

Report on the unannounced inspection of  
the short-term holding facility at:

**Lunar House, Croydon**

7 June 2009

by HM Chief Inspector of Prisons

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# Overview

The facility is managed by Group 4 Securicor (G4S) on behalf of the UK Border Agency (UKBA). It is situated in the same building as the UKBA asylum screening unit, which receives approximately 20 new applications each day. The facility was open from 10am to 7pm on Monday to Friday.

Two staff ran the facility – usually, but not always, one male and one female. It comprised a main holding room, with separate toilet facilities for men and women. A second holding room, with a separate toilet, was used by the UKBA as an interview room, restricting its availability to hold detainees. Between the two holding rooms was a central staff area, and off an adjacent corridor were two interview rooms used by the UKBA, a searching room and a separation room, which had never been used to hold detainees and was used as a store room.

G4S supplied us with detention logs for the three-month period from March to May 2009. During this period, 417 detainees (267 men and 150 women) had been held. The average length of stay was three hours. No children or families had been detained in the holding room in the previous three months.

## **Lunar House Short-Term Holding Facility**

Inspected: 7 June 2009

Last inspected: June 2006

### **Inspectors**

Susan Fenwick

Martin Kettle

Lucy Young

# The healthy custodial establishment

HE.1 The concept of a healthy prison was introduced in our thematic review *Suicide is Everyone's Concern* (1999). The healthy prison criteria have been modified to fit the inspection of short-term holding facilities, both residential and non-residential. The criteria for short-term holding facilities are:

**Safety** – detainees are held in safety and with due regard to the insecurity of their position

**Respect** – detainees are treated with respect for their human dignity and the circumstances of their detention

**Activities** – detainees are able to be occupied while they are in detention

**Preparation for release** – detainees are able to keep in contact with the outside world and are prepared for their release, transfer or removal.

HE.2 Inspectors kept fully in mind that although these were custodial facilities, detainees were not held because they had been charged with a criminal offence and had not been detained through normal judicial processes.

## Safety

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HE.3 The route from the holding room to escorting vehicles was not secure, and exposed detainees to public view.

HE.4 Unrelated female detainees were held in the same holding room as male detainees, despite the availability of a second holding room. No children or families had been held in the previous three months.

HE.5 Staff did not carry anti-ligature knives and there was no refresher training in self-harm and suicide awareness and procedures or anti-bullying.

HE.6 All detainees had an IS91 form, giving authority to detain, and a copy of their reasons for detention (IS91R), although not in their own language. Interpreters were used to explain reason for detention and for immigration casework. Daily checks of the holding room by UKBA managers did not always take place. An independent monitoring board was not yet visiting the facility.

HE.7 There had been three uses of force in the previous 12 months, and they had been appropriately documented. One incident had been the subject of a complaint, which had been thoroughly investigated.

## Respect

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HE.8 There were limited interactions between detainee custody officers and detainees, with officers failing to introduce themselves properly or explain the facilities available.

**HE.9** There were only hard seats available in the holding area. The number and range of sandwiches available were inadequate and no hot meals were provided, despite stays of up to nearly eight hours.

**HE.10** There was a diversity policy, although it was not displayed in the holding room or staff area. A national disabilities policy was displayed but there was no liaison officer. The holding area was not suitable for people using a wheelchair or those with significant disabilities. There was no evidence of diversity impact assessments. Staff had never used telephone interpreting services, even though many detainees could not speak English fluently.

## Activities

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**HE.11** There was little to occupy detainees, with only a television and a few newspapers available.

**HE.12** Detainees did not have access to exercise in the fresh air.

## Preparation for release

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**HE.13** Many detainees were transferred to the Port of Dover short-term holding facility for interview, often moving on to immigration removal centres (IRCs) shortly afterwards. These multiple moves were potentially disorientating for detainees and inevitably made it more difficult for them to obtain legal advice, maintain contact with family, friends and support groups, or make arrangements to recover property or money.

**HE.14** Detainees were not allowed visits, and family and friends were not able to bring items in for them.

**HE.15** Detainees were informed of their destination before transfer and were able to inform family and friends. They were given cards with brief details of IRCs, although no information about the Port of Dover short-term holding facility was available.

# Section 1

## Escort vans and transfers

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*Expected outcomes:*

*Detainees under escort are treated courteously, provided with refreshment and comfort breaks, and transported safely*

- 1.1 The main escort contractor was Group 4 Securicor (G4S). The vehicle we inspected was clean and supplied with water and snack packs. Men and women were sometimes transported in the same vehicle.
- 1.2 The escorting staff we spoke to indicated that they had been subject to Criminal Records Bureau checks to enhanced level. Escort vehicles were parked outside the building, at the bottom of a metal staircase leading from the holding room. The area where the vehicles were parked was not secure and was open to the street. The escorting staff tried to make the route more secure by parking the van or coach alongside the gate at the bottom of the stairs. Detainees could be seen being moved on to the transport by members of the public, which was potentially distressing and degrading.
- 1.3 Before collecting any detainees, the escorting staff were given the IS91 form (giving authority to detain) for each detainee, containing information about risk of harm to self or others. It also had a short briefing from the detainee custody officers based in the holding room about the demeanour of the detainees while they had been in the holding room, and any other relevant information.
- 1.4 G4S escorting staff said that they always telephoned ahead to the next place of detention, to give them advance notice of their time of arrival.

## Recommendations

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- 1.5 **Detainee should not be moved onto escorting vehicles in an area open to the public.**
- 1.6 **Single male and female detainees should be transported separately.**

## Arrival and accommodation

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*Expected outcomes:*

*Detainees taken into custody are treated with respect, have the correct documentation, and are held in safe and decent conditions. Family accommodation is suitable.*

- 1.7 There was one main holding room, with separate toilets for men and women. A second holding room, previously used to hold families, also with a separate toilet, was currently not used for detention but as an interview room. It had complete visibility from the rest of the holding room suite, and was not satisfactory for private interviewing. It was used because the allocated interview room was in a corridor area outside the holding areas, and the security cover for this area had been withdrawn in a staff reduction; UK Border Agency (UKBA) staff did not feel that it was safe to interview in that area until security cover was restored. The outcome was that

one interview room was out of use, and another room which had important potential uses, especially if one or more people needed to be located separately from the main holding room, was not available for such use. The facility was not used to hold families, and none had been held in the previous three months according to logs, although we were told of one recent occasion when it had been necessary to move a family from Electric House to Lunar House for their own safety when a male detainee was behaving aggressively. There was a baby changing mat and equipment available in case of need.

- 1.8 In each of the two holding rooms there was a pay telephone, which accepted cash and credit cards, and a drinking water fountain. The main room contained 25 backless seats, one row against a wall and two rows back to back. These hard seats – especially those placed back to back – were not suitable for stays of several hours. There were also two fixed tables with four fixed chairs around each. The second holding room contained a fixed table with four chairs and some other seating. Smoking was not permitted anywhere. There was effective air conditioning, which the staff readily adjusted on request. Fire evacuation plans were prominently displayed in the staff area.
- 1.9 Female detainees were routinely co-located with males. During the inspection, a female Muslim detainee was put into the room with four males, and told us later that she had not been comfortable with this (see section on duty of care).
- 1.10 Detainees were brought into the holding room by immigration officers or collected by detainee custody officers from the interview room. When accepting custody of detainees, the detainee custody officers were given the IS91 form by immigration staff. They indicated that they would not accept a detainee without a completed IS91 form.
- 1.11 The holding room was open between 10am and 7pm on Monday to Friday. There were two detainee custody officers on duty – usually one female and one male.
- 1.12 All detainees were given a rub-down search on arrival. Searching was carried out with reasonable care and sensitivity by an officer of the same gender as the detainee, and for detainees who did not understand English, the officer would use gestures to explain what was required. Interpreting services were not used.
- 1.13 During the inspection, we observed little interaction between detainee custody officers and detainees. After being searched, detainees were ushered into the holding room without any introductions or explanation about the facilities or what to do if they required assistance. A drink and a snack pack were handed to them or left in the holding room for them. There were some sandwiches available, but no hot food (see section on services).
- 1.14 Summary information about the process was displayed in 15 languages on the wall of the main holding room. During the inspection, no detainees were offered a free telephone call on arrival. One mobile telephone was available, into which the detainee could place his or her own SIM card. On several occasions, this had been insufficient, as several detainees had been waiting to use this mobile telephone. Staff said that they would provide a free call from the office telephone if necessary. Money was available in a petty cash supply to enable detainees to make calls. Property was sorted and accounted for properly.
- 1.15 There were no shower facilities available and no clothing was held for issue to detainees who might need it. Hygiene packs were not available. Paramedics had been called twice in the preceding month, and Aeromed, a medical triage service, had been called to check on medication. Paramedics had attended within 20 minutes on each occasion. Detainees were able to have access to their medication on the authority of a chief immigration officer.

- 1.16 Interpreters were used in all cases by UKBA staff, but never by detainee custody officers, who had never accessed a telephone interpreting service and did not have the details of such a service available in the office, although they were delivered during the inspection.
- 1.17 There was a log book to record visits from immigration staff, and records indicated that these did not take place daily and there was no evidence of engagement with detainees during this visit. An independent monitoring board was being formed but had not yet started visiting the facility.

## Recommendations

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- 1.18 Single male and female detainees should be held in separate rooms.
- 1.19 Families should be held together but separately from single detainees.
- 1.20 The bench seating in the main holding room should be replaced with upholstered seats suitable for stays of several hours.
- 1.21 A member of the holding room staff should welcome each detainee on arrival, introduce themselves and explain the facilities available. They should also check the level of understanding of English, and ascertain whether the detainee has any immediate needs or concerns.
- 1.22 Holding room staff should offer a free telephone call in private to each detainee on arrival, and ask whether they have the means to make further calls if they so wish.
- 1.23 A second loan mobile telephone should be made available.
- 1.24 Hygiene packs should be available to detainees.
- 1.25 Interpreters or telephone interpretation should be used to communicate with detainees who do not speak English fluently.
- 1.26 The holding room should be visited each day by an immigration manager, and part of the visit should include a check on the welfare of detainees held.

## Positive relationships

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*Expected outcomes:*

*Those detained are treated respectfully by all staff, who have proper regard for the uncertainty of their situation and their personal circumstances.*

- 1.27 Staff greetings to detainees were cursory, if they spoke to them at all. During the inspection, one detainee was placed in the interview room by the UKBA staff member who had interviewed him, with no G4S member of staff speaking to him at all.
- 1.28 When detainees gestured to staff through the holding room window that they wished to speak to them, the member of staff would open a small hatch in the locked door and conduct the conversation through it. Refreshments were also passed through this hatch. This extreme caution was based on no risk assessment, and undermined the sense of any respectful relationship between staff and detainees.

## Recommendation

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- 1.29 Staff should interact directly with detainees in their presence or through an open door, and not through a hatch, unless justified by evidenced risk of physical harm.

## Legal rights

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*Expected outcomes:*

*Detainees are able to obtain expert legal advice and representation from within the facility. They can understand and retain legal documents. They can communicate with legal representatives without difficulty to progress their cases efficiently.*

- 1.30 Detainees had access to their legal documents if they had them with their property; otherwise, there was no help available to have them collected. Detainees were advised to wait until they were at an immigration removal centre (IRC) or the Port of Dover short-term holding facility, where a friend or relative could bring in their documents. If the detainees did not have a solicitor but wanted one, they were advised to wait until they arrived at the next destination and request one there.
- 1.31 The telephone numbers for the Immigration Advisory Service and the 'Refugee Legal Centre' (now Refugee Migrant Justice) were written on the IS91R form and both of these numbers, plus the number for the Refugee Council, were displayed near the pay telephones. Most of the legal advice telephone numbers provided to detainees were out of date. The number for the 'Refugee Legal Centre' was correct and advice was available on Mondays, Wednesdays and Fridays. There was an advice line number for the Joint Council for the Welfare of Immigrants, but this organisation no longer provided advice to detainees. The other number was for the Immigration Advisory Service, but only helped people who could go to their offices for appointments. They were able to give another number for those detained, but this provided a recorded message which required a voice message to be left for someone to call back within 48 hours. Telephone numbers for the 'Refugee Legal Centre' and the Immigration Advisory Service were also written on the IS91R form. If detainees did not have the means to make a call to their legal representative, they were either given the cash to do so or allowed to use the office telephone on request, but we felt it unlikely that detainees would ask.
- 1.32 Detainees were not able to receive visitors, including legal visitors. There was no facility for detainees to send faxes but the telephone number of their immigration officer was provided on the top of their IS91R form and they were told that their legal representatives could ring this number and arrange for documents to be faxed. There was no email access.

## Recommendations

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- 1.33 Friends and families of detainees should be able to bring in important documents for them.
- 1.34 Detainees should be informed of their right to apply for legal advice and bail soon after arriving at the facility and, where necessary, given assistance; access or refusal should be documented.
- 1.35 Information about legal services should be available in all the main languages.
- 1.36 Detainees should be able to receive legal visitors while in detention.

- 1.37 Detainees should be able to send faxes and emails to legal representatives.

## Casework

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*Expected outcomes:*

*Detention is carried out on the basis of individual reasons that are clearly communicated.*

*Detention is for the minimum period necessary.*

- 1.38 All detainees had an IS91 authority to detain form and detention officers were clear that they would not take anyone without one. Detainees were also given a copy of the form stating the reasons for their detention (IS91R) in English.
- 1.39 Details of all those detained were recorded in the log. The average length of detentions over the previous three months was three hours, ranging from 15 minutes to seven hours 55 minutes.

## Recommendation

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- 1.40 Written copies of the reasons for detention should be given in a language that the detainee understands.

## Duty of care

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*Expected outcomes:*

*The centre exercises a duty of care to protect detainees from risk of harm*

## Bullying

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- 1.41 G4S had operating procedures which contained a policy and guidance on bullying. Staff had received some training in anti-bullying during their initial training course but there was no programme of refresher training.
- 1.42 The practice of holding unrelated men and women in the same holding room potentially exposed detainees to unwanted attention or simply to feeling uncomfortable or unsafe. The detainee custody officers we spoke to could not recall any incidents of bullying or harassment in the holding room but were able to describe the action they would take if they noticed problems between detainees.
- 1.43 A woman detained at the time of the inspection had been located in the same room as several unrelated men. We spoke to the woman, using a telephone interpreting service, and she indicated to us that she felt unsafe and uncomfortable. As soon as we made staff aware of the woman's concerns, they arranged for her to be held separately in the second holding room (see recommendation 1.18).

## Suicide and self-harm

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- 1.44 Although detainee custody officers received self-harm and suicide awareness training during their initial training course, they had not received any refresher training in these areas. The contractor regularly issued information notices to their staff about lessons learned from incidents that had occurred in other G4S-run short-term holding facilities and escorting

services. The officers indicated that they read the notices, and this was evidenced by a signed log. The staff on duty at the time of the inspection confirmed that they were trained in basic first aid and received refresher training every three years. They did not carry anti-ligature knives, although one was attached to the first aid box in the staff area.

- 1.45 The IS91 authority to detain forms contained a section on risks, which sometimes gave information about particular issues concerning a detainee, including risk of self-harm or suicide. Detainee custody officers indicated that they would monitor detainees more closely if they had been identified as being at risk or if they believed from the detainee's behaviour or demeanour that they were at increased risk.
- 1.46 There had been one recorded incident of self-harm in the holding room in the previous 12 months. The incident involved a detainee who had become violent and aggressive and subsequently made a cut to his throat with a nail from a door trim which he had removed. The incident had been dealt with appropriately and paramedics called immediately to examine the detainee. The fittings had been changed after the incident.

## Recommendations

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- 1.47 **Detainee custody officers should receive regular refresher training in anti-bullying and self-harm and suicide prevention.**
- 1.48 **Detainee custody officers should carry anti-ligature knives at all times.**

## Childcare and child protection

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*Expected outcomes:*

*Children are detained only in exceptional circumstances and for the minimum time.. Children's rights and needs for care and protection are respected and met in full*

- 1.49 There was a national G4S child protection policy document, which staff were aware of, but it had not been agreed with the local safeguarding children board. A child protection policy prompt card was on display to assist staff if they were concerned about a child's welfare. G4S had a nationally nominated person who could give advice on children's issues.
- 1.50 G4S staff told us that they had been subject to enhanced Criminal Records Bureau checks. UKBA managers informed us that all staff in contact with children had been checked to enhanced level and had completed the UKBA child protection training, 'keeping children safe', up to tier three. G4S staff had not completed any specific child protection training, but some related issues were covered in their initial training.
- 1.51 We were told that families had not been held at this facility for the previous three years. The log of the previous three months showed that no children had been held during that period. The only exception to this occurred when a problem at Electric House meant that a family needed to be held elsewhere for their own safety, so they had been moved to Lunar house (see paragraph 1.7).

## Recommendations

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- 1.52 **The child protection policy should be tailored to the specific purpose of the holding room and should be agreed by the local safeguarding children board.**

- 1.53 All staff in contact with children should receive appropriate child protection training.

## Diversity

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*Expected outcomes:*

*There is understanding of the diverse backgrounds of detainees and different cultural norms. Detainees are not discriminated against on the basis of their race, nationality, gender, religion, disability or sexual orientation, and there is positive promotion and understanding of diversity.*

- 1.54 Apart from during initial training, detainee custody officers had not received specific training in diversity issues. There was no diversity policy and no disability liaison officer, although G4S had a nationally nominated person tasked with advising on disability issues. The generic G4S policy on the treatment of staff, detainees and visitors with disabilities was displayed on the holding room wall. Neither managers nor staff were aware of any impact assessments carried out on policies. We were told that the facility was not accessible for people using a wheelchair or those with disabilities or mobility problems. People in any of these groups would usually be bailed. There were no other adjustments for those with disabilities.
- 1.55 If detainees wanted to make a racist incident complaint, this could be done using the normal complaint form. Staff we spoke to were not aware of any racist incident complaints submitted to date.
- 1.56 A notice made detainees aware that religious items were available on request, including a bible, a Qur'an, a prayer mat and a kiblah (indicating the direction of Mecca). However, this notice was displayed only in English.
- 1.57 If a detainee did not speak English, an interpreter would be present during immigration interviews. During the inspection, we did not observe the interpreter being used after immigration interviews to explain basic information about the holding room to the detainee or to communicate with a detention officer. Although information about the Big Word telephone interpreting service was displayed on the wall in the staff area, staff could not recall using the service and records indicated that it had not been used in the previous six months.

## Recommendations

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- 1.58 Staff training in diversity should be up to date.
- 1.59 There should be a diversity policy displayed in the holding room in the main languages spoken by detainees.
- 1.60 There should be an assessment of the impact of policies on detainees within the different strands of diversity, including ethnicity, religion, culture, gender, age, sexuality and disability.
- 1.61 There should be a nominated disability liaison officer.
- 1.62 All notices should be displayed in the main languages.
- 1.63 Staff should always use interpretation for detainees who do not speak fluent English, to explain what is happening to them on first detention and whenever necessary thereafter.

## Activities

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*Expected outcomes:*

*The facility encourages activities to preserve and promote the mental and physical well being of detainees.*

- 1.64 There was a television in each of the holding rooms, with access to the five terrestrial channels. In the main holding room, there were two English and one French newspaper but no books or magazines.
- 1.65 There was no access to exercise in the fresh air.

## Recommendations

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- 1.66 Newspapers, magazines and books reflecting the main languages spoken by detainees should be available and reviewed regularly.
- 1.67 Detainees should have access to exercise in the fresh air.

## Facility rules

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*Expected outcomes:*

*Detainees are able to feel secure in a predictable and ordered environment.*

- 1.68 There was a significant security issue with the movement of detainees from the holding room to any escorting vehicle (see section on escort vans and transfers).
- 1.69 The staff area was situated between the two holding rooms and had large Perspex windows, giving excellent visibility into the holding area. The holding room was supervised at all times and detainees could easily attract staff attention in an emergency.
- 1.70 Detainee custody officers and escorting staff had all received training in control and restraint techniques as part of their initial training course and attended an annual refresher course.
- 1.71 There had been three uses of force in the previous 12 months. In each case, the staff involved had completed detailed reports explaining the circumstances surrounding the incident and the actions taken, but in two cases the sections for review by the line manager and area or operation managers had not been completed. In one case, the detainee had been examined by paramedics while in the holding room and again on arrival at an IRC. The second detainee had been seen by a nurse on arrival at the Port of Dover short-term holding facility. However, in the third case there was no indication that the detainee had been seen by a nurse or doctor or that a request had been made for the detainee to be checked on arrival at his destination. The reports indicated that force had been used as a last resort and that, wherever possible, situations had been de-escalated at the earliest opportunity.
- 1.72 There was a special cell situated along the corridor from the holding room. We were told that this had never been used to hold detainees. At the time of the inspection, it was being used as a store room.

## Recommendations

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- 1.73 All use of force documentation should be reviewed by an appropriate manager who was not involved in the recorded incident, and the relevant section on the forms should be completed.
- 1.74 All detainees subject to use of force should be examined as soon as possible by a medical practitioner and the details recorded on the use of force reports.

## Complaints

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*Expected outcomes:*

*There is a published complaints procedure; compliant forms are freely available.*

- 1.75 There was a notice in the holding room briefly explaining how to complain, but this was in English only. The generic G4S detainee information booklet gave detainees brief information about how to complain, stating that they should speak to staff. Detailed information about how to complain and complaint forms in 11 different languages were available in the staff area but they were not freely available, as detainees had to request them from staff.
- 1.76 A locked complaints box was fixed to the wall of the holding room. This was checked and emptied by UKBA managers during their visits to the holding room, although these visits did not take place daily (see paragraph 1.17). All complaints were sent to the UKBA central detention services complaints office.
- 1.77 There had been one recorded complaint in the previous 12 months. This related to a use of force incident (see paragraph 1.71). The complaint had been investigated by the UKBA Professional Standards Unit. The complainant alleged that he had been assaulted by detainee custody officers at Lunar House. The matter had been investigated thoroughly and the allegations found to be unsubstantiated, but the detainee had been removed to Germany before completion of the investigation and had not received a reply to his complaint. There was no indication that the UKBA had attempted to obtain a forwarding address from the detainee.

## Recommendations

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- 1.78 Information about the complaints procedure should be displayed in the holding room in the main languages spoken by detainees.
- 1.79 Complaints forms in the main languages spoken by detainees should be freely available in the holding room.
- 1.80 The complaints box should be checked and emptied daily.
- 1.81 The UKBA should make every effort to ensure that detainees receive a full reply to their complaints, even if they have been removed.

## Services

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### *Expected outcomes:*

*Services available to detainees allow them to live in a decent environment in which their normal everyday needs are met freely and without discrimination.*

- 1.82 A cup of squash and a dry pack including biscuits, crisps and dried fruit were handed to detainees or put into the holding room ready for their arrival. During the inspection, we did not observe staff explaining to detainees that these provisions were intended for them, and consequently the detainees did not consume them. We were told that detainees could have as many drinks as they requested, but this was not explained to them and we were not confident that they would ask.
- 1.83 A range of sandwiches was delivered three times a week and stored in a refrigerator in the kitchen area. On the day of the inspection, there were only three sandwiches (two egg, one cheese), which was inadequate for the number of detainees being held and did not cater for all diets. There was no attempt to renew the supply on this day in view of the shortage. We did not observe detainees being made aware of the availability of sandwiches. Logs suggested that many detainees were given only a dry snack pack. No hot meals were available, despite some detainees being held there for almost eight hours. We were told that petty cash was available to buy food to meet the particular needs of detainees. Complaints about food could be made through the normal complaints procedure. There was no food complaints book.
- 1.84 Detainees were able to keep all their cash in-possession.
- 1.85 A range of women's sanitary products and a sanitary disposal bin were available in the main female toilet, but the range of products in the second, 'family' holding room was insufficient.

## Recommendations

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- 1.86 Detainees should be made aware that they can have food and drinks whenever they want, and these should be routinely offered at regular intervals.
- 1.87 A sufficient range of hot meals and sandwiches, including hot meals, should be available to cater for different diets.
- 1.88 There should be a food complaints book.
- 1.89 All toilet areas should have a sufficient range of sanitary products.

## Preparation for release

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### *Expected outcomes:*

*Detainees are able to maintain contact with family, friends, support groups, legal representatives and advisers, are given adequate notice of their release, transfer or removal, and are able to recover property. Families with children and others with special needs are not detained without items essential to their welfare.*

- 1.90 As the holding facility served the Asylum Screening Unit, it was normally a route into further detention. Most detainees (approximately 57%) held in the previous three months had been

transferred to the Port of Dover short-term holding facility, which had overnight accommodation, and a few had been taken directly to IRCs (mainly Oakington IRC). Eleven had been granted temporary admission to the UK.

- 1.91 Detainees being transferred to an IRC were given small cards, providing the name, address and telephone number of the centre to which they were being taken, and showing the location on a map of the UK. There was no information about the Port of Dover short-term holding facility.
- 1.92 As soon as a movement order was received, detainees were advised of their destination and could contact their family, friends or legal advisers.
- 1.93 A number were taken to the Port of Dover short-term holding facility, interviewed and often transferred to IRCs within a few days. These multiple moves were potentially disorientating for detainees and inevitably made it more difficult for them to obtain legal advice, maintain contact with family, friends and support groups, or to make arrangements to recover property or money.
- 1.94 Detainees were not able to receive visitors, and property could not be handed in to the unit. Property in detainees' possession was stored, accounted for and dispatched with them efficiently.

## Recommendations

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- 1.95 Detainees should not be subjected to frequent disorientating movements around the detention estate.
- 1.96 Detainees should be given detailed information about the holding facility or immigration removal centre to which they are to be taken.
- 1.97 Detainees should be able to receive visitors.
- 1.98 Detainees should be able to receive property from family or friends at the holding facility.

## Section 2: Summary of recommendations

<b>Recommendations</b>	<b>To UKBA</b>
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- 2.1 The holding room should be visited each day by an immigration manager, and part of the visit should include a check on the welfare of detainees held. (1.26)
- 2.2 Written copies of the reasons for detention should be given in a language that the detainee understands. (1.40)
- 2.3 The complaints box should be checked and emptied daily. (1.80)
- 2.4 The UKBA should make every effort to ensure that detainees receive a full reply to their complaints, even if they have been removed. (1.81)

<b>Recommendations</b>	<b>To UKBA and facility contractor</b>
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- 2.5 Friends and families of detainees should be able to bring in important documents for them. (1.33)
- 2.6 Detainees should be able to receive legal visitors while in detention. (1.36)
- 2.7 Detainees should be able to send faxes and emails to legal representatives. (1.37)
- 2.8 All staff in contact with children should receive appropriate child protection training. (1.53)
- 2.9 There should be an assessment of the impact of policies on detainees within the different strands of diversity, including ethnicity, religion, culture, gender, age, sexuality and disability. (1.60)
- 2.10 Detainees should not be subjected to frequent disorientating movements around the detention estate. (1.95)
- 2.11 Detainees should be able to receive visitors. (1.97)
- 2.12 Detainees should be able to receive property from family or friends at the holding facility. (1.98)

<b>Recommendations</b>	<b>To the escort contractor</b>
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- 2.13 Detainee should not be moved onto escorting vehicles in an area open to the public. (1.5)
- 2.14 Single male and female detainees should be transported separately. (1.6)
- 2.15 Single male and female detainees should be held in separate rooms. (1.18)
- 2.16 Families should be held together but separately from single detainees. (1.19)

## Recommendations

## To the facility contractor

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- 2.17 The bench seating in the main holding room should be replaced with upholstered seats suitable for stays of several hours. (1.20)
- 2.18 A member of the holding room staff should welcome each detainee on arrival, introduce themselves and explain the facilities available. They should also check the level of understanding of English, and ascertain whether the detainee has any immediate needs or concerns. (1.21)
- 2.19 Holding room staff should offer a free telephone call in private to each detainee on arrival, and ask whether they have the means to make further calls if they so wish. (1.22)
- 2.20 A second loan mobile telephone should be made available. (1.23)
- 2.21 Hygiene packs should be available to detainees. (1.24)
- 2.22 Interpreters or telephone interpretation should be used to communicate with detainees who do not speak English fluently. (1.25)
- 2.23 Staff should interact directly with detainees in their presence or through an open door, and not through a hatch, unless justified by evidenced risk of physical harm. (1.29)
- 2.24 Detainees should be informed of their right to apply for legal advice and bail soon after arriving at the facility and, where necessary, given assistance; access or refusal should be documented. (1.34)
- 2.25 Information about legal services should be available in all the main languages. (1.35)
- 2.26 Detainee custody officers should receive regular refresher training in anti-bullying and self-harm and suicide prevention. (1.47)
- 2.27 Detainee custody officers should carry anti-ligature knives at all times. (1.48)
- 2.28 The child protection policy should be tailored to the specific purpose of the holding room and should be agreed by the local safeguarding children board. (1.52)
- 2.29 Staff training in diversity should be up to date. (1.58)
- 2.30 There should be a diversity policy displayed in the holding room in the main languages spoken by detainees. (1.59)
- 2.31 There should be a nominated disability liaison officer. (1.61)
- 2.32 All notices should be displayed in the main languages. (1.62)
- 2.33 Staff should always use interpretation for detainees who do not speak fluent English, to explain what is happening to them on first detention and whenever necessary thereafter. (1.63)
- 2.34 Newspapers, magazines and books reflecting the main languages spoken by detainees should be available and reviewed regularly. (1.66)
- 2.35 Detainees should have access to exercise in the fresh air. (1.67)

- 2.36 All use of force documentation should be reviewed by an appropriate manager who was not involved in the recorded incident, and the relevant section on the forms should be completed. (1.73)
- 2.37 All detainees subject to use of force should be examined as soon as possible by a medical practitioner and the details recorded on the use of force reports. (1.74)
- 1.99 Information about the complaints procedure should be displayed in the holding room in the main languages spoken by detainees. (1.78)
- 1.100 Complaints forms in the main languages spoken by detainees should be freely available in the holding room. (1.79)
- 2.38 Detainees should be made aware that they can have food and drinks whenever they want, and these should be routinely offered at regular intervals. (1.86)
- 2.39 A sufficient range of hot meals and sandwiches, including hot meals, should be available to cater for different diets. (1.87)
- 2.40 There should be a food complaints book. (1.88)
- 2.41 All toilet areas should have a sufficient range of sanitary products. (1.89)
- 2.42 Detainees should be given detailed information about the holding facility or immigration removal centre to which they are to be taken. (1.96)