the right responsibilities and skills.	Review Senior Management Team (SMT).	30 th September 2017	Paul Kempster	Director, (Lee Hanford), has review and will be presented to Paul Kempster and Jerry Petherick w/c 9.10.17 The newly recruited Head of Safeguard has a confirmed start date of 11th December The new Head of Residence post has been advertised.+	Complete
		Review the management and staffing structure and relative responsibilities to ensure best fit with operating requirements and accountability.	30 th November 2017	Lee Hanford	Phase One – SMT and middle management review complete Phase Two – Front Line Management Review complete Phase Three – Front Line Staff completed	Complete
	Rotate staff appropriately.	Publish Staff Rotation policy.	Complete	Steve Skitt	Published September 2017	Complete
		First rotation of staff between groups.	31 st October	Steve Skitt	To commence post ITC going live 30.10.17	Complete



Ref	Objective	Actions	Date	Owner	Update	BRAG
		Review the assignment of DCMs – include reallocation of duties and the frontline management of DCOs.	31 st October 2017	Lee Hanford	There are a number of vacancies in this grade currently filled with temporary promotions. Adverts will be published advertising these posts, 16.10.17. Job rotation will take place on appointment	Complete
		Introduce six-monthly reviews of DCM assignment to ensure management staff are including staff being regularly mixed between different teams.	31 st October 2017	Lee Hanford	Next will take place on appointment of DCM posts and be reviewed 6 monthly thereafter	Complete and ongoing
4. Reporting / Governance						
	Implement best practice internal governance and reporting processes.	Complete review and renewal of Duty Director log to allow daily cross reference with reported incidents.	30 th September 2017	Steve Skitt	Implemented w/c 2.10.17	Complete
		Introduce unannounced walkabout log from HMP Altcourse – where SMT and external managers visit the site to complete unscheduled inspections.	30 th September 2017	Mike Gibson	Implemented w/c 2.10.17	Complete
		Review Security Incident Report sign off process.	31 st October 2017	Mike Gibson	Review complete with recommendations made	Complete
		Introduce a process of automatic review for any staff member who has more than three complaints or three UoF in three months – completed by SMT.	31 st October 2017	Lee Hanford	The complaints log the Use of Force log will be reviewed at the weekly ‘Scrutiny Meeting’ and monitored by the Deputy Director.	Complete
		Jill Dando Institute recommendation: 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	Jerry Petherick	Initial contact made with the NHS to review how appropriate ‘Candour logs’ would be in an IRC. JKP has conducted a presentation to the Home Office 24.10 on G4S structure to introduce Candour representatives at each site.	Complete
		Introduce Candour logs (if appropriate)	30 st November introduced (if appropriate)	Lee Hanford		



Ref	Objective	Actions	Date	Owner	Update	BRAG
		Jill Dando Institute recommendation: 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	Mike Gibson	‘Never Events’ system introduced	Complete
		Quarterly Assurance visit reporting directly to COO – looking at reporting procedure.	31 st December 2017	Mike Gibson		
		Introduce new Body Worn Cameras and supporting processes.	31 st December 2017	Peter Corrigan	Cameras ordered by 15.9.17 Draft DSO received w/c 9.10.17 Site visit from installation company 11.10.17 Cameras delivered 19.10.17 Training for DCMs scheduled for 10.11.17	On target
		Review BWV Policy	30 th November	Michelle Brown		
	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.	18 th September	Jerry Petherick	Complete	Complete
		Request that updates from DESAAT and PSU actions are added to the standing agenda at Monthly Contract Review Meeting.	30 th September 2017	Steve Skitt	Now included as an agenda item	Complete
		Review mechanism to report incidents to the Home Office following policy review.	31 st October 2017	Steve Skitt	All staff related incidents including direct complaints are copied to Home Office	Complete
	Ensure use of force governance contributes to continuous reduction in incidents and violence rates.	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.	30 th September 2017	Lee Hanford	Scrutiny meetings are held weekly to inform UoF. Commenced w/c 2.10.17 Home Office to be invited to attend	Complete
		Introduce Violence Diagnostic Tool used in our prisons to the IRCs.	31 st October 2017	Michelle Brown / James Begg	Data collection to provide appropriate violence data updated/retrospectively report period May-October using Brook House Diagnostic Tool. Brook House hosted a meeting of IRC Governor/Directors to discuss violence	Complete



Ref	Objective	Actions	Date	Owner	Update	BRAG
		Commence data collection for the Violence Diagnostic Tool.	1 st November 2017	Steve Skitt	Reviewed data is being collected. Backtracking data to be able to produce trend analysis	Complete
	Increase the use of Whistleblowing procedure.	Provide all staff with whistleblowing cards.	22nd September 2017	Steve Skitt	Received and delivered individually to staff's home addresses	Complete
		Jill Dando Institute recommendation: Select and train staff "Speak Out" Champions.	31 st October 2017	Lee Hanford	Will be reviewed at SMT meeting, (7th Nov). Delay in implementing this action because of staff shortages. Action will be implemented to a revised timetable after SMT discussion.	Beyond milestone
	Ensure policies and procedures reflect current needs and HMIP Expectations.	Complete review of policies and procedures at Brook House to identify potential development needs.	6 th October 2017	Lee Hanford	A review of policies which require development needs has taken place.	Complete
		Review Room Sharing Risk Assessment Policy/ Process .	31 st October 2017	Steve Skitt	Review complete	Complete
5. Drugs						
	Drugs supply reduction.	Introduce randomised weekly staff searches	30 th September 2017	Steve Skitt	Introduced w/c 25 th Sept	Complete
		Review drug supply reduction plan and include NPS-specific section.	31 st October 2017	Lee Hanford	Drug and Alcohol Strategy Reviewed, includes a review of drug supply reduction	Complete
		G4S Security SME to review supervision of visits.	20 th October 2017	Mark Jones	Mark Jones, Head of Security and a Security Manager from HMP Altcourse conducted a review of the management organisation and supervision of visits. They will provide a report by 4th Nov.	Complete
		Review and increase the use of G4S Canine Services.	31 st October 2017	Steve Skitt	Review complete. We are agreeing an MOU to provide appropriate room and visitor searching by dogs. MOU to be signed by end Nov.	Complete



Ref	Objective	Actions	Date	Owner	Update	BRAG
		Refresh and deliver search technique training to including training about NPS.	31 st December 2017	Steve Skitt		
		Review Disruption Protocol	31 st December 2017	Steve Skitt		
		Introduce Level 4 Security Intelligence Operations Apprenticeship.	31 st November 2017	Jane Shannon	JS is organising Security Intelligence Operations Apprenticeship. Identifying candidates. Liaising with HMPPS for training dates. Likely start Jan 2018.	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/Forward Trust.	31 st October 2017	Steve Skitt	Review of Drug and Alcohol Strategy completed and distributed with action plan.	Complete
		Complete a review of the care officer scheme to include regular welfare check including substance misuse checks.	30 th September 2017	Lee Hanford	On reception detainees are assessed by DCOs and healthcare staff and referrals made to substance misuse team, (Forward). Any detainee found, or suspected to be involved with drugs are also referred to the substance misuse team for on-going support.	Complete
		Introduce monitoring system for actions identified by the Regular Welfare Checks including substance misuse actions.	30 th September 2017	Lee Hanford	Monitoring of the substance misuse service takes place through the Quarterly NHS Contract Review Meetings with the NHS Commissioner, the healthcare sub-contractors, the substance misuse provider, (Forward), and the Director.	Complete
6. Environment / Detainee Experience						
	Ensure all detainees are treated with respect by all staff, with	Ask the Home Office to extend Measuring the Quality of Detainee Life currently being piloting at Yarls Wood –to Brook House.	30 th September	Lee Hanford	Home Office have agreed to contact colleagues to engage Michelle Smith with Mary Bosworth. Initial engagement with MQDL team has been conducted at Brook House. Awaiting draft report from MQDL team.	Complete



Ref	Objective	Actions	Date	Owner	Update	BRAG
	proper regard for the uncertainty of their situation and their cultural backgrounds.	Introduce weekly minuted Wing Surgeries - attended by G4S SMT.	31 st October 2017	Lee Hanford	Initial discussion for introducing wing surgeries discussed at SMT 4.10.17 Deputy Director is conducting weekly wing forums with detainees from each unit. In addition 'walkabout' surgeries are conducted weekly by the Deputy Director and the Home Office	Complete
		Expand the role of the PDA Executive Oversight Board to oversee safeguarding across Gatwick.	31 st October 2017	Lee Hanford	The next PDA Oversight Board meeting is due to take place on 7th November. Expanding their remit will be discussed.	Beyond milestone
		Jill Dando Institute recommendation: Explore the possibility of introducing a "Detainees Speakout" line with an agency such as Crimestoppers.	30 st November	Paul Kempster	Initial research into different options is taking place.	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	Lee Hanford	In the interim regular G4S/Home Office Detainee meetings are being conducted with separate forums from each unit	
		Introduce detainee advocacy role – with Healthcare Staff acting as patient advocate during incidents.	31 st December 2017	Angie Hill		
		Review safeguarding policy in conjunction with West Sussex Social Services.	31 st December 2017	Lee Hanford		
		Review the mechanisms by which third party agencies (e.g. the Samaritans) contribute to Safer Custody.	31 st December 2017	Lee Hanford		
		Explore piloting Sound Intelligence's Aggression Detection system on one wing.	31 st March 2018	Peter Corrigan	Awaiting results of current pilot at HMP Berwyn	



Ref	Objective	Actions	Date	Owner	Update	BRAG
	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	Lee Hanford	Included in FM project plan – aligned with Inundation project Awaiting response from the Home Office about closure of units.	
		Develop environment plan – identifying potential changes to activities and physical environment from Detainee Focus Groups.	30 st November 2017	Lee Hanford	Detainee focus groups have identified IT as a major issue for detainees. IT review commenced and equipment ordered. Decoration of centre commencing 12.10.17 IT suite refurbished and re-opened 30.10.17 New procedure in place. Final painting took place overnight, (snagging), 2/3 Nov Installation of inundation points scheduled to start 20th November. (subject to approval for the closure programme from the Home Office).	On target
	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	Juls Williams	These areas are currently being decorated so action will be completed on the completion of the decorating programme in early November	Complete
		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	Lee Hanford		



Ref	Objective	Actions	Date	Owner	Update	BRAG
	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	Lee Hanford		
		Review the curriculum and education needs through an external Education Manager. Recruit 2 additional teachers to expand the quantity and range of the curriculum.	31 st March 2018	Lee Hanford		
		Introduce well-being strategy for detainees following Health Needs Assessment completed by NHS England.	31 st March 2018	Lee Hanford	Health Needs assessment is booked for end of this 2017 by NHS England.	

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.

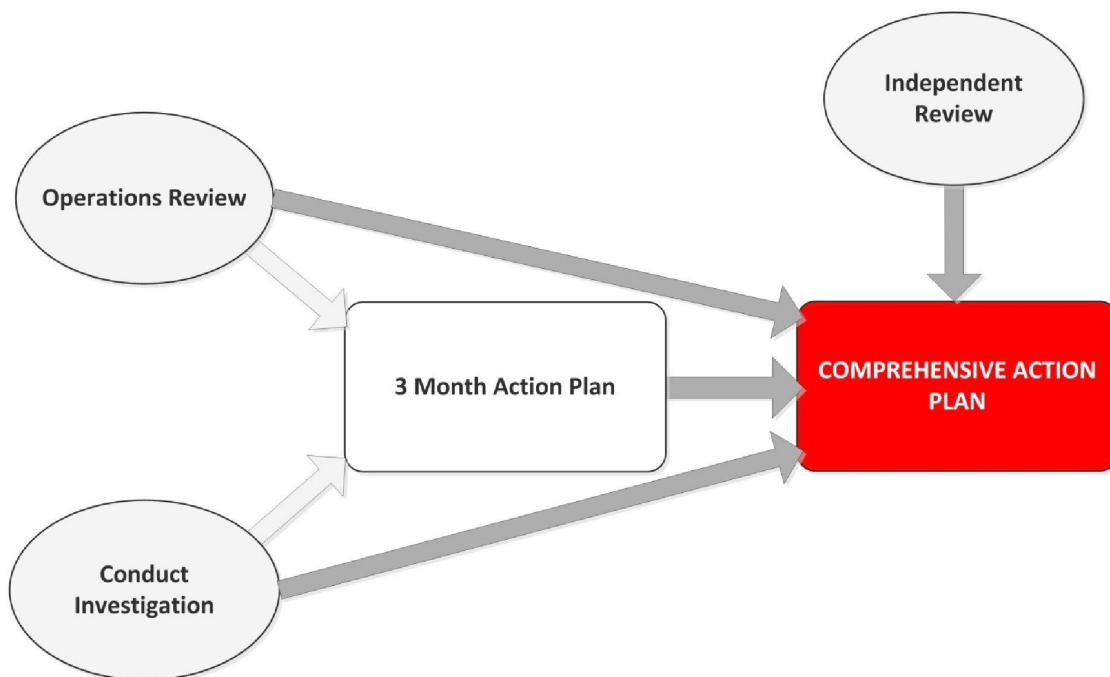


Fig 2: Plan development