



Home Office

**Border &
Immigration Agency**

Brook House Operating Contract Commercial Evaluation

(Restricted Commercial)

7th December 2007

Strategic Context

- BIA is already committed to a 25 year lease for Brook House [REDACTED] per annum – JAC and GIB approved
- Brook House provides purpose built, secure accommodation at Gatwick Airport comprising 426 beds
- Brook House remains of strategic importance to the Agency – in dealing with the more difficult ex-FNP population and increasing capacity
- Construction is well advanced and is on target for completion in September 2008
- However, the developer has proposed that they will not undertake the security fit-out so opening is likely to slip by some 3 months

Procurement background

- ITT for the Operations Contract of Brook House IRC
- 6 Companies provided bids GSL, GEO, Serco, G4S, Kaylx & Reliance
- Centre is a new build so no existing supplier or TUPE costs
- The timetable for the procurement:

Issue ITT	16 th May 2007
Site Visit/Q&A	9 th May 20 th June & 29 th June
Return of ITT	14 August 2007
Evaluation	15 th August – 1 st October
Bidder presentations	2 nd October 2007
Preferred Bidder selected	10 th October 2007
Contract Award	17 th January 2008
Service Begins	6 th February 2009

Outcome required: JAC approve recommendation for contract award.

Key features:

- **Output based specification**
- **Market stimulation to ensure competition through regular updates on the project's progress, including meetings and site visits**
- **Building on experience – T&Cs LAB**
- **Costs analysis – Detention & HMPS**
- **Consistency of BIA staff working on the project**
- **Retaining tight control of the procurement process and scope**

Evaluation weighting

The evaluation was weighted and split in the following areas:

Quality

Operational delivery	25%
Staff	15%
Maintenance	10%

Commercial

50%
100%

This split was agreed with the Procurement Board and ensures a balance between the costs and quality elements of the bids.

GSL operations bid

Staff: GSL propose to have all DCOs trained and in post by the scheduled opening date. They have confirmed adequate staffing levels will be deployed at the centre and will employ additional staff at their cost if required following operational review.

Healthcare: Generally a very detailed, thorough and high quality tender using [REDACTED] - a proven sub contractor.

Cateri [REDACTED] menu cycle was well balanced and able to meet the needs of the population using [REDACTED] a proven sub contractors.

Escorting: The escorting proposals were excellent and met our requirements.

Safety and Security: Safety and security proposals were sound and met the authorities requirements

COMMERCIAL

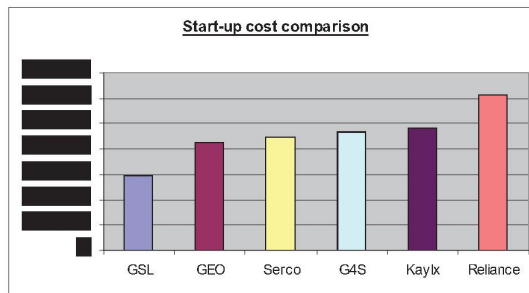
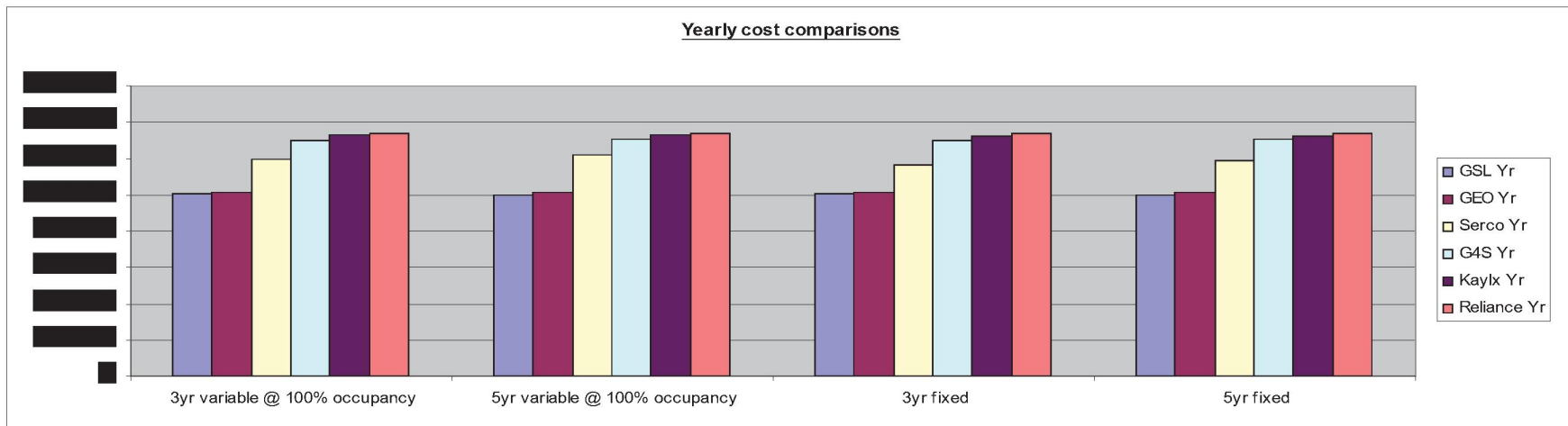
Pricing for a 3yr, 5yr and 8 year contract reviewed Fixed & variable costing options:

- GSL
- GEO
- Serco
- G4S
- Kaylx
- Reliance

(see appendices)

Pricing

The Brook House tender has delivered significant (35%) cost savings compared to the original budget and is below the current average cost per bed when compared like for like on 2009 projections.



Pricing

Contract options	GSL		GEO		Serco	
	Monthly	Yr	Monthly	Yr	Monthly	Yr
3yr variable @ 100% occupancy						
5yr variable @ 100% occupancy						
3yr fixed						
5yr fixed						

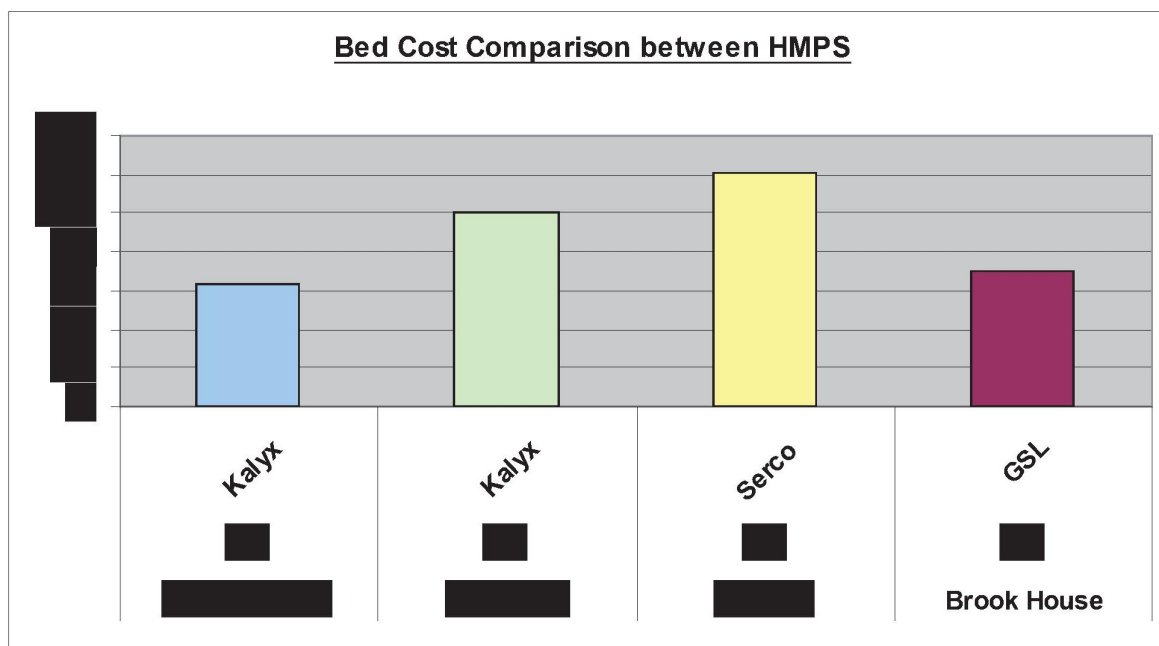
Contract options	G4S		Kaylx		Reliance	
	Monthly	Yr	Monthly	Yr	Monthly	Yr
3yr variable @ 100% occupancy						
5yr variable @ 100% occupancy						
3yr fixed						
5yr fixed						

Detailed summary

	A	B	C	D	E	F	G	H	I
1	5 Year Variable Option								
2									
3	Commercial Evaluation								
4			GSL	GEO	Serco	G4S	Kalyx	Reliance	
5		Total start up cost							
6		Yearly start up cost							
7		Yearly operating cost							
8		Total yearly cost 3yrs							
9		5 Year contract							
10		Weighting							
11		Min offer							
12		Score							
13									
14	Technical Evaluation								
15	Schedule C		GSL	GEO	Serco	G4S	Kalyx	Reliance	
16		Tech score							
17		weighting							
18		Max score							
19		Score							
20									
21	Technical Evaluation								
22	Schedule D - Staff		GSL	GEO	Serco	G4S	Kalyx	Reliance	
23		Tech score							
24		weighting							
25		Max score							
26		Score							
27									
28	Technical Evaluation								
29	Schedule D		GSL	GEO	Serco	G4S	Kalyx	Reliance	
30		Tech score							
31		weighting							
32		Max score							
33		Score							
34									
35		Overall scores %	84.15	82.90	75.50	69.47	68.03	74.90	
36									

Costing comparisons

Below shows the average cost per bed per night compared with comparable HMPS prison establishments:



Supplier Development

Contract negotiations

Prior to contract award in areas including start up costs and the procurement of additional packages for the centre including the kitchen and security systems.

Contract life

To ensure BIA continually review contract costs and value for money Detention Services are deploying a Shared Savings initiative. This process will form a key element of ongoing cost savings at Brook House throughout the life of the contract, which GSL have signed up to.

Recommendation

We sign a 5 year contract with GSL on the fixed variable price option

This provides the following benefits:

- Provides savings of around [REDACTED] compared with a 3 year contract year contract.
- Allows us to align Tinsley and Brook House contract commencements. We will consider a re-tender Brook House and Tinsley in 2014 together, achieving greater economies of scale.
- Maintains alignment of our re-tender programme across the estate allowing market forces to create competition.
e.g. Harmondsworth/Colnbrook re-tendered in 2012 Brook/Tinsley in 2014.

Conclusion: That the project is approved to proceed to the award of contract to GSL



Appendix documents

- Detailed Financial Analysis per bidder

GSL

	A	B	C	D	E	F	G	H	I	J	K	L	M
1	GSL												
2													
3	Variable cost option												
4	Fixed monthly fee												
5	Variable cost per head												
6	100% occupancy (426)												
7													
8	90% occupancy (383)												
9													
10	80% Occupancy (341)												
11													
12	70% Occupancy (298)												
13													
14													
15	Fixed cost option												
16													
17	Start up costs												

GEO

	A	B	C	D	E	F	G	H	I	J	K	L	M
1	GEO												
2													
3	Variable cost option												
4	Fixed monthly fee												
5	Variable cost per head												
6	100% occupancy (426)												
7													
8	90% occupancy (383)												
9													
10	80% Occupancy (341)												
11													
12	70% Occupancy (298)												
13													
14													
15	Fixed cost option												
16													
17	Start up costs												
18													

Bed cost per night based on 5 year contract variable pricing option 90% occupancy

Serco

	A	B	C	D	E	F	G	H	I	J	K	L	M
1	Serco												
2		3yr contract	5yr contract	5 years+		<i>Fixed cost per night based on 5 year</i>							
3	Variable cost option					<i>contract variable pricing option 90% occupancy</i>							
4	Fixed monthly fee												
5	Variable cost per head												
6	100% occupancy (426)												
7													
8	90% occupancy (383)												
9													
10	80% Occupancy (341)												
11													
12	70% Occupancy (298)												
13													
14													
15	Fixed cost option												
16													
17	Start up costs												

G4S

	A	B	C	D	E	F	G	H	I	J	K	L	M
1	G4S - Compliant												
2													
3	Variable cost option	3yr contract	Contract est yr 4	Contract est yr 5	5yr contract	Contract est yr 6	Contract est yr 7	Contract est yr 8					
4	Fixed monthly fee												
5	Variable cost per head												
6	100% occupancy (426)												
7													
8	90% occupancy (383)												
9													
10	80% Occupancy (341)												
11													
12	70% Occupancy (298)												
13													
14													
15	Fixed cost option												
16													
17	Start up costs												
18													

Kaylx

	A	B	C	D	E	F	G	H	I	J	K	L
1	Kalqs											
2												
3	Variable cost option	3yr contract	5yr contract	5yrs+								
4	Fixed monthly fee											
5	Variable cost per head											
6	100% occupancy (426)											
7												
8	90% occupancy (383)											
9												
10	80% Occupancy (341)											
11												
12	70% Occupancy (298)											
13												
14												
15	Fixed cost option											
16												
17	Start up costs											

Reliance

	A	B	C	D	E	F	G	H	I	J	K	L
1	Reliance	3 yr contract costs										
2	Variable cost option	3yr contract	Contract est yr 4	Contract est yr 5	Contract est yr 6	Contract est yr 7	Contract est yr 8					
3	Fixed monthly fee											
4	Variable cost per head											
5	100% occupancy (426)											
6												
7	90% occupancy (383)											
8												
9	80% Occupancy (341)											
10												
11	70% Occupancy (298)											
12												
13	Fixed cost option											
14												
15		5 yr contract costs										
16	Variable cost option	5yr contract	Contract est yr 6	Contract est yr 7	Contract est yr 8							
17	Fixed monthly fee											
18	Variable cost per head											
19	100% occupancy (426)											
20												
21	90% occupancy (383)											
22												
23	80% Occupancy (341)											
24												
25	70% Occupancy (298)											
26												
27												
28	Fixed cost option											
29												

Bid cost per night based on 5 year contract variable pricing option 90% occupancy

NUM

COMMERCIAL IN CONFIDENCE

FINAL ASSESSMENT OF THE RESPONSES TO BROOK HOUSE SCHEDULE D

Executive Summary

The operational assessment of the Brook House tender was based on responses to 22 different aspects of performance. The assessors read each response from the bidders and marked in accordance with an agreed scoring matrix. The initial assessment produced a ranking in terms of quality in the following order:

Bidder	Marks	%
GEO		72.82
G4S		
SERCO	10382.79	71.12
GSL		
Reliance		
Kalyx		

Following the return of clarification responses the bid was remarked and at the request of the Project Board the sections relating to Contact Management and Staffing Levels 2 were removed.

The assessors' final marks are:

Bidder	Marks	%
GEO		
GSL		
SERCO		
G4S		
Reliance		
Kalyx		

Initial Assessment

The initial assessment of the six responses to the Brook House ITT, Schedule D, was assessed by John Thomson, Phil Schoenenberger, and Marina Enwright, between 20 August and 7 September 07. The bids were assessed in the following order, SERCO, GSL, Reliance, GEO, Kalyx, and G4S. Twenty-two aspects of performance were examined by the team with four specialist areas namely being marked by, catering (Ian Wilson), healthcare (Dr Stuart Morgan), health and safety (Wayne Debnan), and fire prevention measures (Trevor Jennings). Each of the twenty-two areas of performance was given a weighting between 2.5 and 10 and each aspect of performance within each area was weighted on a score of 1-4.

- 4 Absolutely key deliverable to a successful operation;
- 3 High impact on operation if not delivered;
- 2 Medium impact on operation if not delivered;
- 1 Low impact on operation if not delivered.

Each of the operational requirements was marked by an assessor on a scoring matrix of 0-5:

- 5 Bidder supplies a proposal with value that is in excess of the maturity profile;
- 4 Bidder supplies a proposal that encapsulates the maturity profile;
- 3 Elements of the bidders proposal are sub-standard or lacking in quality;
- 2 Elements of the bidders proposal are sub-standard or lacking in quality;
- 1 Bidder states they will comply and provides brief details of how they will achieve this;
- 0 Bidder states they will comply but provides insufficient detail of how they will achieve this.

This report provides an overview of each of the bidders' responses to the nine most critical aspects of performance. These are Safety and Security, Admissions and Discharge, Contact Management, Healthcare, Catering, Welfare and Privileges, Contingency Planning, Staffing Commitments, and Staffing Levels.

Safety and Security

SERCO sufficiently addressed most aspects of this requirement however their proposals to move detainees around the establishment were vague and the accompanying drawing only added to the confusion. They have been asked to clarify. They have proposed to lock up detainees between 2200-0730hrs.

GSL proposed to lock up detainees between 2100-0800hrs but we have concerns about the impact this would have on the availability of some services including visits. In general safety and security proposals were sound but we need to better understand how they intend to move detainees around the establishment during activity hours.

The Reliance safety and security proposals adequately reflect the difficulties any operator would encounter in running this Centre. The lock down proposal of 2300-0700hrs was the least restrictive of all the bidders.

GEO adequately met the safety and security requirements and scored well in this section. The lock down proposals of 2100-0800 Monday to Friday, and until 0900hrs on Saturday and Sunday, were the most restrictive of any bidder.

The Kalyx proposals were undermined by their intention to closely search all visitors and yet there was to be no searching of BIA or IMB staff. Strip searches of all detainees going into Rule 42 accommodation were an overreaction. Their proposals for free flow movements were difficult to understand. Lock down times were 2100-0715hrs and they have been asked to clarify the impact this lock down time will have on visits.

In the G4S bid, searching proposals of all persons entering the Centre range between 5-10% and seem unduly low. Lock down time was 2130-0800hrs.

Admissions and Discharge

SERCO: The requirement to provide a physical and mental examination by a Doctor within 24 hours was on a request only basis which does not meet the requirement of DC Rules. There was a weakness in the commitment to ensure that detainees understood the reception process. Most commitments were met but only just.

GSL failed to confirm that they would provide the facilities to admit and discharge 2.5k detainees each month or that there would be privacy and confidentiality during the admissions process, they have been asked to clarify.

Reliance failed to confirm that they would provide the facilities to admit 2.5k detainees each month, they have been asked to clarify. They were generally strong in all other areas.

GEO: A particularly strong response to 99% of this section.

Kalyx's response to this element of the bid was abysmal with a large number of omissions and poor responses. They have been invited to provide responses.

G4S met the requirements of this element in general terms with no particular highs or lows.

Contact Management

G4S and GEO both provided adequate responses to this element and demonstrated a good understanding of this work. GSL provided a particularly poor response indicating no great enthusiasm for the work. SERCOs proposals were peppered with aspirational deadlines and they were not prepared to allocate specialist task to the staff. Reliance and Kalyx in the main provided acceptable responses.

Healthcare

Healthcare was marked by Dr Stuart Morgan who commented as follows:

SERCO: comprehensive, detailed and thorough with some excellent responses/proposals.

GSL: generally a very detailed, thorough and high quality tender.

Reliance: A good response in general with some areas of limited detail with some very good practice identified.

GEO: overall a satisfactory to good bid with some areas showing a good level of detail.

Kalyx: a surprisingly poor response in many areas.

G4S: a generally satisfactory and good response, RMN cover is a concern.

Catering

Catering was marked by Ian Wilson who commented as follows:

SERCO: Some concern at the proposal that the catering manager will be a shared service with two other centres but generally satisfactory in other regards.

GSL: The menu cycle was well balanced and able to meet the needs of the population although there were some inconsistencies with healthy choices.

Reliance: There appears to be little effort towards healthy options and some of the lunch choices appeared to be aimed at children rather than at adults.

GEO: The bid was lacking in substance in a number of areas namely how food was distributed and served, how compliance with food legislation safety would be achieved, and a disappointing response to HACCP requirements.

Kalyx: A good detailed response to this requirement and the menu cycle appears to be well balanced and multi-cultural although a little lacking in healthy choice indicators.

G4S: A good response in relation to healthy eating but some of the dish classifications need to be reviewed. There were excellent detainee consultation processes.

Welfare and Regime

SERCO: The response to this section was generally very poor. They failed to address library access hours, payment of the weekly allowance, and how they were going to provide 100 opportunities in paid activities, and how detainees would access the Library. These elements contributed to them providing the poorest response in this section.

GSL: The proposal for activities was extremely poor, there was no programme, the incentive scheme lacked imagination, a proposal that detainees watch DVDs and videos was not matched by an undertaking to provide televisions. Unit based activities comprising table tennis, pool, and computer games provided a modicum of comfort.

Reliance: There was no timetable of proposed activities and we are unclear as to how detainees would access these. Provision for a qualified librarian is unnecessary. We were not taken with the proposal that a wing DCO undertake the welfare officer function on a daily basis. The incentive scheme was entirely practical but the system for being down graded a level was very unclear. The library proposals were rather muddled and Reliance have been asked to provide clarification. The voluntary participation in paid activity was weak.

GEO: This response was peppered with some good innovation, in particular the use of accommodation, including the proposal to put a library on each of the wings. Their description of how detainees would access services and activities was clear and unique in terms of numbers and timings. Some aspects of the activities profile were

visionary including the provision of driving simulators and the establishment of a radio station for Brook House. We see these two activities as being particularly suitable for an all-male establishment. There would also be arts and crafts, ICT, and ESOL. We have sought clarification over the staff necessary for this provision. Kalyx: Their response to this element was extremely poor, in particular, their proposal for the incentive scheme. The incentive scheme was non-compliant and in no way reflects the Authority's procedure for the operation of the two tier incentive scheme. This is difficult to comprehend given that Kalyx are already operating an IRC. The degree to which this proposal deviates from good practice can be clearly demonstrated in their proposal which gives detainees subject to Rule 40 more hours out of cell than those on the standard level of the incentives scheme. Proposals for voluntary participation in paid activity, provision of a welfare officer service, the provision of newspapers, were of a very low quality.

G4S: The incentive scheme was very difficult to understand not least where the Residential Manager would review every single proposed change of status every day leaving him with very little time for any other tasks. This seems like poor use of a senior manager's time. Despite much of the bid reflecting that the turn around time at Brook House would be very short, the proposal to provide qualified tutors for a largely education based programme seemed at odds with this. Whilst G4S have provided 100 work opportunities, these are at times aspirational with regard to length of stay, particularly with detainees being trained in food handling and the reliance on them to undertake cleaning duties with no back up in the event that they choose not to take up the opportunity to participate in this particular activity. It was noticeable that the cleaning schedule was poor.

Contingency Plans

All the bidders were generally sound although GSL failed to provide outline plans and have been asked to do so.

Staffing Commitments and Levels

SERCO: Staffing levels during the day appeared to be adequate at all levels. That said, SERCO have been asked to confirm that they will abide by the minimum staffing levels set out at Document A. Staffing from 2200-0700hrs comprises █ DCOs, █ DCMs, and various non-DCO posts. We are seriously concerned at the ability of such a low number of DCO trained staff to respond to an unforeseen event. Not least, one officer is profiled to cover two wings. This concern applies at all levels of occupancy.

GSL: We are seriously concerned at the GSL proposal to reduce DCO levels at 2100hrs through to 0800hrs which has clearly been done in order to accommodate the lock down hours which are at the same time. The Centre, after 2100hrs, will be staffed by █ DCO trained officers and this includes █ duty managers. We do not consider this to be an adequate number of staff as the Centre is still likely to be receiving detainees into the early hours of the morning and discharging a good number of detainees throughout the night. Their ability to address standard operational functions such as constant watches and RFA/TC has not been addressed during the night hours.

Reliance: The Staffing levels, particularly at night, gave complete reassurance that all the identified tasks and the operational requirements of the Centre would be able to be met. We are satisfied that they have identified all crucial aspects of work. █ hour shifts, █ days on, █ days off, provide an accepted industry standard and

should afford opportunities to cover overtime if it is necessary. We have sought clarification that they will comply as a minimum with staffing levels and their intention to over recruit at DCO level by 20% for opening is entirely sensible.

They are the only bidder whose night-time staffing levels adequately reflect the needs of the business that will continue 24 hours per day. Daytime staffing levels are completely realistic and are not the highest proposed.

GEO: We have failed to be reassured by the staffing levels at night which do not demonstrate an ability to cover escorts and the RFA/TC requirement, let alone the ability to respond to events that are unplanned but are not unusual. The paucity of staff is underlined by the proposal to have [REDACTED] DCO covering two wings. We are perplexed at the serious reduction, approximately [REDACTED], in staffing levels during the day at weekends and have sought clarification. The proposed hours for contact management at weekends would not address expected levels of need. They have been asked to provide shift patterns.

Kalyx: There are several issues that cause grave concern with the staffing proposals. The Welfare Officer function forms part of the escort staff profile which is barely enough to meet the escort requirement if the demands for escort were anything other than very low. We are not attracted to staff working a [REDACTED] hour shift or for a total of [REDACTED] hours per week, both of which are proposed in this bid. More importantly however, are the staffing levels. During the core day staffing levels are adequate. Our concerns arise when staff go off duty at 21:15hrs. The proposal that from 21:00hrs to 07:15hrs that there only be [REDACTED] DCOs and [REDACTED] DCM is seriously unsafe, far below any level that would meet even the most basic demands of an average night. We have sought to clarify whether certain tasks are actually covered, as the operational proposals are not reflected in the staffing profiles. In addition to this poor provision we note that no additional staff would be provided for implementation.

G4S: To capture contractual commitments would be a real challenge from this bid and nowhere more so than in the staffing levels where the assessors were seriously bamboozled. Without the shift pattern that should have been provided it was difficult to understand fractional attendance over a shift period and this discredited the whole staffing proposal. In the present form, it is considered to be well nigh impossible to monitor their proposed staffing levels. We have sought a large number of clarifications regarding their staffing proposals, however given the complexity of their proposals we are not confident that this clarification is possible. From what we can determine, night-time staffing levels are tight and day time staffing levels would seem to be adequate but we remain to be convinced after clarification. The implementation process included the deployment of [REDACTED] additional DCOs, which seems very good and takes into account a higher rate of leavers at start of contract.

Conclusions

The results of the initial assessment of each bid are:

Bidder	Marks	%
GEO	[REDACTED]	[REDACTED]
G4S	10428.67	71.43
SERCO	10382.79	71.12
GSL	[REDACTED]	[REDACTED]
Reliance	10232.56	70.49
Kalyx	9162.67	62.75

Table of Detainee Custody Managers and Detainee Custody Officers on duty at specific times

BIDDER	00.00	09.35	14.05	21.05	LOCKDOWN
SERCO					2200 – 0730
GSL					2100 – 0800
GEO					2100 – 0800 Mon- Fri 2100 – 0900 Sat - Sun
RELIANCE					2300 – 0700
KALYX					2100 – 0715
G4S					2130 - 0800

Conclusions

The table below sets out the performance of each of the bidders and demonstrates the extent of the distance between them in each of the 22 aspects of performance. The highest and lowest performance in each section are highlighted.

EVALUATION OF PROPOSALS BROOK HOUSE IRC										
							FIRST			
First Assessment							LAST			
		SERCO	GSL	G4S	GEO	RELIANCE	KALYX			
Sch D	ASPECTS of PERFORMANCE									
1	Pre requisites									
2	Safety and Security									
3	Admissions/Discharges									
4	Contact Management									
5	Escorting									
6	Healthcare									
7	Catering									
8	Welfare and Regime									
9	Religion and Race Relations									
10	Communication									
11	Requests and Complaints									
12	Use of Force/Removal from Assoc and Temp Confinement									
13	Health and Safety									
14	Detainees at risk									
15	Contingency Planning									
16	Fire prevention									
17	Cleaning									
18	BIA Manager and IMB									
19.1	Staffing Commitments 1									

19.2	Staffing levels 2	
20	Personnel policies and training programme	
21	IT Systems	
22	Audit arrangements	
TOTAL SCORE		

At this stage the assessors are satisfied that GEO represents the best quality bid in many aspects not least of which is their innovation with regime proposals such as driving simulators and a radio station operated by detainees which is especially suitable to an all male environment. Whilst these are small points in the greater scheme, the benefits of having a content population that can engage in a positive regime during the day cannot be understated in terms of a safe, orderly population. That said, however we cannot ignore the fact that they share very tight staffing levels during the night-time period, a fact shared with four other bidders which border on the unsafe. The assessors are satisfied that only one bidder has proposed sufficient staffing levels for the night-time period. An ethos of cutting corners and meeting basic standards was evident from much of what we read and we are especially disappointed at the extended lock down hours proposed by these four of bidders. This appears to be a desperate attempt to reduce cost at the expense of welfare.

Our gravest concern with the findings so far is the overall quality of the Kalyx bid. The absurdly low staffing levels at night are only one of a number of serious issues contained in the bid. To receive proposals from an existing provider that includes a punitive standard level on the incentive scheme, a bid that was littered with references to prisons and prisoners, and numerous other abysmal attempts to address key requirements made the assessors wonder why Kalyx had provided a bid totally at odds with security, decency, Detention Service standards, previous HMCIP recommendations that they would be aware of, and any ethos of genuine care and welfare. We can see no merit whatsoever in this bid proceeding any further.

Final Assessment

The bids were remarked in the light of the clarification responses from the bidders between 20 – 25 September and comments are included in the summary of each bidder's response however we make the following points.

Post Clarification Comments:

Staffing

In assessing the bidders staffing levels, the assessors have had to make a judgement about the staffing levels. We are satisfied that all the bidders have proposed adequate staffing levels during the unlock hours taking account of the potential workload and the regime they intend to operate. The major concern relates to the lock down hours and, as indicated earlier in the report these vary considerably from bidder to bidder. The assessors looked at the workloads at Colnbrook, Campsfield and Oakington IRCs during the night hours and have assessed on a workload of approximately 20 admissions and 10 discharges during the lockdown hours with attendance required on each accommodation unit, in RFA and/or TC, a constant watch and/or a bed watch. In making a judgement the assessors have concluded that DCO staff should be allocated as a minimum to the following duties during the lock down hours, plus a minimum of one manager post:

[illegible]

Staffing figures at midnight from each bidder are as follows:

Bidder	Managers	DCOs	OSGs
Serco			
GSL			
GEO			
Reliance			
Kalyx			
G4S			

In seeking to comprehend the proposed staffing levels and taking account of the numbers of staff on duty throughout a 24 hour period and at varying levels of occupancy, the assessors have judged that the staffing responses are in the following order.

Reliance	1 st
SERCO	2 nd
GSL /GEO	3 rd
G4S	5 th
Kalyx	6 th

Conclusions

In the main, clarification improved the quality of each bid and it was especially worthy of note that Serco offered two additional DCO posts during the night time hours at no additional expense. On the other hand, the G4S explanations did not greatly improve the clarity of their responses and in particular the staffing proposals are still shrouded in mystery. Some bidders have sought to provide reassurance about the time that lock down commences but this is not borne out in their original staffing tables.

To reflect the decision by the Project Board not to pursue the option of a contact management service and to withdraw a mark for staffing levels from the operational response it has been necessary to take out those sections from the table below. The total available marks have been reduced and the percentage score is now based on that revised total.

The scores for each aspect of performance are now as follows;

EVALUATION OF PROPOSALS BROOK HOUSE IRC									
						FIRST			
Final Assessment						LAST			
		SERCO	GSL	G4S	GEO	RELIANCE	KALYX		
Sch D	QUALITY ASPECTS								
1	Pre requisites								
2	Safety and Security								
3	Admissions/Discharges								
5	Escorting								
6	Healthcare								
7	Catering								
8	Welfare and Regime								
9	Religion and Race Relations								
10	Communication								
11	Requests and Complaints								
12	Use of Force/Removal from Assoc and Temp Confinement								
13	Health and Safety								
14	Detainees at risk								
15	Contingency Planning								
16	Fire prevention								
17	Cleaning								
18	BIA Manager and IMB								
19.1	Staffing Commitments 1								
20	Personnel policies and training programme								
21	IT Systems								
22	Audit arrangements								

FINAL TOTAL SCORE						
<i>INITIAL TOTAL SCORE</i>						
<i>INITIAL % SCORE</i>						
FINAL % SCORE						

The operational assessors have marked the final assessment as follows;

Bidder	Marks			%	
GEO					
GSL					
SERCO					
G4S					
Reliance					
Kalyx					

The assessors are satisfied that GEO offers the best all round response. However the long lockdown period, which is shared with other bidders and tight staffing levels, remain a concern.

John Thomson

Marina Enwright

Phil Schoenenberger

Summary of the G4S response to Schedule D

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Post Clarification: Conclusions

[REDACTED]

[REDACTED]

[REDACTED]

Summary of the GEO response to Schedule D

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Post Clarification: Conclusions

[REDACTED]

[REDACTED]

Summary of the GSL response to Schedule D

Staffing

We are concerned at the GSL proposal to reduce DCO levels at 2100hrs through to 0800hrs which has clearly been done in order to accommodate the lock down hours. The Centre, after 2100hrs, will be staffed by ■■■ DCO trained officers and this includes ■■■ duty managers. We do not consider this to be an adequate number of staff as the Centre is still likely to be receiving detainees into the early hours of the morning and discharging a good number of detainees throughout the night. Their ability to address standard operational functions such as constant watches and RFA/TC have not been addressed and we do not understand why the ■■■ is staffed by DCOs when this could be a non-DCO function.

Lock Down

GSL have proposed a lock down period, which we consider to be excessive and not in keeping with the ethos of the rest of the estate: 2100hrs-0800hrs. The proposals give no justification for such a lengthy period of non-association. Against this background it is difficult to believe that there will be no impact on visiting hours, activities, and staffing levels.

GSL propose to have all DCOs trained and in post by the scheduled opening date.

GSL have failed to provide a number of commitments including dealing with 2500 admissions and 2500 discharges each month, and the provision of privacy at the reception stage. They have not undertaken to provide the detainee with £5 within 24 hours.

We need clarification of how detainees will access activity areas and the activities that will actually be available. Their proposal for activities is extremely poor, no programme of activities was provided. The incentives scheme lacked imagination. The question of how detainees will watch DVDs/Videos needs to be considered. We liked their proposal to place a table tennis table, a pool table, and computer games on the units.

In general safety and security proposals were sound but we need to better understand how they intend to move detainees around the establishment during activity hours.

Escorting proposals were excellent.

- Proposals for contact management exhibited little enthusiasm for the task.

- The Welfare proposals provided a team of DCOs without any clear leadership.
- In terms of religious provision, we are unclear about what we might be buying.
- GSL propose to use [REDACTED] for healthcare provision and [REDACTED] for cleaning and catering.
- GSL propose to close visits for one hour during the evening mealtime
- Cleaning proposals were poor

To summarise, certain aspects of this bid require no improvement or clarification, however we remain very concerned about certain areas. With opportunities to clarify, GSL could improve the overall quality of this bid but the lock down proposal is rather harsh.

Post Clarification: Conclusions

GSL provided confirmation of a number of operational aspects however in certain areas this still left us with some concerns. There was improvement in understanding some of the facilities to be provided in the regime and how these would be accessed but we did not like another proposal that detainees would be able to rent a DVD player at a cost of £5. The number of cleaners to be provided on a daily basis was described as a "minimum average" of [REDACTED] cleaners on duty per day between 0700-1800 hrs, we see difficulties in monitoring without some greater clarity. Perhaps the issue of most concern in clarification is that detainees not in the Visits Hall would be secured in their room at 2045hrs each day. Aligned to that, the proposal that a roll check would be undertaken at 2045hrs given that people will be either in Visits, between Visits and Accommodation Units, and entering the Accommodation Units is difficult to comprehend. We now believe GSL lock down hours to be 2045-0800hrs.

While the bid advanced in a number of areas the issue of a reduction in visiting hours and the failure to provide a shift pattern remain a concern. Cleaning, fire prevention and contingency planning proposals all improved and these served to improve the overall quality of the bid.

Summary of the Kalyx response to Schedule D

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Post Clarification: Conclusions

[REDACTED]

[REDACTED]

Summary of the Reliance response to Schedule D

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Post Clarification: Conclusions

[REDACTED]

[REDACTED]

Summary of the Serco response to Schedule D

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

understanding that the contractor would have no control over the timescales for reply from caseholders. We feel these proposals will only

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Post Clarification: Conclusions

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Brook House Independent Monitoring Board
Email: DPA

IMB Charter Flight Monitoring Team
Email: DPA

Administrative contact via IMB Secretariat: DPA

Chris Philp MP
Minister for Immigration Compliance and the Courts
Home Office

(via email to: DPA)

2nd October 2020

Dear Minister,

IMPACT OF DUBLIN CONVENTION CHARTER FLIGHTS ON DETAINEES

We are writing to alert you to the concerns of Independent Monitoring Boards (IMBs) about the impact of charter flights on the above cohort of detainees. This letter draws on first-hand observations and information from the IMB at Brook House Immigration Removal Centre (IRC) and the IMB Charter Flight Monitoring Team (CFMT).

Under Detention Centre Rules 61 (3) and (5), IMBs are required to bring certain causes of concern to the attention of the Minister. As members of the UK's National Preventive Mechanism, we additionally have a duty to identify practices in detention that could amount to inhuman or degrading treatment.

Background

On 12 August 2020, in order to remove detainees who entered the UK via Channel crossings, the Home Office began a concentrated programme of charter flights to European Union countries party to the Dublin Convention. Men scheduled for removal on these charters have been brought to Brook House to be escorted from there to the flights. To date, eight such charters have left, one was cancelled and another (to Spain) injunctioned on the day before it was scheduled to fly.

To date, the main nationalities of those affected are Iranian, Iraqi, Kuwaiti, Syrian and Yemeni.

IMB findings

Our evidence indicates that a series of issues are collectively and cumulatively having an unnecessary, severe and continuing impact on detainees, particularly those facing removal on charter flights, as well as across the detainee population as a whole. We believe that the cumulative effect of these concerns amounts to inhumane treatment. We should make it clear that

this is not a criticism of the detainees' treatment by the staff at Brook House, but rather of the circumstances surrounding detention and removal:

- The Brook House IMB has observed that the programme of charter flights has resulted in a sharp increase in the number of vulnerable detainees¹ at Brook House, as can be seen in the indicators on the Annex. In particular, a large number of men have been identified as at risk of suicide or self-harm, with significant numbers needing constant or hourly supervision as a result of incidents of actual or attempted self-harm and others needing less frequent observation. Additionally, some men have refused food or fluids, and there are others considered to be "at risk" if removal directions are served². For much of September, detainees on ACDTs and those who have been assessed as "at risk" if removal directions are served represented around 20% of the centre's population.
- As well as the impact on each individual detainee in the numbers shown in the Annex, it is evident to the Brook House IMB from our own on-site visits and monitoring that this charter flight programme is having a wider impact on detainees. We have spoken with men who say they have been picked up without warning from hostels, and who seem both bewildered and fearful about what is happening to them. In other conversations, we have heard men talk of being subject to racism, homelessness and hunger in the countries to which they are to be removed. In our view, these are signs of what we believe are both constant and high levels of stress and anxiety in the Brook House population generally. This is reinforced by our conversations with staff who are dealing with the detainees on a daily basis.
- In addition, it is the Brook House IMB's view that there is a further negative effect on the wellbeing and anxiety levels in the centre arising from the concentrated nature of this charter flight programme. Many flights are clustered together (usually at least one and often two a week over a prolonged period), and for various reasons men may be 'bumped' to the next available flight. As a result, over August and September in particular, a large number of men at Brook House have become extremely distressed, as highlighted above and in the Annex. This is, in turn, having an effect on the wellbeing and anxiety levels of others who are living with these distressed men for days or weeks. There does not appear to be any mitigation or forward plan in place to address this issue if, as we understand, these frequent charter flights are to continue in the period between now and 31 December.
- The Rule 35 process is a key safeguard for identifying and managing vulnerability. It requires an experienced GP to assess the likelihood of a detainee's health being injuriously affected by detention, or if they are at risk of suicide or may have been a victim of torture. During September, because of the pressures described above, there has been a significant backlog of these GP assessments at Brook House IRC – for example on 10 September, up to 60 men were waiting. There is still a considerable backlog, despite extra GP provision. In the Brook House IMB's view, this is contributing to high levels of anxiety and unease among all detainees held there.
- Some of the vulnerable men who are still on ACDTs and constant supervision have been removed on flights: an example, observed by the CFMT, was a man who had poured

¹ An aggregate of the categories in the Annex: individuals on an assessment care in detention and teamwork (ACDT) plan, especially those under constant watch (C/W), food and fluid refusal (FFR) and at risk if removal directions (RDs) are served.

² The "at risk" assessment is based on factors such as removal directions triggering self-harm on previous occasions or statements about intention to self-harm if removal directions are served to a particular country.

boiling water on his legs in the hours before his removal. We understand that others had been taken to hospital after self-harm immediately before transfer back to Brook House for removal. The CFMT has noted that their vulnerability is compounded by a seeming lack of handover arrangements between the Home Office/escort contractors and the authorities in the receiving country when the charter flights land. It is not at all clear that any formal process exists for providing information to the receiving authorities about the mental and physical health of detainees, including any risk of suicide or self-harm; this may put the men at further risk. Our enquiries to the Home Office on this point have failed to elicit details of any current or planned process.

- An additional concern, which is exacerbating the distress of detainees both at Brook House and during charter flights, is the lack of information provided to the men about reception arrangements on arrival in the receiving country. A basic leaflet appears to be all that is provided and little effort is made to provide a full briefing or explanation in advance in a way that detainees can understand. This poor level of engagement with detainees means that their anxiety and risk levels are raised even further.

We are raising these issues because of our concern about the actual and potential risks of harm to detainees. Both the Brook House IMB and the CFMT would welcome an urgent response from you.

Yours sincerely,

Signature

**Mary Molyneux – Chair, Brook House
Independent Monitoring Board**

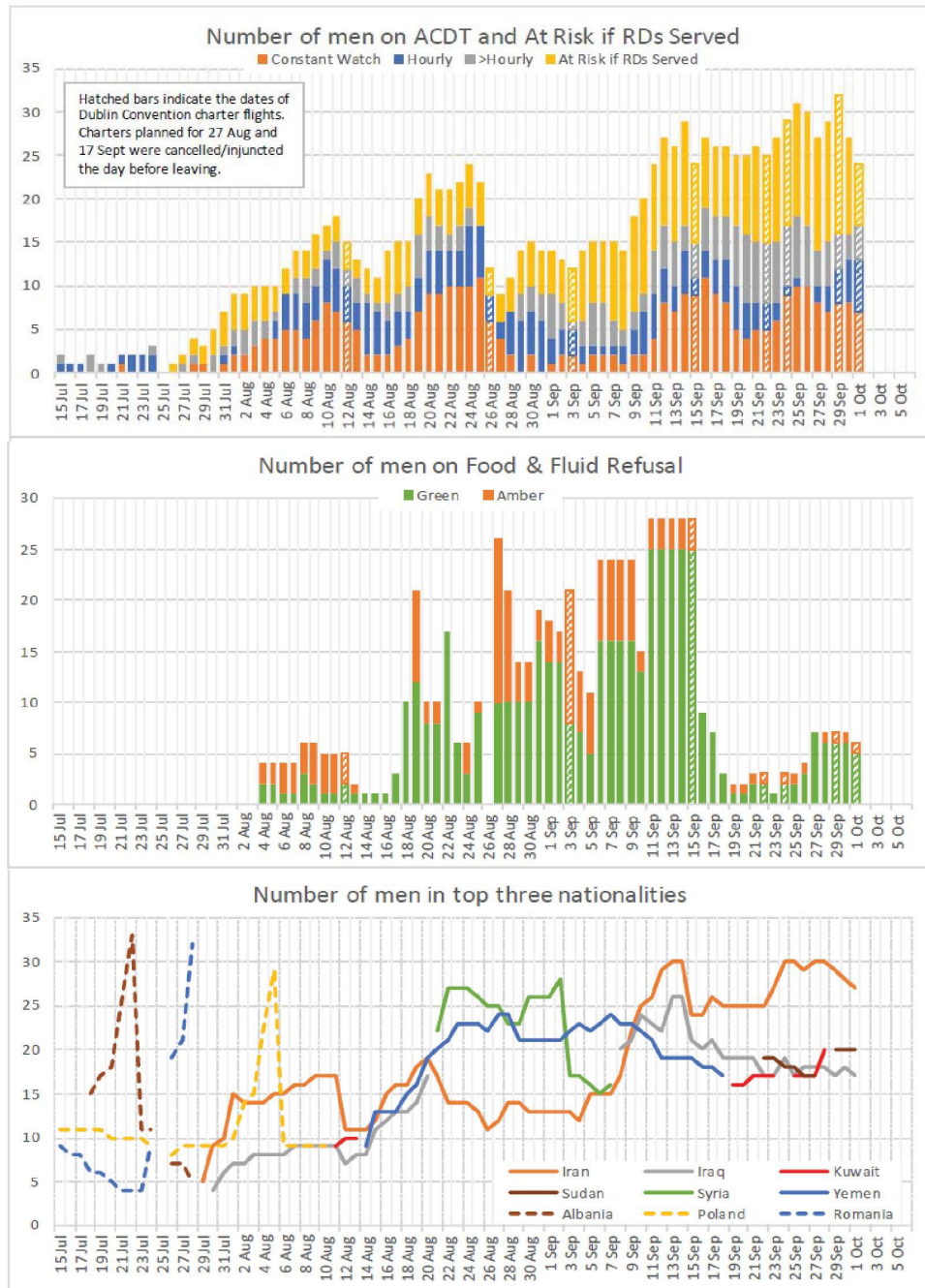
Signature

**Lou Lockhart-Mummery – Chair,
IMB Charter Flight Monitoring
Team**

cc: Phil Riley, Director of Detention and Escorting Services
Alan Gibson, Head of Operations, Detention and Escorting Services
Mark Griffiths, Director, Returns Logistics
Sebastian Potts, Assistant Director, Returns Logistics
Dame Anne Owers, IMB National Chair
Jane Leech, IDE lead, IMB Management Board
Andrew Newell, IMB Regional Representative for IRCs
Amy Barron, Head of IMB Secretariat
Sarah Clifford, Head of Policy, Training and Engagement, IMB Secretariat
Catherine George, Policy and Impact lead, IMB Secretariat

ANNEX

Impact of Charter Flights



Data from Serco Daily Operations Report
Analysis by the IMB

01/10/2020