



Interim Operational Instruction 01/2025

Care and management of transgender individuals in the immigration removal estate

As of 15th November 2024, the Detention Services Order (DSO) 11/2012 'Caring for and managing transsexual detainees' has been withdrawn. A new and substantive version of the DSO will be published in due course, but until such a point, this interim operational instruction must be used when considering the placement of transgender individuals in an immigration removal centre (IRC) or residential short-term holding facility (RSTHF).

Detainee Escorting Population Management Unit (DEPMU) will conduct an initial assessment based on the information provided by the referring officer. It is the responsibility of DEPMU to share these known risks or vulnerabilities with the receiving IRC prior to an individual's placement. DEPMU will endeavour to place transgender individuals in the most appropriate centre, based on the considerations within this instruction and on information known at the time of placement.

Every transgender resident has the right to be treated with respect and to have their wishes considered. In order to determine appropriate accommodation to allocate within the IRC, the individual's preference (male or female centre) must be established upon reception at the IRC, by the contracted service provider, along with any immediate concerns that the resident has in relation to their accommodation. Following that, a vulnerable adult care plan must be opened by the service provider, considering the circumstances of each transgender individual. The subsequent IS91RA Part C document must be completed with pertinent details of the resident's circumstances and sent to Detention Engagement Teams (who will share with caseworkers), local Compliance teams, and DEPMU. DEPMU are responsible for uploading the IS91 RA Part C to ATLAS.

Transgender women with male genitalia, or transgender women with a known history of violent or sexual offences, should not be accommodated on a residential unit alongside female residents. In either of these circumstances, an assessment must be undertaken at a multi-disciplinary team (MDT) meeting, set up and chaired by the Home Office Service Delivery Manager of the IRC where the resident is currently accommodated and taking place within 72 hours of initial placement, to determine how any risk factors may best be managed within the IRC or wider detention estate. The parties involved in the MDT will be dependent on the circumstances and needs of the individual – it will include the Compliance team, contracted service provider and healthcare as a minimum, but may also include the caseworker, DET, Faith team, Welfare staff and the detained individual. A verbal contribution may be obtained over telephone when a representative from a relevant party is not available to attend.

Transgender men with female genitalia should not be accommodated on a residential unit alongside male residents and an assessment should follow the same process as outlined above. An individual assessment at an MDT must be made for each transgender man.

Staff must use the MDT to establish if the transgender resident should be allocated to a separate area in the estate of their affirmed gender, with a person-specific plan for

unsupervised or supervised access to the rest of the centre, or if they should be housed in a separate area within the estate of their sex assigned at birth. The latter should only occur in the rare circumstances where the individual's transgender status cannot be evidenced or substantiated in any way, and must be approved by the Head of Detention Services Operations. Factors to consider in the assessment may include, but are not limited to, whether they have a gender recognition document of any kind, for how long have they been living in their affirmed gender, if they have had any gender-affirming surgery, or if they are receiving hormone therapy. Service providers are responsible for recording the outcomes of the MDT within the Vulnerable Adult Care Plan document.

If there are significant safeguarding concerns around an individual's vulnerability or any susceptibility to being pressured into an inappropriate relationship, access to the main regime must be carefully managed, but these concerns would need to be significant and considered against the potential decision to isolate an individual within the receiving IRC.

Operational staff should be mindful of operational capacity limits when assigning transgender residents within the centre. If there is any doubt, it is advisable to seek advice from the Detention Policy Team, Immigration and Border Policy Directorate, and Home Office Legal Advisers.

For guidance on the care and management of transgender individuals once they are placed, please refer to the [Management of Adults at Risk in Immigration Detention DSO](#).

Glossary

Term	Definition
Transgender	Someone whose gender identity is different from the sex they were assigned at birth. People who are proposing to, undergoing, or have undergone a process to reassign their gender.
Transgender woman	Someone registered male at birth, but who identifies as a woman.
Transgender man	Someone registered female at birth, but who identifies as a man.
Affirmed gender	The gender that matches a person's gender identity – the gender they have chosen to live as.
Gender recognition certificate (GRC)	A gender recognition certificate (GRC) is a document that legally recognises a person's affirmed gender in the UK.
Gender-affirming surgery	Gender-affirming surgery is a surgical procedure, or series of procedures, that helps a person transition from their assigned sex at birth to their affirmed gender.