

## **Translation of the summary, conclusions and recommendations**

### **Reason**

In this report, the Security and Justice Inspectorate (S&J Inspectorate or *Inspectie Veiligheid en Justitie*) reports about its investigation into the actions taken by the Dutch government with respect to Alexander Dolmatov, a Russian citizen.<sup>1</sup> On 17 January 2013, Dolmatov was found lifeless in his cell in the Rotterdam Detention Centre, where he resided in connection with his intended deportation to Russia. The State Secretary for Security and Justice asked the S&J Inspectorate to investigate whether the Dutch government has acted with due care.

### **Question**

The investigation should provide an answer to the following question:

*"Has the Dutch government acted with due care in placing the person concerned in a detention centre, and during the period the person concerned resided in immigration detention? This also includes the conduct and alertness of the various chain partners relating to the earlier medical condition of the person concerned, as well as the transfer of relevant information on the condition of the person concerned between these chain partners."*

For the S&J Inspectorate, this question results in the following topics to be addressed in this report:

1. the carefulness of the actions taken by the Dutch government upon the detention. Here, the Inspectorate assesses the lawfulness of the detention and the legal assistance provided;
2. the carefulness of the actions taken by the Dutch government during detention. In addition to the immigration detention, the Inspectorate also includes the stay in the detainees' complex;
3. the conduct and alertness of chain partners with respect to the medical condition of Dolmatov;
4. the transfer of relevant information. Here, the transfer of both medical and other relevant information is assessed.

In order to answer this question, the S&J Inspectorate will involve the entire course of the foreign national's process: from Dolmatov's arrival in the Netherlands to his death in the Rotterdam Detention Centre.

For its opinion on the quality of the medical care, the S&J Inspectorate involved the Healthcare Inspectorate in the investigation.

The investigation does not focus on the substance of Dolmatov's asylum application. It is up to the judiciary and not to the S&J Inspectorate to give a well-founded judgment on this. Nor does the investigation focus on any involvement of national or foreign secret services. The S&J Inspectorate has no statutory powers to do so.

### **Central conclusion**

Viewed together, the S&J Inspectorate comes to the conclusion that various organisations in the immigration chain acted negligently at various times. This also applies to those who were involved in the legal assistance and medical care provided to Dolmatov after he had been placed in detention. The Inspectorate is unable to assess whether more careful actions by the Dutch government could eventually have resulted in a different outcome. It does establish, however, that Dolmatov was wrongly placed in immigration detention, that, with respect to the legal assistance provided, actions

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<sup>1</sup> Mr Alexander Dolmatov will hereinafter be referred to as "Dolmatov".

were not taken in accordance with laws and regulations and that the medical care provided was inadequate.

The negligent actions taken by the Dutch government cannot only be attributed to the acts or omissions by officials, but also to the dependence of - and faith in - the systems, procedures and forms that support these officials in their decisions in this chain. The Inspectorate has found that, in practice, the systems, procedures and forms often contain summary, unclear and sometimes even incorrect information and that they are insufficiently consistent with each other, as regards accuracy and up-to-dateness. A cause for concern is the fact that the chain partners involved knew about most of these system omissions.

### Summary of the reconstruction

On 9 June 2012, Dolmatov arrived in the Netherlands, where he reported in Ter Apel, the Netherlands, on 13 June and stated on 15 June that he wanted to apply for asylum. He then briefly resided at two reception locations of the Central Agency for the Reception of Asylum Seekers (*Centraal Orgaan opvang Asielzoekers* or COA) before he went to the Asylum Seekers' Centre in 's-Gravendeel, the Netherlands. On 22 October 2012, the Immigration and Naturalisation Service (*Immigratie en Naturalisatiedienst* or IND) prepared a written intended decision of rejection of the asylum application, of which Dolmatov's lawyer was informed the next day. On 14 December 2012, Dolmatov's lawyer was informed of the fact that the IND had decided not to grant him asylum. According to Article 45 of the Aliens Act 2000, aliens have the right to appeal against the negative decision within 28 days. In Dolmatov's case, the deadline was 11 January 2013. On 17 December 2012, the lawyer informed Dolmatov in writing of the decision to reject the asylum application and invited him to discuss the response to this on 8 January 2013.

As from the period of November - December 2012, various respondents observed a change in Dolmatov's behaviour: while he used to be friendly, cheerful, punctual and helpful, he was introvert and grim more often in this period and sometimes did not show up for appointments. The same was true for the appointment with his lawyer.

In the days before 11 January 2013, the lawyer made various attempts to reach Dolmatov, but to no avail. The lawyer then decided to lodge an appeal on 11 January 2013. As this was the final day of the appeal period, the appeal was lodged in time. In accordance with Article 82 of the Aliens Act 2000, Dolmatov is allowed to stay in the Netherlands while the appeal is being handled.

Two days later, on Sunday 13 January 2013, however, the INDiGO information system used by the IND automatically changed, causing the system to state that Dolmatov had no lawful residence in the Netherlands and was therefore deportable. This was done because the suspensive effect of the appeal lodged by Dolmatov was not entered in INDiGO. Since mid-2011, there had been a lack of clarity within the IND about whether or not entering the 'check mark' of suspensive effect. The information in INDiGO was then transferred to the Foreign Nationals Database (*Basisvoorziening Vreemdelingen* or BVV), the information system that can be accessed by various chain partners.

In the early evening of Sunday 13 January 2013, Dolmatov called the police from his caravan at the asylum seekers' centre. The police found him in a disrupted condition. Due to his behaviour - Dolmatov was under the influence of alcohol, made suicidal statements and showed that he had made preparations for this - the police decided to detain him, in order to protect him from himself and his environment, pursuant to Article 3 of the Police Act 2012, in the detainees' complex of the National Police in Dordrecht, the Netherlands. Here he would be assessed by the crisis unit of a mental healthcare institution.

Upon inspection of the list of detainees on Monday morning 14 January 2013, the Aliens Police found that, according to the BVV, Dolmatov resided unlawfully in the Netherlands and was deportable. As the parties involved were aware of the fact that the information contained in the BVV was not always

up-to-date, the Aliens Police made enquiries at the IND chain partner line (which has direct access to INDiGO) and the Repatriation and Departure Service (*Dienst Terugkeer en Vertrek* or DT&V). They confirmed that Dolmatov had no lawful residence in the Netherlands and was deportable, after which the Aliens Police made preparations in order to place him in immigration detention that same day.

While the systems used by the partners in the immigration chain stated, from Sunday afternoon 13 January onwards, that Dolmatov resided unlawfully in the Netherlands and was thereby deportable, the Central Registration Office for Aliens Affairs (*Centraal Inschrijfbureau Vreemdelingenzaken* or CIV) of the Council for the Judiciary in Haarlem, the Netherlands, processed the appeal filed by fax by Dolmatov's lawyer in the BERBER-VK system on the next Monday. This is the national internal system of the courts, which is not linked to the systems used by the partners in the immigration chain. In the afternoon, the CIV faxed the lawyer's appeal to the legal representation department of the IND, where it was entered manually in INDiGO on Tuesday morning 15 January 2013. This action did not result in a change in the status of "no lawful residence" in the IND system, because the system did not have an automatic link between the registration of the appeal and the status of "no lawful residence".

In the meantime, Dolmatov resided in the detainees' complex awaiting the assessment of his condition by the crisis unit of the regional mental healthcare institution. This assessment was indicated - by telephone - on Sunday evening by a general practitioner called in by the GC A practice line<sup>2</sup>. Due to a miscommunication, however, the crisis unit was not called in immediately, as a result of which the assessment was eventually conducted on Monday during the course of the afternoon. The crisis unit decided that Dolmatov could return to the asylum seekers' centre, on the condition that he would be provided with outpatient care there.

In the meantime, however, the Aliens Police informed the detainees' complex that, after the assessment by the crisis unit, they were not allowed to release Dolmatov because they intended to place him in immigration detention. After having taken note of the opinion of the crisis unit and after Dolmatov was visited by a duty lawyer, his immigration detention was implemented by an acting public prosecutor of the Aliens Police. On Monday 14 January 2013, at around 9.30 pm, Dolmatov was therefore placed in immigration detention pursuant to Article 59a of the Aliens Act 2000. The Duty Officer of the detainees' complex then decided to place Dolmatov in an observation cell. The consideration here was that it had become known that Dolmatov had made suicidal statements earlier and that he had just been informed of his possible deportation to Russia.

On Tuesday 15 January, Dolmatov was reported by the Aliens Police to the Aliens Affairs Coordination Office (*Bureau Coördinatie Vreemdelingenzaken* or BCV) of the Custodial Institutions Agency (*Dienst Justitiële Inrichtingen* or DJI) which is responsible for placing deportable aliens in detention centres.

The Aliens Police sent the M118 form<sup>3</sup>, stating that Dolmatov is known to psychiatry and is suicidal. This information was a reason for the BCV to decide that Dolmatov should be placed in the Special Care Unit of the Rotterdam Detention Centre.

Late in the evening of 15 January 2013, the central post of the detainees' complex discovered that Dolmatov attempted to commit suicide. This attempt was unsuccessful due to the swift action taken by the custody officers. They did not call in a doctor. After this attempt, there were no incidents the rest of the night and the following day.

On Wednesday 16 January 2013 at around 7.00 pm, Dolmatov was transported from the detainees' complex to the Rotterdam Detention Centre. After his arrival, he was assessed by two nurses in attendance. They were briefly informed of Dolmatov's earlier suicide attempt in the detainees complex. After their assessment, they recommended that in view of his physical-mental condition at

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<sup>2</sup> The practice phone line of the Asylum Seekers' Health Centre (*Gezondheidscentrum Asielzoekers* or GC A).

<sup>3</sup> The M118 form serves to guide foreign nationals throughout the return process and to act as a document of growth, used by the chain partners to inform each other during the return process. See paragraph 3.4 of this report for a detailed description.

that time, Dolmatov should be placed in the Special Care Unit and not in an observation cell. Although protocol dictates that a doctor should be consulted if this decision is made, this was not done.

The next morning, on 17 January 2013 at around 7.10 am, Dolmatov was found lifeless in his cell. Resuscitation by the staff of the Rotterdam Detention Centre and the emergency services was of no avail. A doctor of the Mobile Medical Team that had arrived confirmed Dolmatov's death.

## **Conclusions**

### **1. With respect to the carefulness of the actions by the Dutch government upon the detention**

#### *Lawful detention*

The S&J Inspectorate finds that the 'social' inclusion of Dolmatov on 13 January 2013 was done with good reason. The police officers who stopped him and had him detained pursuant to Article 3 of the Police Act 2012 did so because Dolmatov was a danger to himself and his environment at that time.

The S&J Inspectorate also finds that Dolmatov was wrongly placed in immigration detention on 14 January 2013. For Dolmatov's lawyer lodged an appeal in time on 11 January 2013, as a result of which Dolmatov was allowed - according to Article 82 of the Aliens Act - to stay in the Netherlands while the appeal was being handled. However, an automatic change was made in INDiGO on Sunday 13 January 2013, causing the system to state that Dolmatov did not reside (or no longer resided) in the Netherlands lawfully and was deportable.<sup>4</sup> This happened because the suspensive effect of the appeal lodged by Dolmatov was not entered in INDiGO.

The S&J Inspectorate established that between mid-2011 and February 2013, - in a number of cases unknown to the Inspectorate - the IND had failed to enter in INDiGO that an appeal lodged in the extended asylum procedure had a suspensive effect. The appeal period was not entered, because there was a lack of clarity during this period with respect to the use thereof. As a result, the information about the deportability of Dolmatov did not change into 'no lawful residence' after six, but already after four weeks.

Dolmatov's status of 'no lawful residence' was then no longer corrected. During a check at the request of the Aliens Police - who made enquiries at both the IND and the DT&V for the sake of certainty -, the IND failed to discover that the automatic change was made incorrectly. Nor does the entry of the appeal in INDiGO result in a correction of the information about the unlawful residence of Dolmatov.

With respect to the processing of the appeal, the Inspectorate finds that the immigration chain is unable to offer the information available within the chain to all chain partners on a real-time basis. The partners in the chain were aware of this, but were nevertheless guided by this in their actions. The realisation that the information about the deportability of Dolmatov was changed only recently, linked to the knowledge that the up-to-dateness of the (own) systems was sometimes limited and that appeals are often lodged at the last moment, did not result in extra carefulness. The chain partners failed to check at a later point in time whether the residence and deportability status of Dolmatov may have changed.

#### *Providing legal assistance*

The S&J Inspectorate finds that with respect to the legal assistance provided to Dolmatov, the Aliens Police acted negligently and contrary to the Aliens Decree.

Prior to his detention, the Aliens Police offered Dolmatov legal assistance by personally engaging a duty lawyer for aliens affairs. The Aliens Police and Dolmatov had no contact about this. As there was no such contact, Dolmatov was unable to take advantage of the opportunity to name a lawyer he

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<sup>4</sup> See paragraph 3.1 of this report for a more detailed analysis.

preferred. In doing so, the Aliens Police failed to act in accordance with laws and regulations.<sup>5</sup> Moreover, the information provided on paper in both the form "*HV04 Melding Vreemdelingenpiket*" [HV04 Aliens Duty Lawyer Notification] and the official report of the interview drawn up under oath of office was factually incorrect at several places, which can wrongly give the impression that careful actions were taken.

During the interview, the Aliens Police failed to actively involve the duty lawyer who had been called in, despite the fact that it was known that this lawyer was still talking to Dolmatov immediately prior to the interview in the detainees' complex. The duty lawyer declared that he had not been aware of the imminent detention of Dolmatov. After the interview, he was not informed of the implementation of the detention either. The Aliens Police did leave copies of the detention measure and the record of the interview for the duty lawyer at the detainees' complex.

The duty lawyer and the Aliens Police adopted a strikingly passive attitude towards each other in the detention of Dolmatov. Both waited for the other to take the first step. The interests of Dolmatov were neglected here, according to the Inspectorate. The S&J Inspectorate is surprised that the duty lawyer was not aware of the imminent detention of Dolmatov, because he was called in in the capacity of "duty lawyer for aliens affairs".

## **2. With respect to the carefulness of the actions taken by the Dutch government during detention<sup>6</sup>**

### *Dordrecht Detainees' Complex*

The S&J Inspectorate finds that the actions taken by the individual custody officers during Dolmatov's stay in the detainees' complex show that they were very committed. However, comments can also be made on the carefulness of the actions taken at the time of the detention in the detainees' complex.

At various times, rules contained in the internal manual of the detainees' complex were not followed, as a result of which no forensic doctor was called in. However, this should have been done both after the arrival of Dolmatov in the detainees' complex on 13 January 2013 and after his suicide attempt on 15 January 2013. The forensic doctor only learns of Dolmatov's presence in the detainees' complex for the first time on 14 January 2013, at the start of his shift. After Dolmatov's suicide attempt, it was decided - for reasons unclear to the S&J Inspectorate - not to call in the forensic doctor. In view of Dolmatov's earlier suicidal statements and actions, and the fact that he had been assessed earlier by the crisis unit, there were definitely reasons to do so, according to the S&J Inspectorate.

During the period of his detention, Dolmatov was not given the opportunity to make a phone call. This was promised to him by the Aliens Police and is also in accordance with the regime applied to the immigration detention. Here, actions were taken that were not in Dolmatov's best interests.

### *Rotterdam Detention Centre*

The Inspection believes that during Dolmatov's stay, detention supervisors and duty sergeants acted with due care and in a committed way. They actively informed him of the procedure in the Detention Centre and supported him in his questions. After they discovered that Dolmatov wasn't visible during the morning counting, they took immediate action.

## **3. With respect to the medical care<sup>7</sup>**

### *Medical care at the asylum seekers' centre*

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<sup>5</sup> In accordance with Article 4.18 of the Aliens Decree and Article 3.7 of the Aliens Act 2000 Implementation Guidelines (A).

<sup>6</sup> The opinion on the actions taken by the medical staff during detention will be discussed in the next opinion.

<sup>7</sup> Findings and conclusions with respect to the medical care come from the Netherlands Healthcare Inspectorate.

The Healthcare Inspectorate finds that the provision of medical care to Dolmatov before his psychological disruption on 13 January 2013 was responsible. In the period preceding this, there were no psychological problems or other signs that should have given the care providers from the GC A a reason to increase their alertness to serious psychological health problems in Dolmatov. Furthermore, the Healthcare Inspectorate finds that, at the time of Dolmatov's psychological disruption on 13 January 2013, the assistance was provided in a sufficiently fast and responsible manner. As Dolmatov called the police himself, the police also became involved in an early stage. As a result, a further escalation could be prevented.

#### *Medical care in the detainees' complex*

With respect to the fact that there was a delay in calling in the crisis unit, the Healthcare Inspectorate finds that the GC A and the crisis unit cannot be blamed for this. The delay was based on miscommunication as a result of Dolmatov's departure from the asylum seekers' centre which was not foreseen by care providers. The investigation did not show that the delay had any consequences for Dolmatov's health condition. Apart from that, the Healthcare Inspectorate believes that staff members of the detainees' complex should have informed about the arrival of the crisis unit earlier. The Healthcare Inspectorate comes to the conclusion that although the response time of the crisis unit (three hours) exceeds the standard time<sup>8</sup>, this did not result in irresponsible care provided to Dolmatov. The psychiatrist (and his colleague) of the crisis unit carried out the psychiatric consultation with the pertaining report with due care and in the usual manner.

In the opinion of the Healthcare Inspectorate, the forensic doctor on duty in the detainees' complex acted proactively during his shift on 14 January 2013: he offered his help to custody officers, contacted the crisis unit, responded properly to Dolmatov's request for assistance and ensured that relevant information was transferred to the agencies and officials involved at that time. Despite their responsibility to do so, the staff members of the detainees' complex failed to take any initiative to have Dolmatov's condition assessed by a forensic doctor immediately after his placement on 13 January 2013 and after his suicide attempt on 15 January 2013. This is contrary to the internal manual and should have been done, in the opinion of the Healthcare Inspectorate.

#### *Medical care in the Rotterdam Detention Centre*

The Healthcare Inspectorate believes that the quality of the care (and organisation thereof), as provided by the Rotterdam Detention Centre and individual care providers of the Rotterdam Detention Centre, did not meet the requirements of responsible care. At a crucial moment in time, the nurses assumed too much responsibility.

The Healthcare Inspectorate finds that various possibilities to obtain a better and especially more complete picture of Dolmatov for his placement were not used in order to create a safer situation (which afterwards turned out to be necessary). In the opinion of the Healthcare Inspectorate, the relevance of the summary registration information - although little specific - was weighed in an insufficiently multidisciplinary way. This would have benefited the quality of care.

The relevant nurses who assessed Dolmatov should have consulted a doctor on duty when assessing his suicidality. First of all because there was a reason to do so based on substantive arguments and secondly because this was prescribed. As a result, the nurses have insufficiently guarded their individual professional responsibilities and powers. In the opinion of the Healthcare Inspectorate, both nurses were insufficiently aware of the decisions they made and the responsibility they accepted in doing so. Without establishing a direct causal link between the actions taken by the nurses and the final suicide of Dolmatov, the Healthcare Inspectorate finds that the relevant nurses have failed professionally. The Healthcare Inspectorate also found that the psychologist and general practitioner adopted a wait-and-see attitude before Dolmatov's arrival, resulting from habit and the working

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<sup>8</sup> The point of departure is that a crisis unit staff member is present within two hours at the latest, or as sooner as possible, after the first (telephone) contact. Practice shows that the crisis unit is present within two hours in 80% of cases. In the other 20% of cases, the crisis unit can guarantee that it is present within three hours (source: *Convenant Politie - GGZ Nederland 2012*).

arrangement to wait for the referral by nurses. The Healthcare Inspectorate notes that professionals are considered to do all that is medically necessary, even if this requires them to depart from a protocol, giving reasons.

Despite the fact that resuscitation was of no avail, the medical actions taken from the moment Dolmatov was found in his cell were responsible, in the opinion of the Healthcare Inspectorate. The Healthcare Inspectorate was able to conclude from the information obtained that the staff members of the Rotterdam Detention Centre who were trained for this started resuscitation immediately after Dolmatov was found. With respect to the emergency services that offered emergency assistance through the emergency call, the Healthcare Inspectorate comes to the conclusion that these were present within the standard time.

#### **4. With respect to the information transfer by the chain partners**

The S&J Inspectorate believes that the way in which the transfer of information about a foreign national's particulars - in this case Dolmatov - is organised within the chain, has its vulnerabilities. First of all, it is noticeable that the multiplicity of systems, part of which are linked to each other and part of which are not, makes it very difficult to share information. The use of faxes and, in some cases, manually retyping information by various chain partners in order to share this information, is time-consuming and causes inaccuracies. Especially within a complex chain such as the immigration chain, which consists of a large number of organisations and where the importance of careful information provision is crucial, it is undesirable to maintain the vulnerabilities found, because they stand in the way of careful actions.

The S&J Inspectorate also believes that the chain partners should use the M118 form more carefully. Within the immigration chain, there is a lack of control and discipline when it comes to entering data. The form is insufficiently used for its intended purpose, namely as document of growth used by the chain partners to inform each other within the chain about relevant circumstances regarding a foreign national. The chain partners' lack of discipline when it comes to entering data was known by the partners, but did not result in any action. The same applies to the use of the form by the Aliens Police: one year after the introduction of a new model that is more aimed at providing clarity about a foreign national's characteristics and behaviour, it still uses the old model. Within this context, the parties in the immigration chain adopt a passive attitude towards each other.

As the information transfer via the systems and the M118 form is often incomplete and leaves room for interpretation, many respondents - working in the immigration chain - prefer personal contact for the exchange of information. The Inspectorate understands this and agrees that this is valuable. However, it also points out its vulnerability, especially if information is to be shared with more than one partner. In case of Dolmatov, the information known within the immigration chain is only available to the individual chain partners in fragments. The information does not come together anywhere to form a complete picture, which makes it very difficult to take careful actions within the immigration chain. According to the Inspectorate, the chain therefore mostly benefits from guaranteeing the chain partners' discipline when it comes to entering data.

The Healthcare Inspectorate also finds that information is 'leaking away' throughout the immigration chain. This 'leaking away' is caused by various factors: inadequate use of existing reporting systems, the lack of a clear information system, insufficient use of instruments available, the lack of taking proactive actions at transfer moments and the failure to comply with relevant organisational protocols. The investigation shows that the transfer of medical information is inadequate within the chain. The interpretation of medical confidentiality in order to exercise restraint in sharing information could play a role here. The Healthcare Inspectorate endorses the importance of the duty of medical confidentiality and sees the tension that could arise in sharing information without the foreign national's express permission. However, the basic principle should always be to provide necessary care.

## **Recommendations of the S&J Inspectorate:**

*To the State Secretary for Security and Justice:*

1. Guarantee control in the immigration chain.
2. Arrange, in consultation with the chain partners, for an up-to-date and accurate information system where information about individual foreign nationals comes together and to which all chain partners are connected.

*To the IND:*

1. Ensure an up-to-date registration of appeals in INDiGO and guarantee that 'suspensive effect', if applicable, is entered correctly and immediately at all times.
2. Prevent foreign nationals from automatically be given the status of 'no lawful residence' in INDiGO without a human check.

*To the chain partners:*

1. For individual foreign nationals and the other chain partners, consistently and carefully enter information about foreign nationals in the intended systems and forms (M118 form).
2. Increase the awareness that the responsibilities of the partners go beyond the limits of their own organisation.

*To the National Police:*

1. Consistently implement the regulations that apply to foreign nationals placed in immigration detention, in order to guarantee their rights.
2. Ensure that the (medical) files of foreign nationals are transferred to detention centres.

## **Recommendations of the Healthcare Inspectorate:**

*To the Custodial Institutions Agency:*

Promote the substantive connection and procedural coordination between the various working instructions, procedures and protocols, paying attention to the professional expertise and pertaining limitations. Increase the awareness with respect to the importance of and possibilities for proactively sharing relevant information within the chain about a foreign national's health condition. Especially gather information about the possibilities for exchanging medical information, and make agreements with the chain partners about this.

*To the Special Facilities Department*

Make sure that a sound medical screening/intake interview is conducted as soon after the arrival as possible and make sure that the relevant professionals pay sufficiently proactive attention.

## **Measures of the Healthcare Inspectorate:**

1. The Healthcare Inspectorate expects the Rotterdam Detention Centre to have the improvement measures, taken as a result of the recommendations of the calamities investigation committee, tested by means of an audit as soon after the implementation as possible. This audit should be performed by a multidisciplinary audit team with an independent chairman. The management should submit the results of this audit by 1 November 2013 to the Healthcare Inspectorate for assessment.
2. The Healthcare Inspectorate finds that nurses of the Rotterdam Detention Centre, who talked to Dolmatov, have failed in their professional actions. In order to test the nursing professional standard for responsible care in comparable complex and highly regulated environments (detention centres, prisons, etc.), the Healthcare Inspectorate will ask the disciplinary court to give a judgment.
3. The Healthcare Inspectorate expects the Custodial Institutions Agency and the Rotterdam Detention Centre to give the staff members professional development and extra training on a sound

information exchange and cooperation with recognition of each other's professionalism. The policy on suicide prevention forms part of this. Special attention should be paid to the complex relationship between the regulated and secure environment (which applies to everyone) and the basic principles that apply to the provision of professionally responsible care (which is used on an individual basis). The Healthcare Inspectorate will monitor the progress of this during the periodic consultation with the Custodial Institutions Agency and will, in the course of the fall, check by means of an unannounced visit to the Rotterdam Detention Centre whether the implemented measures have resulted in the desired improvements.