



Annual Report of the Independent Monitoring Board at Tinsley House IRC

**For reporting year
01 January 2020 – 31 December 2020**

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Introductory sections 1 – 3

1. Statutory role of the IMB

The Immigration and Asylum Act 1999 requires every immigration removal centre (IRC) to be monitored by an independent board appointed by the Secretary of State from members of the community in which the IRC is situated.

Under the Detention Centre Rules, the Board is required to:

- monitor the state of the premises, its administration, the food and the treatment of detainees
- inform the Secretary of State of any abuse that comes to their knowledge
- report on any aspect of the consideration of the immigration status of any detainee that causes them concern as it affects that person's continued detention
- visit detainees who are removed from association, in temporary confinement or subject to special control or restraint
- report on any aspect of a detainee's mental or physical health that is likely to be injuriously affected by any condition of detention
- inform promptly the Secretary of State, or any official to whom authority has been delegated, as it judges appropriate, any concern it has
- report annually to the Secretary of State on how well the IRC has met the standards and requirements placed on it and what impact these have on those in its custody.

To enable the Board to carry out these duties effectively, its members have right of access to every detainee and every part of the IRC and all of its records.

The Optional Protocol to the Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT) is an international human rights treaty designed to strengthen protection for people deprived of their liberty. The protocol recognises that such people are particularly vulnerable and aims to prevent their ill-treatment through establishing a system of visits or inspections to all places of detention. OPCAT requires that states designate a National Preventive Mechanism to carry out visits to places of detention, to monitor the treatment of and conditions for detainees and to make recommendations for the prevention of ill-treatment. The IMBs are part of the United Kingdom's National Preventive Mechanism.

2. Description of the establishment

Tinsley House IRC is predominantly used to hold male detainees who are awaiting decisions on their immigration status and possible removal from the UK. It has a normal capacity of 162 male detainees, accommodated in two-, four- and six-bedded rooms. A separate dedicated and comfortable suite (the 'borders accommodation') provides accommodation for one family group at a time, who are usually in transit and due to fly within the next 48 hours.

During the first five months of 2020, Tinsley House was managed and operated under contract by G4S on behalf of the Home Office, in accordance with the Detention Centre Rules (2001) and Operating Standards and Detention Service Orders. As was noted in last year's annual report, a new procurement exercise to appoint a contractor from May 2020 was started during 2019, when the contract with G4S was due to expire. That new contract was awarded to Serco, which took over responsibility for managing and operating Tinsley House at the end of May 2020. This new contract with Serco was a single contract covering the whole Gatwick immigration detention estate, which comprises Tinsley House IRC; the pre-departure accommodation (PDA) for families, which is adjacent to Tinsley House IRC; and the much larger Brook House IRC, which is a short distance away.

The separate G4S subsidiary which had had responsibility under contract for the provision of healthcare services at Tinsley House on behalf of NHS England continues to provide those services, as its contract to do so does not expire until September 2021

The contract between G4S and Aramark to provide cleaning and catering services was not renewed by Serco, which itself took over these responsibilities in-house from May 2020.

Mitie, which is sub-contracted by the Home Office to provide escort and transportation services, continues to carry out those responsibilities.

The work of the Tinsley House welfare department is due to be significantly expanded under the terms of the new contract with Serco, and during the early part of 2020 was supplemented by the voluntary work of the Samaritans, the Gatwick Detainee Welfare Group and by BID (Bail for Immigration Detainees).

The Home Office Immigration Enforcement Team (HOIE) maintains a permanent presence at Tinsley House and is responsible for ensuring that contractual requirements are met from its contractors and sub-contractors.

It should be noted that from September to December 2020, Tinsley House IRC was dual certified as a Short Term Holding Facility (STHF) and an IRC, operating under both the Short Term Holding Facility Rules 2018 and the Detention Centre Rules 2001, a status which remained in place at the close of 2020. There is, as yet, no indication as to if and when it will revert to its sole IRC status.

3. Executive Summary

3.1 Background to the report.

It should be noted that the quoted numbers in this section of the report for those detained at Tinsley House at various times were collated locally and have not been formally confirmed by official Home Office data sources.

The 2020 Covid-19 pandemic and its consequences for Tinsley House IRC

2020 was a quite exceptional year, with major consequences for the operation of Tinsley House IRC. In many respects, this annual report is itself also unavoidably exceptional, and directly reflects the changes the pandemic brought about for the centre.

For January, February and the early part of March 2020, Tinsley House continued to operate relatively normally as an IRC, although the number of detainees held was well below capacity. At the end of January, there were 85 detainees held at the centre, and by the end of February these numbers had actually increased to 114, which was still well below its capacity of 162. During March, however, with the onset of the first national Covid-19 lockdown and little prospect of detainees being able to be removed from the UK at that time, detainees were gradually released, and by the end of the month the centre was empty.

From the end of March Tinsley House, while being on standby, remained empty of all detainees for nearly six months until September.

From September, Tinsley House was dual certified as a STHF and an IRC, a status which it retained for the remainder of 2020, and operated to hold those who sought to enter the UK from September through to December on small boats across the Channel. It was thereafter a very different centre, operated under the Short Term Holding Facility Rules 2018, rather than under the Detention Centre Rules 2001, and where those held were expected to remain for a matter of days only. As would be expected, arrivals at Tinsley House STHF from September for the rest of the year were unpredictable and always at very short notice, making planning and preparation a considerable challenge.

Thus, in September, the centre remained empty for the first two weeks. It held between 30 and 50 detainees for approximately four days mid-month, before returning to holding either single figures, or at times being empty again towards the end of the month.

In October, the centre was empty for the first two weeks, held less than 20 detainees mid-month and was empty again towards the end of the month.

In November, there was the same unpredictable picture, with an empty first week, followed by three days with numbers up to 78, and two days with numbers up to 53.

Similarly, December saw four days with over 70 detainees held, while the rest of the month saw numbers generally below 20. By the end of the month, and therefore at the end of this reporting year, Tinsley House STHF was empty once again.

As a STHF, therefore, Tinsley House for four months has presented a considerable challenge, not only in terms of the unpredictable and constant variation of numbers of detainees almost from day to day, but also in terms of a very transient population, who were at the centre for a matter of days only before being moved on to have their asylum claims processed.

For the staff at Tinsley House, this was a new experience, which coincided with the takeover mid-year of a new contractor, Serco, with all the changes that an entirely new contract inevitably introduces, and all at a time of a continuing pandemic demanding wholly new ways of working with detainees, with new and previously untried safety protocols.

For the Board, this has similarly been an exceptional and, in some respects, challenging year. For nearly half the year, we have of course, been effectively redundant and physically away from the centre while the centre was empty of all detainees between the end of March and September. This coincided, in May, with Serco taking over the operation and management of the centre for the first time, under contractual conditions and requirements which differed in some important respects from those which had applied to G4S, its predecessor. While the Board was not physically present during this six month period, we remained on standby to conduct our statutory monitoring duty once detainees returned again to the centre. During that period, which included the national lockdown, we conducted our own risk assessment as to how we should conduct that monitoring responsibility if and when required to do so, assessing the risk arising from entering and re-entering the centre from the outside community, not only to ourselves, but also to detainees and staff inside the centre. Having taken into account all developing government and Public Health England (PHE) requirements and guidelines, and having carefully considered the position of all Board members in terms of their personal situations and potential vulnerability to the virus, we concluded that when the centre once again held detainees, we would, in common with many other Boards across the country, monitor remotely for the time being and not enter the centre physically to monitor.

In September, when the centre was dual certified as a STHF and an IRC, we were, of course, once again required to monitor the detainee experience, albeit in respect of a population that was constantly on the move and which was at the centre for a matter of days only, and with a new contractor, for whom running a STHF at Tinsley House was a new and challenging experience.

In summary, therefore, while we monitored Tinsley House in its traditional role as an IRC from January to mid-March in the usual way, we were only able to monitor Tinsley House from September to December in its new guise as a STHF remotely, and of course in-between, from the end of March to the start of September, there was no monitoring undertaken at all as the centre was empty of all detainees. This has presented us with some difficulties in drafting this annual report for the year as a whole, and explains why we now present it, unavoidably, as a wholly

exceptional report. Fundamentally, it is difficult to arrive at firm evidence-based conclusions and to make recommendations as we normally would in respect of Tinsley House as an IRC during 2020. We have experience of less than three months during the year of its operation as such an IRC, during which the number of detainees it held was low, and not only is this experience now nine months old, but it also derives from a time when the present contractor had not yet taken over operational and management responsibility for the centre. As will be seen, therefore, our conclusions relating to Tinsley House IRC in 2020, where we have been able to reach them at all, are necessarily very limited in scope, and our recommendations for the coming year reflect an attempt to breathe new life into those 2019 recommendations which have not been able to be addressed this year due to the pandemic, but which we believe still to be of importance in 2021.

The focus of this report of course, limited as it unavoidably is, is on Tinsley House as an IRC, but we have taken the opportunity to make some generalised comments, where possible, concerning the detainee experience of those held on a short term basis from September to December while Tinsley House has operated as a STHF. These comments derive from our remote monitoring of the centre from September to December but recognise the limitations both of remote monitoring itself as well as the wholly different experience of detainees held on a short term basis, which never exceeded seven days and has been frequently much shorter. In both cases, due to time, language and accessibility difficulties, it has been impossible to capture the detention experience directly from the detainees themselves, and what evidence we have gathered suffers from that limitation.

Moreover, it is important to note that Tinsley House as a STHF has been used essentially as overflow capacity when Yarls Wood STHF has been full. Yarls Wood is an IRC in Bedfordshire which is also now operating, at least in part, as a STHF, and which has been used as the front-line STHF for those reaching the UK in cross-Channel small boats. This means that Tinsley House as a STHF has been used only sporadically in the last four months of the year, when Yarls Wood was full, and for much of that time, while constantly on standby, was empty or held very low numbers indeed. The comments we do feel able to make concerning the detainee experience at Tinsley House STHF recognise that the issues which are the focus of our report on Tinsley House IRC do not always have relevance to the STHF.

3.2 Main judgements

How safe is the IRC?

During the first three months of 2020, when Tinsley House operated as an IRC, we are satisfied, on the evidence then available to us, that detainees were held in a generally safe environment. In January, there was one recorded use of force, which was spontaneous and designed to prevent self-harm; there were none in February, and four in March, each of which was spontaneous and used against the same detainee. There were two detainees subject to removal from association (Rule 40) in this three-month period, and only three acts of self-harm, none of which required off-site medical treatment. These figures remain low when compared with the overall population held at Tinsley House at this time, and are consistent with the figures presented in our 2019 report, when the centre operated as an IRC for the full twelve months of that year.

This is, of course, a judgement that relates solely to the three-month period at the start of 2020, when the centre (now with its new contractor, Serco) was managed by G4S. As Tinsley House did not operate as an IRC thereafter in 2020, there is no further judgement on safety that can be made.

As referred to earlier in this report, Tinsley House was used as a STHF from September to December 2020, with a varying population held for a matter of days only. It is perhaps worth noting that in those four months there were only two recorded uses of force (one relating to a detainee accommodated in the PDA, which was being utilised as a care and isolation unit at this time), no recorded acts of self-harm, and no removals from association (Rule 35 of Short Term Holding Facility Rules) notified to us, suggesting that Tinsley House STHF continued to provide a generally safe environment whenever it held short term detainees at this time.

How fairly and humanely are detainees treated?

During its short time as an IRC in 2020, we believe that, on the evidence available to us from those three months, detainees were generally treated fairly and humanely at that time. In part, as we commented last year, this is a consequence of the good relationships between staff (at all levels) and detainees that were evident again at the centre in the first three months of 2020.

In our last report, we did, however, make a recommendation designed to address a concern that we had expressed as a caveat to our judgement under this heading, as to whether particularly vulnerable detainees were always adequately and humanely protected by the adults-at-risk policy, and in particular by the manner in which the Rule 35 procedure and decision making was functioning. Although the recommendation was partially accepted, we comment later in this report that it had not in fact been addressed by the end of March this year, unsurprisingly, given the context of the pandemic, and therefore now remains outstanding. The caveat expressed last year therefore remains on our judgement regarding fairness and humanity in this 2020 report, although the judgement this year, based only on the evidence from three months, is itself unavoidably limited.

It is again perhaps worth commenting that we have seen no evidence to suggest that detainees held at Tinsley House STHF from September to December have been treated in anything other than a fair and humane way.

How well are detainees' health and wellbeing needs met?

We are satisfied from the very limited evidence we have from the first three months of 2020, that, in a general sense, the healthcare and wellbeing needs of detainees were met during the centre's brief time during 2020 as an IRC. We continue to believe, however, that meeting those needs would be greatly assisted by the restoration of the monthly patient consultative forums, as we recommended last year. They had not been restored by the end of March but we welcome an assurance that has now been given that they will be, once the centre reverts to its IRC role, whenever that takes place. It should be noted, from a healthcare perspective, that by the time of the first national lockdown in March 2020, Tinsley House was very nearly entirely empty of detainees, and remained so during the height of the first Covid-19 surge.

The re-designation of Tinsley House IRC as a STHF from September 2020 coincided with the start of the second wave of infections, and specific safety measures were put in place within the centre. On occasion, healthcare staff were faced with the challenge of screening up to 70 or 80 arrivals at the same time at Tinsley House STHF, either from Yarls Wood STHF as an overflow, or, on occasion, more directly from the Kent intake team. While all screenings were carried out, the 2 hour requirement in the Short Term Holding Facility Rules within which screening should be completed could not always be complied with. However, the healthcare centre remained open and accessible whenever detainees were held during these last four months of the year.

Elsewhere in this report, we have commented on our concerns about room-sharing, facemask wearing, social distancing and Covid-19 testing while Tinsley House was functioning as a STHF.

How well are detainees prepared for return or release?

In our 2019 report, we commented on the variability of the quality of the preparation for detainee release back into the community or removal from the UK, and we made a number of recommendations designed to address our concerns. These recommendations were all accepted, but in the first three months of 2020, when Tinsley House operated as an IRC, there had been insufficient time for these to be addressed. Furthermore, these were among the last months of the G4S contract, and the issues raised in these particular recommendations were, by their nature, longer term and essentially matters for the new contractor when they took over the running of the centre in May. As Tinsley House has not yet operated as an IRC under Serco's management, the consequence therefore has been that these matters remain outstanding.

At present, therefore, our judgement on these issues remains unavoidably qualified. Serco has indicated that significant improvements will be introduced in due course,

to enhance the preparation detainees will receive prior to release or removal. For now we must await those developments.

These issues of preparation for return or release did not, of course, apply to Tinsley House when operating as a STHF.

3.3 Recommendations

The recommendations we make in this report are limited by the circumstances in which Tinsley House IRC has found itself during 2020 as a result of the pandemic and, in the main, they apply to Tinsley House IRC, as opposed to Tinsley House STHF. These recommendations are essentially designed to breathe fresh life into those recommendations from last year which were unable to be addressed during 2020 but which we believe will retain their importance once Tinsley House resumes its role as an IRC.

While we hope that the general comments we have also felt able to make in this report, concerning aspects of the detainee experience during the four months of Tinsley House operating as a STHF, will be considered by the Home Office, Serco and healthcare staff, we are not proposing to make formal recommendations as such, given the current transitory nature of the STHF status of the centre. There is, however, one exception we make to this, which reflects the level of concern we have felt in relation to compliance with Covid-19 guidelines and safeguards while the centre is acting as a STHF. This concern, which has immediate relevance, is reflected in the recommendations we make to the Home Office and to healthcare staff.

TO HOME OFFICE IMMIGRATION ENFORCEMENT

We ask the Home Office and healthcare staff:

1. to reconsider its policy of allowing room sharing at Tinsley House STHF by multiples of detainees during the currency of the pandemic, simply because they may have spent time together in small boats or on coaches en route to the centre.
2. to reconsider its current policy of not Covid-19 testing detainees on arrival at Tinsley House STHF, or thereafter during their period of detention.
3. to consider requiring the STHF to adopt a more stringent policy of compulsory facemask wearing and a more persistent approach to social distancing by detainees and staff around the centre.

We ask the Home Office:

4. to ensure that HOIE Rule 35 notification responses are tailored to the individuals to whom they relate, and that those responses are genuinely meaningful.
5. to continue to monitor the handling of detainee complaints concerning the performance of solicitors giving advice and assistance at Tinsley House IRC and STHF.

TO THE DIRECTOR/CENTRE MANAGER

We ask the contractor:

6. to ensure, as part of its approach to reconsidering the format of meetings at the centre, that the Tinsley House safer community meetings are organised in a way that makes them relevant and attractive for detainees to attend; that the adults-at-risk meetings are organised to allow time for the appropriate consideration of specific Tinsley House adults-at-risk issues; and that the terms of reference of the diversity and race relations meetings adopt a more focused approach to issues of equality and diversity.
7. to continue to explore ways of early identification of protected characteristics among the detainee population at Tinsley House, in order to comply fully with the Equality Act 2010.
8. to continue to explore ways of providing tablet computers in the library at Tinsley House, to enable detainees to download materials, subject to appropriate security checks.
9. to undertake, in consultation with classroom teachers, a review of the portfolio of educational and other activities at Tinsley House, in order to focus specifically on the preparation of detainees for their release back into the community or their removal from the UK. We ask, in particular, for a review of the content and delivery of these courses and sessions, with a view to incorporating more online courses with portable certificates.

3.4 Progress since the last report

As a result of the pandemic, it has not been possible for much progress to have been made in addressing the recommendations in our 2019 annual report. This is now reflected in our recommendations set out above for the coming year, which essentially identify those which we believe continue to be relevant when Tinsley House once again returns to its status as an IRC, hopefully some time in 2021.

In general, progress since that last report can be summarised as follows, and references are to the numbered recommendations in the 2019 Tinsley House IMB Annual Report:

Recommendations 1 and 2

These were policy recommendations concerning the introduction of a time limit on immigration detention, and for an expansion of the time limit on the provision of legal advice and assistance to detainees. Both were rejected by the Minister.

Recommendation 3

The Home Office was asked to reconsider the use of formulaic reasons given to the IMB for decision-making following Rule 35 reports, and this was partially accepted. It was accepted that responses should be tailored to an individual, and that the Rule 35 Team will remind decision-makers of the importance of providing meaningful responses. This remains work in progress, as there was little time to address it in the first three months of this year.

Recommendation 4

We asked the Home Office to reconsider the reduction in free association time that had been introduced some time ago without a justification for its necessity. The contract with the new contractor, Serco, makes provision for such extended periods of free association which have now been introduced at Tinsley House STHF since October 2020, and which, we have been informed, will apply when Tinsley House returns to its IRC status. We therefore regard this recommendation as having been completed.

Recommendation 5

We asked the Home Office to work with the contractor and sub-contractors to ensure the Board has consistent and comprehensive access to all detainee complaints. This was accepted, and appropriate mechanisms were introduced at the start of 2020. We therefore regard this recommendation as having been completed.

Recommendation 6

We asked the Home Office to continue to monitor the performance of the newly contracted solicitors' practices in their delivery of legal advice and assistance to detainees. This was accepted, and monitoring of the progress of consideration of complaints by the Legal Aid Agency was notified to the Board in the first three months of 2020. As there was no time thereafter in 2020 to continue with that, we believe that this remains work in progress.

Recommendation 7, 8 and 10

These three recommendations were all designed to enhance the outcomes of the safer community, adults-at-risk and diversity and race relations meetings, and were all accepted or partially accepted. With the IRC functioning for only three months in 2020, and with the change of contractor at the end of May, there has been no opportunity to address the detail of these recommendations, which therefore remain work in progress.

Recommendation 9

This recommendation was designed to enhance the early identification of protected characteristics among the detainee population to comply fully with the spirit of the

Equality Act 2010, and was accepted. Again, with the change of contractor, and with the time constraints of 2020, it has not been possible to address this issue, which therefore remains work in progress.

Recommendation 11

This recommendation sought to address ongoing dissatisfaction with the food at Tinsley House through a closer monitoring of the work of the then sub-contractor, Aramark. As Aramark no longer has the sub-contract, we regard this recommendation as closed.

Recommendation 12

This recommendation asked the contractor to explore the use of tablet computers in the library as an alternative to hard copy books and other materials. Again, with the change of contractor and the consequences of the pandemic, no progress has been possible to advance this at Tinsley House although some e-readers have been introduced at Brook House IRC. This too remains work in progress.

Recommendations 13 and 14

These two recommendations were designed to enhance the content and delivery of the educational and other activities, in order to focus them more clearly on the preparation of detainees for their eventual release or removal, and both were accepted. With the effective closure of the centre in March and the introduction of the new contractor in May, there has, again, been no opportunity to address these issues, which remain work in progress.

Recommendations 15 and 16

Both these recommendations for the healthcare department were accepted, and with the assurances given we regard them now as completed.

Evidence sections 4 – 7

4. Safety

It should be noted that the numbers quoted in this section of the report have been collated locally and have not been officially confirmed by Home Office data sources.

The data presented below relate to January, February and March 2020, being the only months of the year when Tinsley House operated as an IRC in 2020. A brief summary of the safety issues concerning Tinsley House as a STHF concludes this section.

4.1: The context

Tinsley House IRC continued to exhibit a generally positive atmosphere in the first quarter of the year, and the maintenance of low numbers of detainees contributed to the centre feeling calm, stable and relatively relaxed. This was underpinned by what we observed to be continuing positive relationships between detainees and G4S staff. We have no reason to believe that the findings of the survey conducted towards the end of 2019, which suggested an overwhelmingly positive response to the question of how safe detainees felt at Tinsley House, would be any different at the start of 2020. We believe that Tinsley House IRC was a fundamentally safe environment during the first quarter of 2020.

4.2: Suicide and self-harm, deaths in custody

There were no suicides at Tinsley House IRC between January and March, and there were no deaths from other causes at this time either. Incidents of self-harm were also very low, relative to the size of the detainee population. In January, there were two incidents of self-harm involving the same detainee, which involved him banging his head once against an interview room wall following bad news received from the Home Office, and making superficial cuts to his arm, neither of which required off-site treatment. In February, there was one act of self-harm, where a detainee made a superficial cut to his left wrist. In March, there were no recorded incidents of self-harm.

4.3: Violence and violence reduction

Violence during the first quarter of 2020 continued to be very largely absent from Tinsley House IRC. There were no assaults by detainees on staff or on each other, and no reported fights; there was no damage to centre property; and there were no threats or verbal abuse recorded. In our 2019 annual report we concluded that violence was not a feature of life at Tinsley House IRC during that year, and that remained the case for the first three months of 2020.

4.4: Vulnerable detainees, safeguarding

The adults-at-risk register at Tinsley House IRC in the first quarter of 2020 suggest that, in January, there were 12 detainees who were deemed to be adults at risk, all of whom were at level 1. In February, there were 13 at level 1 and 4 at level 3. Up to the closure of the centre in late March, there were a further 14 at level 1, and 2 at level 3. The very small number of detainees at either level 2 or level 3 during this short period replicates a similar situation last year, which we commented upon in our 2019 annual report. We have commented elsewhere in this report on our continuing concern, first expressed last year, that the implementation of the adults-at-risk policy may not always adequately identify and protect particularly vulnerable detainees, and while we have no further evidence for this from the very short time span covered by this report, it does remain an issue outstanding from last year that is likely to remain when the centre once again becomes an IRC.

The duty of care owed by the managers of Tinsley House IRC to those in its care who are vulnerable is largely carried out through the use of assessment and care in detention and teamwork (ACDT) procedures. In January, there were 9 ACDT documents open, both new and existing; in February, there were 13, and in March, as the centre emptied, a total of 8. During those months the IMB continued to monitor the quality of the paperwork, which we, again, found to be generally comprehensive and clear, and which adequately set out the details of the detainee's mood at any particular point in time and the action being taken in a timely manner to address that. We found ACDT reviews to be appropriately carried out, in a timely manner, with input from the Home Office or healthcare staff, or both.

Rule 35 of the Detention Centre Rules 2001, which were applicable during January, February and March 2020, sets out a requirement for doctors working in IRCs to report on any detained person whose health is likely to be injuriously affected by continued detention; who is suspected of having suicidal intentions; or for whom there are concerns that he may have been a victim of torture. On receipt of a Rule 35 report, the caseworker must review the appropriateness of continued detention in the light of the report's conclusions, and decide whether detention should be maintained or whether he should be released. As such, it is another mechanism for safeguarding those detainees believed to be vulnerable on those specified grounds.

In the first three months of 2020, there was a total of 30 Rule 35 reports. Of these, 26 decisions were made to maintain detention, although in a number of cases a decision was subsequently taken to release on bail, in order to submit an asylum case, or, in March, to release due to the Covid-19 procedure which was in operation by then. In our 2019 annual report, we criticised the largely formulaic reasons given for maintaining detention in these Rule 35 cases, which render the task of monitoring that reasoning difficult, if not impossible. Our recommendation for more transparency was accepted partially by the Home Office, which commented that 'there should be sufficient differences in drafting that the responses are tailored to an individual' and that 'the Rule 35 Team will remind all decision makers of the importance of providing meaningful responses'. Although we only have the evidence from three months in 2020, including, of course, the very difficult circumstances in March due to the pandemic, from that limited evidence it is clear that there was little change, by the end of March, in the manner of the reasoning provided for decision-making following a Rule 35 report. In January, for example, the formula 'removal deemed to be realistic within a reasonable timescale' was commonly used to justify continuing

detention, while in February there were no reasons at all given for maintaining detention. This will remain an issue once Tinsley House returns to its IRC status, and we have, this year, therefore repeated the recommendation we made last year.

4.5: Use of force

The use of force by officers against detainees continued in this first quarter to be proportionately very low. In January there was one use of force which was used spontaneously against one detainee to prevent self-harm, while there were none at all recorded in February. In March, there were four separate uses of force against the same detainee, again in circumstances to prevent self-harm. In all cases we believe the use of force to have been appropriate and justifiable.

4.6: Substance misuse

There are no residential facilities at Tinsley House to address issues of known drug or alcohol abuse, and identified detainees are transferred to other establishments. It is therefore perhaps not surprising that, historically, drug and alcohol abuse have not been an issue at the IRC, and this remained the case during this early 2020 period.

4.7: Tinsley House STHF

Tinsley House became dual certified as a STHF and an IRC from September 2020, with a general brief to act as an overflow facility, to take those who had crossed the Channel to the UK in small boats seeking asylum when Yarls Wood STHF had reached its capacity. As a consequence, detainees arrived unpredictably and at short notice, and remained at Tinsley House only for very short periods, which never exceeded seven days and were usually much shorter. There were therefore variable numbers of detainees being held from time to time, and, indeed, for much of that time the centre held either very low numbers or was empty. During these last four months of the reporting year, Tinsley House was operated under the Short Term Holding Facility Rules 2018.

In terms of the safety of those who were held at Tinsley House STHF, the evidence we gathered while we were remotely monitoring the centre during these last months of 2020 suggests strongly that the generally safe environment we which we have earlier commented upon in relation to the IRC at the start of the year, albeit then managed by a different contractor, was similarly in evidence at the STHF.

Thus, the centre continued to be marked by a general absence of violence. There were only two recorded uses of force, one in October and one in December. The latter involving a detainee held on medical grounds in the PDA, which at the time was being used as a care and isolation unit, whose use of English was very poor and whose general frustration appeared to have led him to become difficult to manage, while returning to the PDA suite from the centre.

Between September and December, there were only 7 detainees on the adults-at-risk register- one at level 2 and six at level 1. There were no ACDTs opened at the STHF in either September or October. In November, two ACDTs were opened for two detainees held on medical grounds in the PDA/Borders suites which at the time were being used as a care and isolation unit. One of these ACDTs was carried over into December, until it was closed on 2nd December, when the detainee was removed from the UK. In December, three ACDTs were opened; all of these were closed by the end of the year and none were carried over into January 2021.

There were no recorded Rule 32 reports (the equivalent of Rule 35 reports under the Detention Centre Rules), which, given the very short timescales of detention in the STHF, is not surprising. Similarly, there were no Rule 35 (the equivalent of Rule 40 under the Detention Centre Rules) removals from association, and no Rule 37 (the equivalent of Rule 42 under the Detention Centre Rules) temporary confinements..

There have been no acts of self-harm recorded in 2020 at the STHF.

From this limited evidence available to us from four months' experience as a STHF, it is our view that detainees, when held in Tinsley House STHF towards the end of 2020, were held in an environment that was generally safe.

4.8 PDA and Borders Suites

From August until the end of the year, the PDA and Borders accommodation was occasionally used for exceptional purposes involving detainees from Brook House IRC. In those months there were 10 cases of suspected Covid-19, two cases of positive Covid-19, one detainee who was required to shield, and three age disputes. With the exception of the detainee who was shielding and who was removed from the UK in December, all the remaining detainees were transferred back to Brook House IRC in due course.

5. Fair and humane treatment

It should be noted that the numbers quoted in this section of the report were collated locally and have not been formally confirmed by Home Office data sources.

5.1 Accommodation, clothing, food

For the last several years, the IMB has conducted its own survey of detainees at various stages of the year, to seek feedback directly from them on issues such as the quality of the accommodation and the food at the IRC. This has not been possible this year due to the effective closure of the centre in March following the outbreak of the pandemic and national lockdown, and we have therefore been unable to gather evidence from this source. Similarly, the contractor each year would conduct its own detainee survey which was shared with the Board, but this has similarly been a victim of the pandemic. At the monthly Tinsley Matters consultative meetings, issues of accommodation do on occasion arise, although satisfaction with the quality of the accommodation and living spaces remained high at the start of the year. Issues raised were largely of facilities sometimes not working properly. Hence, for example, at the January meeting there were complaints that the shower water was both too hot and too cold, and that the ventilation in the rooms was too fierce. A much more substantial issue that arose at each of the three Tinsley Matters meetings in 2020 concerned ongoing dissatisfaction with the food, an issue that we have commented on in all our recent annual reports. Attempts by Aramark, which still had the contract at the start of the year, to improve the situation through new consultative meetings and different feedback mechanisms appeared to be having little beneficial effect, as complaints continued to be expressed at all three Tinsley Matters meetings at the start of the year. That issue has now been addressed through a decision by Serco, the new contractor from May 2020, not to renew the catering subcontract with Aramark and to take catering in-house, and this has now taken place.

The IRC has not yet, of course, had any experience of this new catering but those detainees held at the STHF since mid-September have. We have not heard any complaints, as yet, from these short-term detainees, although this may be because they are not at the centre for long enough to form views on the food on a continuing basis. Social distancing requirements that currently apply at the centre mean that use of the dining hall is limited, in terms of numbers eating at any one time, but we welcome the initiative taken by Serco to allow detainees to take food into their rooms as an alternative if they so wish.

5.2 Separation

Rule 40 (removal from association) was used very rarely in the first quarter of 2020 at the IRC. It was not used at all in either January or February, and on only two occasions in March, both for very short periods of time and in circumstances which we believed to be appropriate. There was no use at all of Rule 42 (temporary confinement) during this period.

During the four months from September to December, when Tinsley House was operating as an STHF, there were no recorded uses of the equivalent separation of detainee provisions in the Short Term Holding Facility Rules (Rule 35 and Rule 37).

5.3 Staff/detainee relationships

We commented in our 2019 annual report on the positive nature of the relationships between staff and detainees at the IRC, and the significance of that for the comparatively calm and stable atmosphere that existed at the centre. From our own observations at the start of 2020, and the limited evidence then available to us, we believe that those positive relationships between G4S staff and the detainees continued to be very much in evidence. At the monthly Tinsley Matters consultative meetings, also attended by the Board as observers, detainees were routinely asked for their views on staff/detainee relationships. In the first three months of 2020 there were no negative comments recorded at all and there was consistent praise for the staff from the detainees present.

5.4 Equality and diversity

The IRC remained an extremely multi-national, multi-cultural and multi-faith community during the first quarter of 2020. In January the 262 arrivals at Tinsley House (including the PDA and the Borders Suite) were represented by 50 nationalities; in February, the 192 arrivals were represented by 42 nationalities; and the rapidly declining numbers in March were similarly diverse. Albanians consistently formed the largest group, followed by Brazilians, Indians, Bangladeshis and Pakistanis.

During that limited period of time at the start of 2020, the Board saw no evidence of any direct discrimination against any individual or group at the centre on grounds of race, religion or belief. The evidence available to us, on the contrary, suggests that there was a widespread culture of respect for all groupings, cultures and faiths, including the evidence from detainees at Tinsley Matters meetings concerning the respectful relationships that existed with the staff. Evidence from the Chaplaincy consistently confirmed the celebration of all cultures and faiths at the centre. In January, for example, the Chaplaincy reported that:

‘The Christians marked Epiphany. The Sikhs marked Guru Gobind Singh’s Birthday. The Hindus celebrated Maker Sankranti. The Chinese New Year was celebrated by the Chinese with other detainees that joined them. The Orthodox observed Orthodox Christmas, and Orthodox New Year.’

In our 2019 annual report, however, we raised a concern about the possibility of indirect discrimination arising from the manner in which the centre sought to identify protected characteristics amongst the detainee population – namely, by reference to the subject during induction and thereafter through written information on noticeboards in corridors, and through a process of self-declaration. The evidence from Tinsley Matters meetings throughout 2019 had suggested that there was a very high level of ignorance of the term ‘protected characteristics’ amongst detainees, and we recommended that the centre should reconsider the process of identification of any such protected characteristics, in order to comply with the spirit of the Equality

Act 2010, and by so doing minimise the possibility of any unlawful or unfair treatment against any detainee with any such characteristics. The recommendation was accepted by the then contractor, G4S, but, again, there was effectively no time at the start of the year before the lockdown and effective closure of the centre for any such action to be taken. Since then, of course, the IRC has had a new contractor, and we make the same recommendation again, so that this concern can be reconsidered once the centre becomes an IRC again. Such a review should seek to ensure both that detainees have an informed understanding of what is meant by the term 'protected characteristics' (ignorance of which was again expressed at each Tinsley Matters meeting early this year), and where they can access support and guidance, whether from within or from outside the centre. Such a review would also enable officers and managers to anticipate possible risks to detainees with any such characteristics, and so protect them from any potential unfair or unlawful treatment.

We similarly recommended to the contractor in our 2019 annual report that there should be a reconsideration of the terms of reference and format of the monthly diversity and race relations meetings, in order to adopt a more focused approach to issues of equality and diversity. Once again, the lack of time before the lockdown prevented this recommendation (which was accepted) being addressed and there is now a new contractor at the centre. We therefore repeat that recommendation, in order to ensure that the concern we then expressed is now addressed.

5.5 Faith and religious affairs

We believe the detainee population at the IRC to have been well served in the first quarter of this year by the multi-faith Chaplaincy team. The refurbishment, in 2019, of the multi-faith space at the centre to provide an exclusive space for non-Muslim worshippers appears to have been greatly welcomed by those affected. Similarly, we welcome the reversal of the reduction in free association time at the centre, which we had criticised, in part, for its negative impact on the principle of equal access to worship opportunities for all faiths at appropriate times. This change took place later in 2020, after the new contractor took over the management of the centre, and was introduced in October, after the centre had become a STHF. We are assured that this change in free association time will also be introduced for detainees once the centre becomes an IRC once again.

All faith facilities were available to detainees whenever the centre acted as a STHF.

5.6 Complaints

In the first quarter of 2020, and following our recommendation in last year's annual report, we are pleased that the Board was once again copied into complaints, and responses to them, submitted at the IRC.

The data suggest that, in the first three months of this year, complaints were submitted by 11 detainees at the IRC, some of whom submitted more than one. Two of those complainants had their complaints upheld or partially upheld, and the remainder were either withdrawn or rejected. A wide range of topics were represented in those complaints, including alleged unprofessional behaviour by

officers; cancellation of bookings for the 'cultural kitchen'; loss of property between sites or at the centre; and poor food quality.

The data on complaints now shared with us is not all easy to read but we understand that the current manner of presentation across the whole immigration detention estate is currently under review, which we greatly welcome. While the number of detainees submitting formal complaints at the IRC in the first three months of 2020 was relatively low it remains difficult to monitor how well and how fairly they were handled. Feedback from the complainants is not usually forthcoming given the often lengthy timescales of investigation and reporting back involved, which often means that the complainant has long since left the IRC before the outcome of the complaint is known. The success rate of complaints being upheld remains proportionately low, and it is not possible to understand why, for example, a relatively high proportion are withdrawn at some stage in the process.

There was one formal service complaint from a detainee recorded in October 2020, but no other formal complaints were submitted by detainees while the centre was acting as a STHF between September and December.

5.7 Property

In general, property was not an issue at Tinsley House IRC in the first quarter of the year, and was the subject of formal complaint by only three complainants, one of whom withdrew his complaint before a finding had been reached.

Property issues are much more likely to become an issue should Tinsley House continue as a STHF, as there is much opportunity for small amounts of property to go missing when detainees arrive in small boats and come directly from the Kent intake team at Dover to Tinsley House STHF. In November, for example, bags of property relating to 40 different detainees were difficult to identify when they were taken off the coach, as apparently all labelling had been washed off in the rain. After many hours of work, all property on that occasion was eventually allocated to rightful owners.

6. Health and wellbeing

6.1 Physical and Mental healthcare

In our 2019 annual report, we recommended that healthcare staff should consider the reintroduction of monthly patient consultative forums, which had been discontinued early in 2019. It was our view that these forums had provided a valuable opportunity to engage with detainees and gather feedback on any healthcare issues they would like to raise. That recommendation was accepted by healthcare staff who gave an assurance that the forums ‘will resume once Tinsley House starts to receive residents.’ No such forums were held during January, February or March 2020 prior to the closure of the IRC. We look forward to their reintroduction, in line with the assurance given, once Tinsley House again becomes an IRC. In the absence of the forums, the only other feedback mechanism that existed in the early period of 2020 was the Tinsley Matters meetings, which were attended by a representative from the healthcare team. Those meetings were not well attended by detainees, and by March the centre was being rapidly emptied. Healthcare issues raised at those meetings, which were very few in number, tended to be those issues that were particularly personal to the detainee raising them, rather than being representative of the wider detainee population at that time. Thus, there were comments that healthcare staff ‘work too slow and sometimes they are rude’, and that ‘whenever you say you have a problem they just recommend paracetamol’. In the past, these were exactly the kinds of issues that could be handled at the consultative forums, which had provided an opportunity for healthcare staff to explain the strategies behind their pain relief medication prescription policy, for example, but which could not be discussed at Tinsley Matters meetings.

The pandemic, of course, presented a whole new set of challenges for the healthcare team, but it was not until September that these became an issue at Tinsley House, which had by then been closed for nearly six months. In September, the centre became a STHF, which required healthcare staff to conduct individual screening and assessment of cross-Channel arrivals, at unpredictable times, with very short notice and often with considerable numbers of detainees at the same time. While the strict time requirements for conducting these, as set out in Short Term Holding Facility Rules, could not always be complied with, healthcare staff should nevertheless be commended for their response to these situations as they arose, and for the way in which they remained open and accessible, with very little notice, for short term detainees during their stay at Tinsley House.

From September, the pandemic also required the establishment of new safety practices at Tinsley House. With, at times, considerable numbers of detainees arriving together at the STHF, albeit for short periods, room sharing became unavoidable with two, four or six detainees sharing rooms, not only for sleeping purposes, but also for time spent in those rooms during the day. Social distancing requirements, as set out in PHE and government guidelines, clearly could not therefore be complied with at those times. As part of our monitoring of the centre at this time, we raised concerns at these decisions, particularly in the light of our understanding that it had been the impossibility of complying with social distancing, given the hostel-like design of Tinsley House and the shared nature of its facilities, that had led to the effective closure of the building to anything other than very small

numbers of detainees (who did not materialise anyway) from March to September. The response to our concerns was that detainees who had travelled together either by boat or coach en route to Tinsley House would be allocated rooms to share with each other 'as they have already been exposed to any potential risk in those circumstances.' We remain concerned that this is not, in our view, a wholly satisfactory answer, given what is known about the virus and risks of cross-infection, and also that the policy that Covid-19 testing on arrival is not to be carried out at Tinsley House because of its current status as a STHF.

In this context, in this report we have made a number of recommendations to both the Home Office and to healthcare staff, to reconsider the policies and practices not only on room sharing and the maintenance of social distancing, but also on the requirements for Covid-19 testing and the wearing of facemasks, in the context of increased and still developing knowledge about the transmissibility of the virus.

6.2 Welfare and social care

In our annual reports for the last several years, we have commended the proactive work of the IRC's welfare department which has been a constant source of advice, support and practical assistance for detainees. That work continued throughout the first quarter of 2020. Despite numbers of detainees well below capacity the welfare department assisted detainees on 1,078 occasions in January, and on 1,160 occasions in February, providing advice and help on a wide range of issues. In particular it was active in advising detainees on the availability of legal advice and assistance and helping to arrange appointments.

The welfare department has continued to assist short term detainees from September, and has remained open and accessible whenever any were accommodated at the centre. Again, the challenge for these detainees of being able to access legal advice, which, given the time constraints, had to be over the telephone, was greatly assisted by welfare staff. We welcome the planned expansion of this department as part of the new contractor's contract requirements once the centre becomes an IRC again.

6.3 Exercise, time out of room, gym

Earlier in this report, we have referred to free association time at the IRC, and have welcomed the removal of the recently imposed reduction in such time as part of the terms of the new contract for running the centre. While detainees at the start of the year did not benefit from this, the new and increased hours of free association time did apply from October onwards for short term detainees, and we look forward to all detainees benefiting when the centre reverts to its IRC status.

Facilities for exercise are good, and appreciated by detainees. They include the gym, the sports hall and the external all-weather sports field, where, at the start of the year, a range of sporting activities were arranged by staff for the detainees. Those facilities were made available to short term detainees from September, although the health and safety requirements following the outbreak of the pandemic constrained, to some degree, what could be offered. This included the necessity of keeping the

gym closed, as the cleaning requirements every time that pieces of equipment were used could not be complied with.

For all detainees, the courtyard was available for those who wished to take advantage of time out in the fresh air.

7. Preparation for return or release

7.1 Activities, including education and training

In the short period during the first quarter of 2020 when Tinsley House operated as an IRC a wide range of education and other activities was on offer. These included:

Education: classes in Cultural Activity and Studying English; Food Safety and Hygiene; Educational Games and Studying English; Life in the UK and Studying English; Arts and Crafts; Creativity and Calm Workshops.

Cultural Kitchen: classes in Cake-Baking; Cook a Meal in a Hurry; Sweet and Savoury Baking.

Recreational Activities: board games in the library; DVD Collection and X Box games in the library; weekly bingo competitions; movie nights in the dining hall; billiards and game machine.

Music: Music in Detention and Dance in Detention classes.

Gym, sports hall and sports field activities: table tennis with the Brighton Table Tennis Club; badminton; volleyball; cricket; basketball; boxing; daily runs; circuit training; weights, and so forth.

During January, February and March 2020, G4S staff continued to provide management information on detainee access to these education and other activities, which detailed monthly usage of the library, gym, arts and crafts lessons and workshops, the cultural kitchen and educational classes, broken down by detainee age, nationality and religion. Detainee numbers at the centre were low at this time, and during March, of course, were reduced to zero; correspondingly usage of these facilities was also low. As we commented in last year's annual report, these statistics, although useful to provide a broad overview of take up, are of limited value amongst a relatively small population, and fail to address such important questions as why some groups rather than others access activities; whether the range of courses and activities offered is the most appropriate; and, critically, whether these particular activities properly equip detainees for their eventual release back into the community or removal from the UK. Our recommendation last year that other ways should be developed to address the strengths and weaknesses of the present portfolio in order to be able to address these questions was accepted. Once again, however, the pandemic outbreak and the emptying of the centre in March made work to address these issues impossible, and the centre has not operated as an IRC since then. Moreover, there is now a new contractor in place at Tinsley House. We are therefore repeating the same recommendations from last year's report which addressed these concerns, as these important issues will remain to be addressed when the centre once again becomes an IRC.

The re-designation of the centre in September as a STHF saw the reopening of a significant number of these activities, which were important for recreational purposes for detainees who were likely to be at Tinsley House for only a few days. Their role in contributing towards preparation for release back into the community or removal from

the UK became less relevant, given the very short periods that detainees could engage with them.

7.2 Planning for return or release

In addition to the role played by educational and other opportunities in planning for return or release discussed above, the ability to maintain contacts with family and friends while in detention, and access to good-quality legal advice and assistance, are also important.

In January, February and March detainees' ability to maintain contact with families was supported largely by the welfare department and, to a lesser extent, the twice-weekly visits to the centre of representatives of the Gatwick Detainee Welfare Group. Tinsley House welfare department was instrumental in helping detainees to arrange visits by family and friends, and Skype and FaceTime continued to be available to help detainees keep in touch with their families through video calling. The welfare department and the library had fax and scanning facilities which was critical to enabling detainees to send and receive documents, particularly to and from solicitors, and was instrumental in assisting with contact generally with lawyers and the arranging of appointments to see them at the centre. Welfare staff also continued to supply a wide range of leaflets and information on other organisations, including the Samaritans, local charities, religious groups and embassies, all of which had the potential to assist detainees to prepare properly for their release or removal from the UK.

In last year's annual report, we expressed some concern at the introduction to Tinsley House of nearly 40 law firms as approved providers of legal advice and assistance, most of whom were new to the centre. We therefore asked, in a recommendation to the Home Office, that complaints by detainees concerning the quality of the service provided in this crucial area should be closely monitored, in terms of their outcomes. During this short early period of 2020, prior to the closure of the IRC, we were pleased to be kept up to date with the progress of those complaints. Given the very short period involved last year, we are repeating this recommendation to the Home Office, so that, once Tinsley House reopens as an IRC, we will be able to monitor the continuing quality of legal services provision to detainees, so that they can be properly prepared for release and removal from a legal perspective.

The question of access to appropriate legal advice for detainees held on a short term basis is much more difficult, given the very short time spans of detention at the STHF. From September to December, however, we were pleased to see that the welfare department once again assisted, when requested by detainees, in arranging telephone advice sessions with lawyers, as neither the time available nor the pandemic allowed actual legal visits at that time.

8. The work of the IMB

During January, February and the first half of March 2020, IMB members made weekly unannounced visits to Tinsley House IRC to carry out their formal monitoring duties. During these months, we also attended meetings as observers, and attended two monthly IMB meetings with Home Office and senior G4S staff before those meetings became impossible due to the lockdown and closure of the centre until September.

Tinsley House IRC was empty of all detainees by the end of March and the start of the national lockdown due to the Covid-19 pandemic. The centre remained on standby until September 2020, but during those six months there were no detainees held, with the exception of a very small number of individual detainees occasionally accommodated in isolation in the Borders Suite (and the PDA) who were suspected of carrying the virus. There was, additionally, a very small number of age-dispute detainees transferred from neighbouring Brook House IRC until the dispute was resolved.

For the Board, the IRC was effectively closed during those six months, and we therefore carried out no monitoring at all. In September the centre was re-designated a STHF, and remained as such until the end of the year. Following a risk assessment undertaken by the Board, and taking into account all relevant PHE and government guidelines, we monitored the STHF remotely for the rest of the year. No actual visits to the centre were therefore undertaken in 2020 after March.

A number of Board members either retired or resigned by the end of the year, and our numbers dropped to four by the end of December, which included three new members appointed during 2020. With the co-operation of Brook House IRC, which remained open throughout 2020, these three new members were able to make significant progress towards completing their probationary year, and will do so once they have been able to undertake shadow monitoring at Brook House early in 2021.

During the summer the members of both Tinsley House IRC and neighbouring Brook House IRC IMBs together took the view that monitoring across the Gatwick immigration estate as a whole would now be significantly better served by the creation of one, unified Board, working across Tinsley House, Brook House and the PDA. A submission to that effect was submitted to the Minister and approved, and as from January 2021 there will be a single Gatwick Independent Monitoring Board with responsibility for monitoring at Brook House, Tinsley House and the PDA.

This report therefore will be the last to come specifically from the Tinsley House Board.

Board statistics

Recommended complement of Board members	12
Number of Board members at the start of the reporting period	7
Number of Board members at the end of the reporting period	4
Total number of visits to the establishment	11 weekly visits were made in January, February and March.

Applications to the IMB

Applications in 2020 were very small in number and relate solely to January, February and the first half of March, while the centre was operating as an IRC. Details will be provided in an addendum to this report once it becomes possible to access the centre again to obtain these applications after the current national lockdown.

There were no applications while the centre operated as a STHF between September and December.

Code	Subject	Previous reporting year	Current reporting year
A	Accommodation including laundry, showers	1	
B	Use of force, removal from association	0	
C	Equality	0	
D	Purposeful activity including education, paid work, training, library, other activities	0	
E 1	Letters, faxes, visits, phones, internet access	0	
E 2	Finance including detainees' centre accounts	2	
F	Food and kitchens	0	
G	Health including physical, mental, social care	4	
H 1	Property within centre	0	
H 2	Property during transfer or in another establishment or location	0	
I	Issues relating to detainees' immigration case, including access to legal advice	6	
J	Staff/detainee conduct, including bullying	0	
K	Escorts	0	
L	Other	0	
	Total number of applications	13	



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