

**REPORT**  
**of the**  
**INDEPENDENT MONITORING BOARD**  
**on the**  
**NON-RESIDENTIAL SHORT TERM HOLDING FACILITIES**  
**at HEATHROW AIRPORT**  
**for the calendar year**  
**FEBRUARY 2009/JANUARY 2010**

## **SECTION ONE: THE ROLE OF THE INDEPENDENT MONITORING BOARD**

1.1 The duties of Independent Monitoring Boards appointed to monitor in non-residential short term holding facilities are not yet laid down in statute. However, the general principles of independent monitoring in both immigration removal centres and prisons apply.

1.2 The Board's role is to monitor

(a) the welfare of people in immigration custody within the perimeter of the airport by observing their treatment and the environment in which they are detained and

(b) the movement (pedestrian and vehicular) of people to and from immigration facilities within the airport during the removal process.

1.3 To carry out this role the Board needs unrestricted access to every detainee and all the detention facilities within the airport. The Board has mostly had this.

1.4 The Board is required to submit an annual report to the Home Secretary.

**SECTION TWO: CONTENTS**

Page numbers

Section Three: Description of the facilities	4
Section Four: Executive Summary	5-6
Section Five: Detention Authority	7
Section Six: Length of Detention	8-14
Section Seven: Cayley House	15-16
Section Eight: Unaccompanied children and families	17-18
Section Nine: A residential short-term holding facility	19-20
Section Ten: Other outstanding accommodation issues	21-24
Section Eleven: Other aspects of detainee care and welfare	25-26
Section Twelve: Staff interaction with detainees	27-29
Section Thirteen: Removals	30-32
Section Fourteen: Management and contractual oversight	33
Section Sixteen: The work of the Board	34

### **SECTION THREE: DESCRIPTION OF THE FACILITIES**

3.1 At the start of this reporting period the UK Border Agency (“UKBA”) had six non-residential short term holding facilities at Heathrow airport, one in each of the five terminals and the sixth in Queen’s Building (“QB). The facilities in the terminals (“the holding rooms”) cater mainly for incoming passengers who are being questioned or have been refused entry. The holding room in terminal 2 was closed on 23 November 2009: the terminal is being redeveloped.

3.2 QB closed on 13 March 2009 and was replaced by a purpose-built facility, Cayley House (“CH”). It caters principally for people who have been living in the country and are being removed on flights from the airport.

3.3 Group 4 Securicor (“G4S”) is currently contracted to manage the holding rooms and CH and to deliver escorting services (the Contract).

3.4 The capacity of each holding room and of CH is determined by the number of seats in it.

3.5 In each of its preceding reports the Board has drawn attention to the features and fitments of the holding rooms. There have been improvements during this reporting period, noted elsewhere in this report, but in most material respects there has been no change. Degrading features still include:

- No proper facilities for sleep
- No proper facilities for personal hygiene
- No natural light
- Lighting in terminal 1 which cannot be dimmed, and so blazes 24/7
- Poor ventilation – these communal spaces often smell
- Air temperatures which move from the very hot to the very cold and seemingly cannot be regulated
- Some seating chained to the floor
- Metal lavatories without seats

## **SECTION FOUR: EXECUTIVE SUMMARY**

4.1 Our monitoring in this reporting period has been informed by the response to our last report. That was in the form of an action plan we received at the end of May 2009 (“the Action Plan”) to which each of the UKBA and G4S contributed. The Board’s chair and the UKBA’s in-country contract monitor have met regularly to discuss progress.

4.2 We have seen sustained improvements in the levels of care G4S delivers as custodian, as to provision and process, as well as in staff attitudes. We welcome these changes. We record our observations in Sections Eleven to Fourteen.

4.3 We have continued to see people detained in unsuitable conditions. All are denied proper facilities for sleep. Access to proper facilities for washing is mostly a privilege, not a right. We record our observations in Sections Three, Seven, Nine and Ten. We have particular concerns about the detention of families and unaccompanied minors in these conditions, recorded in Section Eight.

4.4 Unsuitability might be objectively tolerable if detention time in these conditions was very short. It is not. We record our observations in Section Six. We acknowledge G4S’ initiative to improve an aspect of its escorting service (paragraphs 6.18-6.21) and the UKBA’s initiative to drive improvements in another respect by contractual means (paragraphs 6.30-6.31.) There is more to be done. Additionally, detention time for some asylum seekers is inevitably increased by UKBA process and/or contractual arrangements which appear to have no regard to immediate welfare needs (paragraphs 6.9-6.16.)

4.5 Our principal recommendations are therefore:

4.5.1 The provision of a residential short-term holding facility at, or very near, the airport. We made the same recommendation to the Home Secretary and the Immigration Minister last year. It was accepted in principle. That is where the matter rests.

4.5.2 Interim measures to ameliorate the situation. Our suggestions are recorded in Section Nine. Whether or not the UKBA accepts them, we believe it must act immediately. It is disgraceful that in 2010 so many are still detained for so long in unsuitable conditions, most especially families and unaccompanied minors.

4.5.3 The UKBA must act to rectify the fact that its own processes and contractual arrangements actually increase some asylum seekers’ length of detention in unsuitable conditions – and this group typically includes families and unaccompanied minors.

4.6 Additionally, we invite:

4.6.1 The UKBA to note our points in paragraphs 3.5, 5.4, 6.8, 6.17, 6.23, 6.25, 6.32, 6.34, 6.36, 7.7-7.10, 8.4, 8.7, 10.5, 10.10, 10.13, 10.15, 10.19-10.20, 10.22, 10.27, 12.5, 12.10, 12.11, 13.2, 13.5, 13.7, 13.10, 13.15, 14.4-14.5 and 15.3

4.6.2 and G4S to note our points in paragraphs 6.25, 6.36, 7.7-7.10, 10.15, 10.17, 11.3, 11.4, 12.3, 12.6, 12.8 and 13.9

## **SECTION FIVE: DETENTION AUTHORITY - the IS91 form for port cases**

5.1 The IS91 is the custodian's authority to detain issued by Border Force locally to G4S, as custodian. G4S may not legally hold someone in a holding room without it.

5.2 We monitor two aspects. First that the authority has been signed and secondly that the supplementary sections have been properly completed and disclose the reason for detention and any special needs or risk factors as a consequence of which the detainees may need special monitoring or supervision.

5.3 During 2008 we observed some unsigned authorities and, more typically, incomplete supplementary pages. The Border Force Inspectors responded by introducing quality control checks in October 2008: it should be clear from the face of the document that the possibility of any special needs or risk factors had actually been considered and secondly, that all IS91s were to be checked and then counter-signed by a Chief Immigration Officer before G4S was asked to accept a detainee.

5.4 These quality control checks have not been withdrawn. **Whilst in our observation they are mostly implemented, this is still not consistently the case, except in T5.** When we read an incomplete IS91 we bring it to the Inspector's attention. An IS91 which has been counter-signed (so allegedly checked) but which is incomplete defeats the object of the exercise.

## **SECTION SIX: LENGTH OF DETENTION**

6.1 Detention in unsuitable conditions is a recurring theme in this report. Our starting point is length of detention. People are still detained for too long in these conditions.

### **The pending Short-term Holding Facility Rules (“the Rules”)**

6.2 We believe the Rules will come into effect shortly. They will impose a maximum detention period in holding rooms

- (a) of not more than 18 hours; or
- (b) of not more than 24 hours if authorised by the Secretary of State

The data presented in the next paragraph suggests the time limits may be challenging.

### **Numbers**

6.3 G4S present monthly statistics to the UKBA tracking length of detention (“the statistics”). We also receive them. By reference to this data, we calculate that over our twelve-month reporting period:

- 30,032 individuals were detained at Heathrow, of whom 20,476 were detained in the holding rooms and 9,556 QB/CH
- approximately 71% (14,596) of holding room detainees and 94% (8,973) of QB/CH detainees left during the first 8 hours

6.4 Of the remaining 5,880 in the holding rooms we calculate that

- 2,367 left at some point between 8 and 12 hours
- 1,879 left at some point between 12 and 18 hours
- 1,277 left at some point between 18 and 24 hours and
- 357 were held for periods in excess of 24 hours

### **General observations on length of detention in the holding rooms**

6.5 The figures on length of detention cited in paragraphs 6.3 and 6.4 give no clues as to the contributing factors. For example, case-working issues may take time to resolve. Transport from the airport must be arranged for some detainees, another element in the computation. We recognise these realities but have concerns which we record in paragraphs 6.6 to 6.25.

### **Timely access to interpreters**

6.6 There are 3 routes to interpreting services, not mutually exclusive:

- A conference call facility, enabling the immigration case-working officer and the detainee to talk to an interpreter off-site. It was originally piloted in terminal 4 in 2008 and was rolled out across the terminals by the summer of 2009. We know it is used. We do not know to what extent it has a positive impact on length of detention.

- Some immigration officers have Home Office language qualifications and can conduct interviews without recourse to an external interpreter. We know this happens. We have been told it is not only cheaper, but quicker to use these staff than to call in an official interpreter. However, as immigration officers work shifts, availability of an officer with the relevant linguistic skills at the relevant time cannot be guaranteed.

- There are the official interpreters.

6.7 This year the Board has noted delays which have had a substantial knock-on effect on detention time for some. Illustrations:

- The family, with 4 children aged between 4 and 15. The adults had to be interviewed with an interpreter. An external interpreter arrived for the father's interview that evening but then had to leave. The mother's interview was postponed until the next day. The family spent the night in the holding room.
- The unaccompanied youngster, detained soon after midnight. An interpreter was required and was booked for the morning. The booked interpreter was found on arrival to speak the wrong dialect: a second interpreter had to be booked. This youngster had been detained for 18 hours at the time of the Board's visit.

**6.8 Timely access to interpreting services is imperative. The UKBA should ensure its consistent provision.**

#### **Detention time for asylum seekers**

6.9 Asylum seekers often cannot communicate effectively without access to interpreting services, although as a detainee group they are not unique in this respect. There are, however, two factors which impact specifically upon them and their length of detention: the operating hours of the Asylum Intake Unit ("AIU") and secondly the contractual arrangements with Transport PLUS ("T+").

6.10 The immigration case-working officer must refer an asylum application to the AIU, a specialist division of the Home office. Border Force at the airport have told us they cannot release an asylum applicant from holding room detention pending the AIU's initial decision on, say, eligibility for the fast-track asylum process. Border Force have also told us the AIU's operating hours are between 08:00 and 19:00 on weekdays and 08:00 and 17:00 at the weekend.

6.11 In our observation asylum applicants detained either shortly before, or after, the AIU closes for the day end up spending the night (and inevitably more than that) in the holding room. Illustrations:

- The lady detained at 21:30: the decision that she could be treated as a fast-tracked applicant was made some 15 hours later.
- The family, parents with 4 children aged between 6 and 9. By the time the initial immigration processes had been completed AIU had closed for the day. The referral to AIU was made at 08:00 the next morning (i.e. the earliest possible moment that day). By then this family had already been detained for nearly 15 hours.

6.12 G4S is contracted to operate a transport service, known as T+ to take some categories of asylum seekers from the airport to their initial accommodation addresses. T+ calls at the airport at 14:00 and 21:00 to meet pre-arranged bookings. If a collection slot is “missed” for whatever reason, the detainee stays in holding room detention until the next collection slot.

6.13 In our last report we asked what consideration had been given to increasing the slots or to an otherwise more flexible arrangement. The Action Plan response was: (1) *“Transport Plus to be approached re timings of collections and (2) “There is a system already in place for the collection of detainees outside of the normal bus routes where necessary.”*

6.14 We have observed no change in the fixed collection times. Illustrations:

- The T+ move was commissioned at 09:00. The lady in question had to wait for the standard 14:00 run. Her total detention time was 27 hours, to which this last element contributed 5 hours.
- The family, parents with 5 children aged between 8 and 18. Their temporary admission was authorised just before 14:00 and so too late for the 14:00 T+ run. They had to wait until 21:00. Their total detention time was 29 hours to which this last element contributed 7 hours.

6.15 We have also observed use of the out of hours service to be occasional. The Action Plan refers to the test of necessity: the second of our illustrations in paragraph 6.14 is interesting in this context.

**6.16 The AIU’s operating hours demonstrably add to length of detention for some, as do the current arrangements with T+. This is curious given Detention Services’ commitment to driving down length of detention and the imperative for Border Force to achieve this when the Rules take effect. Change is called for.**

## **Long detention of families and some unaccompanied children**

6.17 Long detention in unsuitable conditions is inhumane for everyone subjected to it. **We have paid particular attention this year to families and unaccompanied children and record our findings in Section Eight.**

### **Transport to detention**

6.18 The outcome for some holding room detainees is further detention in an immigration removal centre (“IRC”). They are taken from the airport to the IRC by G4S, as escort contractor. Last year we recorded our concerns about long waits for these moves once commissioned by the UKBA – again increasing the length of detention in unsuitable conditions. These concerns are shared by Border Force and Detention Services.

6.19 G4S has devoted more resource to tackling the problem, 2 extra vehicles and crews working between 09:00 and 23:00 on weekdays since the end of May 2009. We acknowledge improvements, although cannot quantify them. We have also noted exceptions.

6.20 Moves during the night are still taking time and contributing to length of detention. An illustration:

- The UKBA commissioned a move from the airport to the local IRC before midnight: the detainee was collected by the morning crew six hours later.

6.21 G4S intends to improve the dedicated off-port service. The changes will be introduced in February 2010.

### **Ring-fenced beds**

6.22 The escorting resource introduced in May was most effectively deployed on short journeys, i.e. from the airport to a local IRC. Accommodation at Colnbrook IRC, reserved for overnight stay by Heathrow detainees, could meet welfare needs and assist G4S in its drive to improve its collection timelines.

**6.23 The Board has been hearing about the possibility of ring-fenced accommodation at Colnbrook IRC since 2008. We have just been told it should be available from sometime in February 2010. We hope so.**

### **Interview timings and transport**

6.24 Some detainees are brought back from their IRC to the airport for further interview and detained in a holding room. We have concerns about the timing of some of these moves either to or from the airport. Illustrations:

- He arrived for interview at 08:00. The Board made inquiries a couple of hours later: the interviewing officer was not due to start work until 13:00. The interview started at 15:00 – so seven hours after he had arrived.
- He arrived for interview at 10:05: the process was completed by 15:05 – five hours after he had arrived: G4S picked him up for the return journey to Colnbrook IRC (down the road) at 21:45 – nearly seven hours later.

**6.25 Arrangements such as these suggest little regard for the well-being of the individual detainees.**

**General observations on length of detention in Cayley House**

6.26 In-country detainees who are to be removed on flights from Heathrow are brought to CH by G4S as escort contractor. They wait there to board their flights. As we record in paragraph 7.2 the amenities of CH are significantly better than those in the best of the holding rooms. Detainees typically leave CH during the first eight hours of arrival.

6.27 Nonetheless we have continued to monitor two aspects of the journey to removal: (a) the time at which it starts at the IRC or Police Station (“start time”) and (b) the length of time then spent in detention between arrival at Cayley House and the time of the flight (“waiting time”).

**Start time**

6.28 We are still concerned about the time at which some journeys to the airport start, particularly for those who are to be removed on morning flights. An illustration:

- G4S collected 3 men from Campsfield House IRC at 00:50: they arrived at Cayley House at 03:00: all were to travel on the same flight at 11:30. We asked G4S movement centre to comment. We were told that the move had been planned to start at 03:00, but the crew arrived “very early”. Clearly, they then just pressed on with the “job”. The early collection had a knock-on effect: the men arrived 8+ hours pre-flight.

6.29 Movement planning must take account of distance and likely traffic conditions. We have asked time and again why detainees in Colnbrook IRC, a distance of approximately 3.5 miles from the airport, are moved so early. When the question is answered, it seems to have little relationship to the detainees’ well-being. The illustrations we now cite are from the last two weeks of this reporting period. We have plenty of similar ones from the preceding months.

- G4S collected two men from Colnbrook at 01:55: they arrived at 03:00. Their flight was at 09:30.

- Two others were collected at 01:50, and arrived at 02:25 for flights leaving at 09:30 and 10:10 respectively.

### **Waiting time**

6.30 In our last report we drew attention to the length of time spent at Heathrow pre-flight. G4S was working to informal parameters agreed with the UKBA that detainees should arrive not less than three nor more than seven hours pre-flight.

6.31 The upper limit of seven hours has had contractual force since 1 July 2009. Detention Services' Head of Operations told us later that month that "*seven hours was chosen as an achievable but challenging milestone for G4S which will be reduced when they achieve it.*" We have seen G4S achieve this milestone although not consistently.

### **Start time plus waiting time**

**6.32 We consider it misleading, in welfare terms, to segregate detention time at the airport from the antecedent journey – both are experienced by the same individual. We ask the UKBA to tackle the escorting patterns with G4S and to reduce the seven hour pre-flight upper limit now, in recognition of the reality of the journey to removal and its likely impact on people at a time of acute stress.**

### **Other factors**

6.33 We have occasionally observed confusion as a consequence of which people were brought to the airport and detained there unnecessarily. Illustrations:

- The mother, father and toddler picked up by an enforcement team in the Midlands, taken to a police station and driven from there to Heathrow. They were to be escorted to their destination in South America, via Madrid. The removal was aborted after they had arrived at the airport – no transit visas. They spent 6 hours in Cayley House before starting the return journey to the Midlands.
- The lady who started her journey from Yarl's Wood IRC to the airport at 07:30. She left CH at noon to board her flight to Mexico via the USA. The lack of a transit visa was discovered at the gate. She was back in CH at 13:10 and left it at 23:00 to start her return journey to Yarl's Wood. We were told the case-owners did not notice the lack of the mandatory transit visa nor did the immigration personnel at the airport who "quality checked the file."

**6.34 We cited examples of similar muddles in our last report: we wonder whether all aspects of the UKBA's operations are equally informed by welfare considerations.**

## **Technology**

6.35 In our last report we referred to the pending introduction of an electronic IT system G4S was developing to record length of stay. It would replace the manual system and in the words of the Action Plan *“would allow a more detailed breakdown of detention to give more visibility of where the blockages are for reducing length of stay.”*

**6.36 Its implementation at Heathrow has been slow. We hope it will prove to be a valuable tool in identifying “the blockages”.**

## **SECTION SEVEN: CAYLEY HOUSE**

7.1 This new purpose-built facility opened on 18 March 2009. It replaces QB.

### **The amenities**

7.2 Its amenities are significantly better than those of both QB and the best of the holding rooms. For example:

- 2 large shower rooms, one in each of the male and female toilets, equipped with proper towels and toiletries, provided by G4S
- a baby changing unit complete with bath
- a well-equipped family room, with decorative murals painted on the walls, a travelling cot, one piece of more comfortable seating – of the lounge variety – as well as upright seats, a public telephone
- a room for male detainees, with upright seats and one lounge, and a “quiet” room off the main area with 2 lounges
- a room for female detainees, again with upright seats and one lounge

### **The purpose/function**

7.3 In-country detainees who are to be removed on flights from Heathrow are brought to CH. They wait there to board their flights. In a sense CH is a transit area for this discrete group of detainees. It is usually unoccupied between, say, 22:00 and 01:30. Its detainees typically start arriving from 01:30.

7.4 Detention Services intended the better amenities at CH to be accessible to some holding room detainees. The Action Plan refers to this in a number of contexts. The intent was stated more explicitly on 6 July 2009 when the Parliamentary Under-Secretary of State, Home Office, was questioned in the House of Lords, on the Board’s last report. To quote just one example from the official record:

*Question: Does not the noble Lord think that in the circumstances, an instruction should be given to UKBA that no one is to be detained overnight in places that have no accommodation for sleeping and scarcely any facilities for washing and cleaning oneself?” Answer: “My Lords, as I said, I think that the provision of Cayley House at Heathrow resolves that situation.”*

### **The reality of the panacea**

7.5 We have closely monitored the extent to which holding room detainees have had access to the amenities of CH. Our observations are that:

- No family has been offered the choice of spending the night in CH instead of in the holding room,
- no unaccompanied child has been offered that choice either
- nor any adult, travelling solo.

7.6 Some adults, and a few unaccompanied young people, have visited CH for a shower. The number has increased significantly since the end of November when G4S was able to provide some extra escorts. This is good although access to a shower for holding room detainees is still a privilege not a right. We have garnered some examples of detainees going to CH to shower soon after midnight and then returning to spend the rest of the night in the holding room: bizarre.

### **Impediments as we perceive them**

7.7 We routinely ask Border Force and G4S why family A, or child B, or adult C, travelling solo, was not taken to CH for the night. The answer is never that the option was offered, and declined. Rather a plethora of reasons suggesting, in our opinion, unwillingness to make this thing happen, despite first the Action Plan and then what the Parliamentary Under-Secretary of State had to say on 6 July 2009.

7.8 It appears to us that Border Force do not sanction the night move, although the initiative lies with them. If they did, the detainee(s) would be taken there by G4S' staff. We believe G4S has the resource to achieve this, but is also reluctant. It is clear to us that G4S is uncomfortable at the prospect of mixing holding room detainees with the usual CH detainee group.

7.9 G4S has told us there is no agreement with the UKBA (Border Force and Detention Services in this context) for holding room detainees to be moved to CH to spend the night there. Detention Services have a position (see paragraph 7.4), Border Force presumably have another, which does not mesh since holding room detainees are not reaching CH (except some to shower) and G4S is piggy-in-the-middle as the party with responsibility for the physical moves.

### **Our conclusions**

**7.10 The commitment should be fully honoured, not as now, more in the breach than the observance.**

## **SECTION EIGHT: UNACCOMPANIED CHILDREN and FAMILIES**

### **The statutory duty**

8.1 Section 55 of the Borders, Citizenship and Immigration Act 2009 came into force on 2 November 2009. It places a duty on the Secretary of State to make arrangements for ensuring that immigration, asylum, nationality and Customs functions are discharged having regard to the need to safeguard and promote the welfare of children. Statutory guidance, under section 55, was issued to the UKBA the same day.

### **The antecedent approach**

8.2 The imposition of the statutory duty was known well in advance. The Board knows that preparations were made: for example, selection of designated children and young person immigration teams who were given specialist training pre-November 2009. When the Board's officers met the Border Force Director, Heathrow, in November they were told the arrival of the statutory duty gave a focus on children but not a grand change in approach.

### **The Board's concerns**

8.3 Nonetheless, the Board has noted detention of unaccompanied children in holding rooms overnight and the regular long detention of families, both before and after 2 November. The Border Force Detention Inspectors know our concerns. We have also advertised them to Detention Services periodically from September through to January, orally to the UKBA's Chief Executive in October and to the Director of Border Force, Heathrow, in November.

### **Our observations**

8.4 We cannot reconcile our findings on the ground with our understanding of the statutory duty and the imperative that it is fully and consistently discharged. Illustrations:

- Four of the six examples we have cited in paragraphs 6.7, 6.11 and 6.14
- The mother with five children one of whom, an eight-year old boy, had acute special needs – epileptic, incontinent and on a leading rein. The Board was assured at the time that the family would be given priority, but the substantive interview with the interpreter started 5 hours after the interpreter had arrived. The family was detained for 11 hours.
- Father, mother and four children detained at 21:15 and released some 17 hours later. The Board was told that some, or all, of the children had slept on the floor during the night.

- The three families detained in the busiest holding room with the worst facilities. Two families, with 5 children between them, spent the whole of that night there and the third family, with babies aged 1 and 2, spent 3 + hours of the same night there.
- The unaccompanied child/young person detained overnight. It happens.

### **Interface with Social Services**

8.5 Border Force must refer incoming children and young people to Social Services. When one of these authorities is to take responsibility for their care someone must come to the airport to collect the child. Border Force have told us attendance is dependent on available resources.

8.6 We see that Social Services will have competing priorities and that a child in a safe environment in detention at the airport may be less of a priority than a child in the community. However, the wait for Social Services adds to the time the child or young person is detained in holding room conditions. Illustrations:

- An age dispute case: an interpreter was needed, the facts were established and the referral to Social Services made 3 hours after the start of detention. They collected the young person 15 hours later.
- Two unaccompanied young boys with no responsible adult waiting to meet them at the airport. A CYP trained officer looked after them whilst another liaised with Social Services in 2 boroughs. It became clear that no one was going to come for the boys that night, and so they were detained in a holding room. One authority was eventually persuaded to take responsibility and collected both boys the following evening.

### **A radical re-think**

8.7 Case-working can be complex. Careful checks must be made in relation to both the unaccompanied child/young person and the one who is claimed to be a member of the family group with whom he/she has arrived. The wait for Social Services is not directly under Board Force's control. **Nonetheless, the UKBA must re-think its approach at Heathrow:**

- **Cases of unaccompanied children/young people and of families must always be dealt with urgently,**
- **the impact on this group of detainees of both AIU's operating hours and the current arrangements with T+ must be redressed and**
- **when for safeguarding or other legitimate reasons speedy resolution is not possible, the child or the family must be accommodated in better conditions than those available in holding room detention.**

## **SECTION NINE: A RESIDENTIAL SHORT-TERM HOLDING FACILITY**

9.1 We have recorded our continuing concerns about length of detention (given the conditions) in Section Six and in Section Seven that few holding room detainees have access to the better amenities at CH.

### **Last year's report**

9.2 The Board urged the Home Secretary and the Immigration Minister to require the UKBA to achieve provision of a residential short term holding facility (a residential STHF) at the airport as a priority.

9.3 The recommendation was accepted in principal. We were told Detention Services were *"looking at options for achieving a STHF either airside or close to the perimeter which would allow detainees to be moved out of the holding rooms and into an area with better facilities."*

9.4 It has been clear to us since September 2009 that there is no prospect of a residential STHF in the foreseeable future.

### **The need for it**

9.5 This has not diminished:

- detention is often unacceptably long
- accommodation is still characterised by degrading features, including no proper facilities for sleep and access to decent facilities for washing still not accessible to all.

9.6 The client group is unchanged:

- the families detained for long hours in the holding rooms
- the unaccompanied young person held overnight with all and sundry
- adults refused entry to this country, waiting hours for the return flight
- in-country detainees subjected to night journeys to the airport, arriving at CH with hours to wait before their flights.

### **Impediments to provision?**

9.7 We assume the impediments to be financial constraints in the current economic climate and/or the UKBA's decision, with Ministerial approval, to direct its available funding to other projects.

### **Might there be interim, and possibly less costly, solutions?**

9.8 The following occur to us. We have already tendered our suggestions to the UKBA informally.

9.8.1 Make better use of the wasted space at the rear of CH. The land is in hand: an existing secure area. Why not build some bedrooms there? There will not be enough to meet the actual need, but better than nothing.

9.8.2 Alternatively (but much less satisfactory) use the land for an extension of CH and equip it with more comfortable seating of the lounge variety.

9.8.3 Create a new central family room with showers, loungers and plenty of space in which children can run around and play: thus providing better facilities for families albeit not accessible to the whole of the residential STHF client group

9.8.4 Alternatively (but less satisfactorily) convert part of the large holding room in T5 for the dedicated use of families, having first installed a shower and lockers around the lavatories.

9.8.5 Guarantee access to accommodation in a local IRC. This may now be in prospect (paragraph 6.23): thus offering better facilities for some but not all of the residential STHF client group.

9.8.6 Install showers in all the holding rooms: that at least would be something for everyone, although only a step towards better conditions. We suspect the UKBA may be reluctant to push for showers in existing holding rooms, as opposed to requiring their provision in new-builds. If this is right, then why not be flexible in the case of Heathrow, given the numbers detained there in comparison with detainee numbers in holding rooms elsewhere in the country?

### **Our conclusions**

9.9 **A residential STHF at or very near the airport is still the optimum, the only way in which men, women and children detained for more than a couple of hours can be assured of access to decent facilities. The current situation may be exacerbated if the proposal to close most of the holding rooms overnight is implemented.**

## SECTION TEN: OTHER OUTSTANDING ACCOMMODATION ISSUES

### Intra-Agency arrangements

10.1 In our last report we recommended a change - that Detention Services took responsibility for managing the relationship with the airport authority (BAA) on matters of accommodation and repair. Whilst our interest was Heathrow specific we see that such a change, if made, would probably apply to all port holding rooms. The recommendation was accepted in principle. It has not been implemented yet.

### The lavatory doors in the T5 holding room

10.2 In our last report we also drew attention to the fact that these lavatory doors opened directly onto the seating area, and had large gaps at the top and the bottom. Detainees were therefore denied privacy of use. We had first complained of this in March 2008.

10.3 New doors were fitted in November 2009. The gaps, top and bottom, are now smaller and, as we understand it, comply with Detention Services' current Holding Room Standards in this respect. The doors still open directly onto to the seating area and detainees are still denied privacy when using the lavatories. We are not making some sort of conceptual point here. Board members have tested the privacy point by using the lavatories.

10.4 We were told on April 2009 that reduction in the dimension of the gaps would be stage 1 and that lobbies were intended. The Holding Room Standards state *"for privacy reasons, it is preferable that a small lobby should be incorporated so that toilet doors do not open directly on to the seating area."*

10.5 **A lobby must be provided as a matter of urgency.**

### The family areas

10.6 In our last report we also drew attention to the provision in T3. It was described as a "family room", but was actually no more than a cupboard some 5m x 3m, claustrophobic, filthy. Detention Services had just taken responsibility for driving improvements and put their revised specification to BAA.

10.7 Execution of Detention Services' January 2009 specification was shoddy but the snagging list drawn up after the Director's visit at the end of April 2009 had the desired effect. **Nonetheless this family space is too small to be fit for purpose.**

10.8 There are two holding rooms in T4. Part of one now has dedicated space for children, in the sense that there is a rug on the floor and a box containing toys. There was previously no provision at all, so to that extent there has been an improvement.

## **Lighting**

10.9 All the lights in all the holding rooms are left on during our “day” for obvious reasons. A dimming capacity is clearly desirable during our “night”. Following our last report, Border Force asked BAA to modify the lighting system at T5. They did so by the end of August 2009: the lighting in each of the main holding room and the Family room can now be dimmed.

10.10 G4S has discovered a switch which turns off one row of lights in the T3 holding room. Its overall “dimming” effect is minimal but better than nothing. All the lights in the T1 holding room are on the same circuit: so no dimming is possible. **Border Force have not addressed the issue.**

## **Air temperatures.**

10.11 Air temperature in T5 cannot be regulated from within the holding room. It is integral with the system for the whole terminal, controlled from a central point. It is cold there at night. The Pan-Heathrow Detention Inspector responded to this point in our last report and arranged for the temperature to be closely monitored. The results demonstrated they were within acceptable health and safety margins. It is our impression that BAA was therefore unwilling to make the necessary modification.

10.12 The test results bear no relationship to the fact that detainees are sedentary, they get cold and particularly at night. Staff have recently told us that whilst they offer extra blankets, people still wear their coats for extra warmth. Border Force asked Detention Services in January 2010 whether they could ring any pressure to bear on BAA. We do not know the outcome.

## **The TV in the T5 Family Room.**

10.13 It still does not work as a TV, so no change from last year, although it serves as a screen for the DVD player. We understand this is a cost issue vis-à-vis BAA.

## **Miscellaneous small repairs.**

10.14 There are inevitably minor problems – the broken soap dispenser, the blocked water fountain, floor tiles a trip hazard, the flushing mechanism discharging water over the lavatory seat.

10.15 The random occurrence of small repairs coupled with the lack of a single repairs register makes it difficult for the Board to gauge whether or not BAA has responded to fault notifications more promptly this year than previously although our observations this year are again of delay. **We suggest a register, kept in each holding room in a standard format, would help G4S staff track progress although responsibility for enforcing the arrangements with BAA rests with Border Force**

## **Cleaning.**

10.16 We have observed significant improvement. There is now a programme for periodic deep cleaning of all the holding rooms and CH. The standard of routine daily cleaning has also improved. The cleaners now attend regularly and the work they do on each visit is (usually) formally recorded. We do not know to what extent the improvement reflects a more stringent specification or better management of the contractors, but either way welcome the change.

10.17 We are concerned from time to time about the cleanliness of the plastic toys. G4S does not share these concerns. **Nonetheless we recommend the use of hot soapy water.**

10.18 The contractor responsible for emptying the sanitary bins has been persuaded to attend fortnightly rather than monthly. We occasionally see sanitary bins which appear to be rather full but holding room staff have the contractor's callout number.

## **Fitting out at Cayley House**

10.19 Our last report anticipated the closure of QB. We expressed our hope that CH, its replacement, would be fit for purpose on opening. It opened on 18 March 2009 but was not then fully equipped. Illustrations:

- The lines to serve the public telephones (for detainees' use) were not laid until June, the phones were fitted later and the intended privacy hoods have still not arrived.
- Aerials for the TVs (for detainees' use) were fitted at the end of June 2009.
- The UKBA provided new furniture. It arrived late and the delay was compounded by the wait for BAA's contractors to fit it: upshot, the new furniture was fitted in June and the loungers in July.
- The water pipes were not lagged. They froze this winter and CH was shut for approximately 24 hours as a result.

10.20 The staff rest room is small, essentially a locker room with toilets directly off it and so an inappropriate location in which to eat.

## **Refurbishment in T3**

10.21 We understand refurbishment of immigration and customs administrative areas in this terminal are to be refurbished and the holding room also. Detention Services invited our wish list for the holding room and we submitted it.

10.22 The T3 holding room is the busiest, with the worst accommodation of any of the holding rooms. The need for larger family space is patent: something which justifies the

label of “room”. We also aspire to a shower, better control of lighting and heat, decent furniture, redecoration, but above all a larger detention area in aggregate. **Whether more space is “found” by Border Force re-configuring their case-working area, or by requirement of BAA to provide more space, it must be found.**

### **Pecking order**

10.23 The Board has been monitoring at Heathrow for now nearly three years. Our observation is of delay by BAA in carrying out remedial work (such as at T5 this year), work carried out badly (the T3 family cupboard), perennial delay in carrying out small repairs and apparent disagreements between BAA and various arms of the UKBA as to who pays for what, again resulting in delay.

10.24 There is a connection between delay and detainee welfare. In our observation it is routinely ignored, except in terminal 5 although even there Border Force appear to be the supplicants.

10.25 The Action Plan acknowledged BAA’s responsibility for repairs adding that *“this was not happening in a timely manner.”* It also affirmed Detention Services’ commitment to detainee welfare and that implementation of the intra-agency change in arrangements referred to in paragraph 10.1 would assist them in addressing issues directly with BAA.

10.26 In June 2009 we asked the UKBA to tell us what obligations BAA has for repair and maintenance and by whom they were enforced. We were referred (again) to section 25 of the Immigration and Asylum Act 1999.

**10.26 In light of our observations we wonder: whether this provision is apt for the second decade of the 21<sup>st</sup> century, whether it has been fully implemented in respect of Heathrow and whether the UKBA enforces it.**

## SECTION ELEVEN: OTHER ASPECTS of DETAINEE CARE and WELFARE

### Provisions and process

11.1 In our last report we urged G4S, as facility contractor, urgently to address a raft of issues: lack of attention had prejudiced detainees' welfare. They have done so. We have seen marked and, most importantly, sustained improvements. Some illustrations:

- A new and mostly effective system for stock control and ordering. For example we no longer observe a dearth of blankets.
- Effective laundering arrangements. We no longer observe a dirty pillow case on offer.
- Improved range and quality of sandwiches
- A new range of microwaveable hot meals

11.2 G4S has also introduced:

- A people-carrier for moving families, replacing use of the caged van
- Blankets and sheets for the travelling cots
- Welfare packs (flannel, soap, toothbrush, toothpaste, socks, comb)
- Conventional towels for the CH shower rooms
- Eye masks
- Oranges and apples, out in the holding room and so immediately accessible to the detainees
- A range of snacks, also out in the holding rooms
- Mobile phones without cameras for detainees to use with their own SIM cards
- Dates on offer during Ramadan with which to break the fast
- Kosher food in T5, kept in a discrete freezer (in addition to the same provision in T1)
- Prayer mats out in the holding rooms, not in a cupboard in the staff office

11.3 There are problems from time to time. The quality of the sandwiches deteriorated again towards the end of the year. G4S is tackling its supplier. The fresh fruit runs out – not surprising given its popularity. Welfare packs are often in short supply but some of the shortfall is made up by local purchases. Replenishing holding room stocks during the day seems not possible at short notice.

11.4 **We have a couple of suggestions for further innovation.** Kosher food is available in Ts 1 and 5. The hot meal options are otherwise standard in all holding rooms. Why not recognise the likely dietary preference of the preponderance of T3 detainees by stocking more of the standard vegetarian options there? Secondly, G4S provides three foreign language papers. Why not review the provision in T3 and include one publication in Punjabi and one in Urdu, more relevant here than the French or Spanish newspapers?

## **Complaints**

11.5 Detention Services' Complaints Procedures (DSO 13/2008) are available to detainees in both the holding rooms and CH. We do not know the extent to which they are invoked, nor the outcomes. We are not part of the process.

11.6 The CIO checks to which we refer in paragraph 12.10 include emptying the locked complaints boxes in the holding rooms.

## SECTION TWELVE: STAFF INTERACTION WITH DETAINEES

12.1 The improvements recorded in the preceding section, whilst welcomed, are mostly of process and provision. The way in which G4S' staff work and interact with their detainees is crucial.

### **G4S staffing levels and gender mix**

12.2 Insufficient or inappropriate staffing compromises attention to welfare needs. In each of our previous reports we drew attention to the DCO regularly working a 12 hour shift in a holding room on his/her own. **We believe G4S has now tackled this successfully.**

12.3 T3 is typically the busiest holding room, by some distance, but staffed at 2 DCOs per shift. By contrast, G4S is contracted to provide 3 officers per shift for T5. In February 2009, and again in April, we suggested G4S review the staffing levels in T3. They did and agreed with the UKBA that the third T5 officer could help out in T3. This arrangement has not been consistently implemented. There are days when there is no need, but in our observation days when the third officer was needed. We are told the initiative lies with the T3 staff: they must ask for more help. **What of their managers' role in supporting their staff?**

12.4 We think it inappropriate, as well as culturally insensitive, that an all-male DCO team has female detainees in its charge. We reported the same concern last year. We were told in the Action Plan that the holding room Detainee Custody Manager "*now organises the exchange of staff between holding rooms if females are detained. In addition extra female staff are being deployed to Heathrow*".

12.5 There are now more female DCOs working in the holding rooms. However the "exchange" arrangements simply do not achieve cover at the times, and for the length of time, they are needed. We are aware of this hiatus during both the day and the night. **The UKBA should address the problem with a contractual requirement of G4S that a female DCO is present in a holding room whenever a woman is detained there and for the duration of her detention.**

### **The attitude of holding room staff to their detainees**

12.6 **We have seen a steep and welcome improvement this year.** It has taken time, but we now generally observe good inductions, good knowledge of detainees' cases, professionalism and more specifically:

- proactive behaviour and care: for example, checking whether a detainee wants something to eat or drink without waiting to be asked

- sensitivity shown towards detainees when a problem arises: for example, the woman who had been head-banging and then hyper-ventilated: staff were doing their utmost to help the other detainees now squashed into the other area
- reassurance given to calm anxious detainees: for example, a female DCO faced with an indignant, mistrustful and defensive man patiently engaged with him and managed to calm him down.

12.7 The role of the holding room staff is, of course, custodial but there has been a focus on the caring aspects this year to an extent we had not previously detected. There is still scope for improving the quality and (in some cases) frequency of inter-action with detainees. Here and there we continue to observe:

- The “they can ask” mind set of some staff: for example, the Detention Custody Officer (“DCO”) who told us a shower is always possible but it was clear he waited to be asked
- Absence of the mandatory hourly welfare check: for example, the three detainees stretched out trying to sleep without pillows or blankets. All had been detained for some 4 hours when our visit started and had arrived off long-haul flights
- Some insensitivity to detainees’ state of mind: for example, the female detainee who woke up during our visit and started pacing round in an agitated manner. The DCOs took no notice.
- Scant empathy when it comes to communicating with detainees who speak little or no English. We have drawn attention to this issue in all our reports. For example, some staff still speak very fast and colloquially to their detainees - “grab a seat”, “you hungry?” or “I’m going to give you the once-over” (i.e. search)

12.8 **We have suggested G4S considers specialist training.**

#### **The attitude of CH staff to their detainees**

12.9 A new interactive approach was introduced when CH opened. The DCOs are required to move around checking how the detainees are and to chat with them. We routinely observe this and it is good. The move from CH to the flight is potentially a more testing time for both the detainees and the staff: we record our observations in Section Thirteen.

#### **Border Force personnel’s attitude to detainees**

12.10 The duty Chief Immigration Officer is required to visit his/her holding room. The frequency of these visits was increased to 4-hourly intervals in direct response to our last report. In addition to the usual checks, the CIO was to speak to all the detainees who were awake “to ensure they are aware of what is going on with their cases and that their

needs are being accommodated” by G4S’ staff. This initiative was taken by the Pan-Heathrow Detention Inspector, based in T5. **It is good and we have seen it in practice.**

12.11 We observe contacts between immigration officers and detainees when they take place in the holding rooms. **Whilst we have seen officers taking time and trouble to communicate clearly ensuring that the detainees understand what they are told, we have also seen some unpleasing contacts which in our perception are abrupt if not rude.**

12.12 Two cases we observed stand out as illustrating both the worst and the best of G4S’ and Border Force’s staff attitude

- The distressed woman with no interpreter, no understanding of her fate, no ready access to her medication, no telephone call, no move to CH for either a shower, or access to a more comfortable environment. We visited when she was some 24 hours into her detention. To us this tale demonstrated little empathy for a fellow human being. We could not resolve her problems, but at least prompted G4S and Border Force to do something about them.
- The detainee with almost unimaginable disadvantages – a transgendered female with a male passport, broken pelvis, no money and no contacts in the UK, and being refused entry – was treated with the utmost respect and kindness by both the Border Force and G4S’ staff, who when searching her, were sensitive to the complicated gender issues and to her general and difficult circumstances. To us this tale demonstrated the humanity and decency of all the staff concerned.

## **SECTION THIRTEEN: REMOVALS**

Removal is an escorted process taking one of two forms.

### **Overseas escorting**

13.1 Some people are escorted from their IRC to the airport, onto the aeroplane and onwards to their overseas destination by a cadre of DCOs known as overseas escorts. This is enforced removal reflecting the UKBA's assessment that the detainee will not leave voluntarily. The overseas escorts are generally G4S employees although UKBA draws on its approved list of other contractors if G4S cannot cover the job. The movement within the perimeter of the airport of those under overseas escort is carried out away from public gaze.

13.2 Following our last report the UKBA gave us a source we could contact for short advance notice of intended escorted removals. We have made use of it from time to time, and have seen no bad practice.

### **In-country escorting**

13.3 There is another cadre of DCOs, G4S' employees at the airport, working as in-country boarding teams. Those whom they escort fall into one of two categories: (a) holding room detainees refused entry and (b) in-country detainees whose removal is not being enforced by overseas escorts.

13.4 In our observation, holding room detainees whilst often unhappy about their removal, tend not to resist it. They are generally boarded on a flight leaving from the same terminal in which they have been detained. They walk with their escorts through the public departure areas. In-country detainees are driven from CH to their departure gate. Detainees in each group often go on board before the other passengers and in this sense the escorted boarding is sensitively carried out. The in-country DCOs wait near the plane until it pulls back.

### **Interaction with detainees**

13.5 Our observations this year are overwhelmingly positive about the attitude of the in-country boarding teams to the detainees in their charge. Illustrations:

- During our walk from the holding room to the aircraft the female DCO chatted with the detainee explaining all the time what was happening.
- The DCOs made a special effort to find out what had happened to the passport of the man travelling on a temporary travel document.
- The detainees were fully briefed before they left Cayley House. Boarding time at the remote stand was repeatedly postponed after the detainees had arrived in the

van. They had to wait in it. The staff kept them informed and then in face of further delay drove back to the terminal to get refreshments for them.

13.6 Not everyone leaves willingly. Some talk about their intended refusal in advance. We have seen staff discuss the pros and the cons with them, address their anxieties and secure their calm boarding. Others physically resist at the door of the aeroplane and cannot be boarded. Others resist in the interval between boarding and the aeroplane pulling back from the stand. The carrier then refuses to take them, and they are disembarked. The in-country boarding team escorts them to CH.

13.7 We have been present on some occasions when control and restraint techniques have been used on a detainee. We have observed no bad practice.

### **Two problems areas**

13.8 Communication. We have observed detainees whose demeanour during the boarding process suggested their lack of understanding of what was happening and/or their inability to communicate their anxieties simply because they could not speak English. Illustrations:

- The boarding team tried to reassure the man who was becoming increasingly agitated en route to the gate. At the airlock he tried to run away. He was restrained and taken back to CH, where an interpreter was called who discovered the man's belief that he would lose all his money if he was removed from the UK. In our view the interpreter was called at the wrong end of the episode, which in any event might have been avoided had anyone understood the root cause of the anxiety in advance.
- A second illustration from the opposite end of the spectrum – a compliant detainee. The young woman had arrived at Heathrow the previous day, was refused entry and detained in an IRC pending her return flight. She spoke no English. She had been treated for depression in her own country. The boarding team was aware of this but could not communicate with her in a language she understood. We travelled with her in the van from CH and walked with her and her escorts to the departure lounge, and waited with her until the queue of other passengers had reduced, when she boarded the plane. All of that took time during which there was no communication other than gestures and smiles.

13.9 Some of the first tier managers and some of the DCOs in CH speak languages in addition to English and this is helpful. In an ideal world G4S should try to ensure that a detainee who has no English is accompanied to the plane by an officer who can communicate in a language the detainee understands, even if the detainee appears to be compliant in his/her removal. **More achievable, perhaps, would be regular use of the Language Line facility which is accessible at CH.** Whilst we are pleased to see that some detainees in the Close Supervision Room (see paragraph 13.12) have had access to

the Language Line, it is another example of access to interpreting services at the wrong time.

13.10 Secondly, some detainees are harassed by some airlines. We have observed distress and (in our perception) public embarrassment when the carrier attempts to recoup the cost of the ticket from the detainee at the boarding gate even though as between the UKBA and the carrier it is a “carrier expense removal”. The boarding team is left trying to resolve the situation. It is not G4S’ responsibility. Border Force have told us they do not get involved. **They should: enforcement of their legal requirements on the carrier is their responsibility.**

### **Aborted removals**

13.11 Detainees whose removal is aborted on account of their refusal are detained in CH pending return to an IRC or enforced removal later that day with overseas escorts.

13.12 They can be held apart from the other detainees in CH. The isolation rooms in QB were out of sight. There is one in CH, located opposite the reception desk and so in full view of staff. It is known as the Close Supervision Room, a name change which is of a piece with the changed approach we record below.

13.13 The discretion to isolate, which initially rests with G4S, and the minimum standards of care to be given to the isolated detainee, are governed by rules. In our last report we recorded our observation of failure by both G4S’ managers and the UKBA to ensure consistent implementation of the then rules.

13.14 **There is now a different approach** which evolved gradually under the leadership of the new G4S Area Manager. It was formalised in September 2009 with the UKBA’s approval. The Board was consulted. The criteria for isolation are unchanged but the expectation now is of isolation for a maximum of four hours, save in exceptional cases when the decision to continue isolation must be made by the UKBA. The level of care and supervision required of G4S’ staff is higher, and the records indicate these standards are being met. Antecedent use of force must be recorded on the isolation room log. A medical assessment is mandatory. **Manager’s supervision, absent last year, is now patent.**

13.15 We calculate there are 71 recorded instances of isolation over our 12 month reporting period, nearly always for periods substantially less than 4 hours, as compared with, for example, 66 in just the last two months of the previous reporting period. We believe this reduction points not only to close management supervision but also a change in the way staff respond to and deal with recalcitrant detainees. That said, the reduction may also point to the fact that the in-country escorts are not being asked to try and board detainees who are clearly going to resist.

## SECTION FOURTEEN: MANAGEMENT and CONTRACTUAL OVERSIGHT

### G4S

14.1 In our last report we recorded the lack of management supervision which had prejudiced detainees' welfare in a significant number of respects. There has been a sea-change following the appointment of a new Area Manager for Heathrow in February 2009. We cite examples in Sections Eleven, Twelve and Thirteen. **We commend his energy and his willingness to tackle some deep-rooted problems and the fact that over time he has carried many of his staff with him.**

14.2 We are not clear about the roles of the two tiers of managers below the Area Manager and think the post of Detainee Custody Manager for the holding rooms may still be evolving. **From our perspective, this role is critical.**

### The UKBA's contract monitoring

14.3 According to the Action Plan "*a dedicated monitor for the Heathrow estate*" was intended by the end of July 2009. This appointment was to enable more regular auditing of G4S "*holding room processes*". The post-holder would work to the UKBA's in-country contract monitor.

14.4 The appointment has not been made yet. G4S has acted to bring about change without this impetus. **We still think it desirable that Detention Services put themselves in the position of having direct knowledge by regular personal observation.**

### Re-tendering the contract

14.5 The contract was due to end in April 2010. It has been extended by a year. Re-tendering is mandatory. The UKBA Project team drafting the Invitation to Tender invited the Board's chair to meet them in January 2010. We are pleased by the emphasis on measurable welfare requirements, in both the escorting and custodial aspects of the draft ITT.

## SECTION FIFTEEN: THE WORK of the BOARD

15.1 There was a change in our clerking arrangements during this reporting period.

15.2 We are a small board but work efficiently provided all members have airside access. We have been disadvantaged since the middle of November when the security clearance for one of us expired and with it the airside access. We discovered, too late, that the IMB Secretariat did not have a system for checking, much less warning individuals in advance. **The renewal process is protracted.**

15.3 We have a structured approach to our monitoring (rota) visits. Our visit reports are for our own records but we have continued to circulate them to external readers, at their request – G4S’ Area Manager, the local Border Force Detention Inspectors and the UKBA’s in-country contract monitor. Their comments are always useful to us: some recipients make a point of responding, with others it is occasional.

15.4 We are invited to attend the Pan-Heathrow Detention meetings and those of the G4S’ national Detainee Welfare Working Group. These fora are helpful to us in our work and we appreciate our access.

15.5 Statistics relevant to our work are as follows:

Number of Board members at the start of the reporting period:	8
Number of active Board members at the end of it:	7
Number of Board meetings during the reporting period:	12
Average number of attendees:	7
Number of visits to Heathrow (including meetings there):	100
Number of attendances at meetings elsewhere:	24